



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 25, 2021

Shirley Schultz, Principal Planner  
City of Tacoma  
Planning & Development Services Department  
747 Market Street, Room 345  
Tacoma, WA 98402

Dear Shirley Schultz:

Thank you for the opportunity to comment on the determination of significance/scoping for the Revised SeaPort Sound Plant Modernization Project (LU20-0107) located at 2628 Marine View Drive as proposed by Anchor QEA on behalf of Seaport Sound. The Department of Ecology (Ecology) reviewed the environmental checklist and information provided. Ecology's previous comments submitted August 17, 2020 on the optional determination of nonsignificance/notice of application, still apply to the project described (see enclosure). After further review, Ecology has the following additional comment(s):

**SPILL PREVENTION, PREPAREDNESS, AND RESPONSE:**

**Brittany Flittner, Project Specialist (360) 584-4490 | [brittany.flittner@ecy.wa.gov](mailto:brittany.flittner@ecy.wa.gov)**

Ecology recommends the following be included in the EIS scoping for SeaPort Sound Terminal's proposed project.

**Earth: Seismic and Earthquake Risk**

In section B.1.d, the SEPA Checklist identifies the area as having high liquefaction susceptibility. The seismic and earthquake risk of this terminal needs to be fully analyzed, and should be included in the scoping for spill prevention, preparedness, and response measures. Areas for consideration include:

- Seismic and earthquake stress considerations for the new storage tanks, piping, and secondary containment.
- The secondary containment must be designed to withstand seismic forces. Ecology highly recommends the storage tanks and piping also be designed to seismic forces using standards such as API 620 due to the vulnerability the site's soil presents.

**Hazardous Materials: Oil-Water Mixtures**

The proposed footprint involves demolishing tanks 12 through 15, which are used to contain oil-water mixtures or "slops". Areas for consideration include:

- Specify how these "slops" will be contained during deconstruction of the tanks.

- What current or proposed tanks will be used to contain “slops” once these current tanks are demolished?

### **Animals: Southern Resident Killer Whales**

Southern Resident Killer Whales (SRKWs) along with other threatened and endangered species may be present within the project area and within the shipping routes that vessels calling to port at this terminal utilize. Areas for consideration include:

- Impact of increased vessel traffic along shipping routes to and from the terminal. Potential impacts include underwater noise pollution, vessel strikes, and a major spill incident.
- Measures to mitigate vessel traffic impacts on SRKWs.

### **Transportation: Vessel and Rail Traffic**

The EIS should include a transportation study regarding the impact of increased vessel and rail traffic. Although there is no permit for increased vessel traffic outside of the permitted capacity for the dock on the marina view side of the terminal, on average, the dock has not reached its current permitted capacity. There will be an increase in vessel traffic, even if it is within the permitted capacity; it is not within the current average vessel traffic seen at this dock. Additionally, the current average rail cars per month are about 570 for the terminal, yet the permitted capacity is 2,340 rail cars per month. With the increased storage capacity, there will be an increase in rail car traffic to the terminal not seen previously. Additional areas of consideration include:

- Are there alternate docks available for use by the terminal? If so, what is the capacity for those docks?
- Include a projection of how much vessel and rail car traffic will increase due to the additional storage capacity.
- Address the impacts of additional vessel traffic, including potential oil spills.

### **Project Clarification: Petroleum Products**

The EIS should specify the exact petroleum products that will be stored within these new storage tanks under the permit. There is no specification in the SEPA Checklist as to what products will be stored in the new tanks. The EIS should be focused on the petroleum products that will be included in the permit. If additional products are used in the tanks in the future, a separate permit process should take place. The risk posed to the community will change depending on which product will be stored. Spill prevention, preparedness, and response measures can target the specific products stored in the tanks.

### **Project Clarification: Storage Capacity**

The Public EIS Scoping meeting stated about 166,856 barrels of new storage will be added to SeaPort Sound Terminal with this project. The Determination of Significance states the new storage capacity will be about 181,000 barrels. The SEPA Checklist does not mention any increase in storage capacity.

- There needs to be clarification on what the current storage capacity is for the entire terminal and how much this will change with the new storage. The exact amount of added capacity needs to be specified.
- Specify the volume of each new storage tank.
- Specify the volume of the secondary containment for the proposed footprint.

### **Project Construction: Secondary Containment**

The following questions need to be addressed in the EIS with regard to the secondary containment:

- What materials are part of the secondary containment for the proposed footprint?
- What is the target permeability for the secondary containment at this location? Permeability (k) numbers should range between  $1 \times 10^{-15}$  to  $1 \times 10^{-19}$  m<sup>2</sup>.
- What is the permeability for the “Bentomat CL Layer” and the “Bentomat 200R Layer”? Are these liners? What are their resistance to sheer forces or ripping? A 6” bentonite layer is preferred if these liners are not a continuous layer. 1” layers do not provide as much height for resistance and thicker layers hold moisture better.
- Is there potential for the bentonite layer to dry? Permeability is lost when the layer dries out.
- A Geotextile liner is labeled near the containment wall and access ramp, but it doesn’t appear on the tank foundation side view. Does this liner only exist near the containment walls and access ramp, and not under the entire footprint of the proposed new tank farm?
- What is the permeability for the Geotextile liner?

### **Tribal Resources**

An assessment of how this project will impact tribal resources in the project area should be considered. Potential areas to consider include:

- How will the increase in vessel traffic impact tribal fishing areas in terms of safety, access, and spill risk?
- How will the increase in vessel traffic impact availability of tribal fishing areas during fishing seasons with high trafficked navigation channels?
- Ensure Federally Recognized Tribes in the project area are consulted during the EIS scoping, drafting, and project approval process. This should be a collaborative and inclusive process.

### **Risk of Oil Spills**

The EIS scope should include an analysis regarding the risk of potential oil spills and what prevention, preparedness, and response measures will need to be in place to mitigate this risk. Areas of risk for oil spills include:

- Vessel and rail transportation.
- Operation and construction standards.
- Equipment design and maintenance.
- Staff training.
- Properties of the petroleum product.

To help mitigate the impact of a spill, a study should be conducted to determine the appropriate level of financial responsibility for the cost of a spill at the terminal. Some areas to look at include the terminal's insurance policy, Protection and Indemnity Club membership documents, surety bonds, guarantees, letters of credit, or qualification for self-insurance. If the terminal cannot handle the cost of a major spill that could occur at their facility, that cost is then placed on the citizens of Washington State and the surrounding community. Financial responsibility ensures a rapid response to a spill and a reduction of damages from the spill.

### **Cumulative Impacts**

The EIS scope should address the cumulative impact of oil handling projects in the Salish Sea.

- How do current and future proposed projects have a cumulative impact?
- How will this change the risk posed by a potential oil spill incident?
- How will this change the risk posed to tribal resources and SRKWs?

### **Sea Level Rise**

The EIS scope should consider how sea level rise could impact the terminal.

- How will the terminal safeguard against sea level rise?
- What preventative measures will be in place to ensure the storage tanks, piping, and secondary containment will not be impacted by sea level rise?

### **Project Scope**

In order to assess the full scope of impact that this project approval will have, the EIS needs to expand the scope of the project area to include shipping routes for vessels calling to port at SeaPort Sound Terminal during operations.

### **Environmental Justice**

All members of the community in and surrounding the project area need to be included in the scoping process.

- How will this project impact marginalized communities?
- How can those impacts be mitigated to ensure there is no unfair distribution of harm to these communities?
- Ensure all those in the community are involved in a meaningful way.

Please contact Brittany Flittner, Project Specialist for the Spills Program, at 360-584-4490 for questions.

### **TOXICS CLEANUP: Sandy Smith (360) 407-7269**

Project proponents report that a petroleum bulk fuel storage and handling facility operated at this location. Ecology has found contaminated soil, soil vapor and groundwater at many similar historical petroleum storage operations. Ecology is concerned that at this proposed

project, petroleum fuels and related hazardous substances may have been released from the facility and may be still detectable in soil, soil vapor, or groundwater.

No information has been provided to Ecology regarding the steps taken to investigate this property for petroleum fuels or other hazardous substances often present at petroleum bulk fuel storage and handling operations. As a preconstruction requirement, Ecology recommends sufficient investigation of the proposed SeaPort Sound property to determine if contamination from petroleum fuels or other hazardous substances is currently detectable in soil, soil vapor, or groundwater. If any contamination is discovered, the release of hazardous substances must be reported to Ecology under WAC 173-340-300 (2). The cleanup of toxic sites is regulated under the Washington Model Toxics Control Act (MTCA), Chapter 70.105D RCW, and implementing regulations contained in Chapter 173-340 WAC.

As a second preconstruction requirement, Ecology recommends that if hazardous substances are determined present in soil, soil vapor, or groundwater at the property, project proponents then obtain a no further action opinion under WAC 173-340-515 for the contaminated site before allowing any grading, filling or other construction activities for this or any project at the Site. Ecology suggests requiring cleanup of contamination before construction begins, while contaminated soil and groundwater is still easily accessible.

Finally, this property is within a quarter mile of three contaminated sites. The sites are 302 McMurray Road, Facility Site ID (FSID) 17865, Airo Services Inc, FSID 1231, and Pump Stn 4103 ROW 2222, FSID 1806706. To search and access information concerning these sites, see <http://www.ecy.wa.gov/fs/> and <https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>.

If contamination is suspected, discovered, or occurs during the proposed SeaPort Sound facility demolition, site preparation, or construction, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. To notify Ecology, contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sandy Smith with the Toxics Cleanup Program at the Southwest Regional Office at (360) 407-7269.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(GMP:202100560)  
Enclosure

cc: Brittany Flittner, SPPR  
Sandy Smith, TCP



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 17, 2020

Shirley Schultz, Principal Planner  
City of Tacoma  
Planning & Development Services Department  
747 Market Street, Room 345  
Tacoma, WA 98402

Dear Shirley Schultz:

Thank you for the opportunity to comment on the mitigated optional determination of nonsignificance/notice of application for the SeaPort Sound Plant Modernization Project (LU20-0107) located at 2628 Marine View Drive as proposed by Anchor QEA. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287**

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the “Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes,” on Ecology’s website at: [Construction & Demolition Guidance](#). All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

**SOLID WASTE MANAGEMENT: Greg Gould (360) 407-6934**

The applicant should update the Stormwater Pollution Prevention Plan for National Pollutant Discharge Elimination System permit No. WA0003204 if the proposed project significantly changes the nature of pollutants discharged in stormwater from the facility or significantly increases the quantity of pollutants discharged.

**SPILL PREVENTION, PREPAREDNESS, AND RESPONSE:**

**Brittany Flittner, Project Specialist (360) 584-4490 | [brittany.flittner@ecy.wa.gov](mailto:brittany.flittner@ecy.wa.gov)**

Ecology recommends including the following:

- Number 3.2.c.3 on page 8 should include a description of the process for stormwater management on the project site. As described in SeaPort's Prevention Plan, this process should include checking for an oil sheen on the stormwater collection pond. If no oil sheen is detected, the stormwater can be discharged. If an oil sheen is detected, it should be removed by skimming. If successfully removed, the stormwater can again be discharged. If unsuccessful, the stormwater should be pumped to the wastewater treatment plant and discharged into the sanitary sewer system.
- Number 3.2.d on page 8 references the Project Description and plan set in Attachment 1. We recommend including a brief explanation of the proposed erosion control measures as outlined in the referenced documents. This should include the following:
  - Installation of a silt fence along the waterway and around the new concrete retaining wall.
  - Installation of filter bags in the existing catch basins along the south side of the property.
  - Stockpiles should be covered with protective sheeting.
- Number 8.a on page 14 should include a description of the adjacent properties.
- Number 8.h on page 16 is unclear as to which areas within the 200 foot shoreland area and 50 foot marine buffer area are classified as critical by the city or county, and why they are classified as such. More information to describe these areas and why they are critical is recommended.
- Number 10.a on page 17 states the tallest proposed structure is expected to be 60 feet in height. It should be noted that SeaPort's tallest existing tanks are also about 60 feet in height.
- Number 16.a on page 21 could be misleading. We recommend including sanitary sewer as SeaPort's wastewater treatment plant is connected to the sanitary sewer system and pumps to it.

Additionally, review of the *SeaPort Sound Plant Modernization Project* has shown that the proposed tank upgrades will not change the facility's worst-case spill volume. However, we recommend Seaport Sound Terminal assess whether this project will affect their Oil Spill Contingency Plan, and to make any necessary plan updates per Chapter 173-182 WAC.

Please contact Brittany Flittner, Project Specialist for the Spills Program, at (360) 584-4490 for questions.

**TOXICS CLEANUP: Eva Barber (360) 407-7094**

This property is within a quarter mile of two contaminated sites. The sites are Pump Stn 4103 ROW 2222 Marine View Dr, Facility Site ID (FSID) 1806706 and Airo Services Inc, FSID 1231. To search and access information concerning these sites, see <http://www.ecy.wa.gov/fs/> and <https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>.

If contamination is suspected, discovered, or occurs during the proposed SeaPort Sound Plant modernization, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Eva Barber with the Toxics Cleanup Program at the Southwest Regional Office at (360) 407-7094.

**WATER QUALITY/INDUSTRIAL OPERATIONS UNIT:**  
**Honor Carpenter, Senior Industrial Stormwater Permit Facility Manager**  
**(360) 407-6273 | [Honor.Carpenter@ecy.wa.gov](mailto:Honor.Carpenter@ecy.wa.gov)**

Facilities conducting certain industrial activities that discharge stormwater to a surface waterbody or storm sewer system that drains to a surface waterbody are required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for those industrial stormwater discharges under the Department of Ecology's Industrial Stormwater General Permit (ISGP). More information about the Industrial Stormwater General Permit (ISGP) is available at the link below:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit>

**WATER QUALITY/WATERSHED RESOURCES UNIT:**  
**Jessica Eakens (360) 407-0246**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding



contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at [Carol.Serdar@ecy.wa.gov](mailto:Carol.Serdar@ecy.wa.gov), or by phone at (360) 742-9751.

Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: <https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

The applicant may apply online or obtain an application from Ecology's website at: [http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(GMP:202003696)

cc: Derek Rockett, SWM  
Greg Gould, SWM  
Brittany Flittner, SPPR  
Eva Barber, TCP  
Honor Carpenter, WQ  
Jessica Eakens, WQ

**Shirley Schultz**  
**City of Tacoma**  
**Planning and Development Services**  
**747 Market Street, 3rd Floor**  
**Tacoma, WA 98402**  
[shirley.schultz@ci.tacoma.wa.us](mailto:shirley.schultz@ci.tacoma.wa.us)

**February 25,2021**

**Public Comment Regarding the Scope of the Environmental Impact Statement of the SeaPort Sound Terminal Substantial Shoreline Development Permit**

Dear Ms. Schultz,

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and preservation of our world's oceans, waves, and beaches, for all people, through a powerful activist network. Surfrider is an international organization with five chapters in Washington state. The South Sound Chapter of the Surfrider Foundation serves the Tacoma, Gig Harbor, and the southern Puget Sound region. We are an entirely volunteer run chapter consisting of 5 Executive Committee leaders and 57 members with support from two regional Surfrider staff. We are surfers, beachgoers, paddlers, divers, and those who simply love our marine waters and beaches in Washington State. Our commitment to protecting the places we play has led us to this letter.

First of all, we would like to say thank you for requiring an Environmental Impact Statement (EIS) regarding the SeaPort Sound Terminal Substantial Shoreline Development Permit. Including an EIS for this project is a hopeful step towards the direction of the environmentally friendly future we envision for the Port of Tacoma. Because we hope to have healthy humans enjoying a healthy environment, here are some additions we would like included in the analysis of this project.

- In regard to the demolition of the tanks on site, we would like to know what hazardous compounds are being held in these tanks and how will these contents be drained and sent off site? We are particularly concerned about the risk of a spill during this procedure and the impacts it would have on recreation sites.
- Given that this project aims to increase the holding capacity of fossil fuels at this site, the analysis of environmental impacts is inadequate. What are the impacts from extracting, processing, and delivering these fuels to this site? And how are these fuels being transported? How are the transport methods being fueled? What is the impact of increased vessel and/or rail traffic? Again, what is the risk of a spill to our waterways? How does the increase in vessel noise impact marine species? How will increased operations from rail and vessel traffic impact air emissions?

- When it comes to complying with the State Shoreline Management Act, how will this project relate to climate impacts and the consequential effects on shorelines including public access, recreational opportunities, and the protection of the shoreline ecology?
- This project takes place in an area that is on the Puyallup Tribe of Indians Reservation and is part of the watershed that contains habitat designated as Essential Fish Habitat under the Magnuson-Stevens Fishery Conservation and Management Act, which is also home to fish and marine mammal species listed under the Endangered Species Act. How will this project comply with the regulations associated with the care and management of these threatened species and habitat which are both federally protected and important resources to indigenous communities?

Thank you for your time and the opportunity to provide comments on the scope of the Environmental Impact Statement for the SeaPort Sound Terminal Substantial Shoreline Development Permit. We are happy to clarify our comments or answer any questions you may have.

Sincerely,

*South Sound Surfrider Foundation Executive Committee*

Stena Troyer, Chapter Chair  
Riley Haizlip, Vice Chair  
Ranell Nystrom, Treasurer  
Lucas Drawdy, Secretary  
Maya Gerlach, Volunteer Coordinator  
Lindsey Moyer, Outgoing Volunteer Coordinator  
[sssurfrider@gmail.org](mailto:sssurfrider@gmail.org)

Shirley Schultz  
City of Tacoma  
Planning and Development Services  
747 Market Street, 3<sup>rd</sup> Floor  
Tacoma, WA 98402  
[shirley.schultz@ci.tacoma.wa.us](mailto:shirley.schultz@ci.tacoma.wa.us)

February 25, 2021

Re: SeaPort Sound Terminal Substantial Shoreline Development Permit (SSDP) and State Environmental Policy Act (SEPA) – LU20-0107 – Environmental Impact Statement Scoping

Dear Ms. Schultz,

Thank you for providing the opportunity to review and comment on the scope of the Environmental Impacts Statement for the SeaPort Sound Terminal (SST) Substantial Shoreline Development Permit (SSDP) and State Environmental Policy Act (SEPA) checklist for project number LU20-0107, hereinafter referred to as the “Project”. Please accept these comments on behalf of Citizens for a Healthy Bay (CHB), Earth Ministry/Washington Interfaith Power & Light, Friends of the San Juans, Mosquito Fleet, Seattle Aquarium, Sierra Club, Sunrise Tacoma, Surfrider Foundation, 350 Seattle, 350 Tacoma, The Lands Council, Washington Environmental Council, and City of Tacoma Councilmember Chris Beale. The undersigned organizations and individuals work to protect public safety, public health, functioning ecosystems and a stable climate. Our focuses include protecting the marine environment of the Salish Sea watershed, inland waters, lands, wildlife, the climate system, human health and public safety. Many of us operate in Tacoma and all of us have physical presence in Washington State. These comments are in supplement to the letter many of the above-mentioned organizations submitted on September 21, 2020.

Firstly, we would like to say ‘thank you’ to City of Tacoma Planning and Development Services staff for withdrawing their original [mitigated] Determination of Non-Significance and issuing a Determination of Significance (DOS), requiring an Environmental Impact Statement (EIS) for the Project. The original Project proposal was missing significant information and did not adequately analyze impacts as required under SEPA and the Shoreline Management Act. The thorough review required in an EIS will make these issues transparent for the public and for the City, resulting in more meaningful community participation and avoidance of significant environmental and public health harms.

We understand the Project involves the demolition of seven existing tanks (five of which are used to store fossil fuels, two for wastewater), construction of ten new tanks (eight of which will be used to store fossil fuels, two for wastewater), and renovations to SST’s wastewater treatment system. The five tanks to be demolished have a combined storage capacity of 11,636 barrels, while the tanks proposed for construction would have a combined storage capacity of 178,492 barrels. This represents a 1,434% increase in fossil fuel storage capacity in the Project footprint area, and an approximate 14% increase in

fossil fuel storage capacity for the entire SST property.<sup>1</sup> These figures are estimates because across many recent permitting documents, there are significant discrepancies in stated storage volume at the site.

**These discrepancies should be reviewed and analyzed as part of the EIS.**

Of the issues currently outlined in the City's scope of work, we urge special attention be paid to:

- Full lifecycle emissions (including upstream and downstream) resulting from the project, including scenarios that consider a possible shifting fuel mix at the facility overall that could be enabled by additional capacity.
- Impacts of the proposed expansion on increased transport, including barge, truck, rail traffic and the associated emissions, air quality, health, safety, and oil spill risks associated with these increased transits.
  - This should include impacts on endangered species, including Southern Resident Orcas, and impacts on Puyallup Tribal resources
  - Risks associated with transport should also be considered beyond the immediate project area, including additional oil barges throughout Puget Sound and oil by rail transport throughout Tacoma and the inland northwest (particularly eastern Washington)
- Health analysis that considers cumulative impacts of industrial activity on the Tidelands, including not only chronic or average pollution, but also historic instances and future likelihood of acute health impacts from industrial accidents and periods of non-attainment of required levels of hazardous air pollutants, including particulate matter.

In addition to the issues already outlined by the City of Tacoma, the elements listed below are in scope for an EIS, and should be included in the analysis of the Project.

#### **Inadequate Description of Process for Tank Draining and Filling**

SeaPort Sound Terminal provided no information on how any products in the seven to-be-demolished tanks would be handled prior to demolition. **What hazardous compounds are being held in these tanks - especially, the wastewater tanks? Will the product be drained and barged? Drained and held in rail cars? What is the risk of spill during this type of activity? What are the impacts to air emissions from this type of oil-handling activity?**

Further, SST provided no information on the process for filling up the ten newly built tanks. **Will all tanks be filled at once? Will they be filled to capacity? What shipment method will be utilized to fill the tanks?** If it is by rail or vessel, there are inherent risks from the added traffic needed to carry and transload 178,492 barrels of fossil fuel products. **Further, what are the air impacts from extracting, processing, and delivering these fuels - i.e., what are the upstream climate impacts of the Project?**

#### **Inadequate Description of Process for Sampling and Excavating Contaminated Sediment**

The Project site is located within the Commencement Bay/Nearshore Tidelands Superfund Site, and has been used for industrial activities including asphalt refining, petroleum storage, vehicle scrapping, shipbuilding, and log sorting for the past century. These industrial uses have left the site contaminated with arsenic, copper, lead, petroleum, PCBs (poly-chlorinated biphenyls), and zinc, among others.<sup>2</sup> Other

common contaminants found at petroleum processing and storage facilities include PAHs (polycyclic aromatic hydrocarbons) and BTEX compounds (benzene, toluene, ethylbenzene and xylene).<sup>3</sup> Because of the hazardous materials stored on site, and the likelihood that the sediments and groundwater at the site are contaminated, we believe this proposal should have triggered Resource Conservation and Recovery Act (RCRA) review. **Why did this proposal not trigger RCRA review? How will excavated material from the site be analyzed? What contaminants will be analyzed? Has there been any leakage from the tanks that are scheduled to be demolished? To facilitate a thorough review, potential pathways and rates of contamination and how they spread to, and through, the water table should be identified at the site.**

*We request that the volume of excavated materials be confirmed, and that a robust sediment, soil and groundwater sampling and removal plan - that includes contaminants commonly found at petroleum processing/storage facilities, as well as contaminants commonly found from the historical uses at the site - be developed. The sediment, soil and groundwater sampling plan should be made available for public review and comment before any sampling, demolition, or construction occurs.*

### **Inadequate Analysis of Environmental Impacts**

#### *State Environmental Policy Act*

Given that SST is permitted to ship 7,000 barrels of fuel oils a day, this Project will allow them to fill up more ships with fuel oil faster and more often – which would result in increased climate pollution and toxic air emissions from both the facility itself and from the vessels and railcars calling to SST to unload and receive oil shipments. <sup>4</sup> **How will this likely increase in deliveries impact ship and rail traffic? How will this likely increase in ship and rail traffic, or any venting or regular operation of expanded tank capacity, impact air emissions?**

Further, any resulting increase in vessel traffic resulting from the growing availability in fossil fuels caused by this Project will impact the habitats of endangered salmonids, orcas, and their prey species. **Increased risk of vessel collisions, groundings, and other accidents at sea must also be assessed in the SEPA review process for this facility. An increase in vessel traffic would cause an increase in vessel noise, impacting our Southern Resident Killer Whales' ability to socialize and hunt for scarce prey in their critical habitat. The EIS must evaluate impacts from increased vessel noise on marine species. Construction of new storage tanks will produce noise and light pollution for both terrestrial and aquatic species, and needs to be analyzed.** The species analyzed should include benthic, aquatic, riparian, and upland flora and fauna listed by either state or federal governments as endangered, threatened, candidate or sensitive in the Central Puget Sound Geographic Response Plan.

Residential communities along and upland of Marine View Drive have been in longstanding conflict with Port industries due to noise, odor and traffic issues associated with common Port activities. Beyond the obvious environmental and public safety harm that would result from this development, the Project would only further exacerbate the strife between Marine View Drive residents and Port industry, and will result in increasing noise, odor, and traffic complaints to the City. **How will the Project proponent protect prospective residents from poor air quality in the area? How will the Project proponent mitigate noise,**

**light and odor conflicts between residents and industry? Further traffic impacts from additional tanker trucks along Marine View Drive and Taylor Way should be analyzed.**

This Project could pose serious risks to the viability of nearby communities. We are especially concerned about affordable housing developments that may not be able to receive the funding they need to expand from the Department of Housing and Urban Development (HUD) if more and more hazardous substances (like distillate fuels) are stored and transported in the Project area.<sup>5, 6, 7</sup> **The EIS needs to include a review of HUD’s hazardous substance list, as well as their calculator for determining Acceptable Separation Distance from a hazardous site, and a determination should be made as to the impact the siting of this Project would have on the ability to expand nearby affordable housing developments.** We cannot continue to ignore the harm just the mere siting of these high-risk fossil fuel facilities is having on our low-income communities, not to mention the negative health outcomes these communities face as a result of their proximity to these hazardous substances.

#### *State Shoreline Management Act (SMA)*

RCW 90.58.100 requires that local governments “consider all plans, studies, surveys, inventories, and systems of classification made or being made by federal, state, regional, or local agencies, by private individuals, or by organizations dealing with pertinent shorelines of the state”. The applicant failed to provide even a basic habitat assessment, which would analyze impacts to aquatic resources. Substantial evidence points to the Project causing short term gains over long term benefits to the public, which is a violation of the SMA. Specifically;

- 1. How is the Project consistent with statewide interests?**
- 2. How will the Project preserve the natural character of the shoreline?**
- 3. How will the Project protect the resources and ecology of the shoreline?**
- 4. How will the Project increase public access to publicly owned areas of the shorelines?**
- 5. How will the Project Increase recreational opportunities for the public in the shoreline?**

*The studies required under the SMA, as they relate to climate impacts and their attendant effects on shorelines and shorelands, need to be taken into account by the City of Tacoma and Shoreline Administrator. If the City of Tacoma determines these studies and considerations of the SMA are not necessary, we request justification for how that determination was made.*

#### **Inadequate SEPA Descriptions of Existing Conditions**

Item B.7.a.3 of the SEPA Checklist states, “No toxic or hazardous chemicals will be stored, used, or produced as part of the Project.” This is inaccurate. Distillate fuel oils are both hazardous to human health if inhaled or ingested, and are also flammable.<sup>8</sup>

*We request that the hazardous nature of the products that will be transloaded and stored at the Project site be accurately described in all SEPA documents.*

This Project falls within the Puyallup Tribe of Indians Reservation and lands covered by the 1988 Puyallup Land Claims Settlement.<sup>9</sup> Commencement Bay and the Puyallup River watershed contain fish and marine mammal species listed under the Endangered Species Act (ESA), as well as designated critical habitat and

Essential Fish Habitat under the Magnuson-Stevens Fishery Conservation and Management Act. These areas also provide juvenile and adult habitat for salmonids and their prey resources.<sup>10, 11</sup> In addition to being federally protected, these species and habitats are culturally important to the Puyallup, Nisqually, Squaxin Island, and Muckleshoot Tribes, and other Coast Salish peoples.

*We request any descriptions of existing conditions in the Project permit documents be updated to accurately reflect the presence of the species listed above and the regulations associated with their care and management, and the significance of the Project site and potentially affected aquatic resources to indigenous communities.*

Thank you for issuing a DOS for the Project and for providing the opportunity to review and comment on the scope of the Environmental Impact Statement for the Project. If you have questions or need clarification of any of our comments, please contact Erin Dilworth at [edilworth@healthybay.org](mailto:edilworth@healthybay.org).

Sincerely,

**Erin Dilworth**, Policy & Technical Program Manager  
Citizens for a Healthy Bay

**Chris Beale**, District 5 Councilman  
City of Tacoma

**Laura Ackerman**, Energy Program Director  
The Lands Council

**LeeAnne Beres**, Executive Director  
Earth Ministry / WA Interfaith Power & Light

**Graham Clumpner**, Field Organizer  
Mosquito Fleet

**Anna Doty**, Fossil Fuel Campaign Manager  
Washington Environmental Council

**Stephanie Hillman**, Campaign Representative  
Sierra Club

**Marquis Mason**, Political Co-Lead  
Sunrise Tacoma

**Nora Nickum**, Ocean Policy Manager  
Seattle Aquarium

**Stacy Oaks**, Leadership Team  
350 Seattle

**Lovel Pratt**, Marine Protection and Policy Director  
Friends of the San Juans

**Liz Schotman**, Washington Regional Manager  
Surfrider Foundation

**Dan Villa**, Leadership Team  
350 Tacoma

CC: Greg Gould, Department of Ecology  
Wendy Buffett, Department of Ecology  
Piper Peterson, Environmental Protection Agency  
Andrew Strobel, Puyallup Tribe of Indians



## References

1. Calculation made from reviewing the tank list provided in the 2013 Shoreline Substantial Development Permit and critical areas review for application # SHR2013-40000203722.
2. Washington Department of Ecology. (n.d.) *Cleanup Site Details Cleanup Site ID 3673*. Accessed from <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=3673> on September 21, 2020.
3. Personal communications with Marv Coleman, former Toxic Cleanup Program manager with the Washington Department of Ecology.
4. Puget Sound Clean Air Agency. (2016). *Notice of Construction Approval No. 11069*.
5. Washington State Department of Health. (n.d.). *Washington Tracking Network: A Source for Environmental Public Health Data*. Accessed from <https://fortress.wa.gov/doh/wtn/WTNIBL/> on December 1, 2020.
6. Eberhard, K., Skelton, L., and S. Cornett. (2018). *I-1631 Could Save Lives and Improve Health by Reducing Pollution: Washingtonians Could Save Billions in Health Costs by Cleaning the Air*. Accessed on March 5, 2019 from Sightline Institute.
7. Wood, S. (2018). *Opinion: Take it from a nurse: Tacoma can't gamble with air quality, public health*. Accessed on March 5, 2019 from *Tacoma News Tribune*.
8. United States Congress Senate Select Committee on Indian Affairs. (1989). Settlement of land claims of Puyallup Tribe of Indians in the state of Washington: hearing before the Select Committee on Indian Affairs, United States Senate, One Hundred First Congress, first session, on S. 402 ... February 24, 1989, Washington, DC. Washington: U.S. G.P.O..
9. Ridolfi. (2008). Year 7 (2008) Monitoring Report for Commencement Bay Habitat Restoration Sites. Prepared for the Commencement Bay Natural Resource Damage Assessment and Restoration Trustees.
10. Pierce County Lead Entity. 2018. Salmon Habitat Protection and Restoration Strategy for Puyallup and Chambers Watersheds. Author.

7311 East Side Drive NE  
Tacoma, WA 98422  
February 25, 2021

Shirley Schultz  
City of Tacoma  
Planning and Development Services  
747 Market Street, 3<sup>rd</sup> Floor  
Tacoma, WA 98402  
[shirley.schultz@ci.tacoma.wa.us](mailto:shirley.schultz@ci.tacoma.wa.us)

Re: SeaPort Sound Terminal Substantial Shoreline Development Permit (SSDP) and State Environmental Policy Act (SEPA) – LU20-0107 – Environmental Impact Statement Scoping

Dear Ms. Schultz:

I appreciate the opportunity to review and comment on the scope of the Environmental Impacts Statement for the SeaPort Sound Terminal Substantial Shoreline Development Permit and the SEPA checklist for this project. My comments are my own, but I also serve as the chair of the Citizens for a Healthy Bay Policy and Technical committee, and have reviewed the CHB comments and fully support and endorse them. In the interest of efficiency, I will not duplicate the comments submitted in the CHB letter and will focus on pollution related issues. I have been working on Commencement Bay related cleanups and permits for the past 40 years and am a PhD chemist, recently retired from the Chemistry Department at Pacific Lutheran University. As a resident of Browns Point, I have direct experience with this terminal, and observe the tankers, ATBs and towed barges transiting to and from the SeaPort Sound Terminal.

I understand that the project will demolish seven existing tanks, construct ten new tanks, renovate the wastewater treatment system, and remove towers once used for asphalt processing. As such, the terminal very likely has historic contamination related to the previous refining operations. There are three documented outfalls to the Hylebos Waterway. Previous CHB records, meetings with the leadership of the previous owner, Targa, and a search of Department of Ecology records document some of the facility cleanups and expansion that have taken place in the past. Since there is a mix of voluntary cleanups, permits granted by various agencies, and past terminal expansion projects, this EIS should include a complete description of the facility operations since 1967 and as expected into the future. It is my understanding that the asphalt refinery opened in 1967 and closed in 1999. Over time, the terminal grew to its present size, a rail car transfer station and pipeline under the Hylebos built and expanded, wastewater treatment systems were created, and expanded, and small voluntary cleanups were completed. It is highly likely that there were spills on site while the asphalt refinery was in operation. There is at best a partial picture of these activities in the public record. Without better documentation, it is difficult to be sure that the EIS addresses future activities on this site. This EIS should provide the documentation for understanding the site history and the effects of this proposed development, a possible no action alternative, and can identify potential cleanups needed via MTCA and/or RCRA.

In 2018, Targa Sound Terminal was granted a National Pollutant Discharge Elimination System Permit (NPDES Permit) No. WA0003204. As outlined in the table on p 4 of the permit (attached), the permit required monthly discharge monitoring reports (DMRs), reporting permit violations and bypasses, a spill control plan, a stormwater prevention plan. A PCB study, AKART analysis and engineering report, a sediment quality impact report, sediment sampling, an engineering report for construction or modification activities, and other submittals. It is my understanding that SeaPort Sound is meeting the requirements of this permit. Since the area of the outfalls and their drainages match the proposed demolition and construction, the EIS should summarize all of the data and compliance from this NPDES permit.

The NPDES permit deals with stormwater, not likely historic subsurface contamination, or subsurface water reaching the Hylebos Waterway. As the historic equipment is demolished there is the possibility of disturbing any contamination. Given the voluntary cleanup Targa did with previous site expansion, the likelihood of contamination is very strong. Preliminary sampling results should be included in the EIS. The EIS should have an associated sampling plan, and this plan should be available for public review and comment.

In addition to the stormwater permit, SeaPort Sound has air permits issued by the Puget Sound Clean Air Agency. Compliance with these permits should also be included and analyzed in this EIS.

SeaPort Sound has submitted an oil spill contingency plan to the Department of Ecology, with public comment open until April 3, 2021. This contingency plan should be referenced, and the requirements for spill response clearly delineated in the EIS.

Finally, a variety of projects have been completed with mitigated determination of non-significance. This action has been determined to have significance. The sum of all other recent projects should be summarized in this EIS, along with plans for future expansion that might have environmental significance.

In summary, the draft EIS should include the following:

1. A description and timeline of all historic and current activities on the site, including refining, terminal activities, expansion and hydrocarbon mix.
2. A list of all process chemicals and fuels used stored or transferred on site from 1967 to the present.
3. A Description of all permits and past and current compliance with them.
4. Summary of the studies required by the most recent NPDES permit WA0003204
5. Sampling plan and preliminary information on subsurface contamination
6. Description of long-term plans for this site.

Thank you for the opportunity to comment on this EIS scoping.

Sincerely

A handwritten signature in blue ink, appearing to read "Sheri J. Tonn", with a horizontal line extending to the right.

Sheri J Tonn, PhD



**From:** Anne Kroeker <annek@36524.com>  
**Sent:** Thursday, February 25, 2021 3:17 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Cc:** Richard Leeds <leedsrichard@gmail.com>  
**Subject:** Comments for the Seaport Sound Oil Terminal Expansion Proposal EIS

Dear Ms. Schultz,

Thank you for receiving our comments on the scope of the Environmental Impact Statement for the Seaport Sound Expansion Proposal.

We would like to expand on the points already raised to be considered for analysis: (1) public safety and emergency response, (2) oil spill risk and safety, (3) air quality impacts and (4) greenhouse gas impacts from the extra fossil fuel storage.

We would like to see these points evaluated for the full production, transportation, storage and distribution, and downstream effects of the expansion, beyond just the actual use of the terminal storage. There are many points that need to be brought to the attention in the EIS, to complete a full and thorough analysis of this proposal. These would include determining impacts of the whole project cycle and use.

For example, how will the increase in fuel storage impact rail deliveries and traffic? How will the GHG and poisonous emissions impacts of these deliveries, and the ensuing deliveries out of the terminals, be evaluated? What will be examined for the excavated material for the building of these terminals, and how will the impact of the material removed from the ones scheduled to be demolished be analyzed?

Further, critical attention needs to be placed on this project meeting the goals of the Shoreline Management Act, and in addressing the impacts to local indigenous communities like the Puyallup Tribe, who depend on salmonids and other first foods as a cultural and subsistence resource, in perpetuity.

Since this project is a deflection from creating sustainable clean electrical infrastructure, how much will this project add to Washington State's short and long term ghg emissions? Given that the UN IPCC has determined that substantial reduction of all emissions needs to be accomplished within 9 years to keep our planet's temperature rise to 1.5 degree Centigrade, if that is even still a doable goal, we cannot allow projects like this to prevent us from reaching our State's emission reduction goals.

Finally, to achieve sustainable public health communities, reducing emissions, and mitigations, should be done first with the surrounding local communities in mind, and then also for the downstream and downwind communities, all along the route of the fossil fuel path, both to the terminal site and leaving it. The negative health impacts of fossil fuel are felt in communities not only at this storage site, but also at the extraction sites, along the transportation corridors, and at all points of distribution. If Seaport Sound were to instead to pivot to a truly renewable energy business, the immediate and short term health benefits of creating and using clean energy would include the reduction of asthma and exposure to heavy metal poisoning and other polluting chemicals in the air and ground, for those same communities.

Thank you for your consideration of evaluating all the impacts of this expansion proposal from Seaport Sound Oil in the City's EIS.

Sincerely,  
Anne Kroeker and Richard Leeds  
Des Moines WA

**From:** Elly Claus-McGahan <info@sg.actionnetwork.org>  
**Sent:** Thursday, February 25, 2021 3:40 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Seaport Sound Expansion Proposal Needs A Robust EIS

Dear Ms. Schultz,

Please assist Planning and Development Staff to make this proposed expansion of Seaport Sound Terminal undergo a thorough EIS review.

I have concern over the upstream impacts of this project on the climate.

I am with Climate Pierce County and we are working actively to reduce Pierce County GHG emissions. But this goes beyond Pierce County borders. GHG emissions and particulate emissions from burning fossil fuel anywhere needs to be reduced. The environmental hazards of increasing fossil fuel capacity in our port are not the direction the city should agree to without a thorough EIS.

What will be the air impacts to increased fuel processing capacity?

How will the increase in fuel storage impact rail deliveries and traffic?

What are the impacts that increased hazardous materials stored will have in the case of spillage or leakage?

How will excavated material from the site be analyzed? What contaminants will be analyzed? Has there been any leakage from the tanks that are scheduled to be demolished?

How does this project meet the goals of the Shoreline Management Act?

How will the EIS account for the impacts to local indigenous communities like the Puyallup Tribe who depend on salmonids and other first foods as a cultural resource?

What are the lifetime GHG emissions for the proposed increase in fuel to be stored? These impacts should all be looked at with the expectation of maximum filling of the tanks, as SeaPort Sound has not committed to tanks being kept ready solely for bio-fuels. Even if a tank was set aside for biofuels - life time emissions would need to be investigated.

The non-interim Tidelands regulations are in draft mode right now. Those regulations stipulate no expansions in storage, but also have a check list of what to look for. I think it makes sense to use that lens in this case and attempt to be as stringent as is legal so that we are in-line with what the city is hoping to accomplish with the new regulations while we wait on the subarea planning process to complete.

Thank you for ensuring that we keep Commencement Bay clean for all who call it's waters home!

Sincerely,

Elly Claus-McGahan, PhD  
Climate Pierce County  
<https://climatepiercecouny.com/drelly@sound-decisions.org>  
253-219-9129  
Elly Claus-McGahan  
[drelly@sound-decisions.org](mailto:drelly@sound-decisions.org)  
4301 N Frace Ave  
Tacoma, Washington 98407

**From:** brian simpson <info@email.actionnetwork.org>  
**Sent:** Saturday, February 27, 2021 10:51 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** SeaPort Sound Terminal EIS Scoping

Dear Ms. Schultz,

Thank you and your team for requiring an Environmental Impact Statement (EIS) for this huge expansion and for listening to residents' concerns. As a resident of Tacoma that has been advocating for limits on fossil fuels, this is such a relief to see the City taking such expansions seriously.

In terms of the scoping for the EIS, thank you for already including the life cycle greenhouse gas emissions.

Some other areas to consider:

- Environmental Justice: how would this continue to negatively impact the Puyallup Tribe and their rights as well as the people downwind of such facilities. My understanding is that the life expectancy of people downwind is considerably less than in other parts of Tacoma.
- Cumulative Emissions: All these projects are approved based on their individual emissions, but how do they all add up, especially when concentrated in a small area near a large population?
- Public Health: How do these emissions impact residents' health? What health costs do we pay in terms of increased asthma and cancer rates (to name a couple) for having these facilities in our city? What does this financially cost our health care system?
- Alleged Benefits to Tacoma: There also appears to be a misconception, even among council members, that increased fossil fuels in the port benefit Tacomans directly, that it means we're just using more of it. As I'm sure the fossil fuel study being conducted by the City will show, the throughput at these facilities is not tied to the prosperity of Tacoma. We are instead a sacrifice zone, where air, water, and soil can be polluted and the health of residents compromised.
- Looking Forward: Given the direction that the new presidential administration is moving, it also seems unwise to continue betting on fossil fuels - these could easily become "stranded assets" and we would be left to clean up, undoubtedly. It seems like a wiser economic choice to dedicate more land to renewable or green industry, which would likely provide more jobs per unit of land than more storage tanks.

Thanks again for requiring an EIS for this proposed expansion at SeaPort Sound Terminal. I look forward to remaining engaged throughout the rest of this review process, so please include me in any future notifications.

brian simpson  
bas85310@yahoo.com  
1413 3rd ave  
Seattle, Washington 98101

**From:** Daniel Villa <dan@350tacoma.org>

**Sent:** Thursday, February 4, 2021 8:47 AM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Subject:** Re: City of Tacoma DS/Scoping Notice- LU20-0107 - SeaPort Sound Terminal - 2638 Marine View Drive

Dear Ms. Schultz,

Wow, what amazing news! Thank you and your team for requiring an EIS for this huge expansion and for listening to residents' concerns. What great news to wake up to. :)

I think it would be great to also include environmental justice in the scoping - how would this continue to negatively impact the Puyallup Tribe and their rights as well as the people downwind of such facilities. My understanding is that the life expectancy of people downwind is considerably less than in other parts of Tacoma.

Cumulative emissions would be another good addition. All these projects are approved based on their individual emissions, but how do they all add up, especially when concentrated in a small area near a large population?

There also appears to be a misconception even among council members that increased fossil fuels in the port benefit Tacomans directly, that it means we're just using more of it. As I'm sure the fossil fuel study being conducted by the City will show, the throughput at these facilities is not tied to the prosperity of Tacoma. We are instead a sacrifice zone, where air, water, and soil can be polluted and the health of residents compromised.

Given the direction that the new presidential administration is moving, it also seems unwise to continue betting on fossil fuels - these could easily become "stranded assets" and we would be left to clean up, undoubtedly. It seems like a wiser economic choice to dedicate more land to renewable or green industry, which would likely provide more jobs per unit of land than more storage tanks.

Hope you and yours are keeping well.

All the best,

Dan



**From:** Brenda Cummings <brensiv2@yahoo.com>  
**Sent:** Thursday, February 4, 2021 9:02 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Environmental Impact Statement

Dear Ms. Schultz,

We no longer have time to debate fossil fuels. Action to save our planet from total collapse needs to be taken now, and it needs to be taken boldly and swiftly. The melting of arctic sea ice, for example, is happening at a rate much faster than predicted even a year ago. It will making our wild and unpredictable weather patterns even more wild and unpredictable. Unpredictable weather will affect everything we do. Rising water levels will accelerate, winds will become more powerful, and flooding events will be more frequent and damaging.

Money and politics are getting the way of logic everywhere. Please don't let money and politics get in the way of Tacoma's progress and future. We must move on from fossil fuels.

Not only should there be no new fossil fuel storage tanks built at the SeaPort Sound Terminal; Tacoma should be moving as far away from fossil fuels as possible as we prepare for the worst. Anything less is irresponsible.

Sincerely,  
Brenda Cummings  
1718 South Proctor St.  
Tacoma, WA 98405  
201-925-4993

**From:** Dshau1 <dshau1@aol.com>  
**Sent:** Thursday, February 4, 2021 12:24 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** proposal to increase storage tanks

I am writing in opposition to SeaPort Sound Terminal's proposal to increase storage tanks. This is exactly what we shouldn't be doing during the climate crisis. Instead, we should be doing everything possible to transition away from fossil fuels and encourage a green economy here in Tacoma.

I also find it troubling that we would continue to allow such storage facilities to be built on land "of high liquefaction susceptibility." So basically, in an earthquake, these tanks might not only rupture but sink into the ground, causing untold devastation to Commencement Bay and the Puget Sound, including our endangered salmon and orca.

As for evidence of "Indian or historic use", this is all on Puyallup Tribal land. Have they been consulted on this expansion?

Hundreds of Tacoma's have testified that we want to see expansion of current fossil fuel uses halted--yet our requests have gone unheeded. . What can be done to stop fossil fuel expansion in the Tideflats?

Thank you for opening up to comments on this important matter.

Diane Shaughnessy  
Tacoma, WA 98406

**From:** Aliza Yair <alazahannah@gmail.com>

**Sent:** Thursday, February 4, 2021 3:56 PM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Cc:** Victor, Steve(Legal) <svictor@cityoftacoma.org>

**Subject:** Re: City of Tacoma DS/Scoping Notice- LU20-0107 - SeaPort Sound Terminal - 2638 Marine View Drive

Hi there

Some initial comments as follows:

1. If your baseline is 15,000 but you increase to 180,000... that does not come across as "additional bulk". Does additional bulk need to be defined? At least as a smaller percentage than current capacity? And how long does fuel need to be stored to count as "bulk" and not "throughput". Seems dodgy and like a big fat loophole, that they would need SO MUCH additional storage for fuel if they're not trying to move it as "throughput".
2. Why not just require the upgrade to old tanks and wastewater/stormwater systems without adding 165,000 barrels of climate-killing fuels to the port... especially if you are not intending it as throughput?
3. Generally speaking... this is a bad idea. We need to completely stop using fossil fuels around the world within the next 8 years to have a chance of not perishing as a species and dooming billions of people and their children, grandchildren, to lives of starvation and suffering. Is there any way you can add the impact to climate change? Requiring compliance with climate accord targets??

Thanks for all you do to stop greedy people from killing the earth.

Aliza

-----Original Message-----

From: Davis <davis@davisfreeman.com>

Sent: Friday, February 12, 2021 5:00 PM

To: Schultz, Shirley <shirley.schultz@cityoftacoma.org>

Subject: Re: seaport sound terminal

Dear Ms. Schultz

Tacoma is approaching "the city of destiny". This is no area for ANY industrial development.

I live next to the MOG and regularly walk along the waterway. I see signs informing the fishermen not to eat anything caught in the Foss waterway. It's poisoned. Now is our opportunity to clean it up.

Fossil fuel is dying. Our city must not support further refining. Or any industrial development.

Tacoma is growing. Let's provide a healthy environment for the citizens.

Thank you

Davis Freeman

1705 Dock St. #548

98402.

**From:** Sara Bhakti <info@email.actionnetwork.org>  
**Sent:** Saturday, February 13, 2021 11:00 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** SeaPort Sound Terminal EIS Scoping

Dear Ms. Schultz,

Re: The Environmental Impact Statement (EIS) for the proposed expansion of the SeaPort Sound Terminal.

Although I am not a resident of Tacoma, I share their concerns.

Besides the potential harm to the environment in greenhouse gas emissions, I am concerned also about the consequences of poor air and water quality to people's health in an increased risk for asthma, cancer, etc. and the associated costs not only to their lives and livelihoods but also increased costs to the local healthcare delivery system.

Encouraging an increase in fossil fuels is not beneficial to the environment, and continuing to support last century's oil and gas industry is not a wise decision for moving forward. In this new century, the focus and prosperity is on clean, renewable energy with its good paying jobs and benefits in addressing carbon pollution and climate change as well as human health.

Even though I am a very old lady - 85 years and counting - I stand for the future with a cleaner environment and better health. I hope you will, too.

Thank you for the opportunity to comment.

Sara Bhakti  
Kirkland WA  
Sara Bhakti  
sarabhakti@yahoo.com  
521 7th Ave  
Kirkland, Washington 98033

**From:** diane burke <gogirl315@gmail.com>  
**Sent:** Saturday, February 13, 2021 6:19 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Please stop the expansion of fossil fuel

Hello,

I'm writing to ask that you do not approve of the port of Tacoma moving towards any additional fossil fuel storage or manufacturing. Tacoma can set the path for new renewable energy sources that's not natural gas or anything related to Fossil fuels. Let's not live in the shadow of Seattle and do business the same as everyone else let's use our ingenuity, your ingenuity to make a difference. it's not all about short-term profits. Work Climate Change and the health of the Salish Sea, we need to look at other options for revenue.

Thank you,  
Diane Burke

**From:** Andrew Mordhorst <a.mordhorststn@gmail.com>

**Sent:** Wednesday, February 17, 2021 2:47 PM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Subject:** Scoping Meeting - LU20- 0107

I am wondering if there is a plan for Global Warming Mitigation for the Port of Tacoma.

Metro Parks of Tacoma have set forth plans to change areas at Point Defiance.

If Metro Parks is aware of the need to move facilities to rebuild at an elevation above the projected rise of sea levels in the near future.

Would not be advantageous to place refinery facilities in the Fredricson Industrial Park..

Thank you for your time.

Andrew Mordhorst

6002 S. Warner St.

Tacoma WA 98409

Member of the South Tacoma Neighborhood Council

**From:** Joe Hiss <info@email.actionnetwork.org>  
**Sent:** Monday, February 22, 2021 1:33 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** SeaPort Sound Terminal EIS Scoping

Shirley Schultz,

Dear Ms. Schultz,

Thank you for requiring an EIS for this expansion and for listening to residents' concerns. My opinion as a retired biologist is that any action that furthers fossil fuel transport is unacceptable. In view of this, I do thank you for including the life cycle greenhouse gas emissions in your analysis, and hope the project can be canceled on this basis.

However, the project could also be rejected on the basis of environmental Justice, in that it would continue to negatively impact the rights of the Puyallup Tribe as well as the people downwind of such facilities.

It might also be rejected on the basis of cumulative emissions, since this project is clustered with others in a small area near a large population. Together they are likely to increase asthma and cancer rates, adding to the cost of adding to the cost of health care.

I do not think that fossil fuel passing through the Port really benefits Tacomans! Rather, it is detrimental, diminishing the people's health and creating a sacrifice zone where air, water, and soil can be polluted.

At this time it seems unwise to continue betting on fossil fuels, which could become "stranded assets." A wiser course would be switching to renewable fuels, which could likely provide more jobs per unit of land than the storage tanks the proposal calls for.

Thanks again for requiring an EIS for this proposed project. Please include me in any future notifications.

Sincerely,

Joseph M. Hiss  
Olympia  
Joe Hiss  
joe.hiss.biologist@gmail.com  
225 17th. Ave. SE  
Olympia, Washington 98501



**From:** Nancy Farrell <Nancy.Farrell.13678366@p2a.co>  
**Sent:** Tuesday, February 23, 2021 5:21 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** SeaPort Sound Expansion EIS Comments

Dear Ms. Schultz,

Thank you for taking community concerns about the proposed SeaPort Sound expansion seriously by issuing a determination of significance and conducting an EIS in order to adequately evaluate impacts of this project.

As the City develops the scope and draft EIS, I urge you to take into account the following impacts:

- Full lifecycle emissions (including upstream and downstream) resulting from the project, including scenarios that consider a shifting fuel mix at the facility overall that could be enabled by additional capacity
- Air quality impacts related to increased transport, storage, and fuel processing at the facility
- Health analysis that considers cumulative impacts of industrial activity on the Tidelands, including not only chronic or average pollution, but also historic instances and future likelihood of acute health impacts from industrial accidents and periods of non-attainment of required levels of hazardous air pollutants, including PM 2.5
- Impacts of expansion on increased transport, including barge, truck, rail traffic and the associated emissions, air quality, health, safety, and oil spill risks associated with these increased transits
- This should include impacts on endangered species, including Southern Resident Orcas, and impacts on Puyallup Tribal resources
- Risks associated with transport should also be considered beyond the immediate project area, including additional oil barges throughout Puget Sound and oil by rail transport throughout Tacoma and the inland northwest destined for the facility
- Consideration of risks associated with excavated material and potential contaminants from the site
- Consideration of how this proposal either meets or does not meet the goals of the Shoreline Management Act

Thank you for your work to comprehensively evaluate this proposal and protect our community.

Sincerely,  
Nancy Farrell  
4005 N 24th St  
Tacoma, WA 98406

**From:** Dimitri Winchester <info@sg.actionnetwork.org>  
**Sent:** Wednesday, February 24, 2021 8:05 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Seaport Sound Expansion Proposal Needs A Robust EIS

Shirley Schultz,

Dear Ms. Schultz,

I would like to start this letter off with a reminder of the current climate crisis we are in. At this moment in time, in 2021 we are past the point of stopping climate change, it has been happening and the past decades of ignorant bliss are crashing down on the current population, and fast.

It would be absolutely ignorant to avoid talk of how most of the damage caused has been by the use and extraction of fossil fuels.

In order to stop further damage we need to commit to supporting innovation that will lead to repairment and restoration to our already frail ecological systems.

It is no longer acceptable to allow companies and corporations to bargain against the health of our communities with the possibility of new jobs.

Under Inslee, Washington has committed itself to several goals to reach in reducing pollution and transitioning away from pollutants such as fossil fuel.

It's a hard truth, but SST needs to face it. They're time as a company is up, it is not just completely unnecessary for SST to request an expansion, but it's pitiful to allow a fossil fuel company to grow when they are already at the brink of their own extinction. In my opinion they should not only be denied but given two opens; either innovate or liquidate. This is exactly how capitalism operates, either SST keeps up with the changing tides or they sell up shop.

If we want future generations to enjoy the beauty in Washington we need to put our foot down and stand up for what is right. So I ask you Ms. Schultz, what direction would you like the future to go?

Thank you for time.

Dimitri Winchester  
windimtree@gmail.com  
2321 S 96th st  
Tacoma, Washington 98444

**From:** Davis Freeman <davis@davisfreeman.com>  
**Sent:** Wednesday, February 24, 2021 11:11 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Cc:** Erin Dilworth <edilworth@healthybay.org>  
**Subject:** re: The Seaport Sound EIS

Dear Ms. Schultz,

By way of a short introduction, my wife and I purchased a condo on the Foss Waterway, I am a former city arts commissioner, and I created and teach a master course for the UW-T.

I was more than delighted the City of Tacoma reversed its earlier decision on the EIS and its particular the proposed tank expansion.

My wife and I strive for daily walks along the path enjoying the exercise and most of the view.

Along the path I notice the signs posted informing fishing anglers not to eat the fish from the waterway as the water is polluted. I also notice the "steam" coming out of the ever present chimneys spewing supposedly "clean" into the atmosphere. It's a constant reminder of my youth on the Mississippi River.

I grew up in Baton Rouge, LA between Exxon, other oil refineries and many chemical plants. ALL professed to not be polluting the air. In the 60s in college my friends and I would sit on the Mississippi River levee and watch the marvelous sunsets. Turns out the air, water and soil was poisoned due to the chemical pollution.

It was in the early 70s that reason, truth and responsibility informed the population that most if not all these businesses were poisoning the air and land. We began to call the river between Baton Rouge and New Orleans "CANCER ALLEY"..

I hope and pray the leaders of our great city of destiny do not follow in the footsteps of the governing bodies of Louisiana.

My desire would be to eliminate ALL commercial use of the island and in time convert it to parks or wetlands.

Tacoma will be either:

A. the city of Destiny in pollution

or hopefully

B. the City of Destiny for clean air, water and marine life.

I strongly support the latter.

Thank you for your time.

Davis Freeman  
1705 Dock St.  
#548  
Tacoma, WA 98402

Owner:

**The Visual and Written Word**

Instructor:  
**"The Art and Business of Photography"**  
UW Tacoma Campus

t: 206.678-4500

w: [www.davisfreeman.com](http://www.davisfreeman.com)

i: follow: jdavisfreeman

**From:** Katie Mahoney <Katie.Mahoney.425338573@p2a.co>

**Sent:** Wednesday, February 24, 2021 9:25 PM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Subject:** SeaPort Sound Expansion EIS Comments

Dear Ms. Schultz,

Thank you for taking community concerns about the proposed SeaPort Sound expansion seriously by issuing a determination of significance and conducting an EIS in order to adequately evaluate impacts of this project.

As the City develops the scope and draft EIS, I urge you to take into account the following impacts:

- Full lifecycle emissions (including upstream and downstream) resulting from the project, including scenarios that consider a shifting fuel mix at the facility overall that could be enabled by additional capacity
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- Health analysis that considers cumulative impacts of industrial activity on the Tidelands, including not only chronic or average pollution, but also historic instances and future likelihood of acute health impacts from industrial accidents and periods of non-attainment of required levels of hazardous air pollutants, including PM 2.5
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- Risks associated with transport should also be considered beyond the immediate project area, including additional oil barges throughout Puget Sound and oil by rail transport throughout Tacoma and the inland northwest destined for the facility
- Consideration of risks associated with excavated material and potential contaminants from the site
- Consideration of how this proposal either meets or does not meet the goals of the Shoreline Management Act

Thank you for your work to comprehensively evaluate this proposal and protect our community.

Sincerely,

Katie Mahoney

8719 238th St SW

Edmonds, WA 98026

**From:** Judy Ferguson <medfordgrad@aol.com>  
**Sent:** Wednesday, February 24, 2021 9:53 PM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Re: LU20-0107 - SeaPort Sound Terminal - 2638 Marine View Drive

Ms. Schultz -

Thank you for the information below. I was able to listen to the archived Zoom meeting this afternoon, but got an error message when I went back on this evening to look at the Power Point presentation. While I will give the site another try tomorrow, I'll go ahead and share my comments regarding the expansion of the SeaPort Sound Terminal below:

I'm more than grateful that the City has acknowledged the many risks of this expansion and will do a thorough review. The community has noted a plethora of concerns and asked that they be considered, as the expansion is certainly not 'non-significant' to the NE Tacoma residents that live upslope or travel Marine View Drive daily.

'Snake Hill' (McMurray Rd. NE) across Marine View Drive from the SeaPort Sound Terminal is a short, curvy drive up the hill to NE Tacoma where you'll find a Public library and public park with playground, a church with a large daycare program, NE Tacoma Elementary School, and many residences. Incidences involving the Terminal's stored petroleum products can certainly pose a health and safety risk to those residing at the top of the hill. Those incidences may also negatively impact both McMurray Road NE and Norpoint Way NE, two of the few routes in and out of the NE Tacoma/Browns Point/Dash Point community.

'Expansion' is a deceptive misnomer to me, as the previous Targa operation was much smaller in scope. From the viewpoint of a home purchase/remodel, the Targa to SeaPort 'expansion' is a tear down and rebuild - - which for a residence comes with all kinds of permits and regulations. As others have noted, there is much to be concerned about when expansion details are vague and the 'down the road' reality of how the stored products will be used and transported is not transparently shared. In its past, the site never experienced full capacity at the dock. How will the SeaPort expansion of ships at the dock affect the health of the Hylebos and Commencement Bay? How will the demolition of the contaminated Targa refinery be done to ensure that those very old toxic wastes do not do more harm to the waterway and wildlife? Who will examine the obsolete tanks to determine what chemical wastes were stored in them, as well as the appropriate method to dispose of them? What group will oversee that corners are not cut in the demolition/clean-up process? Where will the contaminated containment berm debris go?

With the 'expansion' of hundreds of thousands of barrels of 'product,' air and odor pollution are a concern. Local residents have become savvy to particulates in the Tideflats being carried to their neighborhoods and homes. The Puget Sound Clean Air Agency is one organization that can be called, but, sadly, the Agency's scope has not kept pace with Industry. The Agency only measures certain chemicals, often allows companies to 'self report' and does not measure the cumulative effect of the host of pollutants being emitted into the air in the Tideflats. Active monitoring of SeaPort Terminal emissions must be put into place to measure the actual impacts to residents and the environment. Last week's fire on the docked Trident trawler was yet another example where an unanticipated horrific fire sent smoke into the air for days. One will never know how toxic that smoke was to residents once it combined with the particles emitted by other Tideflats businesses, as the cumulative emission isn't measured. What will the pollution effects of the dock at 'full capacity' be? All local residents have been thrilled to often have sightings of both resident and non-resident Orca pods in the Bay over the last two

years. What steps will be taken to ensure that there is 'no impact' from either water or noise pollution that would harm the Orcas or the much needed Salmon population.

I would urge that the EIS truly look at the intended use of the products stored and make sure that a detailed list of what is where be given to the Tacoma Fire Chief should there ever be an emergency. It is hard to believe that the stored products will just be stored and not put on rail cars or tanker trucks that will travel through the Port and out into surrounding communities. Flammable commodities on rail or highway are horrific accidents just waiting to occur and Tacoma has already had precursors of what can go wrong. How will the City ensure that the site is regularly monitored by the Tacoma Fire Department for compliance, staff trainings, drills, etc. ? Does Tacoma Rail have sufficient insurance coverage to handle the aftermath of a loaded train car derailment in the Port?

It is hard not to be sardonic about the SeaPort Sound Terminal expansion. It's unfortunate that there is a sense that SeaPort Sound Terminal is not being upfront and open, but is rather diminishing the risk and scope of the project, as they seek permission to go forward. Please enter this process with eyes and ears wide open and your cynical hat on.

Thank you for reading my concerns.

Judy Ferguson  
7219 East Side Dr NE  
Tacoma, WA 98422

**From:** Judy Ferguson <medfordgrad@aol.com>  
**Sent:** Thursday, February 25, 2021 8:57 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** Re: LU20-0107 - SeaPort Sound Terminal - 2638 Marine View Drive

Shirley -

Thanks very much for the Power Point attachment. I am truly grateful for the EIS determination.

One of the slides niggled my 'thinking hat' in regard to my 'home purchase/remodel' analogy. Purchasers of older homes are held to all current residential requirements and stipulations that are on the books - - i.e. wiring and plumbing must be updated, height codes must be abided by, etc. That same application of newer codes and regulations must also be applied to Tideflats commercial enterprises, superseding methods that were used in the past. 'Grandfathering' doesn't really work with environmental and safety issues.

I look forward to continuing my communications with you as the EIS process goes forward. Thanks for all your efforts on this journey we're on together.

Judy

**From:** Tom & Debby Felnagle <tomdebbyfelnagle@harbornet.com>

**Sent:** Thursday, February 25, 2021 9:34 AM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Subject:** EIS for SeaPort Sound Terminal

Dear Ms Schultz,

I am writing regarding the EIS for the SeaPort Terminal. I support the requiring of an EIS to evaluate the effects of SeaPort's expansion.

Please ensure that environmental justice is part of the EIS. It is important to consult the Puyallup Tribe so that the effect on their resources is considered. We need to respect and honor the treaty rights. We must stand by our words!

Also, please study the effects of increased vessel and train traffic on humans and ecosystems, especially endangered salmonoids, orca and their prey.

As a person of faith, I believe it is my sacred obligation to care for Creation and be a good steward of this wonderful gift of life on our amazing planet Earth.

Thank you for your consideration in this matter,

Sincerely,

Debby Mumm Felnagle  
1618 Wilton Rd S  
Tacoma, WA 98465



**From:** Joy Caddock <info@email.actionnetwork.org>  
**Sent:** Thursday, February 25, 2021 11:55 AM  
**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>  
**Subject:** SeaPort Sound Terminal EIS Scoping

Shirley Schultz,

Dear Ms. Schultz,

I'm a parent, farm worker in Puyallup Valley and lifelong resident of Pacific Northwest in Tacoma since 2006. I am against the expansion of Seaport Sound terminal and expansion of any fossil fuel project:

Just because you can do something doesn't mean you should.

Commodification of life has a cost that affects everyone and there are natural limits. Collectively we are coming up against limits. Passing these limits has caused fire, pandemic, drought, ice storms, cancers, ecocide, genocide and broken and breaking treaties—the list goes on. Ecocide and environmental degradation is accelerating even as the environmental balance becomes more fragile.

You are telling us over and over again that it's your right to sell our life, health, indigenous sovereignty and culture, marine life, water, soil, air and the right relationship to the land we love to foreign investors for them to make money. You are telling us it's your right to make the call whether we and the place we love and live should be cannibalized in order that it make money for a small group of investors that has no tie to the place it's desecrating. You are asking the people whom you've already stolen the land from to take all the risk—but will pass on none of the gain? Hint: there is no amount of money that could make this decision an equitable one. Can you appreciate the audacity of a request like this especially at the time of global pandemic, a sign of ecological imbalance? It should be noted that this week a ship near these proposed sites of expansion released untold chemicals into the Salish Sea while visiting Orca were seen near the Blair waterway. The sightings of these beloved family members (sacred to local indigenous people) is becoming a rare occurrence due to the ports expansion, toxic leeching, salmon decimation, ship traffic leading to echolocation confusion.

Just because you can do something doesn't mean you should. Please consider the generational effects of these harmful projects that desecrate the life water air and soil of our home.

Joy Caddock  
joycaddock@gmail.com  
817 N. I St.  
Tacoma, Washington 98403

**From:** Joy Caddock <joycaddock@gmail.com>

**Sent:** Thursday, February 25, 2021 12:13 PM

**To:** Schultz, Shirley <shirley.schultz@cityoftacoma.org>

**Cc:** Woodards, Victoria <victoria.woodards@cityoftacoma.org>; Thoms, Robert <robert.thoms@cityoftacoma.org>; Walker, Kristina <Kristina.Walker@cityoftacoma.org>; Blocker, Keith <Keith.Blocker@cityoftacoma.org>; Ushka, Catherine <cushka@cityoftacoma.org>; Hines, John <John.Hines@cityoftacoma.org>; Beale, Chris <chris.beale@cityoftacoma.org>; Hunter, Lillian <lillian.hunter@cityoftacoma.org>; McCarthy, Conor <Conor.McCarthy@cityoftacoma.org>

**Subject:** I am against the expansion of the Seaport Sound terminal...

To Ms. Shultz

I am a parent, farmworker in Puyallup Valley, co-steward of a marsh in tideflats and lifelong resident of Pacific Northwest (in Tacoma since 2006). I am against fossil fuel expansion in our port, LNG expansion and expanded storage of fossil fuels in our already dangerous port. Just because you can do something doesn't mean you should.

Commodification of life has a cost that affects everyone and there are natural limits. Collectively we are coming up against limits. Passing these limits has caused fire, pandemic, drought, ice storms, cancers, ecocide, genocide and broken and breaking treaties—the list goes on. Ecocide and environmental degradation is accelerating even as the environmental balance becomes more fragile.

You are telling us over and over again that it's your right to sell our life, health, indigenous sovereignty and culture, marine life, water, soil, air and the right relationship to the land we love to foreign investors for them to make money. You are telling us it's your right to make the call whether we and the place we love and live should be cannibalized in order that it make money for a small group of investors that has no tie to the place it's desecrating. You are asking the people whom you've already stolen the land from to take all the risk—but will pass on none of the gain? Hint: there is no amount of money that could make this decision an equitable one. Can you appreciate the audacity of a request like this especially at the time of global pandemic, a sign of ecological imbalance? (This question and vitriol for the audacity should be for the shareholders at Seaport Sound/Targa but as liaisons and elected officials I need you to find your power to protect the people over profit). It should be noted that this week a ship near these proposed sites of expansion released untold chemicals into the Salish Sea while visiting Orca were seen near the Blair waterway. The sightings of these beloved family members (sacred to local indigenous people) is becoming a rare occurrence due to the ports expansion, toxic leeching, salmon decimation, ship traffic leading to echolocation confusion.

Just because you can do something doesn't mean you should. I am absolutely against the expansion of this project.

Sincerely,  
Joy Caddock

-----Original Message-----

From: Nancy Ferree-Clark <pastornancy@nancyfc.us>

Sent: Thursday, February 25, 2021 2:28 PM

To: Schultz, Shirley <shirley.schultz@cityoftacoma.org>

Subject: comments re: required EIS for SeaPort Sound Terminal's proposed expansion

Good evening. My name is Rev. Nancy Ferree-Clark. I am a retired United Methodist pastor, a proud resident of Tacoma, and a member of Earth Ministry.

I am writing first of all to thank you for requiring an Environmental Impact Statement to evaluate the effect of SeaPort Sound's proposed expansion. I have been gravely concerned about the health of our planet for over 50 years and made commitments in my personal life to reflect those concerns such as driving an all-electric car, using public transportation frequently, and maintaining a vegetarian diet. But I look to you as leaders of our city government to enact regulations that protect our beloved Puget Sound. God calls us to tend the magnificent creation which God has given us in order to preserve and protect it for the good of all people.

With that in mind, I worry about the harm that may be caused by increased vessel and train traffic which would accompany expansion of the fossil fuel industry in our city. As a resident of north Tacoma with an amazing view of Commencement Bay, I have witnessed both the increase in train traffic and ships in the Sounds over the past several years. I implore you to thoroughly investigate the impact of increasing such activity on both humans and our natural ecosystem, especially on endangered salmonids, orca, and their prey. Our water and its marine life are precious gifts that we must protect in every way possible, especially as decisions are made about industry located on or near the Sound.

I also have deep concern about proper consultation with the Puyallup Tribe in this process. As a person of faith and a leader of faith communities, I ask that you respect and honor the treaty rights of the Puyallups as a Sovereign Nation as a sign of your commitment to environmental justice. It is unquestionably the right thing to do.

Thank you for your work on these critical issues as you help to protect the health of our people and our planet.

Sincerely,

Rev. Nancy Ferree-Clark  
3008 N. 33rd St.  
Tacoma, WA 98407



1483 Alaskan Way, Pier 59  
Seattle, Washington 98101-2015

(206) 386-4300  
SeattleAquarium.org

Shirley Schultz  
City of Tacoma  
Planning and Development Services  
747 Market Street, 3rd Floor  
Tacoma, WA 98402  
By email: [shirley.schultz@cityoftacoma.org](mailto:shirley.schultz@cityoftacoma.org)

February 25, 2020

Re: SeaPort Sound EIS scoping

Dear Shirley Schultz,

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the proposed expansion of the SeaPort Sound bulk oil terminal.

We understand the proposed project includes the demolition of seven tanks (five that store fossil fuels, two for wastewater) and construction of 10 new tanks (eight for storing fossil fuels, two for wastewater). The result would be a 1,434% increase in fossil fuel storage capacity in the project footprint area.<sup>1</sup>

We have serious concerns about a project that would expand fuel storage on the Tacoma Tideflats right alongside the sensitive intertidal and marine ecosystems of the Salish Sea. Any increase in vessel traffic caused by this project will adversely affect salmon habitat and increase underwater noise, disturbing the foraging of the endangered southern resident orcas.

One of the most important steps we can take to better protect the health of our ocean and the marine species that call it home is reducing fossil fuel use. The Seattle Aquarium strongly supports phasing out fossil fuels—as rapidly as possible—and utilizing renewable energy over fossil fuels. Expanding fossil fuel storage infrastructure and related vessel traffic, in contrast, contributes to climate change and increases the risk of an oil spill.

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<sup>1</sup> Group comments submitted by Citizens for a Healthy Bay and others, Sept. 21, 2020; Calculation made from reviewing the tank list provided in the 2013 Shoreline Substantial Development Permit and critical areas review for application # SHR2013-40000203722

We urge the City of Tacoma to ensure that the EIS assesses:

- The volume of deliveries to and from the facility as a result of this project, and how that will affect vessel traffic in the Salish Sea.
- Anticipated light pollution from the new tanks and transportation.
- Changes in underwater noise from increased vessel traffic as a result of this project. This analysis should specifically examine impacts on the endangered southern resident orcas, as noise and disturbance are one of the key threats to their recovery.
- Projected changes in the risk of oil spills, vessel collisions, and groundings, as a result of more loading/unloading events and more vessels transporting more crude oil.
- Crude oil spill impacts on wildlife, including forage fish, rockfish, salmon, southern resident orcas, other marine mammals, and seabirds.
- Oil spill prevention and response.
- The full lifecycle greenhouse gas emissions from the additional products to be stored on the site.
- How the project will protect the resources and ecology of the shoreline.

All of these analyses should consider the potential worst case of new tank capacity being used to the fullest, as well as used to eventually store fuels besides distillates (as identified in the application), especially tar sands.

Thank you for your consideration and for requiring an EIS.

Sincerely,



Nora Nickum  
Ocean Policy Manager  
Seattle Aquarium