



City of Tacoma
Planning and Development Services

November 10, 2022

Dear EIS Recipient,

The City of Tacoma invites your comments on the SeaPort Sound Plant Modernization Draft Environmental Impact Statement (DEIS) prepared in accordance with the Washington State Environmental Policy Act (SEPA). The proposal from SeaPort is the demolition of the refinery infrastructure at their Marine View Drive facility, and replacement with fuel storage tanks.

The proposed project demolishes refinery equipment and replaces it with fixed-roof liquid fuel storage tanks. The increase in storage capacity is about 11 percent for the Seaport facility as a whole. The increased storage will not increase permitted throughput limits, but it will allow for (a) more and different fuel mixes on the site and (b) a quicker timeline on reaching throughput limits. The applicant is not seeking to increase throughput limits; that is, no increase in ships/barges calling, trains unloading, or trucks loading at the site. The limits have been established through various City of Tacoma permits as well as Puget Sound Clean Air Agency permits.

The proposal considered in this EIS includes two alternatives: build and no build. Under each, three market scenarios are reviewed. The market scenarios are reviewed based upon the assertion that SeaPort is market-responsive; that is, they sell what there is demand for. Demand is, in turn, based on fuel standards that are set at the national and state level. Therefore, the three market scenarios are:

- No change in existing fuel standards (this would require a rollback of state legislation for clean fuels)
- Current clean fuel legislation (carbon intensity of fuels reduced by 20 percent by 2038)
- State Goal strategy (continued legislation to further review greenhouse gasses (GHG) in fuel and increase biofuels)

The project was analyzed for demolition, construction and operation impacts through 2063.

The applicant provided a GHG life cycle analysis. Under each of the scenarios there is an expected 9 percent increase in GHGs as a result of the consumption of the products passing through the facility. Emissions fall into a few categories: construction, operation, and offsite. Construction emissions include both materials used in construction as well as an assumed consumption by construction equipment. Operations includes emissions from loading, unloading, storing, mixing product. Offsite includes extraction, transportation, and consumption of product.

In developing this DEIS, the City considered all GHG impacts in light of SEPA regulations and SEPA substantive authority for conditioning a proposal. Given the City's policies regarding climate change, and given the areas over which SeaPort can control the impacts of their business, mitigation is required for construction, demolition, and operation of the facility, as well as distribution of the product within the region.

Mitigation

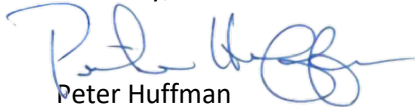
Many mitigating actions arise out of the permitting/regulatory process. That is, many environmental concerns are addressed through compliance with one or more development requirement (e.g., stormwater quality). Additional mitigation measures proposed under SEPA are:

- All construction equipment used for the project is required to use biofuels wherever possible and shall be Tier 4 diesel engines.
- To mitigate for GHG emissions anticipated to be produced from project construction and operation of the new tanks over the next 40 years (as calculated per the Study Report: Inventory of Greenhouse Gas Emissions – SeaPort Sound Plant Modernization Project [Appendix A]), SeaPort Sound will calculate the purchase price of third-party-verified GHG offsets. Expenditure of the funds shall be in the following priority order:
 - Restore a segment of the shoreline riparian buffer adjacent to the SeaPort Sound Terminal. The area would be monitored and maintained for five years and protected in perpetuity.
 - Contribute funds toward the City’s Urban Forestry Program. This mitigation measure is consistent with the City’s 2030 Climate Action Plan sustainability goals and will help the City achieve local GHG emissions drawdown targets (City of Tacoma 2021a).
 - Contribute funds toward a local restoration project proposed by the City or approved third party occurring on or near the tideflats that will be monitored and protected in perpetuity.
 - Purchase third-party-verified GHG offsets.
- Annual reporting of baseline and throughput, per regulations in Tacoma Municipal Code 13.06.080.F

This DEIS is issued in advance of issuance of a Shoreline Substantial Development Permit, which will be issued concurrently with the Final EIS. Commenting opportunities and DEIS availability are described on the attached Notice of Availability for the DEIS.

Thank you in advance for your participation and comments on this DEIS.

Sincerely,



Peter Huffman

Planning and Development Services Director