

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of:)	CASE NO. 15-001
Application No. 2013-01)	
TESORO SAVAGE, LLC)	PETITION FOR INTERVENTION OF
)	COLUMBIA RIVERKEEPER, CLIMATE
VANCOUVER ENERGY DISTRIBUTION)	SOLUTIONS, FORESTETHICS, FRIENDS
TERMINAL)	OF THE COLUMBIA GORGE, FRUIT
)	VALLEY NEIGHBORHOOD
)	ASSOCIATION, SIERRA CLUB,
)	SPOKANE RIVERKEEPER, AND
)	WASHINGTON ENVIRONMENTAL
)	COUNCIL

I. INTRODUCTION

Pursuant to RCW 34.05.443, RCW 80.50.090, WAC 463-30-091, and EFSEC’s Order Commencing Agency Adjudication, EFSEC Case No. 15-01 (January 28, 2015), Columbia Riverkeeper, Climate Solutions, ForestEthics, Friends of the Columbia Gorge, Fruit Valley Neighborhood Association, Sierra Club, Spokane Riverkeeper, and Washington Environmental Council (collectively “Petitioners”) submit this Petition for Intervention.

In its application for site certification, Tesoro-Savage requests authorization to build and operate a crude oil shipping terminal on the banks of the Columbia River that would handle an estimated throughput of 360,000 barrels of oil per day. This extraordinary transformation of the Columbia River into a fossil fuels transportation hub is unprecedented in the Pacific Northwest. While crude-by-rail proposals have been on the rise in recent years, Tesoro-Savage’s proposal is nearly as large as the volumes of all other Pacific Northwest crude-by-rail projects combined. These tremendous volumes of crude oil would bring to Petitioners’ members’ communities risks

of catastrophic river and terrestrial oil spills and explosions. Yet even in the absence of a catastrophe, the everyday operation of this project would result in significant and continuous environmental and public health degradation via a daily parade of rail and river traffic, harmful air and water emissions, harm to fish and wildlife species, and increased greenhouse gas emissions.

The organizations petitioning to intervene and their members have worked for decades to protect the environmental resources and communities this project would put at risk. If Tesoro-Savage succeeds in building and operating its proposed crude-by-rail facility, Petitioners' well-established interests in preserving the environment and protecting local communities would be profoundly diminished. There can be no serious dispute that allowing this project to go forward would adversely affect these organizations' members' work, lives, and ability to enjoy cherished environmental resources. Accordingly, Columbia Riverkeeper *et al.* seek leave to intervene to protect their strong interests in these proceedings.

II. IDENTIFICATION OF PETITIONERS

A. **Columbia Riverkeeper** is a non-profit organization, incorporated under the laws of Oregon, with approximately 8,000 members and supporters. Columbia Riverkeeper's members reside on or near or recreate on the Columbia River, including residents in both the states of Washington and Oregon. Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. To achieve its goals for the Columbia River watershed and estuary, Columbia Riverkeeper uses an integrated strategy of community-based grassroots organizing, public education, legal enforcement, and hands-on citizen involvement in tangible river protection projects. Enforcement of clean air, clean water, and other environmental laws is an integral part of Columbia Riverkeeper's work on the Columbia River. Columbia Riverkeeper's mailing

address is 111 Third Street, Hood River, Oregon 97031.

B. **Climate Solutions** is a Northwest-based clean energy economy non-profit with the goal of accelerating practical and profitable solutions to global warming by galvanizing leadership, growing investment, and bridging divides. Climate Solutions leads initiatives to deliver climate and clean energy policies, models, and partnerships that accelerate the transition from fossil fuels to a clean energy economy. Climate Solutions' mailing address is 1402 Third Avenue, Suite 1305, Seattle, Washington 98101.

C. **ForestEthics** is a non-profit environmental group committed to protecting North America's forests and wild places, and the wildlife and people that depend on them. ForestEthics has opposed new crude-by-rail terminals in North America and has raised awareness of the risks of transporting crude oil in outdated rail cars. It recently released an online mapping tool revealing that 25 million North Americans live in a one mile "blast zone" of the rail lines on which oil trains carry crude oil. ForestEthics' mailing address is 1329 North State Street, Suite 302, Bellingham, Washington 98225.

D. **Friends of the Columbia Gorge** is a non-profit organization with approximately 5,500 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Friends vigorously protects the scenic, natural, cultural, and recreational resources of the Columbia River Gorge by ensuring strict implementation of the Columbia River Gorge National Scenic Area Act and other laws protecting the region of the Columbia River Gorge; promoting responsible stewardship of Gorge land, air, and waters; encouraging public ownership of sensitive areas; educating the public about the unique natural values of the Columbia River Gorge and the importance of preserving those values; and working with groups and individuals to accomplish mutual preservation goals. Friends' mailing address is 522 S.W. 5th Avenue,

Suite 720, Portland, Oregon 97204-2100.

E. **Fruit Valley Neighborhood Association** is a city-sanctioned civic association organized under City of Vancouver Municipal Code section 2.75. The mission of Fruit Valley is to promote the general welfare of the neighborhood, its residents, and businesses. Fruit Valley's boundaries include approximately 1,200 homes, 100 businesses, an elementary school, five parks, and a community center. Rich environmental resources within the neighborhood include the Columbia River Wetland Mitigation Bank, the Ridgefield National Wildlife Refuge, Vancouver Lake, portions of the Columbia River and its shoreline, and the Pacific Flyway. The Tesoro-Savage project threatens to undermine the rights of residents of the Fruit Valley neighborhood to a clean and healthy environment and would place a disproportionate burden on many low-income individuals and people of color. Fruit Valley's mailing address is 2315 Simpson Avenue, Vancouver, Washington 98660.

F. **Sierra Club**, a national environmental organization founded in 1892, is devoted to the study and protection of the earth's scenic and ecological resources—mountains, wetlands, woodlands, wild shores and rivers, deserts, plains, and their wild flora and fauna. Sierra Club has its principal place of business in San Francisco, California and some 60 chapters in the United States and Canada, including the Washington State Chapter in Seattle, Washington and the Loo Wit chapter in Vancouver, Washington. The Sierra Club has more than 1 million members and supporters nationwide, including 24,137 members in Washington State and 17,036 in Oregon. Sierra Club's Beyond Oil campaign is dedicated to reducing the extraction and use of extreme crudes, like those proposed for transport to the Tesoro-Savage crude shipping terminal, as a means of meaningfully addressing climate change and protecting communities placed at risk by the movement of these volatile, hazardous fuels. Sierra Club's mailing address is 85 Second

Street, Second Floor, San Francisco, California 94105.

G. **Spokane Riverkeeper** is a program of the Center for Justice, a non-profit organization, incorporated under the laws of Washington. Spokane Riverkeeper's donors and supporters reside on or near or recreate in the Spokane River Watershed. Spokane Riverkeeper is dedicated to protecting and restoring the health of the Spokane River Watershed. Spokane Riverkeeper accomplishes its goals by collaborating, educating, and, when necessary, litigating to preserve the Spokane River's health through the Clean Water Act and other laws. Spokane Riverkeeper's mailing address is 35 W. Main Avenue, Suite 300, Spokane, Washington 99201.

H. **Washington Environmental Council** ("WEC") is a non-profit, statewide advocacy organization that has been driving positive change to solve Washington's most critical environmental challenges since 1967. WEC's mission is to protect, restore, and sustain Washington's environment. WEC was instrumental in passing (and now enforcing) the foundational laws that help keep Washington's environment healthy: the State Environmental Policy Act, the State Superfund Law, the Growth Management Act, and the Shoreline Management Act. WEC has approximately 20,000 members statewide. WEC's mailing address is 1402 Third Avenue, Suite 1400, Seattle, Washington 98101.

Petitioners' membership includes thousands of individuals who reside near the proposed crude-by-rail terminal, proposed rail route, and proposed vessel route; each organization has a strong interest in protecting the character, safety, and health of the communities that would be adversely affected by the Tesoro-Savage project. Petitioners and their members are also concerned about the substantial environmental justice harms threatened by the project in one of the per capita lowest income neighborhoods in the region. Likewise, Petitioners' members work, recreate, hike, view wildlife, hunt, and fish in areas that would be adversely affected by the

Tesoro-Savage project, both through routine operation of the terminal and by the possibility of small or catastrophic spills or explosions.

These groups are all non-profit organizations dedicated to protecting the environment and natural resources of Washington State and the Pacific Northwest region; ensuring that all communities in Washington and the Pacific Northwest have clean and healthy air and water; seeking positive solutions to the challenge of global climate change caused by combustion of fossil fuels; and working across the region to stop the increase in shipments of crude oil through the Pacific Northwest, as well as ensuring that regulations concerning oil transport, oil spill prevention, and oil spill clean-up are as strong as possible.

III. PETITIONERS' ATTORNEYS

Petitioners are represented by:

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IV. STATEMENT OF PETITIONERS' INTERESTS IN THIS PROCEEDING

A. Petitioners Have Participated in All Stages of Review of this Proposal and Have Expertise in the Applicable Areas of Law.

Tesoro-Savage's proposed terminal would receive and ship approximately 360,000 barrels of oil per day, resulting in risk of fire, explosion, terrestrial and river oil spills, and other catastrophic harms. Routine operation of the terminal would result in emissions of harmful gases and vapors, noise and light pollution, increased train and vessel traffic, and other harms to the surrounding community. The project, by itself or in combination with other proposed crude oil and coal shipping facilities, would cause significant, harmful impacts to the air, water, marine environment, fish and wildlife, economics, public health, culture, and communities across our region. It would further contribute to global climate change and harm Washington State's leadership role in addressing causes of climate change. Because Tesoro-Savage's proposed oil-by-rail terminal would cause significant adverse impacts to the resources Petitioners and their members cherish, Petitioners have participated—and intend to participate—during all stages of review related to this proposal.

On December 17, 2013, the petitioning groups submitted scoping comments to EFSEC on the proposed Tesoro-Savage oil terminal. The scoping comments urged EFSEC to set review requirements for environmental impacts at least as broadly as has been required for other proposed fossil fuel transportation projects. Petitioners urged EFSEC to evaluate at least the same or similar indirect effects of (1) increases in rail traffic across the region, (2) increases in vessel traffic in and out of the Columbia River, (3) increased crude oil spill risk from rail transport, terminal storage, and river/marine transport, (4) additional crude oil extraction in North Dakota and the Alberta tar sands, and (5) greenhouse gas emissions from the transport of crude oil, as well as the life-cycle impacts on the refining and ultimate combustion of the oil.

The comments also urged consideration of all direct, indirect, and cumulative impacts without geographic limitation, including both terrestrial impacts including rail traffic and diesel emissions extending from drill sites in North Dakota and Alberta through communities in Montana, Idaho, and Washington. In addition, Petitioners urged EFSEC to consider risks from river shipping including ocean-going vessel traffic and emissions, risks of collisions, and impacts to near-shore environments, which extend from the dock at Vancouver 106 miles to the mouth of the Columbia River and then to the final, undisclosed destinations across open ocean.

On March 31, 2014, Petitioners submitted comments to EFSEC documenting the incompleteness of Tesoro-Savage's application. Petitioners highlighted four areas in which the application was (and remains) incomplete: oil spill risks, the effects the project would have on the surrounding community, impacts beyond the storage tank site itself, and other missing details such as the type of oil to be received and shipped, geological risks, impacts to threatened and endangered salmon, and possible project segmentation. Petitioners described the environmental justice risks the proposal carries and attached maps showing demographic data for the region. The communities surrounding the project have minority population percentages in the 30-40% bracket, with some over 40%, and a poverty rate in the 30-40% range. These rates among Tesoro-Savage's immediate neighbors are far in excess of the study area's minority population percentage and poverty rates, and they far exceed the rates for Clark County as a whole. Petitioners urged consideration of the disparate impacts the project would have on these communities, including the Fruit Valley neighborhood.

In May 2014, several of the petitioning groups presented argument and submitted detailed comments during EFSEC's determination of land-use consistency, arguing for a more comprehensive review of land-use requirements by the Council. Members of the petitioning

organizations have actively participated in Tesoro-Savage public meetings held by EFSEC, the Port of Vancouver, and the City of Vancouver, voicing their opposition and concerns about the proposed crude-by-rail terminal. Petitioners' members also regularly attend, either by phone or in person, EFSEC's monthly meetings.

These organizations have expertise in federal, state, bi-state compact, and local laws and regulations related to the project review, including but not limited to the Washington State Environmental Policy Act, the National Environmental Policy Act, the Columbia River Gorge National Scenic Area Act, the Endangered Species Act, and local land use regulations.

Petitioners have substantial advocacy experience in these areas of law and have a demonstrated interest in seeing all applicable laws properly implemented. These organizations are leaders in the Pacific Northwest and nationally on safety and health risks resulting from the recent boom in crude oil transportation by rail in the United States and Canada; their members and staff have expertise on the policy and science of crude oil transportation, as well as individuals who would be directly affected by the adverse impacts this project would cause, at the site itself and along the river and rail routes.

B. Petitioners' Interests Extend to All Potential Legal, Procedural, Environmental, Health and Safety, and Socioeconomic Issues Pertinent to the Project.

Petitioners' interests extend to all potential legal, procedural, environmental, health and safety, and socioeconomic issues pertinent to the project. Petitioners also have a demonstrated interest in protecting the community surrounding the proposed project site from toxic emissions and against oil spills and in ensuring that the Columbia River Gorge, Columbia River, and Spokane River remain unique ecological treasures, internationally significant tourist destinations, and economically productive regions.

Petitioners and their members will be affected by all direct, indirect, and cumulative

impacts in this matter including crude oil spill risks and impacts along the rail route, at the facility, in the Columbia River, and in the Pacific Ocean; increased rail and vessel traffic and necessary coordination; impacts to streams, wetlands, salmon, and fishing areas; air quality and respiratory impacts; rail tank car safety; human health impacts from increased rail traffic; impacts of the terminal on local businesses and proposed developments; types of crude oil shipped and their unique properties for health risks, spill clean-up, and climate impacts; impacts on tribal, historic, and cultural resources; particular impacts to the Columbia River Gorge National Scenic Area; and global warming impacts from transportation, refining, and combustion of the oil.

A State Environmental Policy Act draft environmental impact statement (“DEIS”) has not been completed as of the date of this filing, and until such a document is released, it is not possible to compile a comprehensive list of Petitioners’ potential issues of concern. Petitioners specifically reserve the right to add or delete issues following the completion of the public comment period for the DEIS for this project. Because of the broad nature of Petitioners’ goals and areas of concern, Petitioners ask to be allowed to participate with respect to all issues before EFSEC. Petitioners submit the following non-exhaustive preliminary list of issues:

1. Whether the project and the EFSEC process are consistent with all applicable laws and regulations, including but not limited to all city and county land-use laws, regulations, ordinances, criteria, plans, and guidance, the Energy Facilities-Site Locations Act, the Columbia River Gorge National Scenic Area Act, the State Environmental Policy Act, the National Environmental Policy Act, the Clean Water Act, the Clean Air Act, the Endangered Species Act, energy siting laws and regulations, and all local, state, and federal laws and regulations related to

water quantity, water quality, air quality, solid and hazardous waste, spills, wetlands, forest practices, and wildlife.

2. Whether all of the project's potential impacts to the environment and human health, including direct, indirect, and cumulative impacts, are adequately evaluated and addressed.

3. Whether impacts on plants, fish, wildlife, and their habitat, including any threatened, endangered, and sensitive species, are adequately evaluated and addressed.

4. Whether impacts to streams, wetlands, salmon, and fishing areas are adequately evaluated and addressed.

5. Whether soil impacts (e.g., erosion, stability, productivity), water quality, and air quality impacts are adequately evaluated and addressed.

6. Whether geological concerns such as earthquake susceptibility, liquefaction, and landslides are adequately evaluated and addressed.

7. Whether noise impacts to surrounding communities and wildlife are adequately evaluated and addressed.

8. Whether adverse impacts to recreational opportunities, including but not limited to recreational resources in the Columbia River Gorge National Scenic Area, the Columbia River, the City of Vancouver, Glacier National Park, Fort Vancouver National Historic Site, and the Lewis and Clark Greenway Trail, are adequately evaluated and addressed.

9. Whether adverse impacts to Native American treaty-protected and cultural resources, in addition to all other cultural resources, and other cultural resources are adequately evaluated and addressed.

10. Any and all issues involving economic impacts and benefits of the project, including impacts to agriculture, tourism, and rail freight capacity, and any issues involving the economic viability of the project.

11. Whether all public health and safety concerns and risks, including but not limited to rail tank car safety, crude oil spill and explosion risks; impacts along the rail route, at the facility, in the Columbia River, and in the Pacific Ocean; and air and other emissions and respiratory impacts at the facility and along the transportation routes are adequately evaluated and addressed.

12. Whether increased rail and vessel traffic and necessary coordination is adequately evaluated and addressed.

13. Whether the types of crude oil shipped and their unique properties for health risks, spill clean-up, and climate impacts are adequately evaluated and addressed.

14. Whether all global warming impacts from transportation, refining, and combustion of the oil are adequately evaluated and addressed.

15. Whether additional crude oil extraction in North Dakota and the Alberta tar sands is adequately evaluated and addressed.

16. Whether the impacts from construction, modification, and use of roads and rail lines are adequately evaluated and addressed.

17. Whether the impacts from the construction phase of the project are adequately evaluated and addressed, including whether the project has adequately planned for site restoration of the project area.

18. Whether the project has adequately planned for decommissioning of the facility in the event of a financial misfortune, natural disaster, and/or the conclusion of the project's life cycle.

19. Whether any other impacts to local communities and environmental justice issues are adequately evaluated and addressed.

20. Any and all issues listed in the State Environmental Policy Act Scoping Report, the Draft Environmental Impact Statement, and the Final Environmental Impact Statement.

Petitioners also have an interest in all procedural matters that may arise during the adjudicatory process. Petitioners reserve the right to raise and/or address any issue identified by any of the other participants in this matter.

C. Petitioners' Interests Would Be Impaired and Impeded if This Petition for Intervention Is Not Granted.

Petitioners are non-profit organizations whose members rely on these organizations to protect the resources of Washington State, the Columbia River Gorge, the Columbia River, the Spokane River watershed, and local communities by advocating for the effective implementation of federal, state, and local laws. Petitioners' interests in protecting these unique resources and surrounding lands would be impaired and impeded if EFSEC denies this Petition for Intervention because approval of the project without Petitioners' participation would result in the degradation of the resources these organizations are charged with protecting.

V. NATURE OF PARTICIPATION REQUESTED

A. Full Participation Requested.

Petitioners request to be heard in these proceedings and to be afforded the right to participate in these proceedings to the full extent authorized by EFSEC rules. Petitioners' request includes, but is not limited to, the right to have notice and appear at any and all

prehearings, hearings, or proceedings, to participate in discovery, to produce evidence and cross-examine witnesses, to be heard through counsel by written and oral argument, to participate in settlement or alternative dispute resolution, to be served as a party with copies of all pleadings and other materials filed with EFSEC, and to participate in any other way as may be appropriate.

B. No Prejudice or Disruption from Participation.

Petitioners' participation in these proceedings will not prejudice any party to these proceedings, nor will it unduly delay or disrupt the Council's ability to conduct these proceedings in an orderly fashion. Instead, Petitioners' participation in the proceeding will provide expertise and information about the proposed facility and its potential environmental, safety, environmental justice, and health impacts that will assist EFSEC in its evaluation and ultimate recommendation. In accordance with EFSEC's preference that parties present evidence and argument to avoid duplication, the eight separate organizations in this petition will be represented by the same counsel and have joined together to most efficiently and effectively present their evidence and argument.

Respectfully submitted this 26th day of February, 2015.



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Attorneys for Columbia Riverkeeper, Climate Solutions, ForestEthics, Friends of the Columbia Gorge, Fruit Valley Neighborhood Association, Sierra Club, Spokane Riverkeeper, and Washington Environmental Council

VERIFICATION

STATE OF OREGON)
)
County of HOOD RIVER)

I, LAUREN GOLDBERG, being first duly sworn on oath, depose and say:

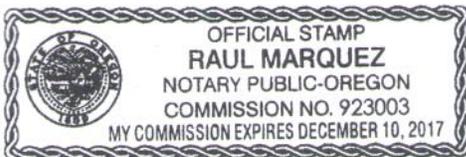
I am an agent of COLUMBIA RIVERKEEPER and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at HOOD RIVER, Oregon on February 24, 2015.

Lauren Goldberg
Signature of Agent

SUBSCRIBED AND SWORN TO before me this 24 day of February, 2015 by

Lauren R Goldberg



Raul Marquez
Notary Public - State of Oregon

VERIFICATION

STATE OF WASHINGTON)
County of Thurston)

I, Beth Doglio, being first duly sworn on oath, depose and say:

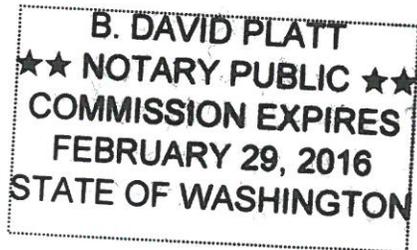
I am an agent of Climate Solutions and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at Olympia, Washington on February 24, 2015.

Beth Doglio
Signature of Agent

SUBSCRIBED AND SWORN TO before me this 24 day of February, 2015 by

B DAVID PLATT



[Signature]
Notary Public - State of Washington

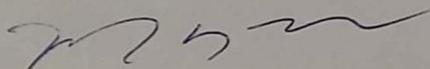
VERIFICATION

STATE OF WASHINGTON)
)
County of Whatcom)

I, Matthew D. Krogh, being first duly sworn on oath, depose and say:

I am an agent of ForestEthics and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

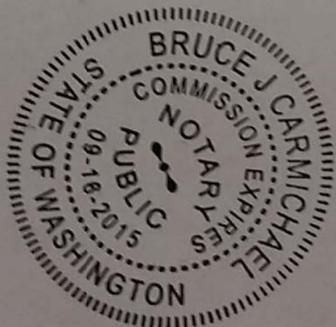
Signed at 600 E Holly St, Bellingham, Washington on February 25th, 2015.

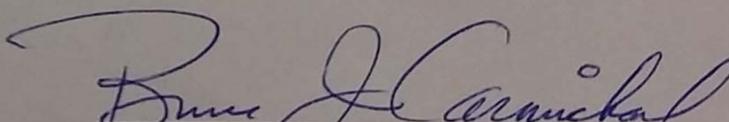


Signature of Agent

SUBSCRIBED AND SWORN TO before me this 25 day of February, 2015 by

Matthew D Krogh





Notary Public - State of Washington

VERIFICATION

STATE OF OREGON)
County of Multnomah)

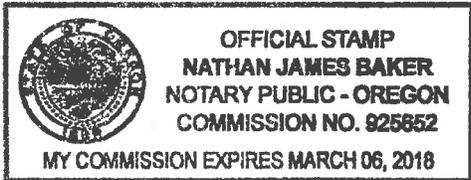
I, Michael Lang, being first duly sworn on oath, depose and say:

I am an agent of Friends of the Columbia Gorge and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at Portland, Oregon on February 23, 2015.

[Signature]
Signature of Agent

SUBSCRIBED AND SWORN TO before me this 23rd day of February, 2015 by
Michael Lang



[Signature]
Notary Public - State of Oregon

VERIFICATION

STATE OF OREGON)
)
County of Multnomah)

I, Eric LaBrant, being first duly sworn on oath, depose and say:

I am an agent of the Fruit Valley Neighborhood Association and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

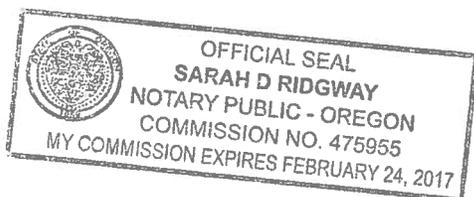
Signed at Portland, Oregon on February 24, 2015.

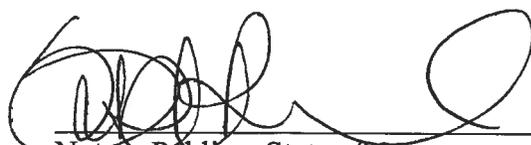


Signature of Agent

SUBSCRIBED AND SWORN TO before me this 24 day of February, 2015 by

Eric LaBrant .





Notary Public – State of Oregon

VERIFICATION

STATE OF CALIFORNIA)
County of San Francisco)

I, Devorah Anceal, being first duly sworn on oath, depose and say:

I am an agent of the Sierra Club and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at 85 2nd St. San Francisco, California on February 24, 2015.

[Handwritten Signature]
Signature of Agent

SUBSCRIBED AND SWORN TO before me this _____ day of February, 2015 by

_____.

See attached "Sunat" Certificate

Notary Public – State of California

VERIFICATION

STATE OF WASHINGTON)
County of Spokane)

I, Jerry White, Jr, being first duly sworn on oath, depose and say:

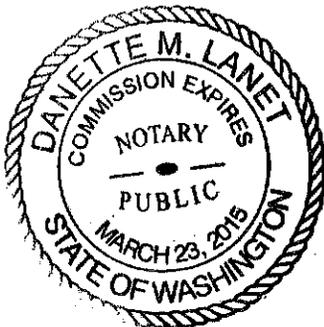
I am an agent of Spokane Riverkeeper and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at Spokane, Washington on February 25, 2015.

[Handwritten Signature]
Signature of Agent

SUBSCRIBED AND SWORN TO before me this 25 day of February, 2015 by

Jerry White



[Handwritten Signature]
Notary Public – State of Washington

VERIFICATION

STATE OF WASHINGTON)
County of King)

I, Becky Kelley, being first duly sworn on oath, depose and say:

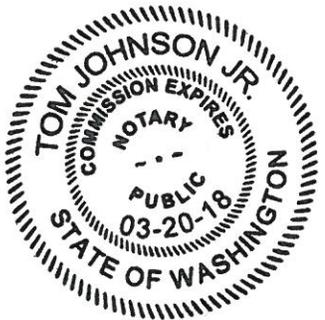
I am an agent of Washington Environmental Council and am authorized to make this Verification on its behalf. I have reviewed the foregoing Petition for Intervention, know the contents thereof, and believe the same to be true.

Signed at Seattle, Washington on February 23, 2015.

Becky Kelley
Signature of Agent

SUBSCRIBED AND SWORN TO before me this 23rd day of February, 2015 by

Becky Kelley



Tom Johnson Jr
Notary Public – State of Washington

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the State of Washington. I am over 18 years of age and not a party to this action. My business address is 705 Second Avenue, Suite 203, Seattle, Washington 98104.

I HEREBY CERTIFY that on February 26, 2015, I served the following documents on the following parties:

- 1. Petition for Intervention of Columbia Riverkeeper, Climate Solutions, ForestEthics, Friends of the Columbia Gorge, Fruit Valley Neighborhood Association, Sierra Club, Spokane Riverkeeper, and Washington Environmental Council.

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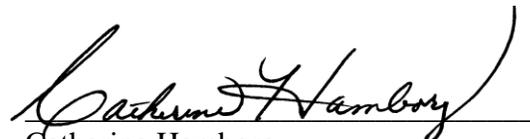
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I, Catherine Hamborg, declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of February, 2015, at Seattle, Washington.


Catherine Hamborg