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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of:  
Application No. 2013-01

TESORO SAVAGE, LLC

TESORO SAVAGE DISTRIBUTION  
TERMINAL

CASE NO. 15-001

SWORN PRE-FILED TESTIMONY  
OF JO REESE

I, Jo Reese, state as follows:

1. I swear under the penalty of perjury of the laws of Washington and the United States that the following statements are true and correct.

2. I am over eighteen years of age and am otherwise competent to testify in this case. My testimony is based upon my education, training, experience, professional qualifications, and understanding of the matters herein.

**I. INTRODUCTION, EDUCATION, AND PROFESSIONAL BACKGROUND;  
OTHER QUALIFICATIONS**

3. I am a Registered Professional Archeologist. I received a Bachelor of Science in Anthropology from Portland State University in 1980, and a Masters of Arts in Anthropology from Washington State University in 1986. I continued to study Anthropology at Washington State University with the objective of earning a Ph.D., and left the program in 1990, after starting my company.

4. I am co-founder/co-owner of Archaeological Investigations Northwest, Inc. ("AINW"), which began in 1989. AINW is a full-service cultural resource firm based in Portland, Oregon, providing professional archaeological, historical, architectural history, and ethnographic resource services for public and private clients primarily in Washington and Oregon. I have more than 39 years of experience in the archaeology and history of

1 the Pacific Northwest. I have worked extensively in southwestern Washington and have  
2 directed or supervised cultural resource studies for numerous infrastructure projects  
3 including for transportation, water, sewer, and commercial and private developments. I  
4 have directed several projects on Port of Vancouver lands. I meet the professional  
5 qualifications of the Secretary of the Interior’s Standards and Guidelines in archaeology  
6 that are required for federally funded or permitted projects. I have extensive experience in  
7 federal cultural resource regulatory compliance requirements for Section 106 of the  
8 National Historic Preservation Act (“NHPA”); the National Environmental Policy Act;  
9 and Section 4(f). I am also highly experienced in the City of Vancouver’s archaeological  
10 ordinance and performing predeterminations and surveys in Vancouver to meet its local  
11 ordinance, and Washington State’s review programs. I have served on the Boards of  
12 national nonprofit organizations related to archaeology and cultural resource management.

13 5. Based on my professional experiences and training, I have developed an  
14 expertise in evaluating historic and cultural resources.

15 **II. PURPOSE OF TESTIMONY**

16 6. The purpose of this declaration is to provide testimony regarding the  
17 Tesoro Savage Petroleum Terminal LLC, d/b/a Vancouver Energy (hereinafter, “TSPT”  
18 or the “Applicant”) Application for Site Certification (“ASC”) for the Vancouver Energy  
19 Terminal (the “Project”) and its compliance with WAC 463-60-362(5), concerning  
20 impacts and mitigation of impacts to historic and cultural sites during its construction and  
21 operation.

22 **III. SCOPE OF MY ANALYSIS CONCERNING THE CULTURAL  
23 RESOURCE IMPACTS OF THE PROJECT**

24 7. I was retained by Berger ABAM in May of 2013 to perform the cultural  
25 resource studies needed for the Project. I have strong knowledge of the Project area from

1 more than two decades of work on Port of Vancouver (“Port”) lands and along the  
2 Columbia River for numerous projects for public and private clients. I directed a survey  
3 of the Port’s Parcel One in 1993, which is the area where most of the Project structure will  
4 be constructed. I am very familiar with the other areas of the Port where the rail,  
5 pipelines, and dock will be constructed. I have directed the work for the Project on Port  
6 lands, and I have overseen the reports that AINW prepared for the Project. I have also  
7 conducted projects on both sides of the Columbia River and am very familiar with  
8 resources and resource potential.

9           8.       I, along with representatives of Berger ABAM staff, met with Robert  
10 Whitlam, State Archaeologist, with the Washington State Department of Archaeology and  
11 Historic Preservation (“DAHP”) July 30, 2013, to introduce the Project and review the  
12 methodology for studying cultural resources. Tribal coordination was also initiated by a  
13 letter sent August 2013 by AINW to cultural resource representatives of the Cowlitz  
14 Indian Tribe, Confederated Tribes of the Grande Ronde Community Oregon, Chinook  
15 Tribe, Confederated Tribes of the Chehalis Indian Reservation, and the Yakama Indian  
16 Nation by AINW requesting information on cultural resources or any other concerns that  
17 each Tribe might have with this Project.

18           9.       AINW conducted an extensive background review of existing reports and  
19 site forms for the Project, and those were gathered from DAHP records, and from records,  
20 maps, reports, and other data accumulated by AINW since the early 1990s. This is in  
21 addition to AINW’s experience working at the Project location in 1993 and during the  
22 geoarchaeological study conducted on site in 2014. Data were also gathered from the  
23 Oregon State Historic Preservation Office (“SHPO”) for the Oregon resources and from  
24 the DAHP on-line database (“WISAARD”) for the Washington historic resources.

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1           10.     The cultural resource overview for the terminal portion of the Project was  
2 completed at the end of 2013 by my staff, overseen by me, and the information was  
3 incorporated into a Preliminary Draft Environmental Impact Statement (“PDEIS”)  
4 prepared by Berger ABAM.

5           11.     AINW compiled data on existing archaeological and historic resources for  
6 Oregon and historic resources in Washington for the rail and navigation transportation  
7 corridors that serve the Project and in 2014 AINW presented these in map books that were  
8 incorporated into the PDEIS.

9           12.     I was asked by Berger ABAM to address information requests from DAHP  
10 and EFSEC that related to the potential for subsurface archeological resources on the  
11 Project site. I, along with representatives of Berger ABAM, met with Sonia Bumpus  
12 (EFSEC) and Robert Whitlam (DAHP) on June 19, 2014, to discuss possible subsurface  
13 sampling. In response, I supervised development of a work plan to sample the area within  
14 the Port’s lands where the construction planned to use vibro compaction stone columns.  
15 The proposed geoarchaeological study plan was circulated to representatives of the U.S.  
16 Army Corps of Engineers (“USACE”), who in turn provided the plan to DAHP and  
17 interested tribes. The geoarchaeological study work plan proposed a network of  
18 geoprobes to sample for cultural resources subsurface. The USACE and DAHP approved  
19 the plan at the end of October 2014, and the fieldwork began November 4. Upon  
20 coordinating with Tribal representatives, representatives of the Confederated Tribes of the  
21 Grand Ronde Community of Oregon requested to be present during the fieldwork to see  
22 how the geoprobe work was handled, and a meeting at the Port office, followed by an on-  
23 site visit, was on November 6, 2014. Weekly status reports were provided though the  
24 completion of fieldwork on November 24, 2014. The final report of findings was  
25

1 submitted in April 2015 to the USACE and EFSEC; and the USACE provided the report  
2 to DAHP and interested Tribes in April 2015.

3 13. I prepared an Inadvertent Discovery Plan in early 2015 that was needed by  
4 EFSEC to address the possibility of encountering human remains or an archaeological  
5 resource during the project; the plan provides guidance, procedures, and contact  
6 information.

7 **IV. ANALYSIS**

8 14. AINW's cultural resource overview and subsurface geoarchaeological  
9 study provided sufficient information to conclude that no archaeological resources are  
10 likely present within the Project's proposed terminal location at the Port of Vancouver. In  
11 the 1993 study for Parcel One, backhoe excavations were used to probe the area most  
12 likely for an archaeological site; no evidence of a resource was found. Fill subsequently  
13 covered that area, and the 2014-2015 geoarchaeological study probed that area again as  
14 well as other parts of the proposed facility. No evidence of an archaeological resource  
15 was found. One area of pipelines placement in Area 500 was recommended to be  
16 monitored if there is a change in proposed construction techniques and construction  
17 excavations are deeper than have been proposed. Other than that, the subsurface probes  
18 confirmed that no resources are likely within the proposed facility at the Port.

19 15. It is my profession opinion, based upon the work by AINW, that  
20 construction and operation of the Project facility will have no impacts on significant  
21 archaeological resources or historic resources at the Project site.

22 16. Based upon AINW's review of maps for the historic resources and  
23 archaeological resources on the Oregon side of the Columbia River and compiled maps of  
24 the historic resources in Washington for the rail corridor, it is also my professional  
25 opinion that normal operations of rail transportation of product to and from Vancouver

1 Energy's facility will not impact archaeological or historic resources along the rail  
2 corridor. I understand from the PDEIS that in the unlikely event of a rail incident and the  
3 discovery of cultural resources, BNSF will have an Engineering Instruction that requires  
4 work to stop immediately, and for BNSF to closely coordinate with the SHPO, appropriate  
5 Tribes, and other agencies that may need to be involved to protect such resources. I agree  
6 that this provides adequate mitigation to address potential impacts to cultural resources in  
7 this unlikely event.

8 **V. ATTACHMENTS**

9 17. The following documents are attached to my testimony for reference:

10 Attachments A: Jo Reese *Curriculum Vitae*

11 *[Signature on the Following Page]*

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