

19 February 2015

Mr. Stephen Posner
 Energy Facility Site Evaluation Council
 Washington Utilities and Transportation Commission
 P.O. Box 43172
 Olympia, WA 98504-3172

Subject: Vancouver Energy
 EFSEC Application No. 2013-01, Docket No. EF131590
 Response to EFSEC Draft EIS Data Request dated 11 February 2015 - Wetlands

Dear Mr. Posner:

On behalf of Vancouver Energy (the Applicant), BergerABAM is providing a response to the Energy Facility Site Evaluation Council's (EFSEC) Draft EIS Data Request from Cardno, dated 11 February 2015.

Code	Data Request Item	Applicant Response
*	1. Does the 2,300 ac of NWI wetlands within 1,000 feet of the rail corridor described in Section 5.5.1.1 in the PDEIS (page 5-88) represent only a subset of the wetlands shown to be present within the 1-mi wide corridor in Mapbooks K4A?	Correct. Wetland acreages were only calculated within 1,000 feet of the rail corridor.
	2. Did the Applicant quantify the number of wetland acres in the larger 1-mi wide corridor?	No, the number of wetlands within the larger 1-mile-wide corridor was not quantified.
	3. What was the Applicant's justification for using a "1,000 foot in each direction from the rail corridor" study area for wetlands, floodplains, and possibly streams?	As discussed in Section 5.5.2 of the PDEIS, "The potential for a release of material to affect wetlands depends upon a number of factors including the size of the spill, timing, the proximity to the resource, type of wetland (riverine, slope, depression, etc.), and topography of the site. Minor, large, and major spill volumes were established and are discussed in Section 5.18. The effects of minor spills would be limited to the footprint of the rail bed itself and would not likely impact wetland resources unless the rail passed over the wetland area on a bridge or trestle. The effects of larger spills could extend a distance of up to approximately 1,000 feet, but actual distances would vary based on terrain, the type of crude oil involved, and the total volume released." A similar reasoning was used for other surface water resources.

* This data request was received by e-mail from Sonia Bumpus dated 11 February 2015, and a code was not provided.

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Please feel free to contact me at 206/431-2373, or irina.makarow@abam.com, if you have any questions about this submittal. We look forward to further coordination with you, your staff, and EFSEC's consultants.

Sincerely,



Irina Makarow
Senior Environmental Project Manager

IM:nb

cc: Kelly Flint, Savage Companies
Jay Derr, Van Ness Feldman