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6 BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

7 In the Matter of:
8 Application No. 2013-01

9 TESORO SAVAGE, LLC
10 VANCOUVER ENERGY DISTRIBUTION
11 TERMINAL

CASE NO. 15-001

PRELIMINARY LIST OF EXHIBITS –
CITY OF VANCOUVER

12 The City of Vancouver preliminarily identifies the exhibits it intends to introduce
13 during its case in chief in the above-proceeding, while reserving the right to revise or add to
14 these exhibits as additional factual information is provided through the discovery, SEPA, and
15 adjudicative processes and to introduce exhibits identified by other parties.

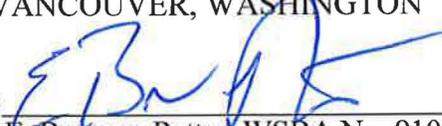
- 16
- 17 1. Comprehensive and Land Use Plans including: Vancouver City Center Vision and
18 Subarea Plan, 2007, Amended 2009; Esther Short Subarea Plan 1998; Fourth Plain
19 Corridor Subarea Plan 2007; Central Park Plan 2008; Lower Grand Employment Area
20 Subarea Plan 2008; Riverview Gateway Subarea Plan 2009; Shoreline Management
21 Master Program, 1997, 2007; Creating a more Sustainable Vancouver Plan, 2009; and
22 Downtown Vancouver Growth and Transportation Efficiency Center Plan, September
23 2007
 - 24 2. City of Vancouver Scoping Comments, dated
 - 25 3. City of Vancouver, Shoreline Master Program, dated November 21, 2011.
 4. Vancouver Municipal Code
 5. Notice of Proposed Rulemaking, PHMSA, Enhanced Tank Car Standards and
Operational Controls for High-Hazard Flammable Trains

- 1
- 2 6. Safety Advisory, U.S. Department of Transportation, Federal Railroad Administration,
3 Recommendation for Tank Cars, dated May 7, 2014
- 4 7. Emergency Restriction/Order United States Department of Transportation, Docket No.
5 DOT-OST-2014-0025, dated May 7, 2014
- 6 8. Emergency Restriction/Order United States Department of Transportation, Docket No.
7 DOT-OST-2014-0025, dated February 25, 2014
- 8 9. NTSB Safety Recommendation to FRA, dated January 23, 2014
- 9 10. Comments of the Natural Resource Defense Council to Pipeline and Hazardous
10 Materials Safety Administration, Recommendations to Improve the Safety of Railroad
11 Tank Car Transportation, dated December 5, 2013
- 12 11. Request for Proposals – Risk Assessment, Gap Analysis, and Fire Protection
13 Engineering Assessment related to the proposed Tesoro Savage Vancouver Energy
14 Distribution Terminal Project, Cardno ENTRIX
- 15 12. Draft Regulatory Impact Analysis, Docket No. PHMSA-2012-0082, USDOT, PHMSA,
16 dated July, 2014
- 17 13. Final Regulatory Impact Analysis, Docket No. PHMSA-2012-0082, USDOT, PHMSA,
18 dated May, 2015
- 19 14. Emerging Risks Task Force Report-2013, Region 10 Regional Response
20 Team/Northwest Area Committee
- 21 15. City of Vancouver’s Comments Regarding Consistency of Proposal with Land Use
22 Plans and Zoning Regulations, dated May 28, 2014
- 23 16. City of Vancouver’s Request to Defer land Use Consistency Determination and Leave
24 Record Open, dated May 22, 2014
- 25 17. Scope of Draft Environmental Impact Statement Vancouver Energy Distribution
Terminal Vancouver, Washington, EFSEC, April 2, 2014
18. Tesoro Savage Vancouver Energy Distribution Terminal Facility Draft Environmental
Impact Statement, dated November 2015
19. City of Vancouver’s Comments on Draft Environmental Impact Statement

- 1 20. Washington State Marine & Rail Oil Transportation Study Preliminary Findings and
2 Recommendations, Department of Ecology, dated October 1, 2014
- 3 21. Washington State 2014 Marine and Rail Oil Transportation Study, Department of
4 Ecology, dated March 1, 2015
- 5 22. City of Vancouver Resolution 07-M-3821
- 6 23. Ground Lease Between Port of Vancouver, USA and Tesoro Savage Petroleum
7 Terminal, LLC, dated July 23, 2013
- 8 24. Photographs of oil train derailments
- 9 25. USEPA Region 10 letter to USACE Re: Permit Application NWS 2013-962, Tesoro
10 Savage Petroleum Terminal Project, dated July 31, 2015
- 11 26. Railway Investigation Report, R13D0054, Runaway and main-Track Derailment,
12 Montreal, Maine & Atlantic Railway Freight Train MMA-002 Mile 0.23, Sherbrooke
13 Subdivision Lac-Megantic, Quebec, Transportation Safety Board of Canada
- 14 27. U.S. Rail Transportation of Crude Oil: Background and Issues for Congress,
15 Congressional Research Service, dated December 4, 2014
- 16 28. Maps of Vancouver, Washington

DATED this 8th day of January, 2016.

CITY ATTORNEY'S OFFICE
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By: 

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1 **CERTIFICATE OF SERVICE**

2 I certify that on the date provided below, I e-mailed a copy of the foregoing document
3 to all parties or their counsel of record as listed below:

4 Kelly J. Flint [] Via Hand delivery or leaving same at
5 Tesoro Savage Petroleum Terminal, LLC his/her office with clerk or other
110 Columbia Blvd, Suites 108 & 110 person in charge
6 Vancouver, WA 98660 [] Via First Class Mail/Postage Prepaid
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8 *Applicant, Tesoro Savage Petroleum Terminal
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24 *The Department of Commerce*

25 Maia D. Bellon, Director [] Via Hand delivery or leaving same at
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<p>6 Phil Anderson, Director 7 Department of Fish and Wildlife 8 1191 Second Avenue, Suite 2200 9 Seattle, WA 98101 10 Tel: (360) 902-2720 11 philip.anderson@dfw.wa.gov 12 <i>The Department of Fish and Wildlife</i></p>	<p><input type="checkbox"/> Via Hand delivery or leaving same at his/her office with clerk or other person in charge <input type="checkbox"/> Via First Class Mail/Postage Prepaid <input checked="" type="checkbox"/> Via Email <input type="checkbox"/> Via Facsimile</p>
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<p>13 Kristen L. Boyles 14 Janette K. Brimmer 15 Matthew R. Baca 16 Earthjustice 17 705 Second Avenue, Suite 203 18 Seattle, WA 98104 19 Tel: (206) 334-7340 20 kboyles@earthjustice.org 21 jbrimmer@earthjustice.org 22 mbaca@earthjustice.org</p>	<p><input type="checkbox"/> Via Hand delivery or leaving same at his/her office with clerk or other person in charge <input type="checkbox"/> Via First Class Mail/Postage Prepaid <input checked="" type="checkbox"/> Via Email <input type="checkbox"/> Via Facsimile</p>
<p>20 David Bricklin 21 Bryan Telegin 22 Bricklin & Newman LLP 23 1001 Fourth Avenue, Suite 3303 24 Seattle, WA 98154 25 Tel: (206) 264-8600 bricklin@bnd-law.com telegin@bnd-law.com <i>Attorneys for Columbia Riverkeeper, Climate Solutions, ForestEthics, Friends of the Columbian Gorge, Fruit Valley</i></p>	<p><input type="checkbox"/> Via Hand delivery or leaving same at his/her office with clerk or other person in charge <input type="checkbox"/> Via First Class Mail/Postage Prepaid <input checked="" type="checkbox"/> Via Email <input type="checkbox"/> Via Facsimile</p>

1 *Neighborhood Association, Sierra Club,*
2 *Spokane Riverkeeper, and Washington*
3 *Environmental Council*

4 I declare under penalty of perjury under the laws of the State of Washington that the
5 foregoing is true and correct.

6 EXECUTED this 8th day of January, 2016, in Vancouver, Washington.

7
8 
9 Tammy Zurn, Senior Legal Assistant
10 City of Vancouver