

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)	INTERVENORS COLUMBIA
)	RIVERKEEPER <i>ET AL.</i>
VANCOUVER ENERGY DISTRIBUTION)	PRELIMINARY ISSUES,
TERMINAL)	WITNESSES, AND EXHIBITS LISTS
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In accordance with the EFSEC’s May 5, 2015 Pre-Hearing Order, intervenors Columbia Riverkeeper, Climate Solutions, ForestEthics, Friends of the Columbia Gorge, Fruit Valley Neighborhood Association, Sierra Club, Spokane Riverkeeper, and Washington Environmental Council (collectively “CRK”) respectfully submit the following preliminary lists of issues, witnesses, and exhibits.

PRELIMINARY ISSUES LIST

In considering whether to recommend that the Governor grant, revise, or deny Tesoro-Savage’s application, RCW 80.50.010 gives EFSEC the authority to balance various interests, including:

- “present and predicted growth in energy demands” in Washington;
- minimization of “adverse effects on the environment, ecology of the land and its wildlife, and the ecology of state waters and their aquatic life”;
- assurance of strict operational safeguards for the welfare and protection of Washington citizens;

- preservation and protection of the quality of the environment;
- enhancement of opportunities to enjoy the esthetic and recreational benefits of the air, water, and land resources;
- promotion of air cleanliness;
- pursuit of beneficial changes in the environment;
- provision of abundant energy at reasonable cost; and
- avoiding decision-making duplication and delay.

Because of the broad nature of EFSEC review and the similarly broad nature of CRK’s goals and areas of concern, CRK reserves the right to raise and/or address any issue identified by any of the other participants in this matter. CRK submits the following preliminary list of issues:

1. Whether the proposed 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 the proposed project is in the best interests of Washington after balancing the statutory directive to provide abundant energy to the state at a reasonable cost with the impact to the environment and the broad interests of the public, particularly with respect to the direct, indirect, and cumulative impacts on or concerning:
 - a. plants, fish, wildlife, and their habitat, including any threatened, endangered, and sensitive species;
 - b. water quality, streams, rivers, wetlands, and shoreline areas;
 - c. air quality and air pollutant emissions at the facility, in the surrounding neighborhoods or “airshed,” and along the transportation routes;
 - d. greenhouse gas emissions from transportation, refining, and combustion of oil;

- e. geological and soil concerns such as earthquakes, liquefaction, erosion, stability, and landslides;
- f. public health and safety concerns and risks, including but not limited to rail tank car safety; crude oil spill and explosion risks along the rail route, at the facility, in the Columbia River, and in the Pacific Ocean; and respiratory and noise impacts to communities near at the facility and along the transportation routes;
- g. recreational and scenic 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;
- h. Native American treaty-protected hunting, fishing, gathering, and access rights and cultural resources;
- i. economic impacts of the project, including impacts to agriculture, tourism, property values, and rail freight capacity; issues involving the economic viability of the project, including likely future taxes on carbon; and decreasing economic benefits over the life of the project as a clean energy economy continues to grow;
- j. longer-term land-use impacts, such as clean-up and decommissioning after cessation of operation, extended oil clean-up, and continued urban blight following decline and decommissioning of proposed project;
- k. increased rail traffic at rail crossings and associated delays;
- l. increased vessel traffic, increased large vessel traffic, and increased risks of vessel collisions, groundings, and other accidents;
- m. the types of crude oil shipped and their unique properties for health risks, spill clean-up, and climate impacts;
- n. additional induced or incentivized crude oil extraction in North Dakota and the Alberta tar sands; and
- o. local communities and environmental justice issues, including but not limited to noise, odors, toxic fumes, and rail-related traffic and access issues.

PRELIMINARY WITNESS LIST

CRK has not yet identified all of their fact and expert witnesses, but preliminarily anticipate calling the following witnesses:

1. Ms. Susan Harvey: oil spill risk analysis on rail, at facility, on river.

2. Mr. Fred Millar, Ph.D.: rail safety/hazardous materials shipment.
3. Dr. Ranajit Sahu: air toxins, pollution, greenhouse gas emissions.
4. Mr. David Wechner, M.S.: land-use consistency.
5. 3-5 expert witnesses to be identified later on issues of earthquakes and liquefaction, environmental justice impacts, human health impacts, impacts to Fruit Valley Neighborhood, and impacts to other rail uses.

PRELIMINARY EXHIBIT LIST

Because review of the Draft Environmental Impact Statement has not yet been completed, CRK is unable to identify all of its proposed exhibits but preliminarily proffer the following list:

NO.	DOCUMENT DESCRIPTION
	Tesoro Savage Vancouver Energy Distribution Terminal, Application for Site Certification Agreement No. 2013-01 (Volumes I & II, and Appendices A–L) (August 2013; and as amended in Jan. 2014 & Feb. 2014)
	Tesoro Savage Vancouver Energy Distribution Terminal Facility, Draft Environmental Impact Statement (Nov. 2015)
	Direct Testimony of James E. Jorgensen, Quinault Indian Nation, et al. v. City of Hoquiam, et al., Shorelines Hearings Board for the State of Washington, SHB No. 13-012c consolidated (September 5, 2013)
	Testimony of Ervin Joseph Schumacker, Quinault Indian Nation, et al. v. City of Hoquiam, et al., Shorelines Hearings Board for the State of Washington, SHB No. 13-012c consolidated (August 29, 2013)
	Fate and Effect of Oil Spills from the Trans Mountain Expansion Project in Burrard Inlet and the Fraser River Estuary (Tsleil-Waututh Nation’s Record of Written Evidence, Vol. 7 of 9), National Energy Board OH-001-2014, Trans Mountain Pipeline ULC Application for the Trans Mountain Expansion Project, File OF-Fac-Oil-T260-2013-03 02 (May 26, 2015)
	Incardona, J. P., et al., Very low embryonic crude oil exposures cause lasting cardiac defects in salmon and herring, SCIENTIFIC REPORTS, Nature.com (September 8, 2015)

	Heintz, R. A., et al., Delayed effects on growth and marine survival of pink salmon <i>Oncorhynchus gorbusha</i> after exposure to crude oil during embryonic development, MARINE ECOLOGY PROGRESS SERIES (December 8, 2000)
	Heugens, E. H. W., et al., A Review of the Effects of Multiple Stressors on Aquatic Organisms and Analysis of Uncertainty Factors for Use in Risk Assessment, CRITICAL REVIEWS IN TOXICOLOGY (September 29, 2008)
	Ibrahim, A. M. and El-naggar, M. M. A., Ballast Water Review: Impacts, Treatments and Management, MIDDLE-EAST JOURNAL OF SCIENTIFIC RESEARCH (2012)
	Kennish, Michael J., Pollution in Estuaries and Coastal Marine Waters, JOURNAL OF COASTAL RESEARCH SPECIAL ISSUE NO. 12: COASTAL HAZARDS (1994)
	Mantua, N., Tohver, I., Hamlet, A., Impacts of Climate Change on Key Aspects of Freshwater Salmon Habitat in Washington State, THE WASHINGTON CLIMATE CHANGE IMPACTS ASSESSMENT: EVALUATING WASHINGTON'S FUTURE IN A CHANGING CLIMATE, Climate Impacts Group, University of Washington, Seattle, Washington (2009)
	Bash, J., et al., Effects of Turbidity and Suspended Solids on Salmonids, prepared for Washington State Transportation Commission (November 2001)
	Oliveira, M. B., et al., Thermodynamic Modeling of the Aqueous Solubility of PAHs, INDUSTRIAL & ENGINEERING CHEMISTRY RESEARCH, American Chemical Society (April 27, 2009)
	Ort, M. P., Finger, S. E., Jones, J. R., Toxicity of Crude Oil to the Mayfly, <i>Hexagenia bilineata</i> (Ephemeroptera: Ephemeridae), ENVIRONMENTAL POLLUTION, Vol. 90, No. 1 (1995)
	Vinebrooke, R. D., et al., Impacts of multiple stressors on biodiversity and ecosystem functioning: the role of species co-tolerance, OIKOS, Vol. 104, Issue 3 (March 2004)
	Ramachandran, S. D., et al., Oil dispersant increases PAH uptake by fish exposed to crude oil, ECOTOXICOLOGY AND ENVIRONMENTAL SAFETY (2004)
	Aas, E., et al., PAH metabolites in bile, cytochrome P4501A and DNA adducts as environmental risk parameters for chronic oil exposure: a laboratory experiment with Atlantic Cod, AQUATIC TOXICOLOGY 51 (2000)
	U.S. Fish and Wildlife Service, Effects of Oil Spills on Wildlife and Habitat, Alaska Region (December 2004)
	Pipelines and Salmon in Northern British Columbia: Potential Impacts, prepared for the Pembina Institute by David A. Levy, Levy Research Services Ltd. (October 2009)

	Article in Canadian Journal of Fisheries and Aquatic Sciences, Altered growth and related physiological responses in juvenile Chinook salmon (<i>Oncorhynchus tshawytscha</i>) from dietary exposure to polycyclic aromatic hydrocarbons (PAHs), by J.P. Meador et al. (October 2006)
	Article in Environ. Sci. Technol., Effects of Diesel on Survival, Growth, and Gene Expression in Rainbow Trout (<i>Oncorhynchus mykiss</i>) Fry, by Lizzy Mos, et al. (2008)
	Leyda Consulting, Inc., letter regarding Ecological Impacts of Proposed Coal Shipping on the Columbia River Port of Morrow and Port Westward, Oregon (October 30, 2012)
	Article on Oiled Wildlife Response, published by Northwest Area Committee/Regional Response Team (January 2013)
	Heavy Traffic Ahead: Rail Impacts of Powder River Basin Coal to Asia by Way of Pacific Northwest Terminals, Report prepared for Western Organization of Resource Councils (July 2012)
	Heavy Traffic Still Ahead, Report prepared for Western Organization of Resource Councils (February 2014)
	Washington State Transportation Commission, Statewide Rail Capacity and System Needs Study, Final Report, prepared by Cambridge Systematics with Berk & Associates, Inc., et al. (December 12, 2006)
	Washington State 2014 Marine and Rail Oil Transport Study, Department of Ecology, State of Washington (Pub. No. 15-08-010) (March 1, 2015)
	Washington State: Amtrak Cascades Mid-Range Plan, prepared by Washington State Department of Transportation, State Rail and Marine Office (December 2008)
	Letter from Thomas J. Herrmann, Acting Director, Office of Safety Assurance and Compliance, to Jack Gerard, American Petroleum Institute, regarding review of potential safety issues related to the transportation of crude oil by rail (July 29, 2013)
	Statement of Adam Sieminski, Administrator, Energy Information Administration, U.S. Department of Energy, before the Committee on Energy and Natural Resources, U.S. Senate (July 16, 2013)
	Moving Crude Oil by Rail, Association of American Railroads (December 2013)
	U.S. Rail Crude Oil Traffic, Association of American Railroads (June 2015)
	How oil is transported from North Dakota's Williston Basin, THE GLOBE AND MAIL (December 2, 2013)

	AAR Reports Record Second Quarter Crude-by-Rail Data; Decreased Weekly Rail Traffic, Association of American Railroads, Weekly Rail Traffic Summary (August 29, 2013)
	AAR Reports October and Weekly Rail Traffic Gains, 3Q Crude Oil Up Year Over Year, Association of American Railroads, Weekly Rail Traffic Summary (November 7, 2013)
	Monthly Update: August 2015 Production & Transportation, North Dakota Pipeline Authority (October 13, 2015)
	A Joint Report by Shanese Crosby, Robin Fay, Colin Groark, Ali Kani, and Jeffrey R. Smith, Terry Sullivan, Transporting Alberta's Oil Sands Products: Defining the Issues and Assessing the Risks (March 17, 2013)
	A Joint Report by Natural Resources Defense Council, National Wildlife Federation, Pipeline Safety Trust, and Sierra Club, Tar Sands Pipelines Safety Risks (February 2011)
	Washington State Department of Ecology, Publication No. 97 252, Oil Spills in Washington State: A Historical Analysis (April 1997; Rev. March 2007)
	Analysis of the Potential Costs of Accidents/Spills Related to Crude by Rail, Report prepared by Ian Goodman and Brigid Rowan on behalf of Oil Change International, Before the Pipeline and Hazardous Materials Safety Administration (November 8, 2013)
	Deadly Crossing: Neglected Bridges & Exploding Oil Trains, Report prepared by Sean Dixon, Matt Krogh, Larissa Liebmann, Eddie Scher, Waterkeeper Alliance, Riverkeeper & ForestEthics (November 2015)
	Fred Millar, Ph.D., Comments on the Draft Environmental Impact Report for the Valero Benicia Crude-by-Rail Project (September 15, 2014)
	Letter from Kamala D. Harris, Attorney General, State of California, to Amy E. Million, Community Development Department, City of Benicia, regarding Attorney General's Comments on the Draft Environmental Impact Report for the Valero Benicia Crude-by-Rail Project (October 2, 2014)
	PHMSA Regulatory Review of Tank Car Rule - Final Regulatory Impact Analysis, Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains, Docket No. PHMSA-2012-0082 (May 2015)
	Fed. Reg. Notice of Tank Car Rule - Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains, 80 Fed. Reg. 26,644 (May 8, 2015)
	Direct Testimony of Dr. Frank James, In the Matter of the Appeal of Re Sources for Sustainable Communities, et al. v. Equilon Enterprises LLC, et al., Skagit County Hearing Examiner, No. PL14-0396 (January 28, 2015)

	Position Statement on Crude Oil Transport and Storage to Governors of Washington and Oregon from Concerned Washington & Oregon Health Care Professionals, Washington Physicians for Social Responsibility and Oregon Physicians for Social Responsibility (February 2015)
	Bakken Crude Oil Spills—Response Options and Environmental Impacts, CB&I Environmental and Infrastructure, Inc., prepared for Commonwealth of Massachusetts Department of Environmental Planning (June 2015)
	San Juan County Oil Spill Response Capacity Evaluation, produced by Nuka Research & Planning Group, LLC for San Juan County (June 30, 2015)
	Report to the British Columbia Ministry of Environment, West Coast Spill Response Study, Volume 1: Assessment of British Columbia Marine Oil Spill Prevention & Response Regime, prepared by Nuka Research & Planning Group, LLC (March 28, 2015)
	Letter from Cynthia Giles, U.S. Environmental Protection Agency, to Jose W. Fernandez and Dr. Kerri-Ann Jones, U.S. Department of State, regarding the Keystone XL Project, at 3-4 (April 22, 2013)
	U.S. Environmental Protection Agency Report, Volume Estimate for Submerged Line 6B Oil in the Kalamazoo River, prepared by Thomas P. Graan, Ph.D., Weston Solutions, Inc., and Ronald B. Zelt, Professional Hydrologist, U.S. Geological Survey (May 1, 2013)
	Lifecycle Greenhouse Gas Emissions of Petroleum Products from WCSB Oil Sands Crudes Compared with Reference Crudes, Appendix U to the FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE KEYSTONE XL PROJECT, U.S. Department of State, Bureau of Oceans and International Environmental and Scientific Affairs (January 2014)
	Muttitt, G. and Stockman, L., Tracking Emissions: The Climate Impact of the Proposed Crude-by-Rail Terminals in the Pacific Northwest, Sightline Institute and Oil Change International (November 2015)
	Schneising, O., et al., Remote sensing of fugitive methane emissions from oil and gas production in North American tight geologic formations, EARTH'S FUTURE, AGU Publications (September 4, 2014)
	Congressional Research Service Report for Congress, Air Pollution and Greenhouse Gas Emissions from Ships, prepared by James E. McCarthy, Specialist in Environmental Policy (December 23, 2009)
	Air Pollution and Greenhouse Gas Emissions from Ocean-going Ships: Impacts, Mitigation Options and Opportunities for Managing Growth, prepared by Axel Friedrich, Falk Heinen, Fatumata Kamakate, and Drew Kodjak (undated)

	Protecting American Health from Global Shipping Pollution, Establishing an Emission Control Area in U.S. Waters, by Janea Scott and Hilary Sinnamon (undated)
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	BP West Coast Products LLC, Material Safety Data Sheet—Crude Oil (MSDS No. RS296) (May 13, 2002)
	U.S. Environmental Protection Agency, Hazard Characterization Document, Screening-Level Hazard Characterization, Crude Oil Category, Sponsored Chemical, Crude Oil (CASRN 8002-05-9) (March 2011)
	Abrams, L., “Fracking chemicals may be making oil more dangerous,” Salon.com (August 13, 2013)
	Gordon, D., Brandt, A., Bergerson, J., Koomey, J., Know Your Oil: Creating a Global Oil-Climate Index, Carnegie Endowment for International Peace (2015)
	National Academy of Sciences, Spills of Diluted Bitumen from Pipelines: A Comparative Study of Environmental Fate, Effects, and Response (December 8, 2015)
	EJ Screens for Vancouver area, U.S. Environmental Protection Agency (undated)
	Article in Entrepreneur, The effect of freight railroad tracks and train activity on residential property values, by Robert A. Simons and Abdellaziz El Jaouhari (Summer 2004)
	Michael Futch, Examining the Spatial Distribution of Externalities: Freight Rail Traffic and Home Values in Los Angeles (November 11, 2011)
	The Impact of the Development of the Gateway Pacific Terminal on the Whatcom County Economy, prepared by Public Financial Management, Inc. for Communitywise Bellingham (March 6, 2012)
	Report from The Program on Climate Economics, Climate Leadership Initiative, Institute for a Sustainable Environment, and University of Oregon, An Overview of Potential Economic Costs to Washington of a Business-As-Usual Approach to Climate Change, prepared by Ernie Niemi, ECONorthwest (February 17, 2009)
	Economic Analysis of the Non-Treaty Commercial and Recreational Fisheries in Washington State, Final Report, prepared for Washington Department of Fish and Wildlife, by TCW Economics, with technical assistance from The Research Group (December 2008)
	Washington State Maritime Cluster, Economic Impact Study, prepared for Economic Development Council of Seattle and King County and Workforce Development Council of Seattle and King County, by Community Attributes, Inc. (November 2013)

	U.S. Army Corps of Engineers, Minimizing Effects of Over-Water Docks on Federally Listed Fish Stocks in McNary Reservoir: A Literature Review for Criteria, Anadromous Fish Evaluation Program Report 2010-W68SBV91602084 (January 2010)
	Overwater Structures and Non-Structural Piling White Paper, prepared by Jones & Stokes Associates, in association with Anchor Environmental, .L.L.C., for the Washington Department of Fish and Wildlife (December 2006)
	Over-water Structures: Freshwater Issues White Paper, prepared by Jose Carrasquero, Herrera Environmental Consultants, for the Washington Departments of Fish and Wildlife, Ecology, and Transportation (June 14, 2001)
	Letter from Michael P. Tehan, Assistant Regional Administrator, NOAA, to Shawn Zinszer, Chief, Regulatory Branch, Corps of Engineers, regarding Request for Additional Information to Initiate Endangered Species Act Section 7 Consultation and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the Coyote Island Terminals Construction of a New Coal Exportation Dock Facility in the Columbia River (6th field HUC 170701010904), Morrow County, Oregon (Corps No.: NWP-2012-56) (December 27, 2012)
	Letter from Paul Sorensen, Principal, BST Associates, to Mark Larsen, Anchor QEA, regarding the conclusions of their analysis and attaching Impact of the Proposed Terminal at Chinook Ventures on the Capacity of the Columbia River System (September 30, 2010)
	Estuary Habitat MOA, Memorandum of Agreement on Columbia River Estuary Habitat Actions Between the State of Washington, the Bonneville Power Administration, the U.S. Army Corps of Engineers, and the U.S. Bureau of Reclamation (September 2009)
	Oregon Department of Geology and Mineral Industries' Earthquake Risk Study for Oregon's Critical Energy Infrastructure Hub, Final Report to Oregon Department of Energy & Oregon Public Utility Commission, prepared by Yumei Wang, Steven F. Bartlett, and Scott B. Miles (August 2012)
	Liquefaction Susceptibility Map of Clark County, Washington, prepared by Stephen P. Palmer, Samantha L. Magsino, James L. Poelstra, and Rebecca A. Niggemann (September 2004)
	Washington Department of Ecology, Guidance for Ecology, Including Greenhouse Gas Emissions in SEPA Reviews (June 3, 2011)
	Council on Environmental Quality, Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions (Feb. 18, 2010)
	Council on Environmental Quality, Revised Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions (2014)

	Friends of the Columbia Gorge, Columbia Riverkeeper, Northwest Environmental Defense Center, Sierra Club, and Center for Biological Diversity, Land Use Consistency Review for the Proposed Tesoro Savage Energy Distribution Terminal (EFSEC Application No. 2013-01) (May 28, 2014)
	City of Vancouver, City of Vancouver’s Comments Regarding Consistency of Proposal with Land Use Plans and Zoning Regulations: In the Matter of Application No. 2013-01; Docket No. EF-131590 (May 28, 2014)
	Matt Grady, AICP, Testimony on Behalf of Columbia Waterfront LLC (May 28, 2014)
	State of Washington Energy Facility Site Evaluation Council, In the Matter of Application No. 2013-01, Council Order No. 872 (Aug. 1, 2014)
	Eric Holmes, City of Vancouver Manager, Staff Report No. 130-14 (Oct. 20, 2014)
	City of Vancouver, Findings of Fact in Support of Moratorium Crude Oil Facilities Pursuant to RCW Sections 36.70A.390 and 35.63.200 (Oct. 20, 2014)
	City of Vancouver, Ordinance No. M-4090 (Sept. 11, 2014)
	City of Vancouver, Ordinance No. M-4118 (March 2, 2015)
	City of Vancouver, Ordinance No. M-4132 (August 17, 2015)
	City of Vancouver, Vancouver Comprehensive Plan, 2011–2030 (2011)
	Clark County, 20-Year Comprehensive Growth Management Plan, 2004–2024, Chapter 13, Shoreline Master Program (August 29, 2012)
	City of Vancouver, Vancouver City Center Vision & Subarea Plan (June 18, 2007)
	City of Vancouver, Fruit Valley Subarea Plan (Sept. 30, 2007)
	City of Vancouver, Riverview Gateway Subarea Plan (Feb. 2, 2009)
	City of Vancouver, Vancouver Regional Trail and Bikeway Systems Plan (April 6, 2006)
	City of Vancouver & Clark County, Vancouver-Clark Comprehensive Parks, Recreation, & Open Space Plan (May 2007, updated Fall 2009)
	City of Vancouver & Clark County, Vancouver-Clark Comprehensive Parks, Recreation, & Open Space Plan—Proposed Park and Recreation Facilities Map (Oct. 2006)

	City of Vancouver, Vancouver Walking and Bicycle Master Plan—Paths & Trails Element (Discovery Historic Loop Trail) (2009)
	City of Vancouver, Shoreline Master Program (Sept. 24, 2012)
	City of Vancouver, Vancouver Municipal Code (“VMC”) Title 12 (Trees & Vegetation) (2014)
	City of Vancouver, VMC Title 14 (Water & Sewer) (2014)
	City of Vancouver, VMC Title 16 (Fire Code) (2014)
	City of Vancouver, VMC Title 17 (Building Code) (2014)
	City of Vancouver, VMC Title 20 (Development Code) (2012)
	Washington State Amendments to the International Fire Code (2012)
	International Code Council, International Building Code (2012)
	Uniform Building Code, Chapter 70—Excavation and Grading (1991)
	Order, <i>Columbia Riverkeeper v. Cowlitz County</i> , Cowlitz County Super. Ct. No. 07-2-00400-0 (May 2, 2007)
	Cowlitz County, Certificate of Consistency regarding Pacific Mountain Energy Center (Feb. 13, 2007)
	Earthjustice, Scoping Comments on Proposed Tesoro-Savage Vancouver Energy Distribution Terminal: Application No. 2013-01; Docket No. EF-131590 (Dec. 17, 2013)
	Vancouver-Clark Parks & Recreation Department, Columbia River Renaissance Trail & Discovery Historic Loop (Fall 2010)
	Vancouver-Clark Parks & Recreation Department, Vancouver Lake Park and Frenchman’s Bar Park (undated)
	City of Vancouver, Waterfront Development Project (undated)
	City of Vancouver, Waterfront Park Project (undated)
	Johnson Economics, Estimated Economic and Fiscal Impacts of the Tesoro Savage Facility on the Waterfront Vancouver Development and Downtown Vancouver (Dec. 9, 2013)
	Johnson Economics, Predicted Impacts of the Tesoro Savage Facility on Development and Redevelopment in Downtown Vancouver, Washington (Dec. 18, 2013)

	Jorgen Johansson, University of Washington, What is Soil Liquifaction (Jan. 27, 2000)
	Northwest Area Committee & Region 10 Regional Response Team, Environmental Protection Agency, Oiled Wildlife Response (Jan. 2013)
	Columbia River Gorge Commission & U.S. Forest Service, Management Plan for the Columbia River Gorge National Scenic Area (Sept. 2011)
	Elliot Njus, “Port of Vancouver to extend multiuse path that will eventually connect downtown to Vancouver Lake,” <i>Oregonian</i> (Aug. 19, 2013)
	Port of Vancouver USA, Notice of Mitigated Determination of Nonsignificance (MDNS), Port of Vancouver Trail Project, CP0280/281 (March 21, 2014)
	Washington Bikes, Complete the Lower River Trail in Vancouver (Aug. 21, 2013)
	Port of Vancouver, Port of Vancouver USA Strategic Plan 2013–2022 (Jan. 2013)
	Oregon Department of Geology and Mineral Industries, Earthquake Risk Study or Oregon’s Critical Energy Infrastructure Hub, Open File Report 0-13-19 (2013)
	Sightline Institute, The Northwest’s Pipeline on Rails (June 2013)
	Evan Applegate, Twenty Five Years of Oil Spills, Bloomberg Business Week (Mar. 13, 2014)
	Washington Department of Health, SEPA Scoping Comments on the Tesoro Savage Project (Dec. 17, 2013)
	Washington Department of Natural Resources, SEPA Scoping Comments on the Tesoro Savage Project (Dec. 18, 2013)
	National Marine Fisheries Service, A Citizen’s Guide to the 4(d) Rule for Threatened Salmon and Steelhead on the West Coast (June 20, 2000)
	National Oceanic and Atmospheric Agency, Sensitivity of Estuarine and Riverine Environments and Wildlife to Spilled Oil, Columbia River Alas (2004)
	U.S. Department of Homeland Security, FIRM Flood Insurance Rate Map for Clark County, Washington, and Incorporated Areas—Panels 53011 C0363D and 53011 C0364D (Sept. 5, 2012)
	City of Camas, Resolution No. 1235 (March 6, 2012)

	Cornell University, Community and Regional Development Institute, CaRDI Reports, Issue 15 (Nov. 2014)
	U.S. Census Data (2000)
	National Marine Fisheries Service, Endangered Species Act Biological and Conference Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response for the Columbia Pacific Bio-Refinery Barge Dock Expansion, Columbia River (5 th Field HUC 1708000302), Columbia County, Oregon (Corps No.: NWP-2007-998) (June 8, 2015)

Respectfully submitted this 8th day of January, 2016.

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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 98104-1711.

I HEREBY CERTIFY that on January 8, 2016, I served the following document on the parties listed below:

- 1. *Intervenors Columbia Riverkeeper, et al. Preliminary Issues, Witnesses and Exhibits Lists*

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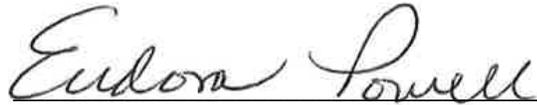
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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Executed this 8th day of January, 2016, at Seattle, Washington.



EUDORA POWELL