

# **Tesoro Savage Vancouver Energy Distribution Terminal**

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## **PART 4 BUILT ENVIRONMENT**



## Section 4.1 – Environmental Health

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WAC 463-60-352

Built environment – Environmental health.

- (1) *Noise. The application shall (a) describe and quantify the background noise environment that would be affected by the energy facility; (b) identify and quantify the impact of noise emissions resulting from construction and operation; (c) identify local, state, and federal environmental noise impact guidelines; (d) describe the mitigation measures to be implemented to satisfy WAC 463-62-030; and (e) describe the means the applicant proposes to employ to assure continued compliance with WAC 463-62-030.*
- (2) *Risk of fire or explosion. The application shall describe any potential for fire or explosion during construction, operation, standby or nonuse, dismantling, or restoration of the facility and what measures will be made to mitigate any risk of fire or explosion.*
- (3) *Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials. The application shall describe any potential for release of toxic or hazardous materials to the environment and shall identify plans for complying with the federal Resource Conservation and Recovery Act and the state Dangerous waste regulations (Chapter 173-303 WAC). The application shall describe the treatment or disposition of all solid or semisolid construction and operation wastes including spent fuel, ash, sludge, and bottoms, and show compliance with applicable state and local solid waste regulations.*
- (4) *Safety standards compliance. The application shall identify all federal, state, and local health and safety standards which would normally be applicable to the construction and operation of a project of this nature and shall describe methods of compliance therewith.*
- (5) *Radiation levels. For facilities which propose to release any radioactive materials, the application shall set forth information relating to radioactivity. Such information shall include background radiation levels of appropriate receptor media pertinent to the site. The application shall also describe the proposed radioactive waste treatment process, the anticipated release of radionuclides, their expected distribution and retention in the environment, the pathways which may become sources of radiation exposure, and projected resulting radiation doses to human populations. Other sources of radiation which may be associated with the project shall be described in all applications.*
- (6) *Emergency plans. The application shall describe emergency plans which will be required to assure the public safety and environmental protection on and off the site in the event of a natural disaster or other major incident relating to or affecting the project as well as identifying the specific responsibilities that will be assumed by the applicant.*

*Statutory Authority: RCW 80.50.040 (1) and (12). 04-21-013, amended and recodified as § 463-60-352, filed 10/11/04, effective 11/11/04. Statutory Authority: RCW 80.50.040. 92-23-012, § 463-42-352, filed 11/6/92, effective 12/7/92.)*



## Section 4.1 Environmental Health

### 4.1.1 Noise

EFSEC rules mandate that the energy facilities it permits must comply with the Washington noise standards and also must assess the potential for impacts from low frequency noise. Washington noise standards identify overall A-weighted sound level limits but do not directly address low frequency noise or potential increases over existing ambient sound levels. Therefore, other noise impact guidelines used in the noise impact analysis include published guidelines regarding low frequency noise.

The noise impact analysis determined that sound levels emitted from the Facility will comply with Washington A-weighted noise limits. In the assessment of impacts from low frequency noise, predicted C-weighted sound levels are at or lower than guidelines suggested to protect against low frequency vibrations and rattles.

#### 4.1.1.1 Affected Environment

##### *Introduction to Noise Technology*

The human ear responds to a very wide range of sound intensities. The decibel scale (dB) used to describe sound is a logarithmic rating system which accounts for the large differences in audible sound intensities. This scale accounts for the human perception of a doubling of loudness as an increase of 10 dB. Therefore, a 70-dB sound level will sound about twice as loud as a 60-dB sound level. People generally cannot detect differences of 1 dB. In ideal laboratory situations, differences of 2 or 3 dB can be detected by people, but such a change probably would not be noticed in a typical outdoor environment. A 5-dB change would probably be clearly perceived by most people under normal listening conditions.

As mentioned above, the decibel scale used to describe noise is logarithmic. On this scale, a doubling of sound-generating activity (i.e., a doubling of the sound energy) causes a 3-dB increase in average sound produced by that source, not a doubling of the loudness of the sound (which requires a 10-dB increase). For example, if traffic along a road is causing a 60-dB sound level at a nearby location, a doubling of the number of vehicles on this same road would cause the sound level at this same location to increase to 63 dB. Such an increase might not be discernible in a complex acoustical environment.

When addressing the effects of noise on people, it is necessary to consider the frequency response of the human ear, or those frequencies that people hear best. Sound measuring instruments are therefore often designed to “weight” sounds based on the way people hear. The frequency weighting most often used to evaluate environmental noise is A weighting because it best reflects how humans perceive sound. Measurements from instruments using this system are reported in “A-weighted decibels,” or dBA. Unless specified otherwise, noise levels are reported in A-weighted decibels.

Low frequency noise is characterized by noise levels at frequencies less than about 100 hertz (Hz). Noise at those frequencies can be annoying to some people even at relatively low levels. Some jurisdictions assess low frequency noise by limiting unweighted sound levels in the octave bands below 100 Hz, typically in the 31.5 and 63 Hz bands. Other jurisdictions assess low frequency noise by an alternative frequency weighting system, C-weighting, which does not

reduce the level of low frequency noise as much as the A-weighting system and is better at describing loud, low frequency sounds. Although low frequency sound is less audible to humans, C-weighting is often used to assess potential annoyance from structural rattling due to low frequency noise. Measurements from instruments using this system are reported in “C weighted decibels” or dBC.

Distance from the source, the frequency of the sound, the absorbency of the intervening ground, obstructions, and duration of the noise-producing event all affect the transmission and perception of noise. The degree of the effect on perception also depends on who is listening (individual physiological and psychological factors) and on existing sound levels (background noise). Typical noise levels of familiar noise sources and activities are presented in Table 4.1-1.

**Table 4.1-1. Common Sound Levels/Sources and Subjective Human Responses**

Thresholds/Noise Sources	Noise Level (dBA)	Subjective Evaluations	Possible Effects on Humans	
Human Threshold of Pain Carrier jet takeoff (50 ft)	140	Deafening	Continuous exposure to levels above 70 can cause hearing loss in majority of population	
Siren (100 ft) Loud rock band	130			
Jet takeoff (200 ft) Auto horn (3 ft)	120			
Chain saw Noisy snowmobile	110	Very Loud		
Lawn mower (3 ft) Noisy motorcycle (50 feet)	100			
Heavy truck (50 feet)	90			
Pneumatic drill (50 feet) Busy urban street, daytime	80	Loud		
Normal automobile at 50 mph Vacuum cleaner (3 ft)	70			
Large air conditioning unit (20 feet) Conversation (3 feet)	60	Moderate		Speech Interference
Quiet residential area Light auto traffic (100 ft)	50			
Library Quiet home	40	Faint	Sleep Interference	
Soft whisper	30			
Slight rustling of leaves	20	Very Faint		
Broadcasting Studio	10			
Threshold of Human Hearing	0			

Note that both the subjective evaluations and the physiological responses are continuous without true threshold boundaries. Consequently, there are overlaps among categories of response that depend on the sensitivity of the noise receivers.

**Noise Standards**

This evaluation includes noise criteria established by EFSEC, the State of Washington, and the City of Vancouver (City).

**EFSEC** – Energy facilities seeking permits from EFSEC are subject to section 463-60-352 of the WAC (WAC 463-60-352). The code states that applications should:

- Describe and quantify the background noise environment that would be affected by the energy facility
- Identify and quantify the impact of noise emissions resulting from construction and operation of the energy facility, using appropriate state-of-the-art modeling techniques, and including impacts resulting from low frequency noise
- Identify local, state, and federal environmental noise impact guidelines
- Describe the mitigation measures to be implemented to satisfy WAC 463-62-030
- Describe the means the Applicant proposes to employ to assure continued compliance with WAC 463-62-030

WAC 463-62-030 states that energy facilities shall meet the noise standards established in Chapter 70.107 RCW, the Noise Control Act of 1974 as implemented in the requirements in 173-60 WAC. These requirements are described below.

**Washington State Standards** – EFSEC rules mandate that the Applicant comply with the noise standards established in WAC 173-60, which establishes the maximum noise levels permissible in identified environments pursuant to Chapter 70.107 of the RCW. The state noise limits are based on the environmental designation for noise abatement (EDNA) of the noise source and the receiving properties. EDNAs are designated by class; Class A generally corresponds to residential areas or areas where people sleep, Class B EDNAs to retail and commercial areas, and Class C EDNAs to industrial and agricultural areas. The class of a property is typically determined by its predominant land use. The noise limits for each land use classification are presented in Table 4.1-2.

**Table 4.1-2. Washington Maximum Permissible Sound Levels (dBA)**

EDNA of Noise Source	EDNA of Receiving Property		
	Class A <sup>1</sup> (Residential)	Class B (Commercial)	Class C (Industrial)
Class A	55/45	57	60
Class B	57/47	60	65
Class C	60/50	65	70

<sup>1</sup>Sound limits shall be reduced by 10 dBA between the hours of 10 p.m. and 7 a.m. at Class A EDNAs  
Source: WAC Chapter 173-60

The noise limits presented in Table 4.1-2 can be exceeded for certain periods of time: 5 dBA for no more than 15 minutes in any hour, 10 dBA for no more than 5 minutes of any hour, or 15 dBA for no more than 1.5 minutes of any hour. Sometimes these exceptions are described in terms of the percentage of time a certain level is exceeded. For example, L<sub>25</sub> represents a statistical sound level that is exceeded 25 percent of the time, or 15 minutes in an hour. Similarly, L<sub>8.33</sub> and L<sub>2.5</sub> are the sound levels that are exceeded 8.33 and 2.5 percent of the time, or 5 and 1.5 minutes in an hour, respectively. At no time can the allowable sound level be exceeded by more than 15 dBA, represented by the L<sub>max</sub>.

The Facility would be considered a Class C noise source. In practice, a Class C noise source may not generate a sound level (L<sub>25</sub>) exceeding 70 dBA at nearby Class C EDNAs (i.e., industrial properties) during daytime and nighttime hours. At the nearest Class A EDNAs, noise generated

by the Facility would be limited to 60 dBA during daytime hours (7 AM to 10 PM) and 50 dBA during nighttime hours. Because the proposed Facility could operate 24 hours per day, it must be designed to meet the 50 dBA nighttime limit at any Class A EDNAs.

WAC 173-60-050 identifies several sources of noise that are exempt from the noise limits displayed in Table 4.1-2. These include the following:

- Traffic on public roads
- Sounds from surface carriers engaged in interstate commerce by railroad
- Sounds from temporary construction activities between 7 AM and 10 PM

**City of Vancouver Noise Standards** – Chapter 20.935 of the Vancouver Municipal Code (VMC 20.935) identifies performance standards for proposed land uses and development activities, including standards for noise. Section 20.935.030(A) applies the noise limits and exemptions established by WAC 173-60, as identified in the previous section. In addition to the WAC noise limits and exemptions, the City restricts construction activities, including construction staging, to between 7 AM and 8 PM, 7 days a week.

**Federal Noise Standards** – There are no federal regulations that establish noise limits on the sound emanating from the proposed Facility as it affects surrounding properties.

**Low Frequency Noise Guidelines** – Energy facilities seeking permits from EFSEC are required to identify potential low frequency noise impacts in their permit applications (WAC 463-60-352). But Washington does not apply specific regulatory limits on low frequency noise nor provide any basis for assessing impacts from such noise. Therefore, to provide a means for considering potential noise impacts from low frequency noise, an appropriate noise guideline was determined based on the review of several sources that consider this issue. ANSI Standard B133.8 Gas Turbine Installation Sound Emissions indicates that a 75 to 80 C-weighted decibels or dBC (C-weighting as defined in this section) sound level should be used as an upper limit to prevent structural vibrations and rattling. Several other documents and studies have indicated that 70 dBC is a more appropriate minimum threshold to prevent rattles and vibrations from low frequency noise.<sup>14, 15, 16</sup> The analysis reported here therefore applied the more conservative noise level of 70 dBC as a guideline to protect against impacts from low frequency noise.

### ***Existing Sound Levels***

The existing noise environment has been previously characterized by sound level measurements (SLMs) taken on nearby parcels for various other projects. These sound levels were taken with Type I sound level meters over periods ranging from several days to a week. The measured sound levels are summarized in Table 4.1-3 and the locations are briefly described below and displayed in Figure 4.1-1.

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<sup>14</sup> Environmental Sound Survey and Noise Impact Assessment – Dairy Hills Wind Farm Project, Perry, NY. Hessler Associates, Inc. May 3, 2006.

<sup>15</sup> Aesthetic and Noise Control Regulations. Rule 802d of the Colorado Oil and Gas Conservation Commission, (COGCC).

<sup>16</sup> *PARTNER - Low Frequency Noise Study*, April 6, 2007. Prepared by Kathleen K. Hodgdon, Anthony A. Atchley, and Robert J. Bernhard.

- *SLM1* – Sound level measurements were taken over a 48-hour period in October 2005 in the Fruit Valley residential area northeast of the proposed Facility.
- *SLM2* - Noise monitoring was conducted at the Jail Work Center over several periods for different projects. A 72-hour measurement was taken between March 31 and April 3, 2009. Additional measurements for a different project were taken at the Jail Work Center during four 5-day periods between July and October 2012. Some of the measured levels in 2012 included noise from construction of the NW Gateway Avenue Overcrossing.
- *SLM3* – Sound level measurements were captured over four 5-day periods between July and October 2012 at the western property boundary of the Terminal 5 site. This measurement location represents the Tidewater office building. This location is identified as SLM3 in Figure 4.1-1.

**Table 4.1-3. Range of Measured Sound Levels in Project Vicinity (dBA)**

SLM Location	Date	Source	Daytime Leqs	Nighttime Leqs	Ldn
SLM1 – Fruit Valley Residential Area	October 2005	1	49-65	42-65	58
SLM2 – Jail Work Center	March-April 2009	1	55-68	50-61	64
	July - October 2012	2	53-74	39-64	61-68
SLM3 – West Side of T5	July - October 2012	2	46-76	40-72	56-71

Sources:

- (1) West Vancouver Freight Access Project, Schedules 2 through 4, Port of Vancouver; Noise and Vibration Discipline Report; July 2009; ICF Jones & Stokes.
- (2) BHP-Billiton POV Terminal 5 Environmental Monitoring; July through October 2012; ENVIRON International Corporation.

#### 4.1.1.2 Environmental Noise Impacts

##### *Construction*

During the construction phase of the project, noise from construction activities could add to the noise environment in the immediate vicinity of the site. The nearest sensitive use to construction of the proposed Facility is the eastern housing unit of the Jail Work Center, which is just over 400 feet from the proposed pipeline from the storage tank area to the ship loading dock. The nearest residences are approximately 3,000 feet from the proposed tank holding area. The Tidewater office building is just over 100 feet from the nearest proposed rail line associated with the Facility. Typical sound levels associated with construction activities at these distances are displayed in Table 4.1-4.



**Figure 4.1-1. Background Noise Measurement Location and Receptors**

**Table 4.1-4. Typical Construction Equipment Noise**

Activity	Range of Hourly Leqs (dBA)		
	At 100 Feet	At 400 Feet	At 3,000 Feet
Clearing	77	65	47
Grading	70-82	58-70	40-52
Paving	67-82	55-70	37-52
Erecting	67-78	55-66	37-48
Types of Equipment	Range of Noise Levels (dBA)		
	At 100 Feet	At 400 Feet	At 3,000 Feet
Bulldozer	71-90	59-78	41-60
Dump Truck	76-88	64-76	46-58
Scraper	74-87	62-75	44-57
Paver	80-82	68-70	50-52
Generator	65-76	53-64	35-46
Compressor	68-75	56-63	38-45

Source: EPA, 1971

As shown in Table 4.1-4, the estimated hourly Leqs at the nearest residences (more than 3,000 feet) are below the noise level limit of 60 dBA that would apply to long-term operational noise. In addition, the calculated construction sound levels at the housing units of the Jail Work Center (the nearest sensitive receivers to the site at approximately 400 feet from the nearest construction area) would fall within the existing range of measured hourly Leqs.

Per WAC 463-62-030, EFSEC requires that energy facilities meet the noise standards established in 173-60 WAC. WAC 173-60-050 exempts construction noise from any limits on noise levels between 7 AM and 10 PM but places no additional constraints on construction activities. Section 20.935.030(4) of the Vancouver Municipal Code restricts outdoor construction activity to between 7 AM and 8 PM, seven days a week. Although the VMC standard is superseded by the State standard for an EFSEC-permitted facility, the Applicant will, to the greatest extent feasible, schedule noisy construction activities to the hours identified in VMC 20.935.030(4). If outdoor construction is required beyond the hours of 7 AM to 8 PM, the Applicant will consult with the City of Vancouver, will notify EFSEC in advance, and will not conduct the work until EFSEC has reviewed and approved the planned activities.

Restriction of construction to daytime hours, the temporary nature of construction noise, the distances between the residential uses and most of the construction areas, and the presence of existing noise at nearby sensitive receivers would serve to minimize potential noise impacts from construction activities.

### **Operation**

**Noise Sources** – The Facility would generate noise from a number of sources associated with petroleum product rail unloading, storage, ship loading, and transport. Some of these sources are relatively quiet, and these quieter sources would not be audible when the louder equipment is operating. Therefore, this evaluation focused on the loudest noise sources associated with the Facility, including pumps, compressors, blowers, and the MVCU. Equipment that would be located inside buildings (i.e., the boilers and the rail unloading pumps) is not expected to

substantially contribute to the overall Facility noise and was not included in the analysis (see Table 4.1-5).

Table 4.1-6 summarizes the A-weighted sound pressure levels associated with the dominant noise sources examined in this assessment. The Sound Power Level (SWL) and octave band data are provided in Table 4.1-7.

**Table 4.1-5. Summary of Major Facility Noise Sources**

Source	Data Source	No. of Units	Approximate Sound Pressure Level at 100 ft (dBA)
<b>Rail Unloading (Area 200)</b>			
Compressor	1	1	72
Transformer	1	3	54
<b>Storage (Area 300)</b>			
Pumps	2	1	64
Transformer	1	1	54
<b>Marine Terminal (Area 400)</b>			
Marine Vapor Combustion Unit	3	8	67
Vapor Blower Skid	1	3	59
Dock Safety Unit	1	1	59
<b>Train Sources</b>			
Locomotives (10 mph)	4	3	54 (Hourly Leq)
Rail Cars (10 mph)	4	7000 feet	52 (Hourly Leq)

Sources:

- (1) Based on equipment sound levels from previous ENVIRON noise analyses
- (2) Based on a sound level of similar petroleum product off-loading pumps
- (3) Based on a sound level of 85 dBA identified by the manufacturer. ENVIRON applied the sound level at three feet from the base of the stack and at the upper rim of the stack.
- (4) CadnaA v4.1. DataKustik GmbH. FRA/FTA module.

Note: Please note that engineering and equipment selection has not been finalized and that the above equipment sound levels are speculative. They are used in this analysis to represent a reasonable estimate of overall future sound levels from the proposed Facility.

**CadnaA Noise Model** – Noise anticipated to be generated by operation of the Facility was evaluated at nearby receivers using the CadnaA noise model. CadnaA is a computer program that calculates sound levels after considering the noise reductions or enhancements caused by distance, topography, ground surfaces (including water), atmospheric absorption, and meteorological conditions in compliance with ISO-9613-2:1996. The modeling includes the following steps: (1) characterizing the noise sources, (2) creating three-dimensional (3-D) maps of the site and vicinity to enable the model to evaluate effects of distance and topography on noise attenuation, and (3) assigning the equipment sound levels to appropriate locations on the site. CadnaA then constructs topographic cross sections to calculate sound levels in the vicinity of a project site.

In addition to using the ISO 9613 procedures in CadnaA for on-site equipment, ENVIRON used the Federal Railroad Administration (FRA)/Federal Transit Administration (FTA) module available in CadnaA for modeling noise due to moving trains. This module computes train noise

using the source levels and methods outlined by the FRA. The trains were specified to consist of three locomotives and be approximately 7,000 feet in length. The train was specified to travel 10 mph while on the site, although it is expected that trains would generally travel slower than 10 mph, and the resulting rail-related noise would be lower than modeled.

For the modeling effort, ENVIRON used numerous modeling “receptor” locations representing the off-site uses nearest the project site. The modeling receptors considered in the noise modeling are depicted in Figure 4.1-1 and described in more detail below.

- R1 – The southwest corner of the Jail Work Center representing the western housing unit, which is nearest the rail line. The housing units of the Work Center are considered Class A EDNAs when applying the WAC noise limits.
- R2 – The southeast corner of the Jail Work Center representing the eastern housing unit, which is nearest the pipeline and marine terminal. The housing unit is considered a Class A EDNA.
- R3 – The Tidewater Office Building near the northwest corner of the site. The office building is considered a Class B receiving property (e.g., commercial).
- R4 – The CPU facility north of the site. This is a Class C (Industrial) receiving property.
- R5 – The nearest residential structure northwest of the site, a Class A receiving property.
- R6 and R7 – Residences in the Fruit Valley residential community northeast of the site, both considered Class A receiving properties.

**Predicted A-weighted Sound Levels at Nearby Receiving Properties** –Modeled A-weighted sound levels with the equipment above are presented below.

**Table 4.1-6. Modeled A-Weighted Sound Levels (Hourly Leq, dBA)**

Receptor	MVCU Option 1		WAC Noise Limit <sup>1, 2, 3</sup>
	Without Train Arrival	With Train Arrival	
R1 – SW Jail Work Center	47	50	60/50
R2 – SE Jail Work Center	50	51	60/50
R3 – Tidewater	39	58	65
R4 – CPU	45	59	70
R5 – NW Residence	33	39	60/50
R6 – Fruit Valley Residence	37	37	60/50
R7 – Fruit Valley Residence	36	36	60/50

<sup>1</sup> The noise limits do not apply to rail noise and are only applicable to the No Train scenarios. Noise from surface carriers engaged in interstate commerce by railroad is exempt from the WAC noise limits (WAC 173-60-050).

<sup>2</sup> The noise limits for Class A receivers (e.g., residences and housing facilities) are displayed as Day/Night where Day refers to the hours between 7 AM and 10 PM and Night refers to the hours between 10 PM and 7 AM. Because the Facility could operate 24-hours a day, the more restrictive nighttime noise limit would apply.

<sup>3</sup> The WAC noise limit shown in the table uses the hourly L25 noise descriptor. The primary noise sources from the site would emit fairly continuous noise, and the modeled hourly Leq would essentially be the same as the hourly L25. Because it is not a continuous noise source, the modeled hourly Leq of railroad-related noise may differ from the hourly L25. However, railroad noise is exempt from the WAC noise limits, so comparisons of the “With Train” scenario sound levels to the WAC noise limits are unnecessary.

**Table 4.1-7. Equipment Octave Band Sound Levels**

Equipment	Sound Power Levels (Octave Bands (Hz))									Total Sound Power Level		
	31.5	63	125	250	500	1000	2000	4000	8000	Linear	A-Wght	C-Wght
<i>Rail Unloading (Area 200)</i>												
Compressor	72	72	71	69	69	71	75	74	70	81	80	81
Transformer	95	95	95	97	95	87	80	73	66	103	95	102
<i>Storage (Area 300)</i>												
Pumps	51	65	81	89	95	100	100	96	83	104	105	104
Transformer	95	95	95	97	95	87	80	73	66	103	95	102
<i>Marine Terminal (Area 400)</i>												
MVCU	117	117	116	117	107	102	95	91	90	123	111	122
Vapor Blower Skid	106	106	105	106	96	91	84	80	79	112	100	111

As shown in Table 4.1-6, the modeled sound levels would comply with the most restrictive nighttime noise limits at the nearest off-site receivers to the Facility. Furthermore, the modeled sound levels at the nearest residences to the site are well below even the nighttime noise limit. During those hours that include a train arrival, the modeled sound levels at most locations would continue to be below the State noise limits (although the limits do not apply to noise emitted by the railroad). The exception is at R2, representing the eastern housing unit at the Jail Work Center, where the modeled level is 1-dBA higher than the nighttime noise limit. This falls within the range of error of the noise model.

**Predicted C-weighted Sound Levels at Nearby Receiving Properties** – The Facility is still in preliminary design, and final equipment has yet to be determined. Therefore, accurate estimates of low frequency noise associated with the major on-site equipment are not yet available. However, frequency data of similar sources were used to estimate potential low frequency sound levels and overall C-weighted sound levels in order to assess the potential impacts from low frequency noise. The primary source of low frequency noise is anticipated to be the MVCU.

The predicted C-weighted sound levels using our presumed frequency data are presented in Table 4.1-8.

**Table 4.1-8. Modeled C-Weighted Sound Levels<sup>1</sup>**

Receptor	Modeled Level	Guideline/Limit
R1 – SW Jail Work Center	60	70
R2 – SE Jail Work Center	62	70
R3 – Tidewater	51	70
R4 – CPU	57	70
R5 – NW Residence	46	70
R6 – Fruit Valley Residence	49	70
R7 - Fruit Valley Residence	49	70

<sup>1</sup> The modeled C-weighted sound levels do not include train noise. The FRA noise prediction method used by CadnaA does not include frequency data for the train sources.

As seen in Table 4.1-88, the estimated C-weighted sound levels are less than 70 dBC from the Facility, which would protect against undue impacts from low frequency noise.

#### 4.1.1.3 Mitigation Measures

##### *Construction*

Construction would occur only during daytime hours to reduce the potential for noise impacts from this activity. Construction noise is exempt from the Washington noise limits during daytime hours.

The Applicant will, to the greatest extent feasible, schedule noisy construction activities to the hours identified in VMC 20.935.030(4), i.e., between 7 AM and 8 PM. If outdoor construction is required outside of these hours, the Applicant will consult with the City, will notify EFSEC in advance, and will not conduct the work until EFSEC has reviewed and approved the planned activities.

## ***Operation***

Modeled sound levels of the Facility would comply with the applicable Washington State noise limits. Therefore, no operational noise mitigation is proposed.

### **4.1.2 Risk of Fire or Explosion**

This section addresses for the risk of fire or explosion during the construction, operation, standby and/or nonuse, dismantling and/or restoration of the Facility and what measures will be implemented to mitigate risk of fire or explosion.

#### **4.1.2.1 Construction**

The risk of fire or explosion during the construction of the Facility is generally related to the storage and use of flammable materials, including petroleum products such as vehicle fuel, solvents, cleaners, and welding gases. The proposed Facility is located in a developed industrial zone; the majority of the areas proposed for the project are devoid of vegetation thereby limiting the potential for fire propagation due to combustible vegetation. During the first phases of construction, patches of existing vegetation where project facilities are proposed will be graded and the vegetation removed, thereby reducing fire risk. With proper storage of these materials on site and proper material handling and work practices, the risk of fire during construction is very low. The Applicant will conduct construction activities and provide firefighting and response equipment in compliance with WAC 296-155 Part D, NFPA 241 (Standard for Safeguarding Construction, Alteration, and Demolition Operations) and NFPA 5000 (Building Construction and Safety Code).

As discussed in Section 4.1.4 below, Washington State chose to run its own workplace safety and health program, under the Washington Industrial Safety and Health Act (WISHA). WISHA safety standards are as stringent as or more stringent than applicable federal Occupational Health and Safety Administration (OSHA) codified in 29 CFR 1926; WISHA standards are implemented through WAC 296.

The Applicant will consult with the Port, City fire officials, and other emergency responders to ensure their response is coordinated with the Applicant's provisions for construction site fire control, existing firefighting facilities, and capabilities at the site (i.e., fire hydrants). Fire prevention and control will include, but not be limited to:

- Ensuring that appropriate firefighting equipment (i.e., extinguishers) is staged in the construction areas, either in fixed locations or on mobile construction vehicles as appropriate.
- Ensuring that highly flammable materials are identified, stored, and handled in accordance with applicable fire prevention and safety regulations.
- Managing combustible wastes to prevent fires.
- Implementing appropriate work procedures so that fires are prevented (e.g. hot work and welding).
- Limiting smoking to approved areas.
- Providing fire safety training to all construction personnel, including the identification of ignitions sources, the initiation of fire alarms, the use of established egress routes and locations, worker gathering locations, and procedures for notification of emergency responders.
- Providing first responders with maps that identify primary and secondary site access locations in the event of a fire.

The construction management lead will develop and implement a construction fire prevention and response plan addressing the procedures for fire prevention and response. The fire prevention plan will be a component of the Facility construction site safety plan and will address:

- A list of the major construction workplace fire hazards and their proper handling and storage procedures, potential ignition sources (such as welding, smoking, and others) and their control procedures, and the type of fire protection equipment or systems that can control a fire involving them;
- Names or regular job titles of those construction site personnel responsible for maintenance of equipment and systems installed to prevent or control construction related ignitions or fires; and
- Names or regular job titles of those personnel responsible for control of fuel source hazards at the construction site.

The construction fire prevention and response plan will be submitted to EFSEC for review and approval prior to the beginning of construction activities.

#### 4.1.2.2 Operations

##### *Flammability Characteristics of Crude Oil*

As noted in the introduction in section 2.10.1.2, the Applicant proposes to handle light and heavy crude oils with an API gravity ranging from 10 to 45.

Across this spectrum crude oils contain a variable mixture of light and heavy hydrocarbons. Light crude oils contain a higher proportion of lower molecular weight (“light”) hydrocarbons, resulting in an overall higher vapor pressure, i.e., they vaporize more easily at ambient temperature and pressure. Heavier crude oils contain a smaller proportion of light hydrocarbons, resulting in lower vapor pressures – i.e., they vaporize less easily at ambient temperature and pressure. As described below, the vapor pressure of crude oils is an important factor in their flammability.

NFPA standard 704 (NFPA 704), *Standard System for the Identification of the Hazards of Materials for Emergency Response*, establishes a standard system for evaluating the flammability rating of materials. NFPA 704 establishes five Degrees of Flammability Hazards, ranging from Degree of Hazard “0” – materials that will not burn under normal conditions, to Degree of Hazard “4” - materials that will burn readily under normal conditions. Table 4.1-9 presents the specific definition of the NFPA 704 Degrees of Flammability Hazards.

**Table 4.1-9. NFPA 704 Table 6.2 Degrees of Flammability Hazards**

Degree of Hazard	Definition
0	Materials that will not burn under typical fire conditions, including intrinsically noncombustible materials such as concrete, stone, and sand.
1	Materials that must be preheated before ignition can occur. Materials in this degree require considerable preheating, under all ambient temperature conditions, before ignition and combustion can occur. Materials in this degree also include finely divided suspended solids that do not require heating before ignition can occur.
2	Materials that must be moderately heated or exposed to relatively high ambient temperature before ignition can occur. Under normal conditions, these materials would not form hazardous atmospheres with air, but under high ambient

Degree of Hazard	Definition
	temperatures or under moderate heating they could release vapor in sufficient quantities to produce hazardous atmospheres with air. Materials in this degree also include finely divided suspended solids that do not require heating before ignition can occur.
3	Liquids and solids (including finely divided suspended solids) that can be ignited under almost all ambient temperature conditions. Materials in this degree produce hazardous atmospheres with air under almost all ambient temperatures or, though unaffected by ambient temperatures, are readily ignited under almost all conditions.
4	Materials that will rapidly or completely vaporize at atmospheric pressure and normal ambient temperature or are readily dispersed in air and burn readily.

The Degree of Hazard is based on a material's "boiling point" and "flashpoint." The boiling point is the temperature at which a liquid begins to vaporize. For the purposes of NFPA 704, the boiling point is the temperature at which the vapor pressure of a liquid equals the surrounding atmospheric pressure. The flashpoint of a material is the minimum temperature at which a liquid or a solid emits vapor sufficient to form an ignitable mixture with air near the surface of the liquid or solid. The NFPA adopts standard test measures for determining boiling points and flashpoints. Generally speaking, materials with a high flashpoint will only emit ignitable vapors at higher temperatures. Materials with low flashpoints will emit ignitable vapors at lower temperatures.

Based on this standard Degree of Hazard, crude oils fall into NFPA 704 degrees 3 and 4. Heavier crude oils are more likely to fall into degrees 2 and 3 and will require the application of heat to produce ignitable vapors. Lighter crude oils are more likely to fall into degrees 3 and 4 and can be ignited at most ambient temperatures. Regardless of the degree, the presence of three conditions is necessary to cause a material to ignite: (1) the presence of combustible components (the fuel); (2) the presence of an oxidizing chemical in the correct proportions to the combustible components (e.g., air), and (3) the presence of an ignition source. Without all three of these components, a material will not burn. For example, in order for a hydrocarbon/air mixture to ignite, the hydrocarbon-to-air ratio has to be 1 to 6 percent (for example, 1 percent fuel and 99 percent air). This ratio varies depending on the specific hydrocarbons that are present. Avoiding the generation of vapors, minimizing exposure to oxygen, and avoiding sources of ignition allows safe handling of crude oil under typical industrial conditions. However, should these conditions not be avoided, ignition of the vapors emitted by crude oil can cause a fire, whereby the vapors are combusted; however, in the absence of the presence of these ignitable vapors, liquid crude oil will not ignite even in the presence of air, under ambient pressures and temperatures.

As noted above, the vapors emitted from crude oils can ignite when mixed with air in the appropriate proportions, and when an ignition source is present. "Flashbacks" and "boilovers" are two extreme, but very rare under typical handling conditions, types of events related to vapor ignition that can be erroneously construed as explosions. Flashbacks and boilovers can occur during the inappropriate handling of many types of materials that can produce ignitable or expandable vapors, not just crude oils. A flashback can occur when a large amount of an ignitable vapor/oxidizing mixture is suddenly ignited. Because of the large amount of fuel present in gaseous form, the combustion of the fuel occurs very quickly over a large area,

causing a flashback. Boilovers are caused by an entirely different set of circumstances. Three key elements must be present for boilover to occur in its severest form: an open top tank fire (due to ignited hydrocarbon vapors on the surface of the crude oil); a water layer in the tank (present from water being sprayed into the surface of oil to abate the ignited vapors), and the development of a high temperature, relatively dense hot zone in the stored product – usually the surface layer of crude oil under the ignited vapors that has been heated to a very hot temperature. When the hot zone of product falls through the fuel and hits the water base at the bottom of, or elsewhere in the tank, the water boils, turns to steam and pushes up through the fuel above. The result is an eruption of tank contents that can boil over the tank walls, and spread beyond the tank. As described further below, the Facility will be carefully designed to avoid the potential for both flashbacks and boilovers.

Although crude oil does not generally have the characteristics of a reactive or explosive material, one of its components, hydrogen sulfide (H<sub>2</sub>S), when emitted in large enough concentrations, can explode. Hydrogen sulfide is a highly flammable, explosive gas. The explosive range of hydrogen sulfide in air is 4.5 to 45.5 percent. This range is much higher than the personal exposure limit (PEL) (see section 4.1.4).

### ***Potential for Fire and Explosions at the Facility***

Fire and explosion hazards at the Facility may result from the presence of combustible gases and liquids and ignition sources during rail unloading and vessel loading activities, releases of flammable liquids and gases, and maintenance activities involving combustible or ignitable materials or equipment that is handling or has handled such materials. Possible ignition sources include sparks associated with the buildup of static electricity, lightning, and open flames. Static electricity may be generated by crude oil moving in contact with other materials, including pipes, transfer pipelines, and storage tanks during crude oil conveyance. Water mist and steam generated during maintenance related tank and equipment cleaning can also become electrically charged, in particular with the presence of chemical cleaning agents. Finally improper hot-work practices, or smoking outside of approved areas could also cause fires.

Mechanical explosions result when a sealed or partially sealed container bursts under internal pressure. Under some conditions, crude oil being stored under anomalous conditions could produce vapors, that when constrained to a certain volume under high pressure could cause the failure of the storage system. Chemical explosions may occur if H<sub>2</sub>S is released in sufficient quantities.

### ***Fire Prevention and Suppression***

Fire prevention actions during operations will be directed towards Facility design to avoid conditions that could lead to a fire, and implementing appropriate practices to safely handle and work in the vicinity of flammable materials.

Fire suppression actions during operations will be directed towards integrating fire suppression systems into the design of the Facility, and developing and implementing a fire response plan.

The Facility will be designed and operated according to federal, state, and local standards for the prevention of fire and explosion hazards, including provisions for distances between tanks in the Facility and between the crude oil-handling facilities and adjacent buildings. Examples of other risk-based management approaches that can be implemented include:

- Implementing safety procedures for unloading of crude oil from rail cars and loading to vessels, including using fail-safe control valves and emergency shutdown equipment.
- Protecting against potential ignition sources and lightning by (1) proper grounding to avoid static electricity buildup and formal procedures for the use and maintenance of grounding connections; (2) using intrinsically safe electrical installations and non-sparking tools; and (3) implementing permit systems and formal procedures for conducting any hot work during maintenance activities, including proper tank cleaning and venting.
- Reducing emissions of VOCs and evaporative losses by:
- Conducting all unloading, conveyance, storage and loading operations using a closed system, where product is not exposed to the atmosphere;
- Using a double seal internal floating roof in each of the crude oil storage tanks to eliminate vapor space;
- Installing pressure, flow and temperature sensors to ensure all storage and conveyance activities are conducted within appropriate parameters, and to quickly identify any abnormal situations that could potentially lead to a fire;
- Designing electrical equipment to WAC 296-24-95711 which addresses the requirements for electric equipment and wiring in locations that are classified depending on the properties of the flammable vapors, liquids or gases, or combustible dusts or fibers that may be present therein and the likelihood that a flammable or combustible concentration or quantity is present.
- Installing a dock safety unit at the loading berth and a MVCU to minimize the risk of explosive conditions being created during the marine vessel loading operations;
- Requiring all personnel to wear Lower Explosive Limit (LEL) detectors to detect hydrocarbon concentrations that could lead to ignition conditions; requiring all personnel to wear H<sub>2</sub>S detectors to detect H<sub>2</sub>S concentrations that could be unsafe.
- Using environmentally friendly firefighting foam, such as Universal Gold Foam (National Foam, 1999)

Fire suppression equipment will be installed to allow control of fires should they occur. Fire suppression equipment and systems will be designed to NFPA and API requirements, the more stringent Factory Mutual Global insurance requirements, and state and local regulations, and will include automatic and engineered controls. Buildings will be fireproofed and emergency egress will be provided in accordance with applicable fire and building codes. All fire suppression systems will be designed to activate automatically and will be equipped with manual trip stations. The design of fire suppression systems for specific proposed project elements is discussed below.

**Area 200 – Unloading and Office.** The rail car unloading area will be served with single interlock pre-action 3 percent foam/water sprinkler systems designed to activate as necessary in five segments of the building. Design density will be 0.30 gallon per minute/4,000 square feet with a hose allowance of 500 gallons per minute. The system will include linear heat detectors, gas detectors, temperature monitors, pump monitors, automatic exterior alarm horns and strobes, manual alarm stations, automatic and manual foam release systems, and tamper-resistant systems. Fire hydrants will be located along the south side of the building at 300-foot intervals. All systems will interface with the rail car unloading building control room.

The office and support buildings will be equipped with extinguishers.

**Area 300 – Storage.** The storage tank area will be served by six foam water sprinkler zones, one per storage tank. Each foam water sprinkler zone will be designed to discharge into the inside of the storage tank it protects. The system will include linear heat detectors and warning horns and strobes, as well as manual alarm and foam release stations. A fire water loop will be provided with hydrants and monitors spaced at a maximum of 300 feet and configured so that each tank can be reached by two hose streams. Each tank will be protected by a fixed 3-percent foam/water suppression system on the seal area surface. All systems will interface with the tank area control room. The east boiler building in Area 300 will be served by adjacent hydrants. Smoke detectors, automatic and manual alarms, and hand held fire extinguishers, will be located as appropriate inside and outside the boiler building as required by local fire code. Based on the construction type and occupancy classification sprinkler systems are not necessary for fire control in the east boiler building.

**Area 400 – Marine Terminal.** Two elevated fire monitors will be installed at the marine loading dock, with hydrants connected to the existing on-site water supply. This system is primarily for fires on the berth, but can be used to assist in the event of a vessel fire.

The vessels berthing at the Marine Terminal are required to have on-board systems as well as contracts with commercial marine firefighting companies to respond in the event of a shipboard fire (see Appendix B.1).

**Area 500 - Transfer Pipelines.** The pipeline area will be served by existing and new (as constructed to serve specific Facility areas) hydrants in the vicinity of the pipeline alignment.

**Area 600 – West Boiler.** The boiler building and area will be served by adjacent hydrants. Smoke detectors, automatic and manual alarms, and hand held fire extinguishers, will be located as appropriate inside and outside the boiler building as required by local fire code. Based on the construction type and occupancy classification sprinkler systems are not necessary for fire control in the Area 600 boiler building.

**Rail Infrastructure.** The location of rail infrastructure improvements will be served by existing and new (as constructed to serve specific Facility areas) hydrants in the vicinity of the rail loop alignment.

The Applicant will consult with the Port, City fire officials, and public fire and emergency responders to develop an Operations Fire Prevention and Control program coordinated with existing local response capabilities. The Applicant will consult with local responders to identify gaps in existing firefighting equipment, and will provide training opportunities at the nationally recognized Tesoro firefighting school at Texas A&M University. These measures will be documented in the Operations Site Safety Plan or other plans related to Facility operations as appropriate to the activity being addressed (e.g., the inadvertent release or contingency plans associated with Marine Terminal loading activities, as required to comply with applicable state and federal regulations). The fire prevention plan will be developed in compliance with WAC 296-24-567, and will address the following requirements:

- The fire prevention plan will be in writing.
- The fire prevention plan will include:
  - A list of the major workplace fire hazards and their proper handling and storage procedures, potential ignition sources (such as welding, smoking and others) and their

- control procedures, and the type of fire protection equipment or systems which can control a fire involving them;
- Names or regular job titles of those personnel responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and
  - Names or regular job titles of those personnel responsible for control of fuel source hazards.
  - Accumulations of flammable and combustible waste materials and residues will be controlled so that they do not contribute to a fire emergency. The housekeeping procedures will be included in the written fire prevention plan.
- Training will include:
    - Informing employees of the fire hazards of the materials and processes to which they are exposed.
    - Reviewing with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.
  - Keeping the written plan in the workplace and making it available for employee review.
  - Regularly and properly maintaining, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials. The maintenance procedures will be included in the written fire prevention plan.

### ***Explosion Prevention***

As noted above, two sources of explosions could potentially occur at the Facility – mechanical explosions due to overpressure conditions, and explosions due to the release of H<sub>2</sub>S. In addition to the fire prevention and suppression elements listed above, Facility design and operating procedures will include, but not be limited to, the following explosion prevention elements:

- The storage tanks will be operated at atmospheric pressure, and will be equipped with internal pressure relief devices to vent gases should an overpressure situation arise;
- Internal pressure relieving systems will be incorporated throughout the Facility, including the transfer pipelines, marine terminal loading equipment, and rail cars;
- Installing pressure, flow and temperature sensors to ensure all storage and conveyance activities are conducted within appropriate parameters, and to quickly identify any abnormal situations that could potentially lead to an explosion;
- Including expansion loops in the design of the transfer pipelines to ensure the pipelines can expand and contract to accommodate changes in ambient temperature;
- Equipping personnel with H<sub>2</sub>S detectors which will trigger alarms at levels well below the explosive concentrations of H<sub>2</sub>S gases emitted.

#### **4.1.2.3 Stand-by and Non-use**

The Applicant anticipates that the Facility will operate continuously. However should there be a period during which the Facility is not operating at full capacity and some portion of the Facility is not in use, the Applicant will ensure that the temporarily shut down equipment is maintained in a fashion to prevent conditions that could result in a fire, consistent with the measures described above. Regardless, all fire detection and suppression systems would continue to be operated and maintained as though the entire Facility was in operation.

#### 4.1.2.4 Dismantling and Restoration

Decommissioning of the Facility is discussed in section 2.3.7. The Applicant anticipates that fire and explosion prevention measures similar to those implemented during construction would be implemented during decommissioning and site restoration. Prior to beginning decommissioning the Applicant will submit a detailed facility decommissioning plan, and such plan would address fire and explosion prevention measures.

#### 4.1.3 Releases or Potential Releases to the Environment Affecting Public Health

This section addresses the treatment or disposition of all solid or semisolid construction and operation wastes including spent fuel, ash, sludge, and bottoms, and show compliance with applicable state and local solid waste and how these wastes will be handled in compliance with applicable state and local regulations. The Facility is being proposed at a location where industrial and solid wastes from the construction and operation of a former aluminum smelter were stored in waste piles and consolidated in landfills on site over the years; an overview of the restrictive covenants in place at this location is therefore also provided.

##### 4.1.3.1 Site History

Terminal 5 is the former location of the Alcoa/Evergreen Aluminum smelter, which operated until 2000. Industrial and solid wastes from the construction and operation of the aluminum smelter were stored in waste piles and consolidated in landfills onsite over the years. Hazardous contaminants in these wastes include petroleum hydrocarbons, polychlorinated biphenyls (PCBs), cyanide, fluoride, trichloroethylene (TCE), low-level organic chemicals, and metals. Prior to the Port's purchase of the properties in 2009, Alcoa and Evergreen completed site remediation and facility decommissioning under Consent Decree No. 09-2-00247-2 and Enforcement Order 4931 with Ecology. Efforts included removing structures and foundations to a depth of approximately 4 feet and the site soil and sediment with concentrations of chemicals of concern above the cleanup levels established by the consent decree.

Five locations within the boundary of the proposed Facility are subject to the Ecology consent decree and the environmental restrictive covenants discussed below. Portions of the Facility, including the rail unloading building and additional rail lines, may be located in these areas.

##### ***Consent Decree No. 09-2-00247-2***

Consent Decree No. 09-2-00247-2 for the Alcoa Inc. site was entered into on January 30, 2009, and an amended Consent Decree on July 2011. It included the areas of the site that are listed below.

- **Vanexco/Rod Mill Site** – The 1995 consent decree (95-2-03268-4) for the Vanexco/Rod Mill building called for the building foundation (floor slabs) and building roof to serve as a cap to address PCB contamination beneath the building. Ecology approved an amendment in the 2009 consent decree (superseding the 1995 consent decree) to allow the removal of the building, providing that surface materials placed above the foundation are sloped to provide drainage away from the area. The site is located in Area 200 and is the location of the administrative and support buildings and the rail unloading building that are included in the proposed project.
- **Spent Pot Liner (SPL) Storage Area** – The 1992 consent decree (92-2-00783-9) for the SPL storage area called for covering it with either a polyvinyl chloride (PVC) or high density

polyethylene (HDPE) membrane or a 2-foot-thick clay cover with a hydraulic conductivity of no more than  $1 \times 10^{-6}$  cm/sec. The 1992 consent decree further required that the SPL cap be maintained. The 1992 consent decree was dismissed on January 30, 2009 and no longer has effect; however, the operation and maintenance activities, including institutional controls and cover maintenance, originally contained in the 1992 consent decree are now contained in the 2009 consent decree and continue to apply to the site.

- Consent decree 09-2-00247-2 (discussed in additional detail below) also notes Ecology's certification that all the terms of the construction portion of the 1992 consent decree had been completed on May 3, 1992. Prior to 2009, the SPL area was covered with an HDPE liner to meet this consent decree requirement.
- In April 2010, with Ecology approval, as part of its WVFA project, the Port placed an asphalt cap over the HDPE liner that had previously covered the area of contaminated soil. The cap consisted of a layer of asphalt overlain by an asphalt-impregnated geotextile (a combination of non-woven polypropylene fabric and asphalt cement tack coat) and geomembrane overlain by a second layer of asphalt. The fabric and tack coat combination form an asphalt membrane interlayer within the pavement section. This cap remains in complete form today.
- **North/North 2 Cap** – On March 26, 2009, former landowner Alcoa Inc. entered into an environmental restrictive covenant in favor of Ecology pursuant to its consent decree with Ecology effective January 30, 2009 restricting activity in the North and North 2 (NN2) landfills. This restrictive covenant was necessary because of the residual concentration of contaminants on the properties that exceeded cleanup levels for soil and/or groundwater established in the MTCA under WAC 173-340-720 and 740. These are presently covered by a 1-foot layer of clean sand. Per the restrictive covenant, these materials may be reused on site with Ecology's permission.
- **Shoreline Restrictive Covenant** – On March 26, 2009, Alcoa Inc., the former landowner, entered into an environmental restrictive covenant in favor of Ecology pursuant to its consent decree with Ecology effective January 30, 2009 restricting activity in the shoreline area. This restrictive covenant was necessary because of the residual concentration of contaminants on the properties that exceeded cleanup levels for soil established in the MTCA under WAC 173-340-720 and 740.
- **Ingot Plant Cap** – On December 31, 2008, former landowner Evergreen Aluminum LLC entered into a restrictive covenant with Ecology restricting activity in the ingot plant cap area. The covenant was necessary because the residual concentration of PCBs exceeds unrestricted use levels under WAC 173-340-740. A 1-foot layer of soil constitutes the cap.

### ***Environmental Restrictive Covenant***

The environmental restrictive covenant entered pursuant to Consent Decree No. 09-2-00247-2 established multiple conditions for the development of the site and addresses the East Landfill, SPL storage area, shoreline area, and the North/NN2 landfills. The sections are summarized below.

- **Section 1** requires that the site be used solely for industrial purposes (per RCW 70.105D.020[23]) and allowed under City of Vancouver zoning regulations (VMC Title 20). The reference to the RCW is outdated and the current definition of Industrial Properties is located at RCW 70.105D.020(14); it reads as follows:  
*'Industrial properties' means properties that are or have been characterized by, or are to be committed to, traditional industrial uses such as processing or*

*manufacturing of materials, marine terminal and transportation areas and facilities, fabrication, assembly, treatment, or distribution of manufactured products, or storage of bulk materials, that are either:*

*(a) Zoned for industrial use by a city or county conducting land use planning under chapter 36.70A RCW; or*

*(b) For counties not planning under chapter 36.70A RCW and the cities within them, zoned for industrial use and adjacent to properties currently used or designated for industrial purposes.*

The Facility consists of a marine terminal and is consistent with the definition from RCW 70.105D.020(14). As noted in section 2.23, the area of the project is zoned Heavy Industrial and the Facility is an allowed use in the zoning district.

- **Section 2** requires that any activity that may result in release or exposure to the environment of the contaminated soil within the restricted areas (noted above) or create new exposure pathway is prohibited without approval from Ecology. Examples of activity that require Ecology approval include drilling, digging, placement of objects, or the use of any equipment that deforms or stresses the surface beyond its load-bearing capacity as well as piercing the surface with a rod, spike, or similar item or bulldozing or earthwork. Activities similar to these will be performed in each of the restricted areas noted above and, pursuant to the covenant, will require approval from Ecology. It is anticipated that this approval will be considered as part of the site certification agreement through EFSEC.
- **Section 3** prohibits the use of groundwater for consumption or other beneficial purposes but allows construction dewatering. A waste determination is required for any water that is extracted during dewatering activities and water must be handled, stored, and managed according to applicable laws and regulations. Wells or groundwater extraction are specifically prohibited in the vicinity of the East Landfill. As noted in Section 2.6, water for domestic, industrial, and fire protection uses will come from existing municipal sources and no groundwater extraction is proposed for beneficial purposes. Excavations for utilities or building foundations may encounter groundwater and dewatering may be necessary.
- **Section 4** specifically prohibits activity on the property that may interfere with the integrity of the remedial action and the continued protection of the human health and the environment.
- **Section 5** requires Ecology approval for activities that may result in the release, exposure of, or creation of a new exposure pathway for hazardous substances that remain on the property
- **Section 6** requires written notification to Ecology for any proposed conveyance of title, easement, lease, or other interest in the property.
- **Section 7** requires the owner to restrict the use of the property and notify lessees of the restrictive covenant.
- **Section 8** requires Ecology approval for uses that may be inconsistent with the covenant.
- **Section 9** allows Ecology to enter the property and inspect records.
- **Section 10** defines a process to eliminate the covenant.

### ***Environmental Restrictive Covenant (Enforcement Order No. 4931)***

The environmental restrictive covenant entered into on December 31, 2008 for Evergreen established multiple conditions for the development of the former Evergreen site and addresses the ingot plant cap area. The sections are summarized below.

- **Section 1** requires that the site be used solely for industrial purposes (per RCW 70.105D.020[14]) as allowed under the Clark County Unified Development Code and that the existing cap may not be altered, modified, or removed without prior written approval from Ecology. It also states that any activity, that may result in release or exposure to the environment of the contaminated soil within the restricted areas or that creates a new exposure pathway, is prohibited without prior written approval from Ecology. Examples of activity that require Ecology approval include drilling, digging, placement of objects, or use of any equipment which deforms or stresses the surface beyond its load bearing capacity as well as piercing the surface with a rod, spike or similar item or bulldozing or earthwork.
- **Section 2** specifically prohibits activity on the property that may interfere with the integrity of the remedial action and continued protection of the human health and the environment.
- **Section 3** prohibits activity that may result in the release or exposure to the environment of a hazardous substance remaining on the Ingot Plant Capped Area as part of the Remedial Action or create a new exposure pathway is prohibited without prior written approval from Ecology.
- **Section 4** requires written notification to Ecology for any proposed conveyance of title, easement, lease or other interest in the property.
- **Section 5** requires the owner to restrict use of the property and notify lessees of the restrictive covenant.
- **Section 6** requires Ecology approval for uses that may be inconsistent with the covenant.
- **Section 7** allows Ecology to enter the property and inspect records.
- **Section 8** defines a process to eliminate the covenant.

#### 4.1.3.2 Construction

Releases to the environment affecting public health are not anticipated during construction due to the limited types and relatively small quantities of hazardous materials that will be used during construction. Measures to prevent and contain any inadvertent release of hazardous materials will be provided as described in section 2.10 Spill Prevention and Control.

During construction of the Facility, solid construction debris, such as scrap metal, cable, wire, wood pallets, plastic packaging materials, and cardboard, will be removed by licensed disposal operators and disposed at local landfills licensed to accept such waste. Should any hazardous waste be generated, it will be collected, handled, stored and disposed of in accordance with applicable federal, state, and local regulations.

As noted in section 4.1.3.1, areas of the site and/or adjacent to the site are restricted for use because of the presence of subsurface soil and/or groundwater contamination from previous historic uses. Disturbance of those areas will be avoided to the extent practical. However, construction is necessary in each of the restricted areas. Construction will comply with the site-specific restrictive covenants, consent decrees, and MTCA and Dangerous Waste Regulations.

- **Vanexo/Rod Mill** – Contaminants in this area consist of PCB-impacted soils (Anchor 2008), Monitoring indicated that groundwater is not affected by the PCB-impacted soils (Consent Decree No. 09-2-00247-2). The building foundations and floor slabs were left in place to form a cap over the contaminated soils as required by the consent decree (95-2-03268-4) and surface materials above the foundation are sloped to provide drainage away from the area or that the foundation is replaced with an impervious layer and stormwater control facilities are located above the layer.

The Facility includes the construction of parking facilities and a portion of the rail unloading area within the Vanexco/Rod Mill restricted covenant area (see Figure 2.3-5). The parking facilities will not require deep excavations that penetrate the cap and will serve as an additional impervious layer to prevent precipitation from reaching the PCB-contaminated soils. Approximately 250 lineal feet of the northern edge of the rail unloading area is located above the cap. The building will require excavation for concrete foundations or driving piles within the cap area. The cap materials and excavated materials from beneath the cap will be segregated, characterized, and properly disposed of based on the characterization. Any material exceeding Ecology soil cleanup levels for unrestricted use (that cannot be used on site) must be disposed of at a Subtitle D landfill in accordance with WAC 173-350. After construction of the foundation or pile driving, the cap will be restored with appropriate materials to form an impervious surface and restore the integrity of the cap.

- **Spent Pot Liner (SPL) Storage Area** – Contaminants in this area consist of residual affected soils containing cyanide and fluoride beneath a cap (Anchor 2008). The cap consists of a layer of asphalt overlain by an asphalt-impregnated geotextile (a combination of non-woven polypropylene fabric and asphalt cement tack coat) and geomembrane overlain by a second layer of asphalt. The fabric and tack coat combination form an asphalt membrane interlayer within the pavement section.  
The Facility will construct two additional rail loops within the SPL Storage Area. However, no excavation into the caps or the contaminated materials they cover will be necessary for the construction and no approval is required from Ecology.
- **North/NN2 Cap** – The North/NN2 cap covers former landfill areas that were remediated by disposing of materials off site and in the East Landfill and the resulting excavation was used to dispose of PCB-contaminated dredge materials from the cleanup of shoreline areas on the site. These materials are presently covered by a 1-foot layer of clean sand. Per the restrictive covenant, these materials may be reused on site with Ecology’s permission.  
The Facility will construct two additional rail loops within the North/NN2 cap. However, no excavation into the caps or the contaminated materials they cover will be necessary for construction and no approval is required from Ecology.
- **Shoreline Restrictive Covenant Area** – The shoreline restrictive covenant area was remediated by removing soil and materials. Residual levels of contamination may remain and there is no cap or other surface material specifically placed in the area (Anchor 2009).  
The Facility will construct two additional rail loops within the area. Work will include manhole relocations that require excavation up to 20 feet below ground surface. These will be installed by cutting a trench, installing the manhole and pipe, and backfilling with soil and compacting. Utility relocations will be installed by cutting a trench, placing the conduits, and backfilling with soil and compacting. Excavation and grading on the north side of the shoreline berm will take place to allow the removal and relocation of the Terminal 5 access driveway and loop tracks. This construction will require approval from Ecology under the covenant.
- **Ingot Plant Cap** – The ingot plant cap covers residual affected soils containing PCBs. The cap consists of a 1-foot layer of clean soil.

The Facility will construct two additional rail loops within the ingot plant cap. However, no excavation into the cap or the contaminated materials it covers will be necessary for the construction and no approval is required from Ecology.

The following construction methods are anticipated based on construction within the restrictive covenant areas:

- Measures to prevent releases will be included in a contaminated media management plan and construction specifications. For all work, the contractor will be required to follow a work plan, a health and safety plan, a stockpiling plan, and a decontamination plan.
- Areas that are disturbed or removed as part of final construction will be covered with at least 1 foot of clean soil fill to prevent a future direct contact hazard. Where asphalt (road) is laid, it will substitute for 1 foot of clean fill to prevent a future direction contact hazard.
- Soils that are excavated will either be:
  - Direct loaded or stockpiled, sampled and analyzed for polynuclear aromatic hydrocarbons (PAHs) and total petroleum hydrocarbons, and disposed of off site, or
  - Reused on site in accordance with applicable regulations.
- Standard dust control measures such as spraying exposed soil surfaces with water will be employed during construction to prevent the release of airborne particulates.
- Equipment employed in the shoreline restrictive covenant area will be decontaminated at a location to be specified in the contractor's decontamination plan.

Excavation in other areas of the site is not expected to encounter soils with contaminant concentrations greater than industrial cleanup levels and can be reused on site. Excess excavated soils that will not be used onsite will be direct loaded or stockpiled, sampled and analyzed for PAHs and total petroleum hydrocarbons, and disposed of offsite in an appropriate location based on the results of the analysis.

At Terminal 5, groundwater has been shown to be contaminated throughout the site (Ecology 2008). Dewatering may be necessary during excavations for building foundations, utilities, and pipelines. Groundwater that is pumped out of the excavations will be stored, characterized, and treated in accordance with state and federal regulations prior to disposal. The water may be treated onsite and disposed of via the City's sanitary sewer system (if appropriate), or removed by a licensed commercial waste disposal facility for off-site treatment and disposal. If not exceeding state water quality levels, dewatering water will be managed in accordance with Construction Stormwater General Permit requirements.

#### **4.1.3.3 Operations**

##### ***Wastes Resulting from Normal Operations***

The following solid waste streams are anticipated to be generated during normal operation of the facility:

- Oily and non-oily waste and rags resulting from cleaning of facility components;
- Oily sludge recovered from the bottom of the storage tanks when these are cleaned on a 10-year interval according to API standards;
- Domestic garbage and packing materials (cardboard, paper, plastic).

There are no wastes generated as a by-product from handling of crude oil at the Facility. The Applicant will identify the appropriate designation of the wastes produced, and if they designate as hazardous waste, they will be collected, handled, stored and disposed of in accordance with applicable federal, state, and local regulations. Solid wastes (i.e. non-hazardous) will be collected and recycled or disposed of at a licensed waste handling facility.

### ***Wastes Resulting from Handling of Inadvertent Releases***

Section 2.10 and Appendices B.2 and C describe the comprehensive spill prevention activities the Applicant will implement at the Facility during the operational phase. However, should an inadvertent release occur, the Applicant will be responsible for spill control and collection, and disposal of the resulting wastes.

Prior to beginning operations, as part of its SPCCP and Spill Contingency Plan, the Applicant will identify a process for dealing with wastes resulting from cleaning up inadvertent releases. This process will address the types of waste materials likely to be collected, the means for their characterization to determine if they are designated as solid waste or dangerous waste, and potential methods of disposal based on the waste type and its designation. Designation procedures and waste management requirements are contained in Dangerous Waste Regulations (Chapter 173-303 WAC). The Dangerous Waste Regulations also apply to other wastes and are more stringent than Federal Hazardous Waste Regulations (40 CFR, Parts 261 to 279).

Based on the types of waste identified, the Applicant will consult with spill contractors, chemical testing laboratories, and Ecology for advice on designating wastes as dangerous or solid. Testing of actual waste during a spill response activity may be required to determine whether such mixtures are designated as dangerous waste. If recovered, oily liquids and other materials contaminated by oil not designated as dangerous waste, will be classified as solid waste and subject to RCW 70.95. For example, recovered oily liquids and other materials contaminated by oil that are not designated as dangerous waste may be recycled, burned, or blended for fuel. Recovered oily liquids may be managed as “off specification fuels” under the exemption in the dangerous waste rules, as long as it is used as fuel. Recovered oily liquids and other materials contaminated by oil that cannot be recycled, burned, or blended for fuel are considered solid waste and subject to designation.

Oily waste may be designated as dangerous waste (dangerous waste or extremely hazardous waste) depending on characteristics, such as ignitability, corrosivity, reactivity, toxicity, and persistence.

Wastes may be designated as dangerous waste because they are:

- Listed (appear on lists for discarded chemical products or from specified industrial processes) or characterized as “dangerous waste” in the absence of knowledge of waste origination.
- Ignitable (flash point <140 degrees F);
- Corrosive (pH ≤ 2.0 or ≥ 12.5) ;
- Reactive (explosive, self-igniting, reactive with water);
- Toxic (specific standards and test methods apply, i.e. Toxicity Characteristic Leaching Procedure (TCLP) and DW bioassay; and
- Persistent (specific standards and test methods apply).
- If a waste is classified as a dangerous waste, the Applicant will ensure safe management procedures to collect, handle, and dispose of the waste, including, but not limited to:

- the waste is placed in proper tanks or stored in closed compatible drums,
- has appropriate labels and markings,
- is transported by authorized haulers,
- is shipped using a Hazardous Waste Manifest,
- is delivered to an authorized recycler or permitted treatment, storage or disposal facility

#### **4.1.4 Safety Standards Compliance**

The implementation of a safety program for the facility will be based on compliance with state and federal regulations, as well as the implementation of industry standards. The following discussion identifies the primary safety regulations applicable to the activities conducted at the facility, and provides an overview of the numerous industry standards that the Applicant will implement in the design, construction and operation of the facility.

##### **4.1.4.1 Washington State Safety and Health Standards**

The U.S. Congress created the Occupational Safety and Health Administration (OSHA) in 1971 to develop and enforce workplace safety and health rules throughout the country. States may choose to enact and implement their own safety and health programs as long as they are at least as effective as OSHA. In 1973, the Washington State Legislature passed the Washington Industrial Safety and Health Act or WISHA (RCW 49.17), wherein the state chose to develop its own workplace safety and health program, which is implemented through WAC 296. In Washington, OSHA continues to cover workplaces with federal employees, nonfederal employees working on federal reservations and military bases, employees working on floating worksites (floating dry docks, fishing boats, construction barges), and employees working for tribal employers on tribal lands. The Facility will not have any such workplaces and is therefore entirely subject to WISHA.

The Facility will include multiple elements that will be subject to a host of health and safety standards. The following discussion identifies the most likely applicable chapters of WAC 296 and specific sections within them that address particular activities unique to the facility, such as rail operations, handling of crude oil, and longshore, stevedore, and waterfront-related operations. However, the Applicant recognizes that other standards will also apply, and intends to work with agencies during project review to refine and ensure compliance will all potentially applicable regulatory requirements. Many of the requirements of WAC 296 that apply to the Facility will overlap, with the more stringent requirements of a section prevailing over another. In developing the safety program for the construction, operation and decommissioning phases of the Facility the Applicant will review the entirety of WAC 296 and determine the scope of applicability of each chapter to the activities that are proposed to occur at the Facility.

##### ***WAC 296-24, General Safety and Health Standards***

These regulations establish standards for the design and operation of specific equipment that may be installed and operated at the Facility, including the handling of rolling railroad cars and design standards for electrical systems.

- WAC 296-24-21501: Use of Mechanical Equipment
- WAC 296-24-21509: Clearance limits
- WAC 296-24-21511: Rolling railroad cars requirements; Under normal operating conditions, the unit trains will be moved by locomotive, which is exempted under this regulation;

However, the regulation requires the employment of a clearly audible warning system when cars are being moved by car pullers or locomotives, and when the person responsible for the moving does not have assurance that the area is clear and that it is safe to move the car or cars

- WAC 296-24-21513: Guarding requirements
- WAC 296-24-235 through 296-24-23533: Overhead and gantry cranes requirements.
- WAC 296-24-237: Construction, operation, and maintenance standards for chain and electric hoists
- WAC 296-24-238: Air hoists requirements
- WAC 296-24-240 through 296-24-24019: Crawler cranes, locomotive cranes, wheel mounted cranes or other variations used for construction or operation
- WAC 296-24-245 through 296-24-24519: These regulations apply “to guy, stiffleg, basket, breast, gin pole, Chicago boom and A-frame derricks of the stationary type, capable of handling loads at variable reaches and powered by hoists through systems of rope reeving, used to perform lifting hook work, single or multiple line bucket work, grab, grapple, and magnet work.”
- WAC 296-24-294 through 296-24-29431: These regulations apply if rigging is used in the construction or operation of the project
- WAC 296-24-295 through 296-24-295-29505: Compressed gases general requirements
- WAC 296-24-33013: This section provides the standards for a bulk plant, which is defined as “that portion of a property where flammable or combustible liquids are received by tank vessel, pipelines, tank car, or tank vehicle, and are stored or blended in bulk for the purpose of distributing such liquids by tank vessel, pipeline, tank car, tank vehicle, or container, including tank storage requirements under WAC 296-24-33005 and piping, valves, and fitting requirements under WAC 296-24-33007.”
- WAC 296-24-56525: Automatic sprinkler system requirements
- WAC 296-24-56527: Fire alarm signaling systems
- WAC 296-24-567 and WAC 296-24-56701: Employee emergency plans and fire prevention plans, as required by particular WISHA standards
- WAC 296-24-592 through 296-24-62911: These regulations govern the standards for fire suppression equipment depending on what type is used
- WAC 296-24-73501 through 296-24-73511: Requirements for walking-working surfaces
- WAC 296-24-75003 through 296-24-75011: Requirements for guarding floor and wall openings and holes
- WAC 296-24-76503 through 296-24-76555: Requirements for fixed industrial stairs
- WAC 296-24-85501: Requirements for dockboards
- WAC 296-24-92002 through 296-24-92011: Inspection requirements of compressed gas cylinders
- WAC 296-93003: General requirements for safety release devices for compressed gas cylinders
- WAC 296-24-93503: General requirements for safety relief devices for cargo and portable tanks storing compressed gas cylinders
- WAC 296-24-95701 through 296-24-95713: Design safety standards for electrical systems, especially WAC 296-24-95711 which covers the requirements for electric equipment and wiring in locations that are classified depending on the properties of the flammable vapors,

liquids, gases, or combustible dusts or fibers that may be present therein and the likelihood that a flammable or combustible concentration or quantity is present

- WAC 296-24-960 through 296-24-985: Electrical safety-related work practices.

### ***WAC 296-56, Safety Standards -- Longshore, Stevedore and Waterfront-Related Operations***

This chapter sets out the specific safety standards for the waterfront-related operations at the facility. The following list is a summary of provisions anticipated to apply to the waterfront activities conducted at the facility:

- WAC 296-56-60006: Personnel requirements
- WAC 296-56-60007: Housekeeping requirements
- WAC 296-56-60009: Accident prevention program
- WAC 296-56-60010: Emergency action plans
- WAC 296-56-60011 through 296-56-60047: Waterfront operations requirements
- WAC 296-56-60049 through 296-56-60053: Requirements for hazardous cargo, hazardous materials, and hazardous atmospheres and substances. It is necessary to first determine whether crude oil is a hazardous cargo, material, substance, or atmosphere which is defined in WAC 56-60005
- WAC 296-56-60071 through 296-56-60099: Cargo handling gear and equipment requirements
- WAC 296-56-60109 through 296-56-60133: Personal protection requirements
- WAC 296-56-60209: Requirements for fixed ladders
- WAC 296-56-60211: Requirements for portable ladders
- WAC 296-56-60213: Requirements for Jacob's ladders
- WAC 296-56-60215: Requirements for fixed stairways
- WAC 296-56-60217: Requirements for spiral stairways
- WAC 296-56-60219: Requirements for employee exits
- WAC 296-56-60221: Illumination requirements
- WAC 296-56-60223: Requirement for passage between levels and across openings
- WAC 296-56-60225: Requirements for guarding temporary hazards
- WAC 296-56-60229: Sanitation requirements
- WAC 296-56-60231: Signs and marking requirements
- WAC 296-56-60233: Machine guarding requirements for related terminal operations and equipment
- WAC 296-56-60235: Welding, cutting and heating (hot work) requirements
- WAC 296-56-60237: Requirements for spray painting connected with maintenance of structures, equipment, and gear at the marine terminal and of transient equipment serviced at the terminal. It does not apply "to overall painting of terminal structures under construction, major repair or rebuilding of terminal structures, or portable spraying apparatus not used regularly in the same location."
- WAC 296-56-60239: Requirements for working with compressed air
- WAC 296-56-60241: Requirements for compressed air receivers and equipment used for operations such as cleaning, drilling, hoisting, and chipping. It does not apply to equipment used to convey materials or in transportation applications such as railways, vehicles, or cranes

- WAC 296-56-60243: Fuel handling and storage requirements
- WAC 296-56-60245: Battery charging and changing requirements
- WAC 296-56-60247: Prohibited operations
- WAC 296-56-60249: Petroleum dock requirements

### ***WAC 296-62, Occupational Health Standards***

This chapter provides the general occupational health standards related to the handling of toxic and hazardous substances, if such standards are present during construction or operation of the Facility:

- WAC 296-62-055 through 296-62-05520: Requirement to retain Department of Transportation Labeling
- WAC 296-62-060: Control requirements for hazardous conditions in addition to those specified in this chapter
- Parts F through L: Specific control requirements for certain toxic and hazardous substances

### ***WAC 296-155, Safety Standards for Construction Work***

This chapter provides the safety standards for construction of the Facility and addresses:

- General safety and health provisions
- Occupational health and environmental control and hazard communication
- Personal protective and life-saving equipment, and fall protection requirements for construction
- Fire protection and prevention
- Signaling and flaggers
- Storage, use, and disposal
- Rigging requirements for material handling
- Tools—hand and power
- Welding and cutting
- Electrical
- Stairways and scaffolds
- Cranes, rigging, and personnel lifting
- Motor vehicles, mechanized equipment, and marine operations
- Excavation, trenching, and shoring
- Concrete, concrete forms, shoring, and masonry construction
- Steel erection
- Underground construction
- Miscellaneous construction requirements
- Demolition
- Power distribution and transmission lines
- Rollover protective structures and overhead protection

### ***WAC 296-800, Safety and Health Core Rules***

This chapter is applicable to the non-waterfront-related operations, and regulates:

- WAC 296-800-110 through 296-800-11045: Employer responsibilities for a safe workplace
- WAC 296-800-120 through 296-800-12005: Employee responsibilities

- WAC 296-800-130 through 296-800-13025: Safety Committees and Safety Meetings
- WAC 296-800-140 through 296-800-14025: Accident prevention program
- WAC 296-800-150 through 296-800-15040: First aid summary
- WAC 296-800-160 through 296-800-16070: Personal protective equipment
- WAC 296-800-170 through 296-800-18020: Chemical hazard communication and material safety data sheets
- WAC 296-800-190 through 296-800-19005: Safety bulletin board
- WAC 296-800-200 through 296-800-20005: WISHA poster requirement
- WAC 296-800-210 through 296-800-21005: Lighting requirements
- WAC 296-800-22005 through 296-800-22022: Housekeeping requirements
- WAC 296-800-22025 through 296-800-22030: Drainage requirements
- WAC 296-800-22035 through 296-800-22040: Storage area requirements
- WAC 296-800-230 through 296-800-23075: Sanitation and hygiene facilities and procedures
- WAC 296-800-240 through 296-800-24005: Environmental tobacco smoke in the office
- WAC 296-800-250 through 296-800-25015: Stairs and stair railings
- WAC 296-800-260 through 296-800-26010: Floor openings, floor holes, and open-sided floors
- WAC 296-800-270 through 296-800-27020: Workplace structural integrity
- WAC 296-800-280 through 296-800-28045: Basic electrical rules
- WAC 296-800-300 through 296-800-30025: Portable fire extinguishers
- WAC 296-800-310 through 296-800-31080: Exit routes and employee alarm systems
- WAC 296-800-320 through 296-800-32025: Accident reporting and investigating

***WAC 296-817, Hearing loss prevention (noise)***

This chapter addresses requirements applicable for hearing loss prevention in the workplace.

***WAC 296-841, Airborne Contaminants***

This chapter is applicable when employees are, or could be, exposed to an airborne hazard. WAC 296-841-100 lists examples of airborne contaminants that may become airborne hazards in some workplaces, including the chemicals listed in Table 3 of WAC 296-841-20025. Emissions of hydrogen sulfide (H<sub>2</sub>S) are a hazard associated with activities involving the handling of crude oil. H<sub>2</sub>S is a colorless gas with a rotten egg odor, but odorless at poisonous concentrations. H<sub>2</sub>S deadens the sense of smell so that odor cannot be relied upon to warn of the continuous presence of this gas. It is also heavier than air and will tend to accumulate at the bottom of poorly ventilated spaces. Facility employees working in areas where they can be exposed to H<sub>2</sub>S will be required to wear personal H<sub>2</sub>S detectors, which will alert them of poetically dangerous concentrations of the gas, and allow them to evacuate problem areas. Fixed H<sub>2</sub>S sensors will also be located in enclosed spaces, setting off evacuation alarms should safety threshold concentrations be reached in the ambient air, in the unloading buildings for example.

- WAC 296-841-20003: Employee protective measures
- WAC 296-841-20005: Requirements for exposure evaluations
- WAC 296-841-20010: Exposure controls
- WAC 296-841-20015: Respirators
- WAC 296-841-20020: Notification requirements
- WAC 296-841-20025: Permissible exposure limits

### ***WAC 296-824, Emergency Response***

This chapter is applicable if employees are, or could become, involved in responding to inadvertent releases of hazardous substances in a workplace or any other location. For example, the requirements of this chapter would apply in the event of an inadvertent release of crude oil. The chapter addresses:

- WAC 296-824-200 through 296-824-20005: Requirement for employers to anticipate and plan for emergency response operations by developing an emergency response plan
- WAC 296-824-30005: Training for employees
- WAC 296-824-400 through 296-824-40010: Medical surveillance requirements
- WAC 296-824-500 through 296-824-50030: Incident requirements
- WAC 296-824-600 through 296-824-60015: Personal protective equipment requirements
- WAC 296-824-700 through 296-824-70005: Post-emergency response requirements

### ***WAC 296-860, Railroad clearances and walkways in private rail yards and plants***

This chapter applies to all railroad clearances and walkways in rail yards and plants, including logging railroad yards, such as mill yards, maintenance yards, and sorting yards.

In addition, the Applicant commits to having every train attended upon taking control of the unit train from BNSF until the time control is released back to BNSF when the train leaves the Facility.

### ***WAC 296-901, Globally harmonized system for hazard communication***

This chapter requires all employers to provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, safety data sheets, and information and training. It applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

#### **4.1.4.2 U.S. Coast Guard (USCG) 33 CFR Part 154 Subpart E – Vapor Control Systems**

During ship loading, crude oil is conveyed from the transfer pipeline through high velocity loading hoses into the cargo tank of the vessel. During this loading, vapors inside the vessel tanks are displaced. Vapors displaced from vessels, ships or barges as they are filled with crude oil will consist primarily of hydrocarbons. These vapors are conditioned, as needed, with natural gas to ensure a safe concentration in excess of the upper flammable limit. All vapors, including any conditioning gases, will be collected and routed to the MVCU for safe disposal.

Subpart E, regulates the manner in which these vapors are collected, conditioned, and then disposed of to ensure the safety of the loading operation at all times.

The regulations address the following topics:

- vapor line connection
- facility requirement for vessel liquid overfull protection
- vessel pressure protection
- cargo vapor conditioning
- protection from fire
- explosion and detonation

- equipment requirements for flame and detonation arrestors
- vapor compressors, vapor blowers and vapor recovery and destruction units
- personnel training and operational requirements

The regulations require that a “certifying entity” review the plans and calculations for the MVCU, and conduct inspections and witness tests that demonstrate the facility conforms to the certified plans and specifications, meets the requirement of the applicable regulations and operates properly. Prior to beginning operations, and based upon the inspection and testing, the facility must receive a letter of adequacy from the USCG Captain of the Port (COPT) with jurisdiction over the geographical location where the facility is located.

The facility will incorporate a dock safety unit and MVCUs as described in section 2.3, in compliance with 33 CFR 154 Part E. The Applicant will seek the necessary review and approval of the dock safety unit and MVCU from the USCG prior to beginning operations of the marine vessel loading components of the Facility.

#### **4.1.4.3 Representative Industry Codes and Standards**

Numerous industry codes and standards apply to the design, construction and operation of the facility and its specific elements. The Applicant will incorporate the requirements of these codes and standards as applicable, including but not limited to the codes of the following associations:

- ACI - American Concrete Institute
- AISC - American Institute of Steel Construction
- ANSI - American National Standards Institute
- API - American Petroleum Institute
- AREMA - American Railway Engineering and Maintenance of Way Association
- ASCE - American Society of Civil Engineers
- ASME - American Society of Mechanical Engineers
- AWS - American Welding Society
- BNSF -Burlington Northern Santa Fe Railway Company
- BPVC - Boiler and Pressure Vessel Code of ASME
- FM - Factory Mutual
- FMEA - Factor Mutual Engineering Association
- IBC - International Building Code, 2012
- ICEA - Insulated Cable Engineers Association
- IEEE - Institute of Electrical and Electronic Engineers
- ISA - Instrument Society of America
- MSHA - Mine Safety and Health Administration
- NACE - National Association of Corrosion Engineers
- NEC - National Electric Code
- NEMA - National Electrical Manufacturer's Association
- NESC - National Electrical Safety Code
- NFPA - National Fire Protection Association
- NIST - National Institute of Standards and Technology
- SMACNA - Sheet Metal and Air Conditioning Contractors National Association

#### **4.1.4.4 Methods of Compliance with Safety Standards**

The Applicant will demonstrate compliance with all applicable safety standards as follows:

##### ***Project Design***

The Applicant will cause the Facility to be designed in compliance with all applicable safety regulations and requirements, including applicable industry standards. Prior to beginning construction of the Facility the Applicant will submit a complete set of construction plans to EFSEC for approval. These construction plans will identify the safety regulations and industry standards that apply to the Facility, and as appropriate will specify which standards apply to specific element designs.

##### ***Project Construction***

Through the construction management program described in section 2.16, the Applicant will ensure that the Facility has been constructed to the specifications of the construction drawings approved above. The Applicant will conduct pre-operational commissioning tests in accordance with industry standards and applicable regulations, including but not limited to the following:

- Hydrostatic testing of piping systems, transfer pipelines and storage tanks
- Testing and certification of the dock safety unit and MVCU in accordance with the provisions of 33 CFR 154 Subpart E
- Testing of fire and alarm systems in accordance with applicable fire and building safety codes

##### ***Project Operation***

The Applicant will ensure that all safety systems inherent in the project design will be operated according to applicable industry standards and state and local regulations and codes. The Applicant will develop operations manuals to address appropriate measures for operation of facility safety systems and their ongoing maintenance. Facility systems will be tested according to industry standards and applicable state and federal regulations.

The Applicant will implement the usage of personal and facility sub area-wide Lower Explosive Limit (LEL) hydrocarbon detection systems and H<sub>2</sub>S detection systems. Personal detection systems will notify individual employees when concentrations of hydrocarbons or H<sub>2</sub>S exceed safe thresholds and they must evacuate their immediate work area. Similarly, sub-area-wide detectors will trigger evacuation alarms.

##### ***Safety Program***

The Applicant will develop, implement and document a facility safety program to ensure compliance with state and federal requirements. The program will incorporate applicable industry design standards. Appendix D includes the Applicant's preliminary Health Safety Security and Environmental (HSSE) Execution Plan. This plan lays out a process through which the Applicant will develop and implement its facility safety program, and identifies the various safety processes and organizational and staff responsibilities, and the training that will occur as a result of the implementation of the program.

The program will include the preparation of construction and operations safety plans, which will be submitted to EFSEC prior to the beginning of facility construction and operations respectively. The plans will address the requirements of WAC 296, as described above, and the

requirements of 33 CFR 154 Part E, as well as any additional related requirements required under other applicable state and federal regulations and spill contingency planning processes described elsewhere in this Application.

#### **4.1.5 Radiation Levels**

Pursuant to WAC 463-60-115, the Applicant requests a waiver of the information required by WAC 463-30-352(5). The Facility will not handle, store or use or release any radioactive materials during operation.

The Applicant discloses that controlled use of testing equipment containing very minor amounts of radioactive materials will occur during construction of the Facility and may occur during maintenance activities associated with facility operation. This use occurs only in connection with standard testing equipment used to conduct radiographic testing of welds to ensure weld integrity.

#### **4.1.6 Emergency Plans**

##### **4.1.6.1 Emergency Response Infrastructure**

The Facility, located within an industrial zone at the Port of Vancouver, will be able to take advantage of the extensive emergency response infrastructure located in the Portland/Vancouver Metropolitan Area. Similar to the broad organization of spill response and contingency planning activities described in Appendix B.1, local, state, and federal agencies and industry cooperatives have established a framework for response for both upland and on-water emergencies.

The Vancouver Fire Department (VFD) responds to fires within the city limits, which includes most waterfront facilities. The Applicant will coordinate closely with the VFD and the Port to ensure the Applicant's emergency plans coordinate with both of these organization's needs with respect to both on-Facility-, and off-Facility-site events.

Vessels moored to piers at the Port of Vancouver are also provided fire by the VFD protection. In addition to the VFD, the Maritime Fire and Safety Association (MFSA), established in November 1983, has in place a system to ensure an adequate, timely, and well-coordinated response to shipboard fires over the entire 110-mile channel of the Lower Columbia River. MFSA established the Fire Protection Agency Advisory Council (F-PAAC) to coordinate this effort. Multiple jurisdictions are involved: two states, seven counties, fourteen cities, seven port districts, and eleven local fire agencies. These eleven agencies comprise F-PAAC. All members have agreed to work and train together, so that when an incident occurs, each fire agency will be familiar with the resources and capabilities of other fire agencies and can rely on their assistance through mutual aid agreements between all F-PAAC agencies. Vancouver has a mutual aid agreement with Portland and all other F-PAAC agencies to provide additional manpower and equipment for waterfront and vessel fires within the City.

The City recently applied for and received a grant from Federal Emergency Management Agency and the Department of Homeland Security to purchase a Type IV Regional Emergency Response Vessel, to provide emergency service delivery on the lower Columbia River waterway and its tributaries. The City has contracted for the construction of the vessel, and anticipates receipt of the vessel in mid- to late 2014. In addition to fire response, the vessel will have the ability to support multi-capability missions and carry people and equipment for:

- Hazmat Response

- Technical Rescue
- Oil Spill Support and Boom Carrying Capacity

#### **4.1.6.2 Facility Emergency Plans**

The Applicant will establish emergency response plans for the construction and operation phases of the Facility to ensure employee safety in the case of the following emergencies: on-site materials or chemicals release, flood, medical emergency, major power loss, fire, extreme weather, earthquake, volcano eruption, and security threat.

The emergency response plan will be developed based on industry standards and regulatory requirements, including but not limited to, WAC 296-24 (Employee Emergency Plans and Fire Prevention Plans), WAC 296-56 (Safety Standards --Longshore, Stevedore and Waterfront Related Operations), WAC 296-824 (Emergency Response), and 29 CFR 1910.38 (Emergency Action Plan). The emergency action plan will be in writing, and will cover the designated actions employers and employees must take to ensure employee safety from fire and other emergencies. The emergency plan will address the following elements:

- Emergency escape procedures and emergency escape route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after emergency evacuation has been completed;
- Rescue and medical duties for those employees who are to perform them.
- The preferred means of reporting fires and other emergencies; and
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.
- Alarm systems established in compliance with WAC 296-800-310.
- Types of evacuation to be used in emergency circumstances.
- Training and review:
  - Of a sufficient number of persons to assist in the safe and orderly emergency evacuation of employees prior to implementation of the plan.
  - Review with each employee when the plan is initially developed, whenever the employee's responsibilities or designated actions under the plan change; and whenever the plan is changed, and
  - Review with each employee upon initial assignment those parts of the plan which the employee must know to protect himself/herself in the event of an emergency.

The Applicant will keep the plan at the workplace and make it available for employee review.



## Section 4.2 – Land and Shoreline Use

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WAC 463-60-362

Built environment – Land and shoreline use.

- (1) The application shall identify land use plans and zoning ordinances applicable to the project site.*
- (2) Light and glare. The application shall describe the impact of light and glare from construction and operation and shall describe the measures to be taken in order to eliminate or lessen this impact.*
- (3) Aesthetics. The application shall describe the aesthetic impact of the proposed energy facility and associated facilities and any alteration of surrounding terrain. The presentation will show the location and design of the facilities relative to the physical features of the site in a way that will show how the installation will appear relative to its surroundings. The applicant shall describe the procedures to be utilized to restore or enhance the landscape disturbed during construction (to include temporary roads).*
- (4) Recreation. The application shall list all recreational sites within the area affected by construction and operation of the facility and shall then describe how each will be impacted by construction and operation.*
- (5) Historic and cultural preservation. The application shall coordinate with and provide a list of all historical and archaeological sites within the area affected by construction and operation of the facility to the Washington state office of archaeology and historic preservation and interested tribe(s). The application shall: (a) Provide evidence of this coordination; (b) Describe how each site will be impacted by construction and operation; and (c) Identify what mitigation will be required.*
- (6) Agricultural crops/animals. The application shall identify all agricultural crops and animals which could be affected by construction and/or operation of the facility and any operations, discharges, or wastes which could impact the adjoining agricultural community.*

*(Statutory Authority: RCW 80.50.040 (1) and (12). 04-21-013, amended and recodified as § 463-60-362, filed 10/11/04, effective 11/11/04. Statutory Authority: RCW 80.50.040. 92-23-012, § 463-42-362, filed 11/6/92, effective 12/7/92.)*



## Section 4.2 Land and Shoreline Use

### 4.2.1 Land Use

#### 4.2.1.1 Surrounding Land Uses and Zoning

##### *Tesoro Savage Vancouver Energy Distribution Terminal Site*

The Facility is proposed for construction at the Port at three separate locations that will be linked by project elements: Terminal 5, Parcel 1A, and berths 13 and 14. (See section 2 for a more detailed description of the project elements.) This area of the Port – the project site – is zoned IH with an industrial comprehensive plan designation and is located within the City, within Clark County, Washington. The proposed Facility is located along the Columbia River at approximately Columbia River Mile (RM) 103.5.

The approximately 41.5-acre site is accessed from NW Lower River Road (SR 501). Approximately 1.5 miles east of the site, NW Lower River Road connects to the Mill Plain Extension and West Fourth Plain Boulevard. West Mill Plain and West Fourth Plain boulevards connect to I-5, SR 14, and points beyond.

Rail access is provided from the east by the Port's internal rail network. Trains will access the Port system from the BNSF and UP main lines approximately 2.25 miles east of Terminal 5. The Port is currently constructing a new access to the Port rail system as part of the WVFA project. Access for marine vessels to berths 13 and 14 is provided by the Columbia River deep draft channel. This navigation channel is maintained at a minimum 600 feet in width and 43 feet in depth. The site is approximately 103.5 river miles from the Pacific Ocean. See Figure 2.1-1 for a map of the vicinity of the site.

**West Vancouver Freight Access Project** - The WVFA project is a multi-phase project initiated in 2007 by the Port to move freight more efficiently not only through the Port but also along the BNSF Railway and Union Pacific Railroad mainlines that connect the Pacific Northwest to major rail hubs in the Midwestern and Southern U.S. as well as to Canada and Mexico.

The WVFA project aims to improve the capacity of the Port's rail infrastructure to meet the current and future industrial needs of Vancouver and Southwestern Washington. Currently, rail traffic into the Port travels on a single track (Hill Track) which runs east/west and crosses the north/south mainline at grade near the Port. When rail volumes are high, this intersection causes congestion and delays for Port tenants and mainline traffic. Three elements contribute to this problem of inadequate capacity and are likely to cause the situation to worsen in the future: 1) the Port's existing rail infrastructure does not allow unit trains to be assembled or handled efficiently; 2) projected economic growth will increase demands on existing and future tenants for more efficient rail operations; and 3) projected increases in traffic along the BNSF mainline corridors will increase rail congestion within the general vicinity, further reducing service.

To address these issues, the WVFA project will:

- Expand Port rail capacity and operations within the existing Port facility – in particular, those relating to unit train capacity – to enhance the rail network for future growth and development while minimizing disruption to existing Port tenants and businesses, and

- Relieve congestion, improve operational efficiencies, and ensure continued safe rail operations as rail traffic grows in and around the Port and along the existing BNSF north/south and east/west mainlines.

The elements included in the multi-phase WVFA project extend from the BNSF mainlines (beginning at the intersection of Hill Street and 7th Street, adjacent to the Albina Fuel and Lafarge companies) and terminate in a loop track at Terminal 5.

As illustrated in Figure 4.2-1, the WVFA project consists of 21 work elements which involve a variety of actions, including an expanded rail facility, roadway modifications, building removal and relocation, the improvement and development of stormwater facilities, import of clean fill, the disposal of some excavation materials, utility relocation, wetland and riparian mitigation, and right-of-way acquisition.

In particular, in order to pass beneath the Columbia River rail bridge with minimum required clearances, a pile-supported trench is being constructed along the Columbia River shoreline, effectively creating a grade-separated new entrance into the southeast side of the Port. When fully constructed, this element of the WVFA project will allow full-length unit trains to enter the Port without impeding traffic on the existing north/south BNSF rail line that carries both freight and passenger trains almost continually throughout the day. Currently, each time a train enters the Port, this line must remain clear while the train is “broken” into pieces that can be processed and staged throughout the terminal. Upon completion, the WVFA project is expected to reduce current delays in rail traffic by as much as 40 percent, thereby lowering transportation costs for the manufacturing and agricultural customers who use the Port and the regional rail infrastructure.

Table 4.2-1 lists the project elements and their completion status as of June 4, 2013. All WVFA project elements are expected to be completed by 2017.

**Table 4.2-1. Status of WVFA Project Elements**

<b>Project Element</b>	<b>Completion Status</b>
Grain Subdivision Phase A	Complete
Schedules 1A, 1B & 1C Rail Improvements	Complete
Utility Relocation Project	Complete
Terminal 5 Unit Train Improvements	Complete
Schedule 2 & 4 Property Acquisition	Complete & In Progress
Terminal 3 Rail Access	Complete
Grain Subdivision Phase B	Complete
Grain Track Unit Train Improvements Phase A	Complete
Malting Facility Relocation – Phase A	Complete
Schedule 2 Rail Trench In-Water Work Phase A	Complete
Terminal 5 Rail Expansion 4000A	Complete
Terminal 5 Rail Expansion SPL	Complete
Bulk Unloading Facility Utilities	In Progress
Malting Facility Relocation – Phase B	In Progress
Malting Drumhouse Demolition	In Progress
Schedule 2 Rail Trench Upland Work	In Progress
Schedule 2 Rail Trench In-Water Work Phase B	In Progress
Grade Separation Structure	In Progress

<b>Project Element</b>	<b>Completion Status</b>
BNSF C&M Commitments	In Progress
Bulk Unloading Facility	Future Improvements
Bulk Unloading Facility Continuation	Future Improvements
Bulk Facility Track Relocation	Future Improvements
Grain Track Unit Train Improvements Phase B	Future Improvements
Grain Track Unit Train Improvements Phase C	Future Improvements

Since its inception, the WVFA project has undergone comprehensive permitting and review under local, state, and federal regulations, including but not limited to:

- Reviews under SEPA by the Port;
- Reviews under NEPA by FHWA in coordination with WSDOT and by the Federal Railroad Administration (FRA);
- Review under local ordinances and development regulations by the City; and
- Review under federal regulations by the USACE, NMFS, and USFWS.

The most recent approval actions authorizing construction of the Terminal 5 rail loop occurred in 2009 and 2011, when permits were first obtained for the construction of the rail track and then subsequently revised to allow a southerly expansion of the rail loop closer to the Columbia River. A chronological list of permits authorizing construction of the Terminal 5 rail loop follows.

April 2009 – Port Supplemental Mitigated Determination of Non-Significance (MDNS) for WVFA project revisions that included the Terminal 5 rail loop

July 2009 – City post-decision review of the WVFA allowing project modifications that included the Terminal 5 rail loop

August 2009 – NEPA approval for modifications to the WVFA project, including the addition of the rail loop at Terminal 5 by WSDOT with final review and approval by FHWA

September 2011 – FRA Finding of No Significant Impact (FONSI) in response to an environmental assessment as a requirement of the Port’s funding request for Railroad Rehabilitation and Improvement Financing (RRIF) funds from the FRA

September 2011 – Port issuance of a Notice of Third Supplemental MDNS for the WVFA project

November 2011 – City approval of a Shoreline Substantial Development Permit, Shoreline Conditional Use Permit, Critical Areas Permit, and Tree Permit for the relocation of the WVFA rail tracks at Terminal 5 into shoreline jurisdiction

# PORT OF VANCOUVER West Vancouver Freight Access Rail Construction Projects

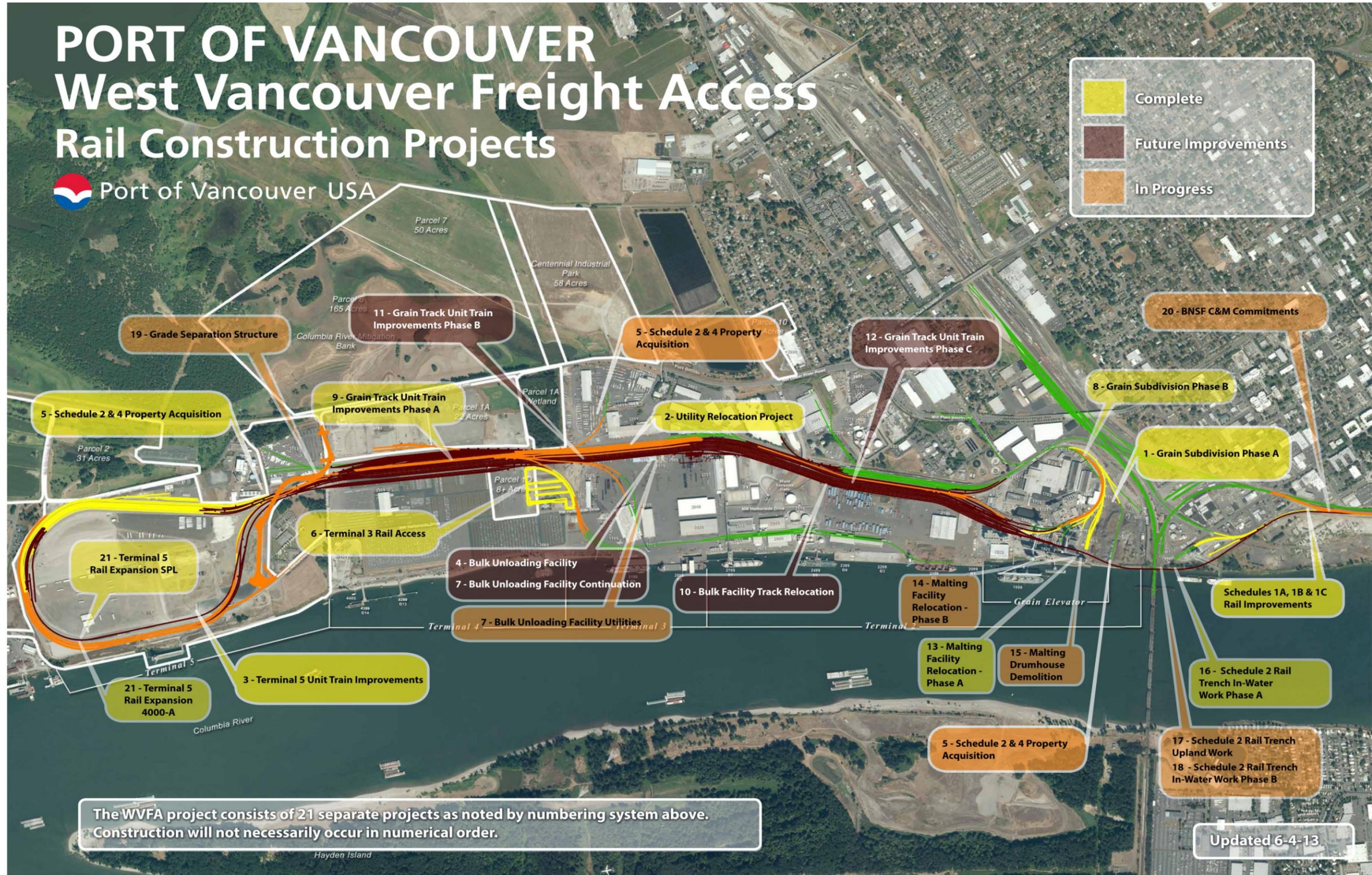


Figure 4.2-1. WVFA Rail Construction Projects

**Area 200** – is located on the Port’s Terminal 5 property. Terminal 5 has been the location of intensive historic industrial uses dating back to 1940s when the site was first developed for aluminum smelting operations through the early 2000s when aluminum processing activities on the property ended. The Port purchased Terminal 5 in 2009 and, with the exception of the on-site water tower and the dock structure in the Columbia River, all structures of the defunct aluminum processing plants have been removed. The Terminal 5 site is currently developed for the outdoor storage of wind turbine components and other cargoes and contains a rail loop including multiple rail lines for Port operations. The rail on the Terminal 5 site represents the westernmost segment of the WVFA project, as described above.

In addition to the WVFA project, BHP Billiton plans to construct a potash export facility on portions of Terminal 5. The approvals received for the project in 2012 included an additional rail loop track and a 301,400-square-foot storage building and an administrative and maintenance building, fuel station, conveyors, surge bin and shiploaders, and marine berthing facilities (Vancouver Hearings Examiner 2011). Initial grading and ground improvements have been completed.

**Area 300** – As part of the proposed project, crude oil storage tanks will be located on Parcel 1A on the south side of NW Lower River Road just east of Farwest Steel (3703 NW Gateway Avenue). This site was first developed by the Port for industrial use beginning in the early 2000s and is currently temporarily partially occupied by a steel scrap storage yard operated by Pacific Coast Shredding.

**Area 400** – Ship or barge loading will occur at existing berths 13 and 14 on the Columbia River south of the current Subaru facility. These berths were developed by the Port in 1994 and have most recently been used as layberths.

**Area 500** – The area encompasses the planned pipeline routes used for transferring crude oil between the project elements. The pipeline routes will be located primarily in existing rail and roadway corridors.

**Area 600** – The structure housing the west boiler will be located on the northwest corner of Terminal 5. This area is currently a vacant gravel pad surrounded by access roads to Terminal 5. It was previously part of the former aluminum facility on Terminal 5 and was the location of an electrical transmission tower for power lines.

**Rail Infrastructure** – rail infrastructure improvements required to support the Facility will be constructed at Terminal 5. The Facility will construct two additional rail loops (tracks 4106 and 4107), in addition to the improvements described above for the WVFA project. Existing Terminal 5 rail associated with the WVFA will be shifted; the shifting of existing facilities will be performed by others, has been previously permitted, and is not included within this request for Site Certification. A third rail loop (track 4105) is permitted for general Port use. This track may be transferred to exclusive use by the Facility once a sustained volume of 120,000 barrels per day is received by the Facility.

### ***Surrounding Land Uses and Zoning***

**Area 200** – Uses immediately surrounding Area 200 are as follows:

- North: Old Lower River Road (Port private road), Port Parcel 2 used for wetland, habitat and tree mitigation and a Bonneville Power Administration electrical substation

- East: Keyera Energy propane distribution facility (Keyera), Jail Work Center (approximately 600 feet to the east), and the CPU River Road Generating Plant (100 feet to the northeast)
- South: Cargo laydown and bulk potash handling facility (under construction)
- West: Tidewater Barge Lines and Tidewater Terminal Company (Tidewater)

The Keyera propane facility is located on an approximately 4-acre parcel consisting of rail unloading, three 80,000-gallon storage tanks, truck loading racks, and a small office building. The Jail Work Center is located on approximately 18.3 acres and has three buildings. The in-custody and work release buildings are housing units with a total of 224 beds. The kitchen and warehouse building contains food and laundry service equipment and a jail industries warehouse. The CPU River Road Generating Plant is a combined-cycle combustion natural gas turbine located on approximately 16 acres that can generate 248 megawatts of electricity.

The bulk potash handling facility will include rail unloading, a storage building, dock and shiploader and accessory structures and facilities. Initial site grading and ground improvement work has been completed for this project.

Tidewater Terminal Company occupy approximately 23 acres including an office building for the corporate headquarter for and Tidewater Barge Lines operates a marine terminal. The terminal handles containers and serves as a tug and barge maintenance and operations facility including marine and upland facilities.

These surrounding properties are all zoned IH (see Figure 4.2-2)

**Area 300** – Uses immediately surrounding Area 300 are as follows:

- North: Lower River Road (SR 501) and Columbia River Wetland Mitigation Bank
- East: Parcel 1A wetland
- South: Port rail system and the Subaru of America automobile import facility
- West: Farwest Steel

The Columbia River Wetland Mitigation Bank is a 154-acre mitigation bank developed in partnership with the Port. It includes 78 acres of enhanced wetlands and 25.5 acres of created wetlands. Credits from the wetland work on site are available for purchase to off-set wetland impacts on other properties. The Parcel 1A wetland is an approximately 10-acre parcel previously enhanced by the Port for wetland impacts on other properties. The Subaru facility is a port of entry for automobiles and consists of an approximately 70-acre parking and storage facility, a processing building, and facilities for rail car and truck loading. Farwest Steel is a steel fabricator and distributor and occupies an approximately 20-acre parcel, which was purchased from the Port in 2011. The site includes an office building and fabrication/warehouse building.

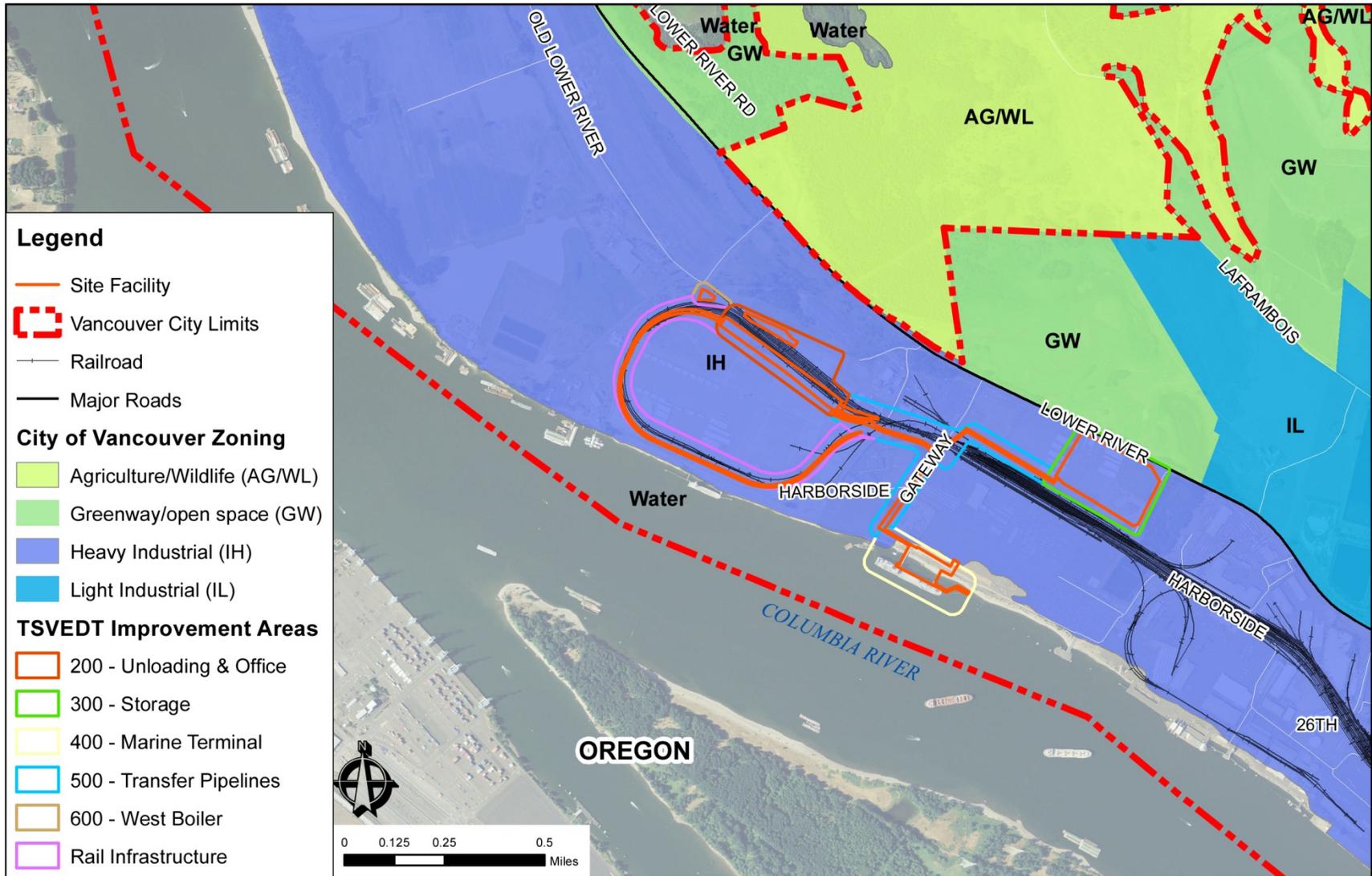


Figure 4.2-2. City of Vancouver Zoning in Site Vicinity

The surrounding properties are all zoned IH, with the exception of the Columbia River Wetland Mitigation Bank located north of Lower River Road which is zoned Greenway (see Figure 4.2-2). The Greenway zone is intended to encourage the preservation of agricultural and wildlife use on land which is suited for agricultural production and is valuable for wildlife habitat (VMC 20.450.020(B)(2)).

**Area 400** – Uses immediately surrounding Area 400 are as follows:

- North and East: Subaru of America automobile import facility
- South: Columbia River
- West: CalPortland Aggregate Yard

The Subaru site is described above and the CalPortland site is an approximately 8-acre aggregate yard where various sand and gravels are received by barge and truck, stored on-site and shipped by truck.

The surrounding properties are all zoned IH (see Figure 4.2-2).

**Area 500** – Properties adjacent to the pipeline routes are all industrial, with the exception of the Jail Work Center, previously described above, which is located south and west of the pipeline routes.

The surrounding properties are all zoned IH (see Figure 4.2-2).

**Area 600** – Uses immediately surrounding Area 600 are as follows:

- North: Old Alcoa Facility Access Road and Parcel 2 mitigation site
- East and South: Terminal 5 rail loop
- West: Tidewater

These areas are described above.

The surrounding properties are all zoned IH (see Figure 4.2-2).

**Rail Infrastructure** – The rail infrastructure improvements are located on Terminal 5. Surrounding land uses are industrial with the exception of the Jail Work Center located to the east of the existing rail loop.

The surrounding properties are all zoned IH (see Figure 4.2-2).

### ***Port of Vancouver Land Uses***

In addition to the land uses immediately surrounding the proposed project site, approximately 50 tenants use the Port for a variety of uses and activities. The Port occupies approximately 4 miles of waterfront and manages a total of 2,127 acres of which approximately 800 acres are currently developed, including a new 108-acre industrial park; 500 acres are undeveloped, 570 acres are devoted to mitigation and another 154 acres constitute the Columbia River Wetland Mitigation Bank. Within the Port's waterfront, there are five marine terminals with 13 shipping berths, with top exports currently including grain, scrap steel, bulk minerals, and pulp (Port Quick Facts, 2013). In addition to main exports, the Port also includes the import and/or export of automobiles, propane, liquid chemicals, and petroleum (including current operations by Tesoro at the Port). In addition to the export and import of products, the Port also provides over 2 million square feet of industrial warehousing.

### ***Land Uses within the Project Vicinity***

Land uses beyond the adjacent properties include a variety of land use activities in jurisdictions in Washington and Oregon.

Land uses within this area vary greatly, but primarily include urban and rural residential lands, commercial, industrial (primarily along the Columbia River), and agriculture and forestry (Clark County 2012). According to the Clark County Comprehensive Plan, the following land uses and their acreages for the County and the urban growth area of the City from 2007 are included in the Table 4.2-2 below and are shown in Figure 4.2-3.

**Table 4.2-2. Clark County and Vancouver UGA Land Uses**

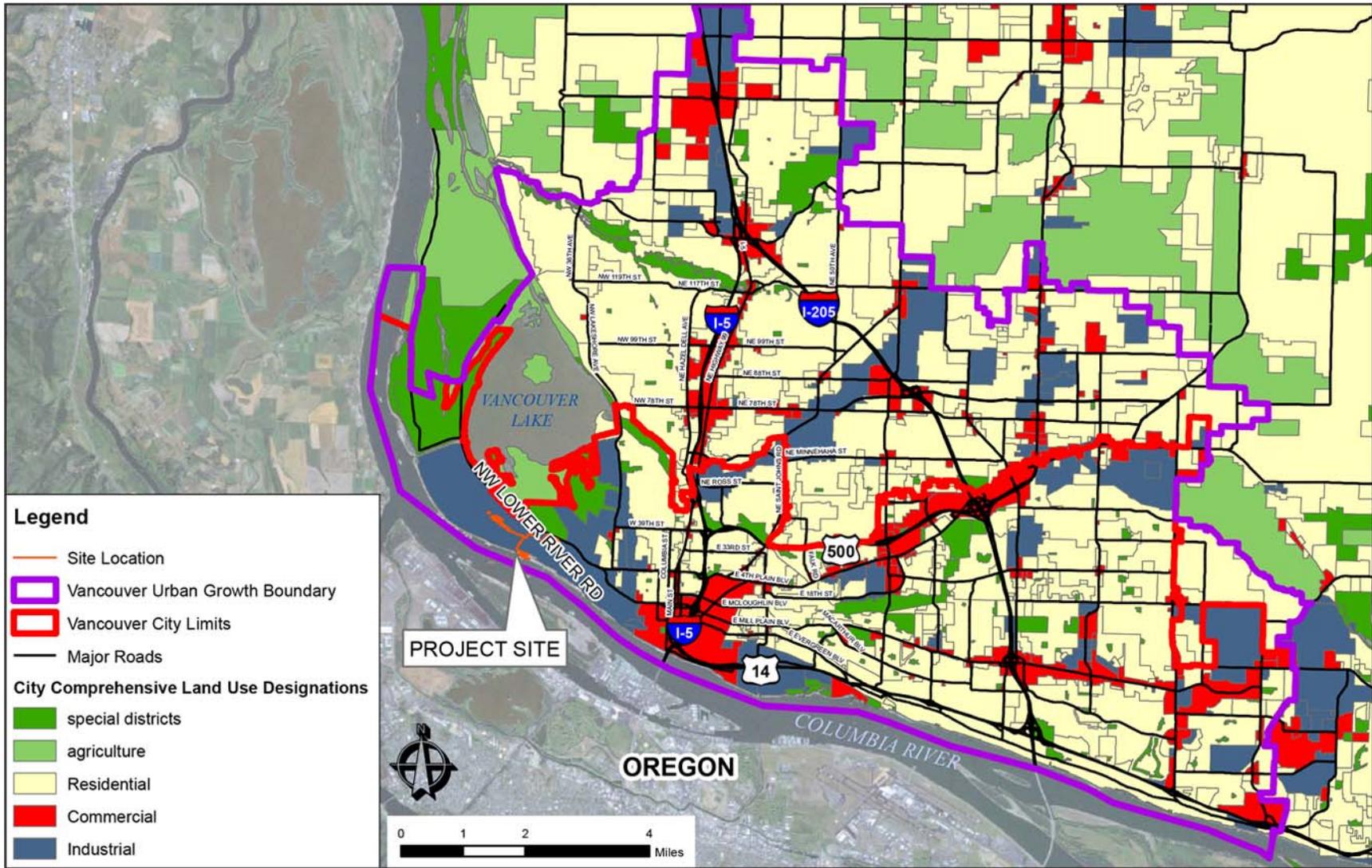
<b>Jurisdiction</b>	<b>Forestry</b>	<b>Agric</b>	<b>Comm'l</b>	<b>Industry/ Employment</b>	<b>Public Facilities</b>	<b>Parks</b>	<b>Residential</b>
Clark County	158,068	35,760	320	307 (industry only)	10	8,968	101,704
Vancouver UGA	0	0	3,732	9,080	1,971	4,445	25,283

*City of Vancouver Comprehensive Plan (2011–2030)*, the City’s comprehensive plan, identifies land uses at the project site and those located nearest to it (Figure 4.2-4). The downtown area, located approximately 2 miles southeast of the site, consists primarily of a mix of retail, commercial and residential uses (City of Vancouver, 2011). Surrounding the downtown core and spreading out to the north and east are neighborhoods, including the Fruit Valley Neighborhood approximately 3,200 feet (0.6 mile) east of the site.

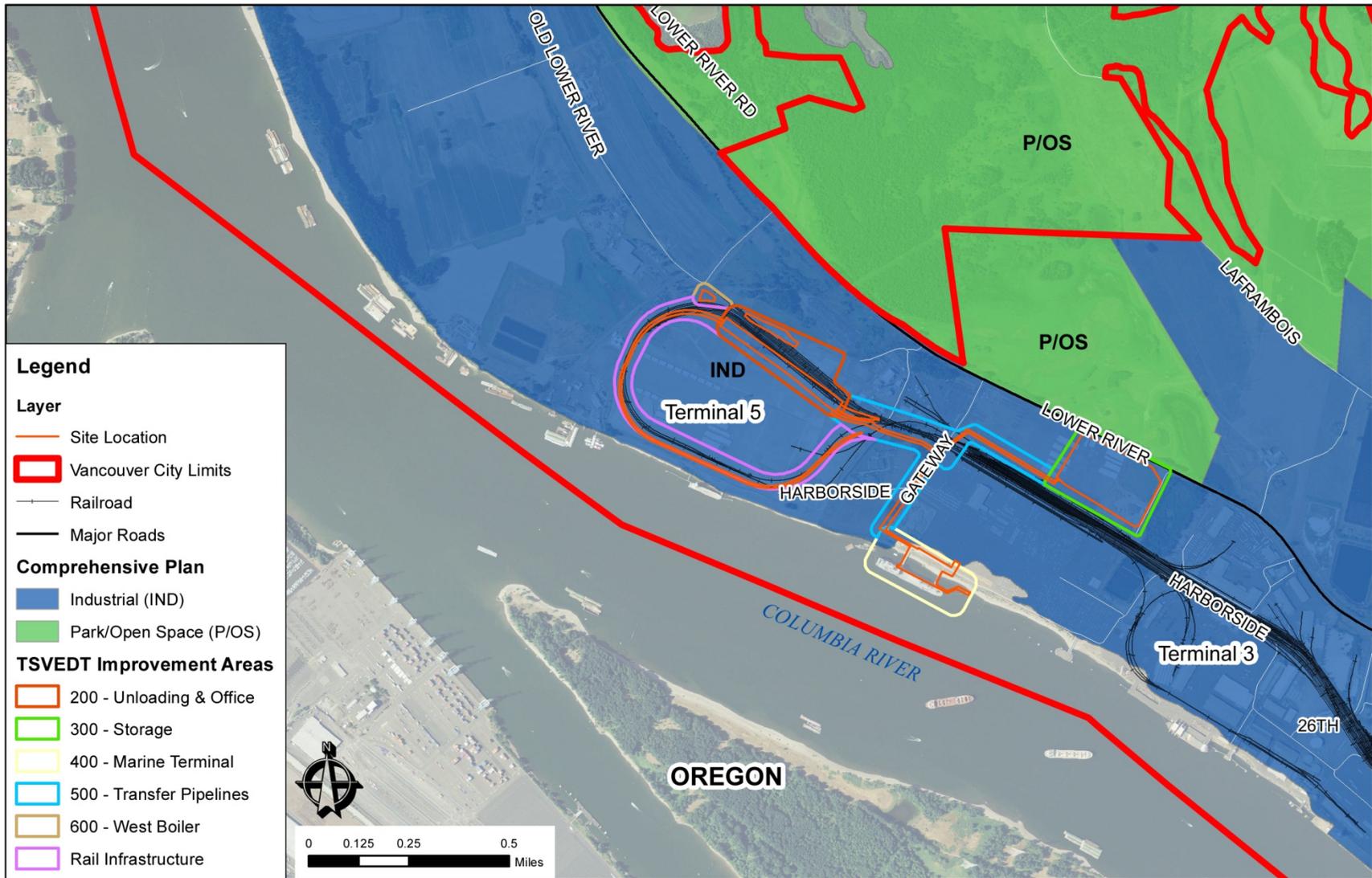
The Fruit Valley Neighborhood is the westernmost neighborhood in Vancouver. It consists of a mix of residential, industrial, business, and agricultural uses and natural areas (Fruit Valley Neighborhood Action Plan [NAP], 2008). The neighborhood consists of approximately 50 percent single family homes, 30 percent multi-family, 17 percent manufactured homes, and about 3 percent houseboats or other categories of houses (Fruit Valley NAP, 2008). To the north of the project site are parks and open space lands associated with Vancouver Lake (City of Vancouver, 2011).

The residence nearest to the proposed Facility is an isolated rural house owned by the Port and located at 6818 NW Old Lower River Road approximately 3,100 feet (0.6 mile) northwest of the proposed location of the boiler/steam plant for the rail car unloading facility. In addition, the Clark County Jail Work Center is located off Gateway Avenue between the elements of the proposed project. This facility opened in 2000 and includes 224 beds in a minimum security setting (Clark County, see <http://www.co.clark.wa.us/sheriff/custody/jwc.html>).

To the south across the Columbia River in Oregon, land uses consist primarily of urban and rural residential, industrial (mostly along the Willamette and Columbia rivers), commercial, and agricultural lands.



**Figure 4.2-3. General Comprehensive Land Use Designations**



The Port of Portland's Rivergate Industrial District is located immediately across the Columbia River from the proposed project site and 9 miles northwest of downtown Portland. The site consists of 2,800 acres with two marine terminals, industrial warehouse areas, and rail lines. Terminals at this location include an auto import, container, grain, steel, and bulk handling facilities. The west end of Hayden Island is located in the Columbia River between the project site and the Rivergate district. This area of Hayden Island is owned by the Port of Portland and is undeveloped.

#### **4.2.1.2 Relationship to Existing Land Use Plans and Policies**

The proposed project site is located at the Port within the City. The property is addressed by the City's comprehensive plan and regulated by Title 20, Land Use and Development, of the Vancouver Municipal Code (VMC), which includes zoning and critical areas regulations, and the City's Shoreline Master Program (SMP). Applicable zoning regulations have also been addressed in section 2.23 of this application.

According to Washington's Growth Management Act (GMA), counties and cities meeting specific population and growth criteria are required to prepare comprehensive plans in accordance with the goals of the GMA as identified in Chapter 36.70A RCW. The County was an initial jurisdiction required to comply fully with the provisions of the GMA and both the City and the County have adopted comprehensive plans in their jurisdictions per the requirements of the GMA.

Land use plans and regulations applicable to the proposed project include the following:

- County
  - *Clark County Comprehensive Plan (2004–2024)*
- City
  - *City of Vancouver Comprehensive Plan (2011–2030)*
  - VMC
    - VMC 20.440 Industrial District (Zoning)
    - VMC 20.740 Critical Areas Protection
    - VMC 20.760 Shoreline Management Area
  - SMP (Effective 9/24/2012)
- Port
  - *Port of Vancouver Strategic Plan (2013–2022)*

A more detailed discussion follows of how these land use plans, policies, and regulations apply to the proposed project.

#### ***Clark County Comprehensive Plan***

The County comprehensive plan was adopted in September 2007 and most recently amended in 2012 (Clark County 2012). The plan identifies goals and policies to guide growth in the County and includes the minimum requirements of the GMA. The GMA requires that a comprehensive plan consider the 20-year population forecasts, establish urban growth areas, and include (at a minimum) the following: land use, transportation, housing, utilities, capital facilities, and rural elements. The County's plan provides policy guidance and a process to help guide development. While the proposed project is located within the jurisdictional boundaries of the City, and therefore is subject to the City's comprehensive plan as described in the section below, the

County and the City must coordinate in the development of their respective comprehensive plans. Each jurisdiction retains exclusive authority to regulate land uses within its jurisdictional (municipal) boundaries, with the City of Vancouver holding such exclusive authority within the city.

The County's comprehensive plan established the Vancouver Urban Growth Area (UGA), including the project site, in 1995 (Clark County 1994). According to RCW 36.70A.110, UGAs are where urban growth should be encouraged. The plan also established land use designations for lands in the County (Figure 4.2-3). The area of the proposed project is designated as Industrial (IND) by the plan as shown in Figure 4.2-4 (Clark County 2012). The land use policies identified in the plan (Land Use Policy 1.1.1) state that the Vancouver UGA is now and will continue to be a major urban area with a full range of residential, commercial, and industrial uses, etc. The economic development policies included in section 9.1 state that industrial uses should be encouraged in major urban centers, along with the promotion of the long-term holding of prime industrial land and the future development of these industrial lands.

### ***City of Vancouver Comprehensive Plan***

The City's comprehensive plan was most recently updated in 2011. As a city planning under the Growth Management Act, the comprehensive plan forms the policy foundation for the legislative enactment of specific land use and zoning regulations, adopted by ordinance. As such, it is the City's responsibility to enact land use and zoning regulations that are generally consistent with the comprehensive plan. To secure development entitlements, an applicant must demonstrate that a project is consistent with adopted land use and zoning ordinances. The proposed project lies entirely within the City limits and therefore is addressed by the City's comprehensive plan and is subject to applicable City land use and zoning code requirements. The proposed project is located within the UGA and is on land designated as Industrial by the City's plan (Figure 4.2-4). This section addresses the policies of the City's comprehensive plan that apply to the project.

**Community Development Policies** – The community development chapter of the City's comprehensive plan provides policies that guide policy decisions on land use and development in the City. Table 1-5 of the comprehensive plan includes the City's land use designations and definitions of corresponding zoning. Under the Industrial designation, IH-zoned lands include the following activities: “[i]ntensive industrial manufacturing, service, production or storage often involving heavy truck, rail or marine traffic, or outdoor storage and generating vibration, noise and odors.” Figure 4.2-4 is the adopted comprehensive plan map for the City indicating the designation of the site and surrounding areas as Industrial. The following policies apply to the project:

- **CD-1 Citywide land supplies**

*Establish land supplies and density allowances that are sufficient to accommodate adopted long-term City of Vancouver population and employment forecast allocations.*

The project site is within the UGA and designated Industrial. It is part of the land area designated by the City to fulfill this policy.

- **CD-3 Infill and redevelopment**

*Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of underutilized and developed properties.*

The project site has been previously developed and its redevelopment is supportive of this policy.

- **CD-9 Compatible uses**

*Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.*

As indicated previously, the site and surrounding areas are zoned for the proposed use and contain similar industrial land uses with the exception of land used for wetland and tree mitigation activities. The Fruit Valley Neighborhood is the closest residential neighborhood to the site and is approximately 0.6 mile east of Area 300. Consistent with this policy, there are no anticipated impacts to the neighborhood from the proposal.

- **CD-11 Archaeological and historic resources**

*Protect and preserve cultural, historic and archaeological resources. Promote preservation, restoration, rehabilitation, and reuse of historically or architecturally significant older buildings. Continually increase knowledge and awareness of historic and archaeological resources, further developing the city's identity and allure. Work with Clark County to maintain state Certified Local Government Status.*

As shown in section 4.2.5, consistent with this policy, there are no historic or archaeological resources that are known to be impacted by the project.

**Economic Development Policies** – The economic development policies of the plan are aimed at encouraging development that leads to increased numbers of jobs for residents and ensuring that enough land is available for industrial development. The following policies apply to the project:

- **EC-2 Family-wage employment**

*Promote the formation, recruitment, retention and growth of businesses that provide a wide range of employment opportunities, particularly family-wage employment. Prioritize family-wage employment in land use policies and practices.*

As shown in section 4.4, the project will result in an additional 110 jobs when fully operational. The Socioeconomic Report (Appendix K) estimates direct labor income associated with the full operation is estimated to be \$33.0 million (in 2013 dollars). Labor income includes both employee compensation (wages, benefits, and taxes) and proprietor's income. Including both indirect and induced benefits, the operation of the terminal is projected to support a total of 890 jobs in Washington, with associated total income of \$64.1 million. The Socioeconomic Report estimates that the jobs directly associated with project operation of the project are likely to generate employee income that is substantially higher than the study area average wage.

- **EC-3 Public revenue enhancement**

*Promote development that enhances revenue generation for public services.*

As discussed in section 4.4 and Appendix K, the project will result in additional revenues to the State and local agencies through property, business and occupation and sales taxes.

- **EC-6 Efficient use of employment land**

*Maximize utilization of land designated for employment through more intensive new building construction and redevelopment and intensification of existing sites.*

Consistent with this policy, the project is part of the redevelopment of Terminal 5.

**Environmental Policies** – The plan’s environmental policies promote the protection and enhancement of the environment while still meeting other goals of the comprehensive plan such as community and economic development and housing and infrastructure goals.

- **EN-6 Habitat**

*Protect riparian areas, wetlands, and other fish and wildlife habitat. Link fish and wildlife habitat areas to form contiguous networks. Support sustainable fish and wildlife populations.*

As shown in section 2.23, the project is consistent with the City regulations regarding the protection of fish and wildlife habitat. The project will not impact riparian areas, wetland or other fish and wildlife habitat as shown in sections 3.4 and 3.5.

- **EN-7 Endangered species**

*Protect habitat for salmonids and other listed species and facilitate recovery. Encourage and support actions that protect other species from becoming listed.*

As shown in section 3.4, listed salmonids and other species use portions of the site and the surrounding areas. As indicated in section 2.23, the project will undergo review under Section 7 of the ESA as part of the federal permit process for the dock improvements. Minimization and mitigation measures will be employed as necessary to protect listed species and habitat that occur in the project area.

- **EN-8 Water quality and quantity**

*Enhance and protect surface water, stormwater, and groundwater quality from septic discharge, impervious surface runoff, improper waste disposal, and other potential contaminant sources. Ensure safe and adequate water supplies and promote wise use and conservation of water resources.*

Stormwater and wastewater will be generated from impervious surfaces and site operations. Stormwater will be collected and treated to adopted City standards prior to discharge to the Columbia River. Wastewater from both domestic and industrial sources will be discharged to the City sanitary system. If necessary, industrial wastewater will receive pretreatment.

- **EN-9 Trees and other vegetation**

*Conserve and restore tree and plant cover, particularly native species, throughout Vancouver. Promote planting using native vegetation. Protect historic and other significant trees. Work towards the Vancouver Urban Forestry Program goal of covering 28% of Vancouver’s surface area with tree canopy.*

As shown in section 3.4, most of the site is impervious and contains little vegetation. Some tree removal will be necessary for the pipeline but this will occur in an isolated area. The project will comply with VMC 20.770 and will plant additional trees to compensate for development that will impact pervious surfaces. In addition, trees will be planted as part of landscaped buffers and parking lot landscaping where currently no trees exist.

- **EN-10 Air quality**

*Protect and enhance air quality, in coordination with local and regional agencies and organizations.*

As indicated in sections 3.2 the project will generate emissions during both construction and operations. A permit for air discharge, included in section 5.1 of this application, will be obtained as part of the EFSEC process and the project will comply with all applicable regulations.

- **EN-11 Hazard areas**

*Manage development in geologically hazardous areas and floodplains to protect public health and safety.*

The project area contains geologic hazards as described in section 3.1 and floodplains as described in section 3.3.3. The project will be built to comply with adopted standards for construction in seismic hazard areas. The only project element in floodplains is the dock. It will be constructed to withstand flooding and the dock surface will be above the 100-year flood level.

As shown, the proposed Facility is consistent with the City's comprehensive plan and applicable policies because the proposed use is an industrial use located on land designated as Industrial within the UGA; in addition, the Facility will promote economic development and will be designed and operated in compliance with all applicable environmental regulations and policies to ensure the protection of sensitive resources.

### ***City of Vancouver Shoreline Master Program***

The Shoreline Management Act (SMA) applies to all counties and cities that have "shoreslines of the state." The SMA requires that these jurisdictions prepare and adopt shoreline master programs (SMP). The *City of Vancouver Shoreline Master Program* was approved in September of 2012 as required by RCW Chapter 90.58 and WAC Chapter 173.26. Within the project area, the Columbia River is a shoreline of statewide significance. The shoreline jurisdiction includes the waterbody and all areas within 200 feet of the ordinary high water mark (OHWM). The SMP designates the shoreline environment of the upland areas on the site as High Intensity and the areas of the site below the OHWM of the river as Aquatic.

The Facility includes a number of elements within the shoreline jurisdiction including modifications to the existing rail loops, dock improvements, and other activities associated with the shiploading within Area 400. Within the High Intensity and Aquatic designations, water-dependent industrial uses are permitted activities. The SMP defines a water-dependent use as follows: "a use or a portion of a use which requires direct contact with the water and cannot exist at a non-water location due to the intrinsic nature of its operations." The purpose of the proposed Facility is to transfer crude oil from rail cars to ships. Consequently, the proposed Facility activities clearly meet the definition of a water-dependent use. Further, per Policy 4.3.5.1, the purpose of the High Intensity designation is "to provide for high-intensity water-oriented

commercial, transportation, and industrial uses....” Table 6-1 of the SMP lists water-dependent industrial uses as permitted in the High Intensity and Aquatic shoreline designations with no setback or height limits.

Compliance with applicable SMP policies is further addressed in Section 2.23 .

***Vancouver Municipal Code***

The project is located within the City and therefore subject to the VMC. Compliance with City development standards is also addressed in section 2.23 and in the Pre-Application Submittal and City Pre-Application Conference Notes included as Appendix I.1. The following zoning ordinances apply to the proposed project.

**Industrial District (VMC 20.440) – Zoning** – Zoning in the City is shown on the attached map (Figure 4.2-2). The IH zoning of the site allows a variety of industrial uses, including the proposed Facility, which will comply with “warehouse/freight movement” as defined in Section 20.160.020 of the VMC. This definition is:

*Uses involved in the storage and movement of large quantities of materials or products indoors and/or outdoors; associated with significant truck and/or rail traffic. Examples include free-standing warehouses associated with retail furniture or appliance outlets; household moving and general freight storage; cold storage plants/frozen food lockers; weapon and ammunition storage; major wholesale distribution centers; truck, marine and air freight terminals and dispatch centers; bus barns; grain terminals; and stockpiling of sand, gravel, bark dust or other aggregate and landscaping materials.*

“Warehouse/Freight Movement” is listed in Table 20.440.030–1 in VMC 20.440 as a permitted use within the IH zone. In addition, “railroad yards” is listed as a permitted use within the IH zone.

Table 4.2-3 below shows how the proposal is consistent with the City’s development standards for the IH zone.

**Table 4.2-3. Development Standards (VMC Table 20.440.040-1)**

<b>Development Criteria</b>	<b>IH Zone</b>	<b>Proposed</b>
Minimum Lot Size	None	N/A
Maximum Lot Coverage	100%	N/A
Minimum Lot Width	None	N/A
Minimum Lot Depth	None	N/A
Minimum Setbacks	Per VMC 20.925 5 feet (west side of Area 300) 10 feet (north side of Area 300)	5 feet for west side of Area 300 60 feet for north side of Area 300
Maximum Height	None	Approx. 50 feet (rail unloading)
Minimum Landscaping Requirement (% of total net area)	0%	≤5%

**Critical Areas Protection (VMC 20.740)** – The critical areas found on the site include fish and wildlife habitat conservation areas, frequently flooded areas, and geologic hazard areas (seismic

hazard). Development is proposed, to some extent, in each of these areas as described below. Compliance with this section of code is further addressed in Appendices I.1 and I.2.

**Fish and Wildlife Habitat Conservation Areas (VMC.20.740.110)** – Project activities at berths 13 and 14 in Area 400 are located within the riparian management area (RMA) and riparian buffer (RB) area of the Columbia River. The riparian boundaries are measured landward from the biological OHWM and are limited by existing impervious surfaces. The existing riparian habitat is of low value because it is functionally isolated from the Columbia River.

**Frequently Flooded Areas (VMC 20.740.120)** – Plans include the use of the existing dock. It is not anticipated that any fill will be placed in the flood fringe or floodway. Further, to ensure any in-water structures included in the proposed project will withstand elevated river levels in flood events, the structures will be approved by a structural engineer licensed in Washington.

A portion of the storage area on Parcel 1A (Area 300) is identified as an isolated floodplain previously approved for fill.

**Geologic & Seismic Hazards (VMC 20.740.130)** – The project site is mapped by Clark County GIS as having moderate-to-high potential for liquefaction or dynamic settlement within the site area of the proposed project. As discussed in detail in section 3.1, a preliminary geotechnical report has been completed for the project that addresses the liquefaction potential on the site and recommends construction techniques to address any identified potential soil instability and seismic issues.

**Shoreline Management Area (VMC 20.760)** – Portions of the project area are located within 200 feet of the OHWM and are subject to the requirements of VMC 20.760 (Appendix I.2). The SMP is used to regulate uses within the shoreline management area as identified in VMC 20.760.030.

### ***Port of Vancouver Strategic Plan***

The *Port of Vancouver Strategic Plan (2013–2022)* is a document that helps focus the Port's efforts in future planning and development. The strategic goals of the plan include the following: maximize marine business and development as well as industrial business and development, develop and preserve multimodal transportation access, and generate and sustain diversified revenues. The proposed project will help increase the Port's marine business and diversify revenues at the Port to promote its long-term sustainability and economic base.

### ***Port of Vancouver Comprehensive Scheme of Harbor Improvements***

The Port has adopted a comprehensive scheme of harbor improvements per RCW 53.20.010.

### ***State of Washington***

The siting of the Facility is regulated at the state level by EFSEC, under Chapter 80.50 RCW (Energy Facilities - Site Locations) and Title 463 WAC. Applicants for certification from EFSEC are required to submit detailed information on the proposed development and its impacts. The application for site certification must also describe efforts to minimize or mitigate possible adverse impacts on the physical or human environment (WAC 463-60-085). Further, the Applicant is required to set forth insurance, bonding, or other arrangements proposed in order to mitigate for damage or loss to the environment (WAC 463-60-075). The proposed Facility is subject to EFSEC jurisdiction.

Chapter 80.50 RCW preempts all state and local approvals relating to energy facility sites that are under the jurisdiction of EFSEC. Certification pursuant to Chapter 80.50 RCW takes the place of any permit, certificate, or similar approval that would otherwise be required. Procedures to be followed by EFSEC in determining whether or not to recommend that the state pre-empt local land use plans or zoning ordinances for a site or portions of a site for an energy facility are set forth in WAC 463-28. The Council generally requires that the Applicant make reasonable efforts to achieve consistency with applicable local land use and zoning ordinances, as well as shoreline management plans in effect at the date of the application filing. If an Applicant is unable to resolve specific noncompliance issues, EFSEC may recommend that the Governor exercise the State's preemption.

#### **4.2.1.3 Impacts**

No impacts to existing land uses are anticipated. Therefore, no mitigation measures are specifically identified.

### **4.2.2 Light and Glare**

#### **4.2.2.1 Existing Environment**

The proposed Facility is located at the Port and in an area designated as industrial in the City's comprehensive plan. Existing ambient lighting levels at the site come primarily from neighboring sources that include Farwest Steel, Kelley Steel, Tidewater, the CPU River Road Generating Plant, the Jail Work Center, various import-export facilities using the adjacent rail lines and Columbia River terminals, and headlights along SR 501. Light from distant residential and commercial land use sources is minimal, primarily because of their distance from the site and the low light associated with residential areas. Minimal, if any, light comes from the existing Port stormwater and mitigation facilities north of SR 501. While there are no permanent light sources on the Columbia River, there is a designated anchorage area directly across the channel from berths 13 and 14 and oceangoing vessels using the anchorage will have various levels of lighting.

#### **4.2.2.2 Lighting**

*Construction phase:* During construction, outdoor lighting may include limited construction lighting and on-site safety lighting or warning flashers.

*Permanent lighting:* The project proposes to install outdoor lighting in various areas. This lighting will include low-level lighting around exits (minimum 2 foot-candles) and general outdoor lighting (from 0.2 to 5 foot-candles) including ground level operating areas, roadways, fuel storage areas, and shiploading, rail car unloading, and parking areas. This lighting will be provided for operator access and safety under regular operating conditions. Precise detailed placement of lighting fixtures has not yet been determined, but outdoor lights will be a combination of pole-mounted and structure-mounted lights and likely will be standard streetlight height (20 to 40 feet).

Outside lighting likely will be placed above doorways, walkways, and stairs around the exteriors of buildings and ancillary equipment. Generally, lighting angles will be determined by an evaluation of the economics of fixture wattage, light patterns, and light levels.

Spot lighting will be provided for illumination-level enhancement where needed around loading equipment maintenance areas and stairwells and catwalks. This lighting will be higher in

intensity than general outside lighting (up to 32 foot-candles), but will be limited to specific areas. This lighting can be adjusted to minimize light spillover or direct glare in response to specific site conditions.

#### **4.2.2.3 Impacts**

During construction, minor temporary outdoor lighting impacts may occur; however, most construction activities will occur during daylight hours and will be temporary in nature. The estimated construction duration is 9 to 12 months. Upon project completion, light and glare impacts on neighboring properties are expected to be negligible or nonexistent because the land uses on those properties are similar to the uses proposed for the Facility, as are their hours of operation and security needs.

Potential glare impacts will be minimized during the day by the use of non-reflective light paint colors on exterior surfaces. Using full cut-off light boxes, adjusting light direction, and using supplemental light shields/vegetation to provide additional screening, if necessary, will minimize light spillover at night. The Facility is expected to make a minimal contribution to overall ambient light levels in the immediate vicinity. There are no residential areas north, south, or west of the site that would be affected by proposed lighting. There are residential areas to the east within 1 mile of the Facility but most impacts are limited by the landform and existing vegetation. Impacts to wildlife as a result of construction and operational lighting is discussed in further detail in section 3.4.4.2.

#### **4.2.2.4 Mitigation Measures**

Most construction will occur during the day. At night, lights will be directed towards the site and will be the minimum wattage required for safety and operations.

Development elements, except for storage tanks, will be painted with earth tones. The storage tanks will be painted with nonreflective paint to reduce surface glare from direct sunlight during the day and headlights at night.

### **4.2.3 Aesthetics**

This section describes the visual qualities of the existing landscape around the project area and the potential changes to these qualities resulting from construction and operation of the Facility.

#### **4.2.3.1 Methodology**

For the purposes of this assessment, methodologies used by federal resource managers were employed. The most widely known methodologies are those developed by the U.S. Department of Agriculture, Forest Service (*Landscape Aesthetics, A Handbook for Scenery Management*, USDA USFS, 1995) and the U.S. Department of Transportation, Federal Highways Administration (*Visual Impact Assessment for Highway Projects*, USDOT FHWA, 1981). While neither methodology applies directly to this project, conducting a visual inventory and identifying viewer sensitivity form a general framework for assessing the project's potential visual impacts. While EFSEC has used both of these methodologies in prior proceedings (most recently in analyzing visual impacts of wind energy facilities), the landscape and land use setting for this facility are considerably different, necessitating consideration of the industrial landscape as context, both in measuring impacts as well as the expectations and sensitivities of viewers.

The visual resource methodology used to inventory and assess the potential impacts of this project includes the following steps:

- Prepare an inventory existing visual quality;
- Identify and evaluate potentially sensitive viewers and viewpoints within the landscape context of the development;
- Use visual simulations to describe the visual changes introduced by the construction and operation of the Facility;
- Assess the visual impacts from potentially sensitive viewpoints within the visual context of the project and an existing heavy industrial zone; and
- Recommend mitigation measures.

Field reconnaissance was conducted to determine the general visibility of the proposed Facility from the identified potentially sensitive viewpoints (e.g., residences, travel routes, public parks or other sensitive viewpoints). Visual impacts were assessed based on the visibility of changes from potentially sensitive viewpoints as a result of construction and operation of the project. Visual simulations of facilities were produced using scaled site photographs and 3-dimensional modeling software. These simulations allowed the assessment of potential impacts and the development of recommendations for mitigation.

#### **4.2.3.2 Inventory**

The project site is located within a highly industrialized area at the Port on the north bank of the Columbia River and west of the downtown area of the City. As described in earlier sections, the project includes construction and operations at five different locations within the Port. The dominant natural features of the area are the Columbia River, Vancouver Lake, and the Vancouver Lake Lowlands. The site, which is generally flat, is south of NW Lower River Road (SR 501). The adjacent natural areas include deciduous riparian vegetation, open grassland, and natural and modified shoreline conditions. The site has been highly modified by riverbank stabilization, imported fill, and the development of heavy industrial land uses and transportation corridors. The site is zoned IH. Surrounding uses include Farwest Steel, Kelley Steel, the CPU River Road Generating Plant, the Jail Work Center, a propane terminal, and various import-export facilities using the adjacent rail lines and Columbia River terminals. The site and its surroundings are heavily modified from their original natural state and are typified by industrial facilities including large industrial buildings, large expanses of impervious surfacing, utility and railroad corridors, fencing, and open storage. The stormwater and mitigation sites operated by the Port adjacent to the project site offer some vegetation; however, these limited sites are generally visually and physically disconnected from the surrounding landscape.

#### ***Past Industrial Use***

Alcoa began operations at the Port of Vancouver in the early 1940s at the site of the proposed project. The new aluminum plant was constructed in Vancouver to take advantage of the inexpensive hydropower produced from the dams recently constructed along the Columbia River. The smelter and fabrication facilities produced rod, wire, cable, and other aluminum products that were shipped throughout the world. The extent of the aluminum smelting and manufacturing activity is illustrated on the historic aerial photo Figure 4.2-5. Alcoa operated the facility through the early 2000s.

Since the plant's closure, site has been remediated to Ecology's standards and redeveloped for other industrial uses. Because of its industrial history, manufacturing processes and structures have dominated the appearance of the project site for more than 70 years. These historic uses

resulted in the development of numerous large structures, utility, and transportation facilities. The proposed project is consistent with historic industrial uses and will not result in new visual impacts to the site and adjacent areas.

### ***Landscape Setting***

In addition to adjacent industrial Port lands, the landscape setting is characterized by the Vancouver Lake Lowlands. This landscape area includes Frenchman's Bar Regional Park, Shillapoo Wildlife Area, Vancouver Lake Regional Park, and other open space lands owned by the state and managed for wildlife. East of the site, residential and industrial areas are found along Fruit Valley Road. Additional residential areas are located on the bluffs overlooking Vancouver Lake and the Port. These residential areas range from approximately 0.6 mile to 1.25 miles from the project site. The Columbia River is directly south of the site. The Port of Portland owns the western end of Hayden Island on the south shore of the Columbia River across from the Port of Vancouver.

### ***Visual Quality***

The general character and setting of the existing landscape are described above. Within the project limits, past and current industrial activities have modified the landscape character greatly. SR 501, other industrial uses, and overhead utility lines separate the project area visually and physically from the adjacent natural features. The visual quality of the project area is consistent with the manmade conditions within the Port.

Based on the described character and setting, three general descriptions were developed to characterize the visual quality of the project site. These visual quality descriptions were developed from the land uses and the visual patterns created by the existing natural and manmade features. The descriptions follow.

- **Urban/Industrial** – This landscape is common to urban areas and urban/industrial fringes. Human elements are prevalent or landscape modifications exist which do not blend with the adjacent natural surroundings (low visual intactness and unity). The character and setting of the site, and its visibility from surrounding areas, will be that of a heavily industrialized landscape, dominated by rail infrastructure, commodity storage, processing and shipping, with or without the project.
- **Rural** – The landscape exhibits reasonably attractive natural and human-made features/patterns, although these are not visually distinctive or unusual within the region. The area provides some positive visual experiences such as natural open space with some existing agricultural areas (farm fields, etc.) or well-maintained and landscaped urban areas.
- **Unique/Distinctive** – This landscape exhibits distinctive and memorable visual features (landforms, lakes and rivers, etc.) and patterns (vegetation/open space) that are largely undisturbed—usually in a rural or open space setting.

### ***Viewer Sensitivity***

Potential viewer sensitivity depends on viewer types and exposure (number of viewers and view frequency), view orientation and duration, viewer frame of reference and expectation, and viewer awareness/sensitivity to visual changes. For the purposes of this report, levels of viewer sensitivity were evaluated using the following criteria:

- **Low** – Viewer types representing low visual sensitivity include industrial/warehouse, utility, and shipping and transportation workers. Compared with other viewer types, the number of viewers is generally considered small and the duration of their view is short. The activities of these viewers typically focus their attention and limit their awareness/sensitivity to the visual setting immediately beyond the workplace.
- **Moderate** – Viewer types representing moderate visual sensitivity consist of highway and local travelers. The awareness and sensitivity of this set of viewers are considered moderate because destination travelers often have a focused orientation. The level of sensitivity is influenced by the rate and frequency of travel. Delivery drivers who often travel a particular route will have less sensitivity than pedestrians who move slowly through an area.
- **High** – Residential and recreational viewers and viewers accessing public places (parks, beaches, etc.) are considered to have comparatively high visual sensitivity. Their views may be of longer duration and higher frequency.

### ***Viewpoints***

To assess the potential visual impacts resulting from this project, the existing conditions were reviewed. This work included a photographic inventory of the landscape setting to identify important viewpoints where visual impacts from the project may be observed. This task considered sensitive viewers in determining final viewpoints. Areas of the project not visible from public roadways and lands, including adjacent Port industrial operations, were not included in the analysis. The viewpoints and the project vicinity are illustrated in Figure 4.2-7.

Four viewpoints were determined to assess potential impacts resulting from project:

- **Viewpoint 1** was selected to assess potential impacts for motorists, bicyclists, and pedestrians traveling SR 501 and viewing the storage area (Area 300). This viewpoint is approximately 400 feet from the storage area. Primary viewers include Port tenants and customers, park users traveling to/from Frenchman’s Bar and Vancouver Lake parks, and recreational bicyclists. Because of the short duration of view, recreational users passing by the storage area have been assigned moderate viewer sensitivity. Port tenants and customers have been assigned low viewer sensitivity (see Figure 4.2-8).
- **Viewpoint 2** was selected to assess potential impacts for users at Franklin Neighborhood Park and residents of the Northwest Neighborhood. This viewpoint includes two separate sub-viewpoints (Viewpoint 2a and Viewpoint 2b) with slightly different perspectives of the storage area to assess potential impacts for different viewers. It should be noted that other park and residential areas are located closer to the Facility in the Fruit Valley Neighborhood. Because of the flat topography and the existence of natural features and built structures located between the neighborhood and the Facility, the site is not visible from the Fruit Valley Neighborhood. No visual impacts are anticipated. Located on a bluff overlooking the Port, Franklin Park is approximately 1.25 miles from the storage area and the Northwest Neighborhood is approximately 0.65 mile from it. Because of the proximity of residential and park areas to the Facility, viewers have been assigned moderate viewer sensitivity rather than the high sensitivity typically associated with this viewer type (see Figure 4.2-9).
- **Viewpoint 3** was selected to assess potential impacts for commercial maritime and recreational boaters on the Columbia River. Dock facilities located at Area 400, and to a lesser extent the storage area, will be visible from the Columbia River. This viewpoint is approximately 0.30 mile from dock and 0.75 mile from the storage area. Maritime users have

been assigned a low sensitivity. Because of the proximity of boaters to the Facility, recreational viewers have been assigned moderate viewer sensitivity rather than the high sensitivity typically associated with this viewer type (see Figure 4.2-10).

- **Viewpoint 4** was selected to assess potential impacts for motorists traveling NW Old Lower River Road. This viewpoint is approximately 100 feet from the west boiler area (Area 600) and 750 feet from the unloading and office area (Area 200). Traffic through this roadway corridor is relatively light consisting primarily of Port tenants, customers, and agricultural workers. Because of the duration, frequency, and types of user groups traveling through this corridor, a low viewer sensitivity has been assigned (see Figure 4.2-11).

Table 4.2-4 below summarizes the four viewpoints that were selected for this analysis, the sensitivity of viewers, and existing visual quality from these viewpoints.

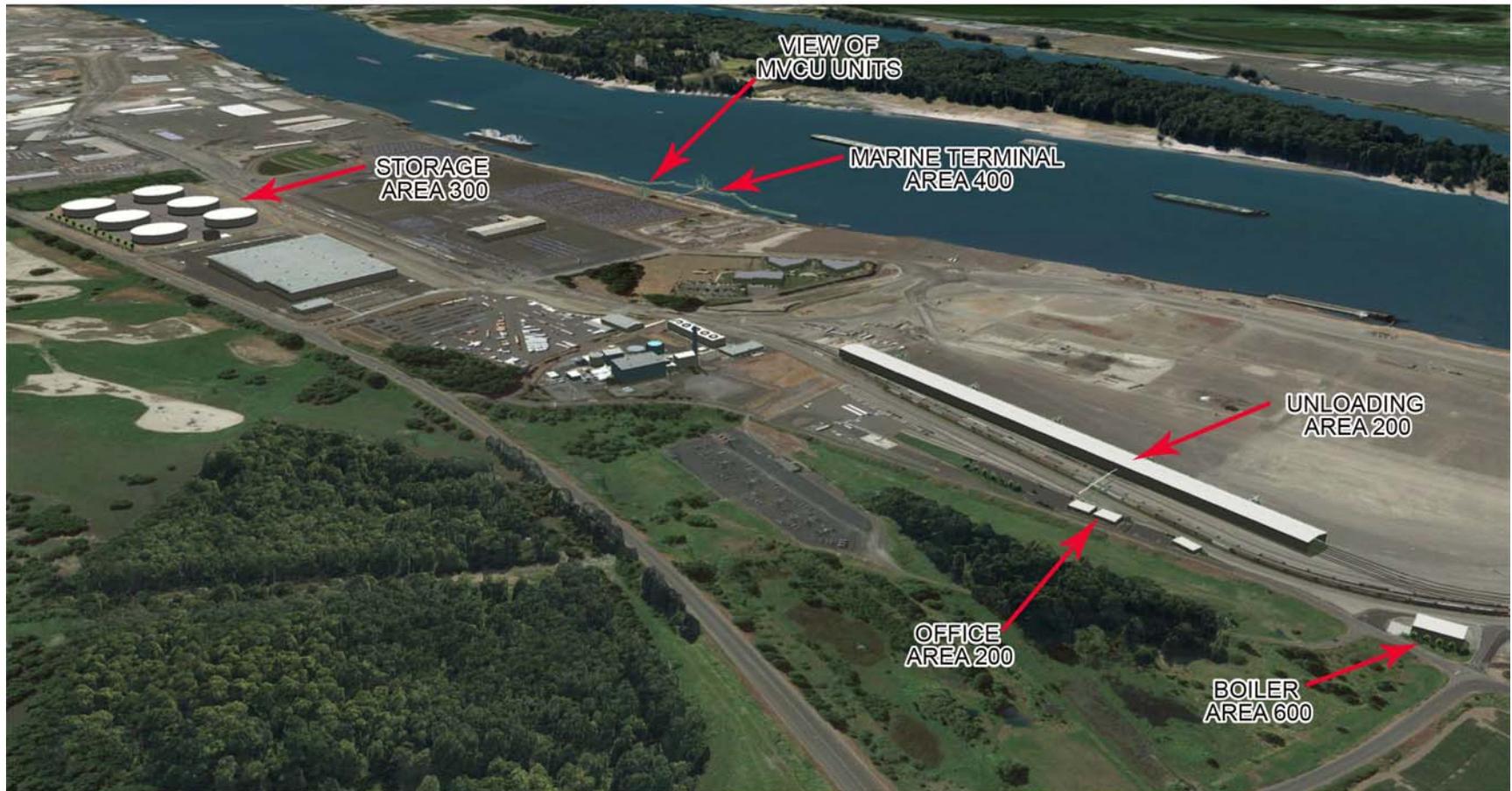
**Table 4.2-4. Viewpoints, Sensitive Viewers, Existing Visual Quality**

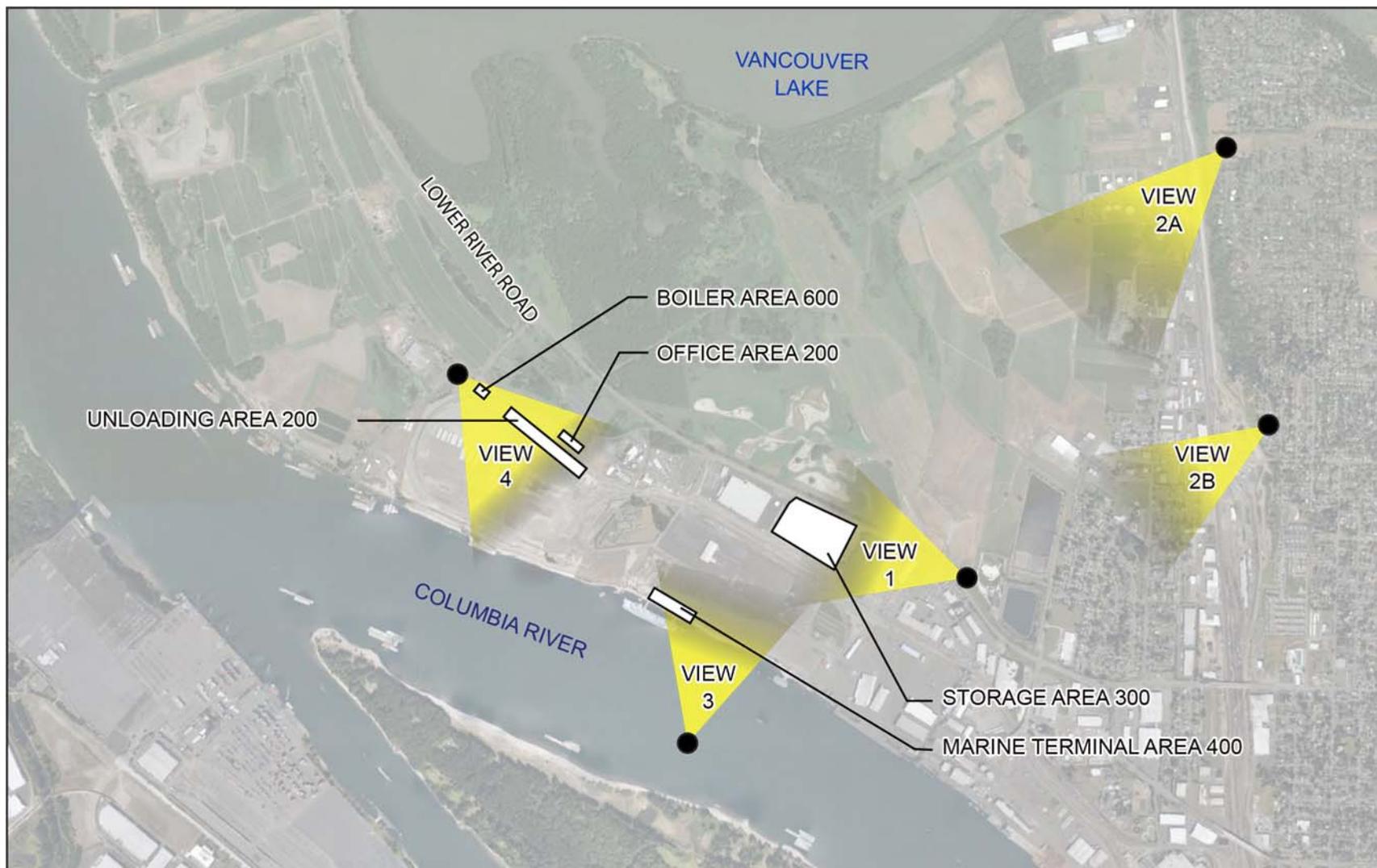
View Number	Viewpoint	Sensitive Viewers (Sensitivity)*	Visual Quality
1	SR 501, looking west	Motorists, bicyclists, and pedestrians traveling SR 501. Primary users include Port tenants and customers (L), park users traveling to/from Frenchman's Bar and Vancouver Lake parks (M), and recreational bicyclists (M).	Urban/Industrial Rural
2a & 2b	Franklin Neighborhood Park (2a) and Northwest Neighborhood (2b), looking southwest	Park users and residents of the Northwest Neighborhood (M).	Urban/Industrial Rural
3	Columbia River Shoreline, looking north	Maritime (L) and recreational river (M) users.	Urban/Industrial
4	NW Old Lower River Road, looking east	Motorists traveling NW Old Lower River Road (L). Primary users include Port tenants and customers and employees and visitors of adjacent industrial sites (e.g. Tidewater).	Urban/Industrial

\*L = low; M = moderate; H = high viewer sensitivity

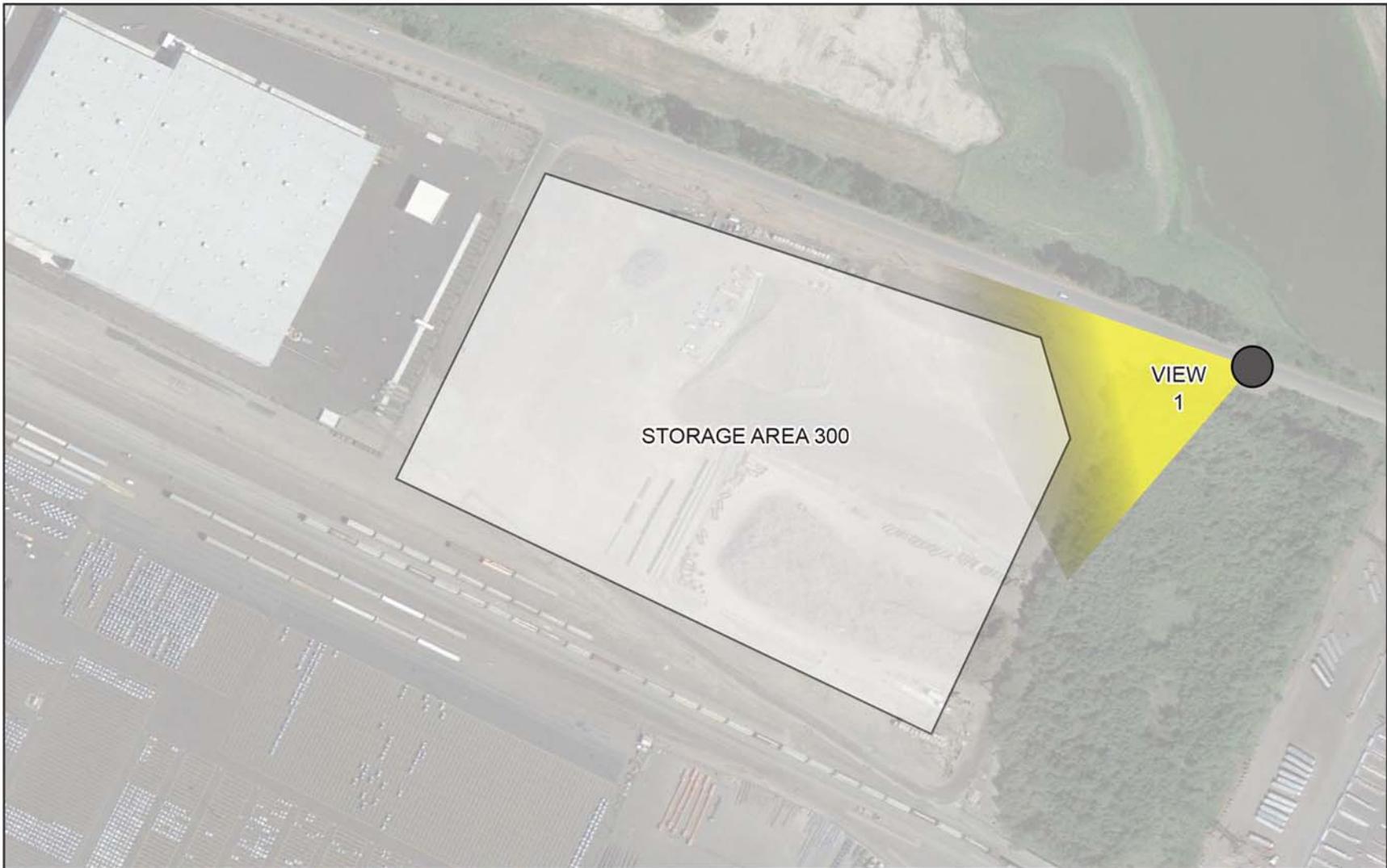


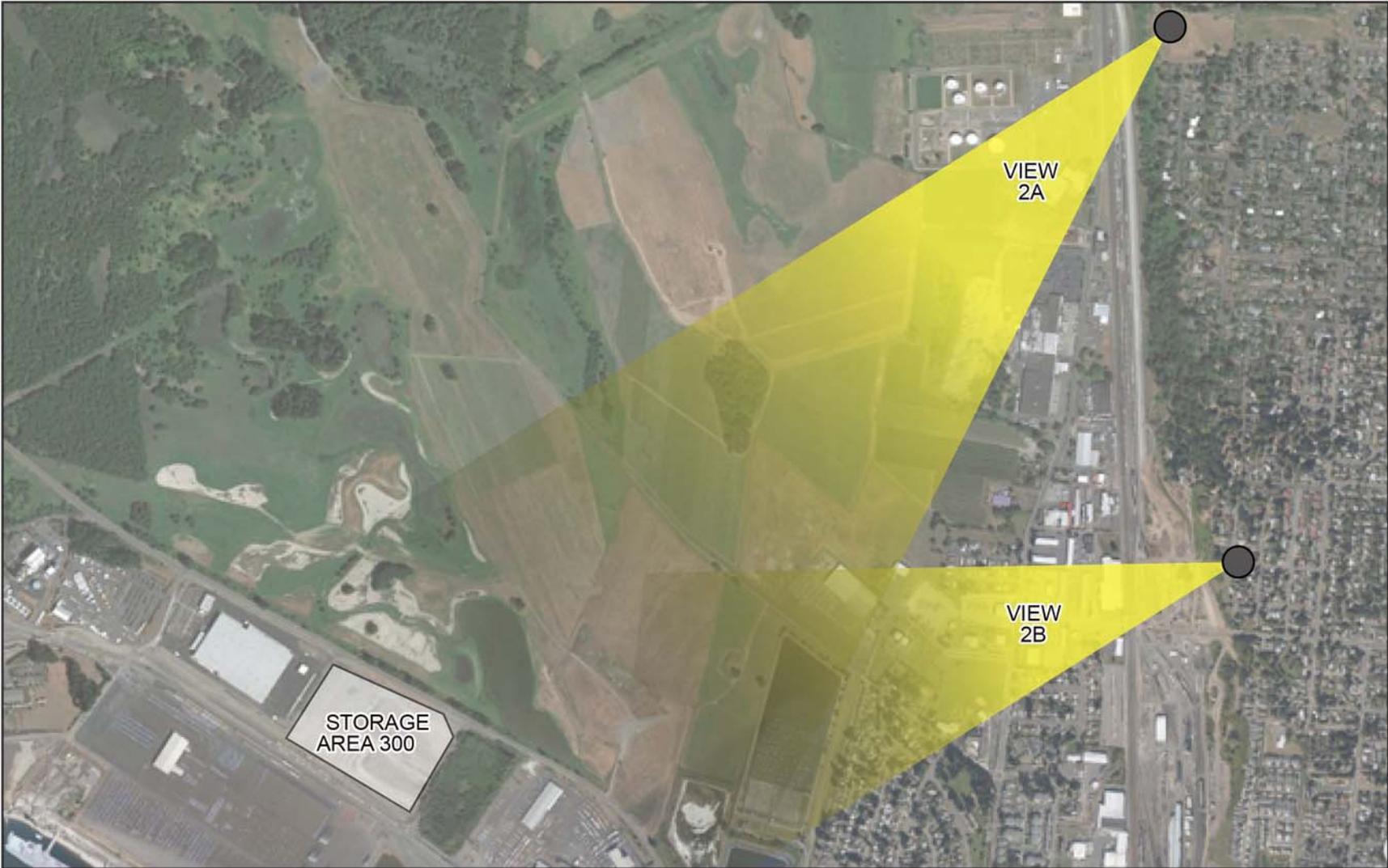
**Figure 4.2-5. Historical Aerial Photo**



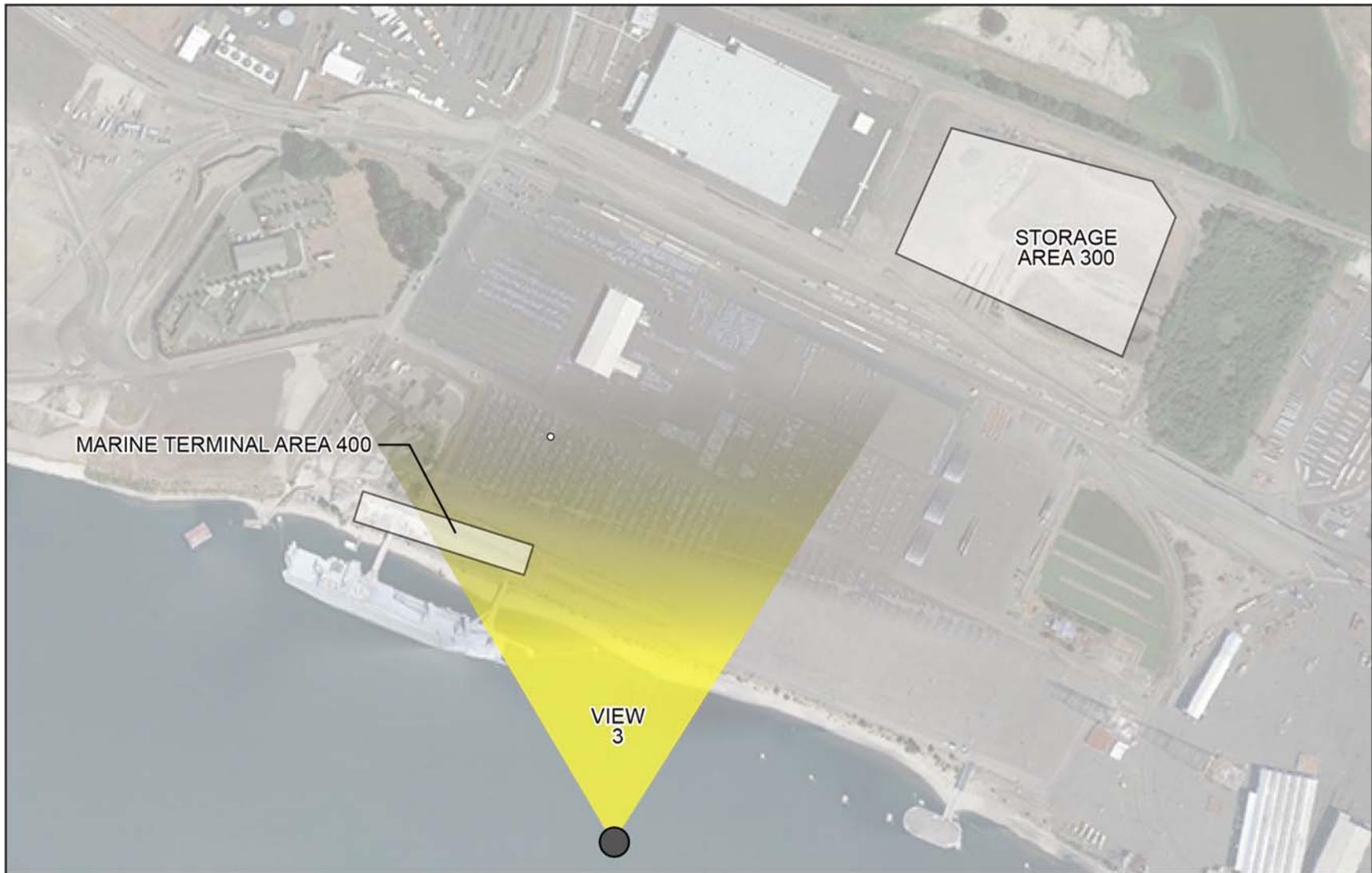


**Figure 4.2-7. Viewpoints and Vicinity**





**Figure 4.2-9. Viewpoint 2**





### 4.2.3.3 Visual Assessment

In order to assess the impacts to landscapes and views potentially affected by the proposed Facility, visual simulations were prepared illustrating the constructed condition of the project. The visual simulations were developed using photographs taken with a digital SLR camera from various focal lengths from 27 mm to 105 mm. Photographs were taken of the existing topographic and vegetative features showing both close-in and distant views of the affected adjacent developed, recreation, residential, neighborhood, roadway and river areas. 3-D models and illustrations were created of the proposed structures using a combination of AutoCAD, Google Sketchup Pro, and Adobe Photoshop. The 3-D models were then geo-referenced and placed in Google Earth Pro. Perspective views of the 3-D models were generated for each structure using the camera locations used for the digital photographs. Images exported from the 3-D model were then superimposed over the high-resolution digital photographs to simulate the constructed condition of the built structures and proposed landscape improvements within the existing landscape setting. The digital photographs and the simulations represent before and after images and help describe the visual change associated with this project. No other photo editing or touchup work was done to the simulations.

The tentative heights of the components of the Facility are presented in Table 4.2-5.

**Table 4.2-5. Estimated Heights of Components**

Structure	Height (feet)
Tanks	48
Boiler Building	45
Administration/Office Building	12
Rail Car Unloading Building	48

The visual simulation task and analysis provided the following visual assessment.

#### **SR 501**

The assessment of visual impacts on those who use the public roadway abutting and directly north of the storage area (Area 300) used one vehicle point (Figures 4.2-12 and 4.2-13). Views from other locations along NW Lower River Road will be similar in nature. NW Lower River Road is a vehicular and non-motorized transportation corridor for travelers bound for the Port and for users of the recreation resources in the area such as Vancouver Lake and Frenchman's Bar parks, the Columbia River, and state recreation lands within the Vancouver Lake Lowlands. The Port property to the east of the storage area is covered with trees that obscure most views of the site from the east. Views of the project are apparent as the traveler nears the storage area. The tanks and the containment berm and fencing will be visible from this viewpoint, although the construction of the storage area is proposed to include a 6-foot-high containment berm that will screen most of the industrial activities from pedestrian and vehicular views. The project will include buffer landscaping including street trees, shrubs, and groundcover plantings. The proposed landscape will soften the views of the storage area from SR 501. Although the storage area structures will be visible from SR 501, this view is not inconsistent with other Port industrial facilities and uses along this corridor.



**Figure 4.2-12. Viewpoint 1 Existing**



**Figure 4.2-13. Viewpoint 1 Simulation**

### ***Franklin Park and Northwest Neighborhood***

This viewpoint (see Figures 4.2-14 and 4.2-15) illustrates the potential visual impacts of the Facility from the urban open spaces overlooking the Port. A second viewpoint – a street-level view from a residential street within the Northwest Neighborhood – was selected. This viewpoint (see Figures 4.2-16 and 4.2-17) illustrates the potential visual impacts of the Facility from the residential neighborhood overlooking the Port. The park and neighborhood are at an elevation approximately 150 feet above the proposed Facility. Although the elevated perspective of this viewpoint provides open westerly views, the distance from the viewpoint to the Facility and the extensive trees and many manmade structures in the foreground restrict views of the proposed structures and the potential impacts are minimal.

### ***Columbia River Shoreline***

The project includes buildings and loading structures at the existing marine terminal (Area 400) located on the Columbia River (see Figures 4.2-18 and 4.2-19). The evaluation included the potential visual impacts of the Facility as seen by users at the Columbia River water level. Although the primary use of the river in this area is heavy marine, recreational boaters pass through en route to recreational areas up- and downstream of the project and views are potentially affected by the proposed Facility. The shoreline at the Port includes several docks, piers, and other industrial structures. Because of the working nature of this waterfront, the proposed cranes and structures associated with this project will have limited visual impact to river users.

### ***NW Old Lower River Road***

One viewpoint was used to assess visual impacts on those who use the public roadway near the west boiler building and rail car offloading facility. A short segment of NW Old Lower River Road is adjacent to this part of the Facility and the proposed structures may be briefly visible to roadway users traveling through this corridor. The proposed visual simulation (see Figures 4.2-20 and 4.2-21) examines the potential impacts of the Facility on a viewer located in the public right of way. Although the structures will be visible from NW Old Lower River Road, this view is not inconsistent with other Port industrial facilities and uses along this corridor.

### ***Temporary Visual Impacts***

Temporary visual changes introduced by construction activities include changes during construction. Viewers will observe earthwork equipment, construction trailers, building construction, and cranes. Construction will last 9 to 12 months and no interim screening will be provided. Standard erosion control measures will be implemented during construction periods.

#### **4.2.3.4 Visual Impacts**

In general, visual impacts to the overall landscape setting resulting from construction of the Facility are expected to be low. The proposed uses are similar to the historic, existing and ongoing land disturbances created by other industrial development. Required landscaping along SR 501 and at proposed parking areas will provide screening, shaded areas, and some unity with surrounding landscape when mature (approximately 10 years). The form, color, and scale of buildings and elements will be similar to nearby heavy industrial developments and the Facility will be visually compatible with the industrial land uses surrounding the development.

This analysis examines the aesthetic impacts of this project. The primary concerns are the potential impacts from the residential and recreation areas and recreation users near the site.



**Figure 4.2-14. Viewpoint 2a Existing**



**Figure 4.2-15. Viewpoint 2a Simulation**



**Figure 4.2-16. Viewpoint 2b Existing**





**Figure 4.2-18. Viewpoint 3 Existing**



**Figure 4.2-19. Viewpoint 3 Simulation**



**Figure 4.2-20. Viewpoint 4 Existing**



**Figure 4.2-21. Viewpoint 4 Simulation**

Because of the industrial nature of the Port, the proposed Facility is generally consistent with the existing land uses and built environment. The visual impact assessment was based on the evaluation of the changes to the existing visual quality and sensitive viewers. Viewer sensitivity should be considered within the context of reasonable expectations of those experiencing views of a heavily industrialized area. The assessment of impacts was based on the visual simulations of the changes portrayed in each image. The levels of impacts are identified as high, moderate, and low:

- **High Level of Impact (H)** – assigned in situations in which the storage area, buildings, or other structures would be highly visible to a high number of sensitive viewers and would impact the visual quality of the landscape setting negatively. Mitigation measures may or may not provide benefit to this level of impact.
- **Moderate Level of Impact (M)** – assigned in situations in which the storage area, buildings, or other structures would be visible to a moderate number of sensitive viewers. Moderate impacts may be generally consistent with adjacent land uses and some mitigation may be required to minimize impacts to sensitive viewers. Views of the storage area from SR 501 are considered to have a moderate level of impact although the mitigation measures that are already part of the project will reduce impacts.
- **Low Level of Impact (L)** – assigned in situations in which the storage area, buildings, or other structures would be minimally visible or visual impacts would be difficult to perceive because of distance, compatibility with other existing land uses, or screening or buffering. Industrial facilities in the foreground of other industrial facilities would not change the visual quality and would be considered a low level of impact. A project that affects a low number of viewers may be a low level of impact. The views from Franklin Park and the Northwest Neighborhood are considered to have low levels of impact because of the distance of the viewpoint from the existing landscape and the manmade structures in the foreground. The views from the Columbia River and NW Old Lower River Road are considered to have low levels of impact because of the viewpoint distance and industrial context.

Potential visual impacts are summarized in Table 4.2-6 below.

**Table 4.2-6. Summary of Visual Impacts from Representative Viewpoints**

View Number	Viewpoint	Existing Visual Quality	Existing Visual Sensitivity*	Anticipated Visual Impacts*
1	SR 501, looking west	Urban/Industrial Rural	M, L	M
2a & 2b	Franklin Neighborhood Park and Northwest Neighborhood, looking southwest	Urban/Industrial Rural	M	L
3	Columbia River Shoreline, looking north	Urban/Industrial	L, M	L
4	NW Old Lower River Road, looking east	Urban/Industrial	L	L

\*Visual sensitivity and impact: L = low; M = moderate; H = high

#### 4.2.3.5 Mitigation Measures

While visual impacts are not considered to be significant, to minimize impacts to all viewpoints, the project will implement the following mitigation measures. These are already required by the City and are standard development requirements. They include:

- Existing trees will be used as landscape buffers and will remain along SR 501 to reduce visual impacts.
- A landscape buffer with street trees, shrubs, groundcovers will be established along SR 501, entrance roads, and facilities along Old Lower River Road.
- Landscaping will be provided in parking lots per City requirements.
- Non-reflecting light colors will be used on structures.

#### 4.2.4 Recreation

##### 4.2.4.1 Inventory of Recreational Facilities

Regionally popular recreational activities include outdoor sports such as boating, windsurfing, fishing, hiking, biking, rock climbing, and camping. As a result of the area's proximity to many rivers, streams, and mountains, many outdoor recreation opportunities are readily available to residents. Recreational opportunities in the immediate vicinity (within an approximately 2-mile radius) of the proposed Facility are listed in Table 4.2-7 and shown in Figure 4.2-22.

**Table 4.2-7. Public Park and Recreation Facilities in the Immediate Vicinity of Project**

Name of Park/Facility	Facilities	Owner
Vancouver Lake Park	<ul style="list-style-type: none"> <li>• 234-acre regional park located along the west shore of Vancouver Lake</li> <li>• 2.5 mile trail connection to Frenchman's Bar Park</li> <li>• Lake access with a sandy beach</li> <li>• Playground equipment</li> <li>• Picnic shelters</li> <li>• Restrooms</li> <li>• Hand launched watercraft access</li> <li>• Vancouver Lake Rowing Club</li> </ul>	Vancouver-Clark Parks & Recreation (VCPRD)
Frenchman's Bar Park	<ul style="list-style-type: none"> <li>• 120-acre regional park located on the Columbia River</li> <li>• 2.5 mile trail connects to Vancouver Lake Park</li> <li>• River access with a sandy beach</li> <li>• 8 sand volleyball courts</li> <li>• Playground equipment</li> <li>• Picnic shelters</li> <li>• Restrooms</li> </ul>	VCPRD
Shillapoo Wildlife Area (Vancouver Lake Unit)	<ul style="list-style-type: none"> <li>• 477-acre unit at the south end of Vancouver Lake</li> <li>• Boat launch on the south shore</li> <li>• Trails</li> <li>• Wildlife viewing</li> <li>• Hunting, trapping, fishing</li> <li>• Target Shooting/ trap shooting/archery</li> </ul>	Washington Department of Fish and Wildlife (WDFW)

Name of Park/Facility	Facilities	Owner
Burnt Bridge Creek Greenway Trail	<ul style="list-style-type: none"> <li>• 8-mile hard-surfaced shared-use trail</li> </ul>	VCPRD
Franklin Park	<ul style="list-style-type: none"> <li>• 12-acre neighborhood park</li> <li>• Play equipment</li> <li>• Sports fields</li> <li>• Picnic tables</li> </ul>	VCPRD
Fruit Valley Park	<ul style="list-style-type: none"> <li>• 6-acre neighborhood park</li> <li>• Play equipment</li> <li>• Paved pathways</li> <li>• Picnic tables</li> </ul>	VCPRD
Liberty Park	<ul style="list-style-type: none"> <li>• 0.2-acre park developed in conjunction with the completion of the Mill Plain Blvd. Extension</li> <li>• Play equipment</li> </ul>	VCPRD
Various Neighborhood Parks (Lynch, Hidden, Carter, Brickyard, and John Ball Parks)	<ul style="list-style-type: none"> <li>• Small neighborhood parks (approximately 1 to 5 acres) located in neighborhoods west of I-5 and south of Burnt Bridge Creek</li> <li>• Play equipment</li> <li>• Multi-use fields/open lawn areas</li> <li>• Picnic tables</li> </ul>	VCPRD
Kelly Point Park	<ul style="list-style-type: none"> <li>• 102 acre multi-use park</li> <li>• Canoe launch</li> <li>• Restroom</li> <li>• Historical site</li> <li>• Paved and unpaved trails</li> <li>• Picnic tables</li> <li>• Willamette and Columbia River Access</li> </ul>	Portland Parks and Recreation
Smith & Bybee Wetlands Natural Area	<ul style="list-style-type: none"> <li>• Approximately 2,000 acre natural area</li> <li>• Paved 1-mile trail</li> <li>• Wildlife viewing platforms</li> <li>• Boat launch</li> </ul>	Metro

The City's comprehensive plan identifies the various types of parks in the community as neighborhood parks, community parks, regional parks, natural areas and open space, and trails and greenways (City of Vancouver, 2011). Neighborhood parks are approximately 2 to 5 acres in size and provide access to basic recreation opportunities for residents located nearby the park, community parks are typically 20 to 100 acres in size and provide a gathering place for larger groups of users, Regional parks serve residents both throughout the County and beyond and are typically larger than 50 acres in size and provide a diversity of recreational opportunities. Natural areas and open space are reserved for primarily undeveloped spaces that are managed for natural, ecological values as well as for light-impact recreational uses. Lastly, trails and greenways provide paths for non-motorized travel or passage by the general public. There are additional parks and recreation areas beyond the immediate vicinity of the proposed project area. These parks are not addressed in greater detail here because no impacts are anticipated because of their distance from the Facility.

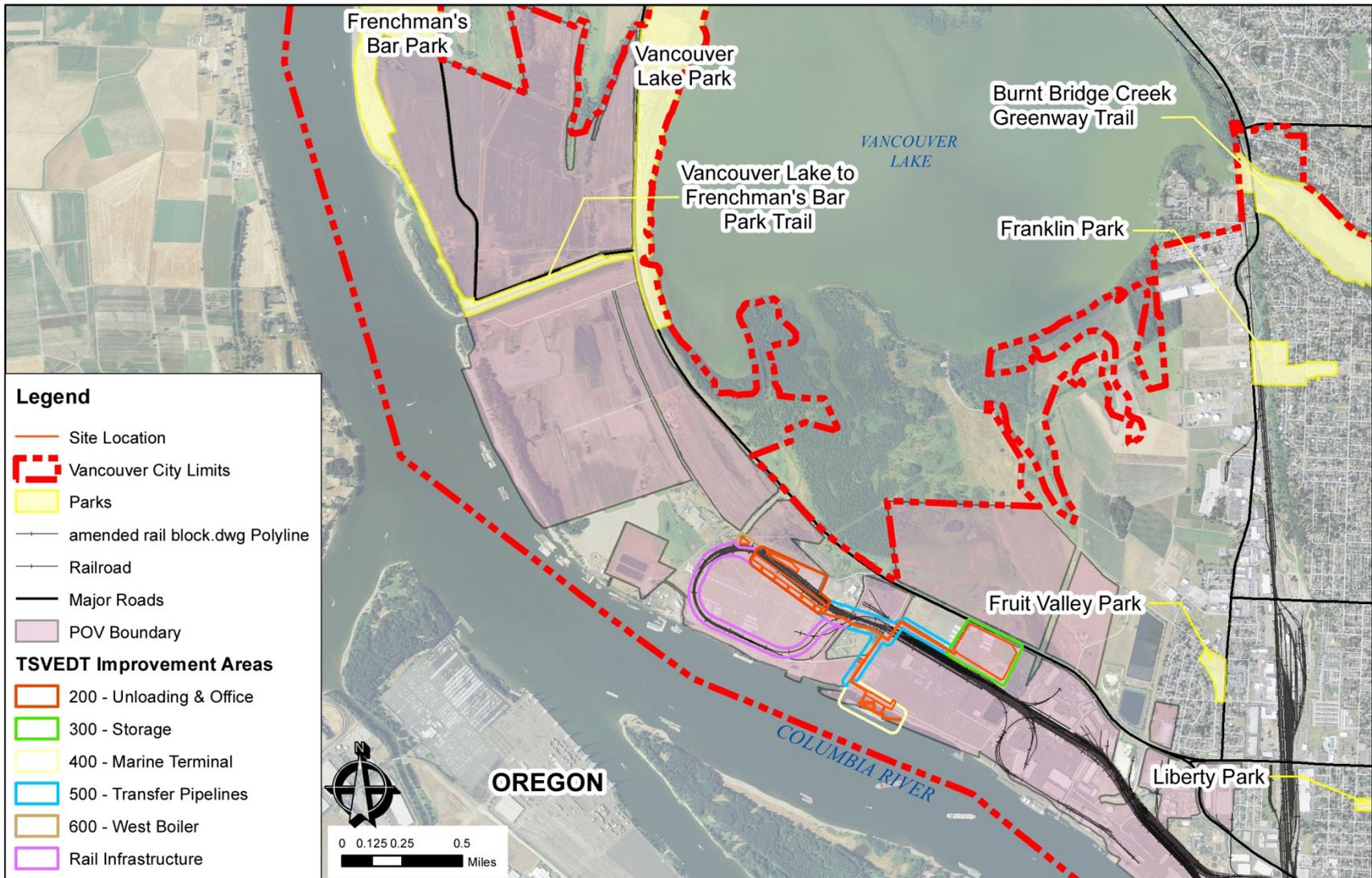


Figure 4.2-22. Viewpoint 4 Simulation

In addition to established parks and recreational facilities, other recreation areas and sites are located within the vicinity of the Facility. These include NW Lower River Road, which is used for biking, and the Parcel 1A trail, which is a 1,200-foot-long path that runs along the south side of NW Lower River Road from Gateway Avenue to the eastern boundary of the parcel, and provides biking, walking, and wildlife viewing. In addition, the Columbia River is used for boating, fishing and other forms of water recreation.

There are three national recreation areas within 25 miles of the proposed Facility. Fort Vancouver National Historic Site approximately 3 miles to the southeast provides a variety of programs, hands-on educational activities, and living history events. The western end of the Columbia River Gorge National Scenic Area approximately 25 miles to the east provides many outdoor activities, including camping, hiking, fishing, boating, windsurfing, and wildlife viewing. The southeastern corner of the Gifford Pinchot National Forest is located approximately 25 miles to the northeast of the Facility; the national forest provides opportunities for recreational activities including camping, cabins, backpacking, hiking, biking, fishing, hunting, and winter sports.

#### **4.2.4.2 Parks and Recreation Plans**

The City and County completed the *Vancouver-Clark Comprehensive Parks, Recreation, and Open Space Plan* in May 2007. This plan covers both jurisdictions and is under the jurisdiction of the consolidated Vancouver-Clark Parks and Recreation Department (VCPRD). The plan identifies current and future recreational needs in the area and establishes priorities for the development of parks, open space, and recreational facilities. The plan also provides a framework for establishment of park policies.

The proposed Facility will not have any direct impact on current or planned park and recreation areas. The development will occur entirely within IND-designated lands zoned for high-intensity development. Therefore, the proposed Facility will not interfere with the goals and objectives of the park plan.

The proposed Facility will not be required to dedicate land for park or open space and/or pay any park impact fees as industrial development is not subject to these requirements. No state or federal recreation regulations or plans apply to the proposed Facility.

#### **4.2.4.3 Impacts**

There are no long-term impacts anticipated to recreational facilities as a result of the proposed Facility. No park land or other recreational facilities will be directly impacted by development of the proposed Facility. The increases in the number of area employees attributable to construction and operations employees will be small portions of the population currently served by the park system and the increased use of recreational facilities will likely not be perceptible. There may also be temporary noise and/or visual impacts during construction, but the activities will be similar in nature to other Port activities and are not anticipated to affect recreational facilities or those using these facilities.

#### **4.2.4.4 Mitigation Measures**

As stated above, impacts to recreation users and facilities are not anticipated or will be temporary in nature and will occur during the construction phase. Mitigation measures specifically related to noise and air quality will minimize potential impacts during construction.

## **4.2.5 Historic and Cultural Preservation**

### **4.2.5.1 Introduction**

WAC 463-62-362 (5) requires that the Applicant identify all historical and archaeological sites within the area affected by construction and operation of the Facility, and coordinate with the Washington State Department of Archeology and Historic Preservation (DAHP) and interested tribe(s). Archaeological Investigations Northwest, Inc. (AINW) completed the cultural resource review presented below to identify all historical and archaeological sites within the area affected by construction and operation of the Facility. The discussion below presents information in response to this requirement.

### **4.2.5.2 Coordination**

On July 30, 2013, Applicant representatives and AINW and BergerABAM staff, met with Robert Whitlam, State Archaeologist, to introduce the project and discuss cultural and historic resources potentially present at the site. The cultural resources review methodology was described and the results of the review were presented.

To initiate Tribal coordination as required by WAC 463-62-362 (5), correspondence was sent to cultural resource representatives of the Cowlitz Indian Tribe, Confederated Tribes of the Grande Ronde Community Oregon, Chinook Tribe, Confederated Tribes of the Chehalis Indian Reservation and the Yakama Indian Nation by AINW on behalf of the Applicant requesting information on cultural resources, or any other concerns that the Tribe might have with this development. Copies of these letters are attached in Appendix A. Coordination between the Applicant and the Tribes is ongoing.

### **4.2.5.3 Study Area**

The proposed Facility is located at the Port in Vancouver, Clark County, in the western lowlands region of Washington. The project is in the Port's industrial area, bounded on the north by NW Lower River Road and the Columbia River to the south. The cultural resources study area for purposes of this application are those areas to be directly impacted by construction activities located within sections 18, 19, and 20 Township 2 North, Range 1 East, Willamette Meridian. The study area includes the Facility site boundary, as well as the area contained within the temporary construction boundary and temporary laydown areas (see Figure 2.17-1).

### **4.2.5.4 Environmental Setting**

The site is located along the Columbia River. Industrial land surrounded by scattered marshes, wildlife areas, and agricultural parcels characterize the Columbia River landscape in the vicinity. Vancouver Lake is approximately 0.6 mile to the northwest. Material dredged from the Columbia River blankets the rivershore (McGee 1972: Plate 56).

Topographically, the site is flat, although the parts closest to the Columbia River slope steeply from the top of the cut bank down to the shoreline. The steepest grades are near the shoreline, where slopes exceed 25 percent from the top of the bank to the riprapped shoreline. Elevation ranges from about 11 feet above MSL at the shoreline to about 33 feet above MSL in the northern portions of the study area.

The present-day environmental setting has been altered substantially from the historic landscape. The site is generally covered with impervious surfaces related to industrial development and recent surface improvements by the Port. Most of the surface has been filled, paved, and/or

capped in association with developments and remediation activities. Today, the study area is covered by gravel, asphalt, sand, or fill materials related to Port development. Vegetation is generally limited to grasses, non-native weedy herbaceous vegetation, and shrubs.

Prior to substantial alterations of the landscape, early maps and aerial photographs show the current site as a low-elevation wetland along the floodplain (U.S. Army Corps of Engineers [USACE] 1940; U.S. Geological Survey [USGS] 1914, 1921). The 1860 General Land Office (GLO) map reveals small floodplain lakes slightly inland from the shoreline surrounded by marshy areas on either side of the current project area (GLO 1860). Higher elevation terraces were situated to the north of the riverbank.

The study area was formerly wetland prairies and scrub forest and was used historically for agriculture, dairying, pasture lands, and orchards. Over the years, significant landscape changes such as levee construction, dredge spoil deposition, and past and recent industrial developments have altered the original landscape. Based on an aerial photograph from 1935, the western end of the Port's facility was used for agricultural activity (USACE Photo 35-452). An aerial photograph from 1966 shows dredge deposits along the shoreline of the Columbia River (USACE Photo 66-294). A photograph from 1980 shows some agricultural activity, although the area was barren and sandy from the placement of dredge material. By 1991, the area was covered completely by dredge deposits. Aerial photographs from 1940 to the recent period show a change in the shoreline as well as the inland portion of the site (Figure 4.2-23).

#### **4.2.5.5 Cultural Setting**

##### ***Native Peoples – Prehistoric Period***

The archaeological record for the Columbia River bottomlands (also known as the Portland Basin) region is typically limited to sites dating to the last 3,000 years, probably owing to land subsidence coupled with rising sea levels. Sites are located along major waterways, including the Columbia and Willamette rivers and Vancouver Lake. Repeated flooding of waterways and rising Holocene sea levels have removed or deeply buried many low-lying archaeological sites within the Portland Basin (Ames 1994; Pettigrew 1990). Several large village sites dating to later periods have been well studied; these include the Cathlapotle site (45CL1) near Ridgefield, the Meier site (35CO5) near Scappoose, Oregon, and the Sunken Village site (35MU4), which is located on Sauvie Island (Ames et al. 1992, 1996; Croes et al. 2007). Older sites, those predating 3,000 to 3,500 years, tend to be found in uplands at higher elevations. In the County, older sites are found on terraces well above floodplains. Excavations at Sunset Ridge (45CL488) and Morasch Terrace (45CL428) in Camas and Gee Creek (45CL631, 45CL632, and 45CL810) southwest of Ridgefield have been dated to older than 5,500 years ago and some as early as the Late Pleistocene (Ozbun and Reese 2003; Punke et al. 2009; Woodward and Associates 1996). These sites demonstrate that older, datable archaeological deposits are located within the County; however, such sites are less common in the bottomlands.

Late Prehistoric native peoples of the lower Columbia region and the greater Northwest Coast area were considered to be complex hunter-gatherers (Ames and Maschner 1999). These complex hunter-gatherers maintained a hunter (including fishing) gatherer mode of subsistence rather than agricultural practices, and had sophisticated social structures and cultural traditions usually found in agricultural societies. Lower Columbia River groups were residentially sedentary and occupied large plankhouses, were socially stratified by wealth and ascribed status,

and maintained some of the highest population densities in native North America (Ames and Maschner 1999).

### ***Native Peoples – Contact Period***

The Columbia River bottomlands region is within the traditional territory of Chinookan-speaking peoples, specifically those who spoke the Multnomah dialect (Silverstein 1990:534). Chinookan-speaking groups possessed cultural traditions bearing similarities to groups on the Pacific Northwest Coast as well as the Columbia Plateau (Silverstein 1990). Chinookan-speaking peoples were ethnohistorically documented as living in large villages comprising one or more plankhouses along major waterways (Moulton 1990).

The Cowlitz, an inland group, regularly traveled to the Columbia River bottomlands. The Cowlitz people were culturally distinct from neighboring tribes, including the Chinook (Hajda 1990). The Lower Cowlitz spoke a Salish dialect and occupied the lower reaches of the Cowlitz River and its tributaries.

Subsistence was based on seasonal availability and included seasonal fish runs of salmon, sturgeon, eulachon, and freshwater fishes; birds; aquatic mammals; and land mammals, primarily deer and elk. Plant foods were seasonal as well and included berries, nuts, and roots as well as bulbs and tubers, such as camas and wapato. Camas and wapato were especially important resources and were harvested in excess for trade (Hajda 1990). People maintained permanent winter villages along the major waterways and temporarily moved to hunting, fishing, and gathering locations for parts of the year (Silverstein 1990).

### ***Euroamerican Settlement-Historical Overview***

By the 1840s, most of the County, including the proposed Facility site, was claimed by the Hudson's Bay Company (HBC), a British fur-trading enterprise that established Fort Vancouver in 1825 east of the site. The HBC used the north shore of the Columbia River, in the vicinity of the study area, for farming, pasture land, and dairying (GLO 1854; Moore et al. 1997).

The GLO map from 1863 shows Parcel 1A within the former Donation Land Claim (DLC) of H. Van Allman (DLC No. 57). Henry Van Allman was born in Switzerland and immigrated to the Oregon Territory in 1847. In that same year, Van Allman settled his DLC of 311.37 acres (Clark County Genealogical Society 1989). In 1859, Joseph Petrain purchased the Van Allman DLC and used the land for grazing livestock and agriculture (Downing 1883 as cited in Moore et al. 1997). Petrain was born in Canada and arrived in the County in 1836 as an HBC employee (Clark County Genealogical Society 1989).

Terminal 5 is within the former DLC of J.H. Matthews (DLC No. 44) (GLO 1863). John Harvey Matthews emigrated on the Oregon Trail from Indiana and settled his DLC of 289.06 acres in 1852 (Clark County Genealogical Society 1989). The 1929 Metsker Map for Township 2 North, Range 1 East, Willamette Meridian depicts Parcel 1A as part of a larger property owned by the Grays Harbor Lumber Company, and Terminal 5 as owned by the Spokane Portland and Seattle Railway (Metsker Maps 1929). The Grays Harbor Lumber Company acquired the property as a site for a sawmill (Van Arsdol 1964 as cited in Morris et al. 1997).

The original course of Lower River Road (now NW Old Lower River Road) is shown on the early GLO maps and the 1897 USGS 15-minute quadrangle map for Portland, Oregon (USGS 1897). The road originally paralleled the Columbia River along the natural terrace above the

shoreline, which passed through the current study area. By 1905, the road was shifted north in the current alignment of NW Old Lower River Road (USGS 1905, 1954).

The Port was established in 1912 and soon entered into a contract with G.M. Standifer Construction Corporation to build a shipyard (to the east of the current project area) to aid the World War I effort. Terminal 1 at Vancouver Landing was acquired in 1925, and a grain export facility was constructed in 1934 at Terminal 2. Harbor cranes were acquired at Terminal 2 for unloading large shipments in 1959. Terminals 3 and 4 were developed by 1963. The berths included in the study area were constructed in the 1980s. In 2009, the Port acquired acreage formerly owned by the Evergreen and ALCOA aluminum industries to develop the Port’s marine Terminal 5. The rail loop at Terminal 5 was completed in 2010 (Port of Vancouver USA 2013).

#### 4.2.5.6 Cultural Resource Assessment

##### *Records Review*

AINW reviewed records available online from the Washington Information System for Architectural and Archaeological Records Data and materials in the AINW library to determine whether archaeological or historic-period resources had been identified within or near the study area. The records search was also done to determine if surrounding areas had been previously surveyed for archaeological resources that might extend into the study area. The study area is located within the Level A, or high (80 to 100 percent) probability on the County archaeological predictive model, and is a “Survey Highly Advised: Very High Risk” area in DAHP’s Washington Statewide Predictive Model. The records indicate that several cultural resource studies have been previously conducted within the study area and archaeological resources have been previously recorded in the vicinity of, but not within, the current study area. Table 4.2-8 summarizes the previous studies chronologically, and Figure 4.2-24 shows their locations with respect to the study area.

**Table 4.2-8. Previously Recorded Cultural Resource Studies**

Author	Date	Area Investigated	Findings
Thomas and Welch	1982	Parcel 1A	<ul style="list-style-type: none"> <li>• 20th century dairy farm (outside the study area)</li> <li>• Section of original Lower River Road (outside the study area)</li> <li>• Dredge fill from shoreline to 800 feet inland</li> </ul>
Forgeng and Reese	1993	Parcel 1A	<ul style="list-style-type: none"> <li>• No cultural resources</li> <li>• Dredge fill up to 5.3 feet deep on the southern half</li> </ul>
King	1995	Parcel 2 (north of the study area)	<ul style="list-style-type: none"> <li>• 45CL408 (outside the study area)</li> </ul>
Thomas	1995	Cogentrix Power Plant (north of the study area)	<ul style="list-style-type: none"> <li>• No cultural resources</li> <li>• Dredge fill up to 10 to 15 feet deep</li> </ul>

Author	Date	Area Investigated	Findings
Moore et al.	1997	Jail Work Center	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill up to 4 feet deep</li> <li>Sterile native soils identified</li> </ul>
Ellis and Mills	1998	Jail Work Center	<ul style="list-style-type: none"> <li>No cultural resources</li> </ul>
Becker and Roulette	2003	Terminal 5	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill up to 20 feet deep on Columbia River bank and up to 4 to 9 feet thick further inland</li> </ul>
Zehendner and Fagan	2008	Columbia River shoreline	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill deposition has substantially changed the shape and elevation of shoreline</li> </ul>
Reese	2009a	Terminal 4 Parcel 1A	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill</li> </ul>
Reese	2009b	Terminal 4 Pond Reconstruction	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill 3 to 6 m (10 to 20 ft)</li> </ul>
Fagan and Zehendner	2009	Terminal 5	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill deposition has substantially changed the shape and elevation of shoreline</li> </ul>
Hetzel et al.	2009	West Vancouver Freight Access Terminal 5 Jail Work Center	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill</li> </ul>
Chapman and Blaser	2010	Terminal 5	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill</li> </ul>
Davis and Ozburn	2011	Parcel 2 (north of the study area)	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Sterile native soils identified</li> </ul>
Jenkins and Davis	2012	Parcel 2 (north of the study area)	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Sterile native soils identified</li> </ul>
Fuld and Reese	2012	Jail Work Center	<ul style="list-style-type: none"> <li>No cultural resources</li> <li>Dredge fill and disturbance</li> </ul>

**Vancouver Lakes Archeological District** – The study area is within the boundary of the Vancouver Lakes Archeological District (45DT101). This district included 125 sites when it was determined eligible for listing in the National Register of Historic Places (NRHP) in 1982 (Burd 1982). The district encompasses 3,706 acres of alluvial floodplain of the Columbia River, Vancouver Lake, Lake River, the Lewis River, and other associated water bodies. Prehistoric sites in the district range from small lithic scatters to the remains of large winter villages.

Historic-period sites reflecting the early settlement of the County are common in the district as well. While several archaeological sites have been identified near Vancouver Lake, no recorded resources were identified within the present study area.

**NW Old Lower River Road Area** – Three cultural resource studies were conducted on the north side of NW Old Lower River Road in the Port's Parcel 2, approximately 50 feet north of the portion of the current study area located in Terminal 5 (Davis and Ozbun 2011; Jenkins and Davis 2012; King 1995). One was a cultural resource survey for a utility substation and access road and included a pedestrian survey and excavation of six shovel tests (Davis and Ozbun 2011). Shovel tests appeared to be in undisturbed native soils; however, no archaeological materials were observed. Another study was a predetermination survey for a tree mitigation project and consisted of a pedestrian survey and excavation of four shovel tests (Jenkins and Davis 2012). Shovel tests appeared to be in undisturbed native soils, but no archaeological materials were observed. These recent cultural resource investigations encountered undisturbed native soils but did not encounter archaeological deposits.

Another study was a cultural resource survey for the River Road project (formerly the Cogentrix Pipeline Lateral project) (King 1995). The survey consisted of a pedestrian survey, shovel testing, and auger probing to tests for deeply buried deposits. While no archaeological materials were observed immediately north of the present study area, one archaeological site, 45CL408, was identified during this project and is located approximately 0.6 mile northwest of the present study area (King 1995).

Another cultural resource study close to the study area was conducted for a power plant project within a portion of the old Alcoa facility, located immediately adjacent to the present study area (Thomas 1995). A pedestrian survey was conducted and dredge fill material was noted on the surface. No archaeological materials were observed (Thomas 1995).

**Parcel 1A Area** – Parcel 1A was first investigated in 1982 as part of a larger survey (Thomas and Welch 1982). This investigation included a pedestrian survey and excavation of 30 shovel tests and augers. Although no archaeological materials were identified in subsurface excavations, the ruins of a 20th-century dairy farm and a portion of the original alignment of Lower River Road were observed southeast of the present study area. Thomas and Welch (1982) state that dredge spoils covered the entire Columbia River beach from the shore to 800 feet inland. Monitoring was recommended in high probability areas and in the vicinity of the old dairy farm and no further work was recommended in the present Parcel 1A study area (Thomas and Welch 1982).

Parcel 1A was investigated again in 1993 for the Port's initial development of the larger Parcel 1 site. During the 1993 study, the area between the BNSF rail track and NW Lower River Road was described as a relatively undisturbed area with a series of ridges, swales, sloughs, and lakes formed by the changing course of the Columbia River over thousands of years (Forgeng and Reese 1993:1). A pedestrian survey was conducted and several backhoe trenches were excavated south of the railroad tracks to explore for buried archaeological sites. Trench excavation revealed dredge fill up to 5.3 feet deep in some places. No archaeological materials were identified and Forgeng and Reese (1993) concluded the native surface of Parcel 1 had been greatly impacted when dredge materials were deposited.

The Parcel 1A and berths 13 and 14 portions of the study area were investigated in 2009 for the Port's Terminal 4 improvements project (Reese 2009a). The Terminal 4 improvements included

the expansion and upgrades of the Subaru facility and creation of marine cargo laydown area within Parcel 1A. Background research and a records review revealed much of the site had been surveyed. A pedestrian survey was conducted in areas that were never surveyed for cultural materials. Sandy fill was observed throughout the survey area and no artifacts were identified. No further work was recommended (Reese 2009a).

**Terminal 5 Area** – The Terminal 5 portion of the study area was first investigated in 2003 for the Alcoa remediation project (Becker and Roulette 2003). The investigation included background research, analysis of bore log data, and a limited pedestrian survey. The pedestrian survey was conducted in areas where excavation would occur, south of the study area. The bank of the Columbia River was described as consisting of about 20 feet of dredge fill covered with riprap. An analysis of bore log data revealed that between 4 and 9 feet of dredge fill caps native soil. The pedestrian survey did not identify native soils or artifacts and monitoring was recommended for areas where deep excavation may encounter native soil (Becker and Roulette 2003).

Background research and a records review were conducted for the Terminal 5 portion of the study area in 2009 for the Alcoa/Evergreen development project (Fagan and Zehendner 2009). This investigation revealed that the shape and elevation of the north shore of the Columbia River had substantially changed when fill materials were added to facilitate construction of the Alcoa facility in the 1940s. Based on the historical evidence of extensive fill deposits on the parcel and because no archaeological deposits have been identified within or adjacent to the former Alcoa facility, no further archaeological work was recommended (Fagan and Zehendner 2009).

The Jail Work Center property, which borders the study area, was archaeologically investigated in both 1997 and 2012 (Ellis and Mills 1998; Moore et al. 1997; Fuld and Reese 2012). The 1997 fieldwork included a pedestrian survey and excavation of 18 shovel tests and 8 shovel scrapes. Coarse sand and gravel dredge fill deposits were observed on the surface and up to 4 feet deep throughout most of the property. Native soils were identified; however, they consisted of sterile flood deposits. No artifacts were observed during the 1997 survey (Moore et al. 1997). The area Ellis and Mills (1998) examined overlapped with the Moore et al. 1997 survey area. The 2012 fieldwork consisted of a pedestrian survey of a portion of the property. Disturbance representing continual modification of the area and dredge fill deposits were identified, and no artifacts were observed (Fuld and Reese 2012).

Three archaeological studies were performed in the project area in association with the Port's WVFA project (Hetzl et al. 2009; Reese 2009a, 2009b). These studies found no evidence of prehistoric or historic-period archaeological sites. The rail siding was determined to be not eligible for listing in the NRHP (Hetzl et al. 2009). Numerous other archaeological studies have taken place in the immediate vicinity of the study area (Becker and Roulette 2003; Forgeng and Reese 1993; Thomas and Welch 1982).

A cultural resource study was conducted approximately 575 feet south of the present study area in Terminal 5 for a bulk potash handling facility (Chapman and Blaser 2010). A field inspection was conducted to identify archaeological or historic resources. The entire project area had been graded, resurfaced, and covered with gravel, asphalt, or loose sand. Fill materials were observed on the shoreline. No archaeological or historic resources were observed. Remnants of buildings and structures associated with the former Alcoa plant were observed, but none were older than 50 years in age. Construction monitoring was recommended for areas of proposed excavation

below the fill level and into native soils (Chapman and Blaser 2010). Construction monitoring did not identify archaeological deposits.

**Columbia River Shoreline Area** – In 2008, background research and a records review were conducted for the Columbia River shoreline for a sediment remediation project at the former Alcoa facility (Zehendner and Fagan 2008). This study revealed the north shore of the Columbia River had undergone substantial changes in shape and elevation as dredge fill materials were gradually added during construction of the Alcoa facility. Aerial photographs from 1940 to recent times show the original Columbia River shoreline had been covered with fill and extended south well beyond the former shoreline (Zehendner and Fagan 2008).

### ***Additional Surveys***

As described above, several studies within the study area and in the vicinity have noted that dredge fill deposits from 4 to 20 feet thick cover the area. Based on the historical evidence of extensive fill deposits and the fact that several archaeological surveys and subsurface testing projects have found no evidence of intact archaeological deposits within or adjacent to the project area, an archaeological survey was not necessary for this project.

### ***Impacts***

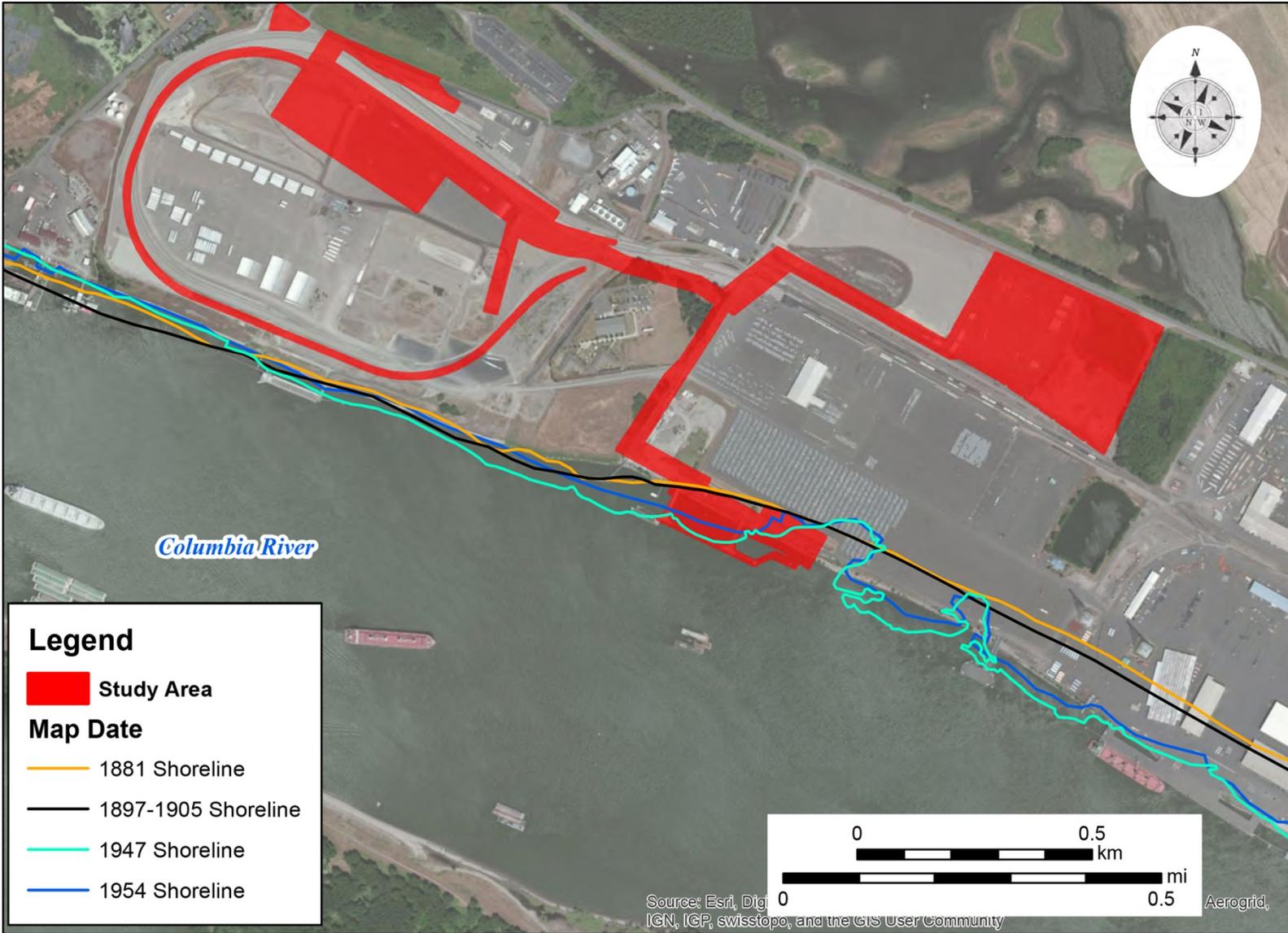
All of the study area and the surrounding area have been studied extensively for cultural resources through previous surveys. No cultural resources or archaeological deposits have been found.

Although the study area is within the Vancouver Lakes Archaeological District (45DT101) and the area is mapped as Level A, or high (80 to 100 percent), probability on the County and Washington archaeological predictive model, no archaeological sites have been identified within or adjacent to the study area. Many of the archaeological sites in the area between Vancouver Lake and the Columbia River are found near wetland environments. Because of the marshy floodplain topography, archaeological sites are generally found on higher land than the study area, although buried features have been found in saturated soils. These sites are outside of the study area and would not be impacted.

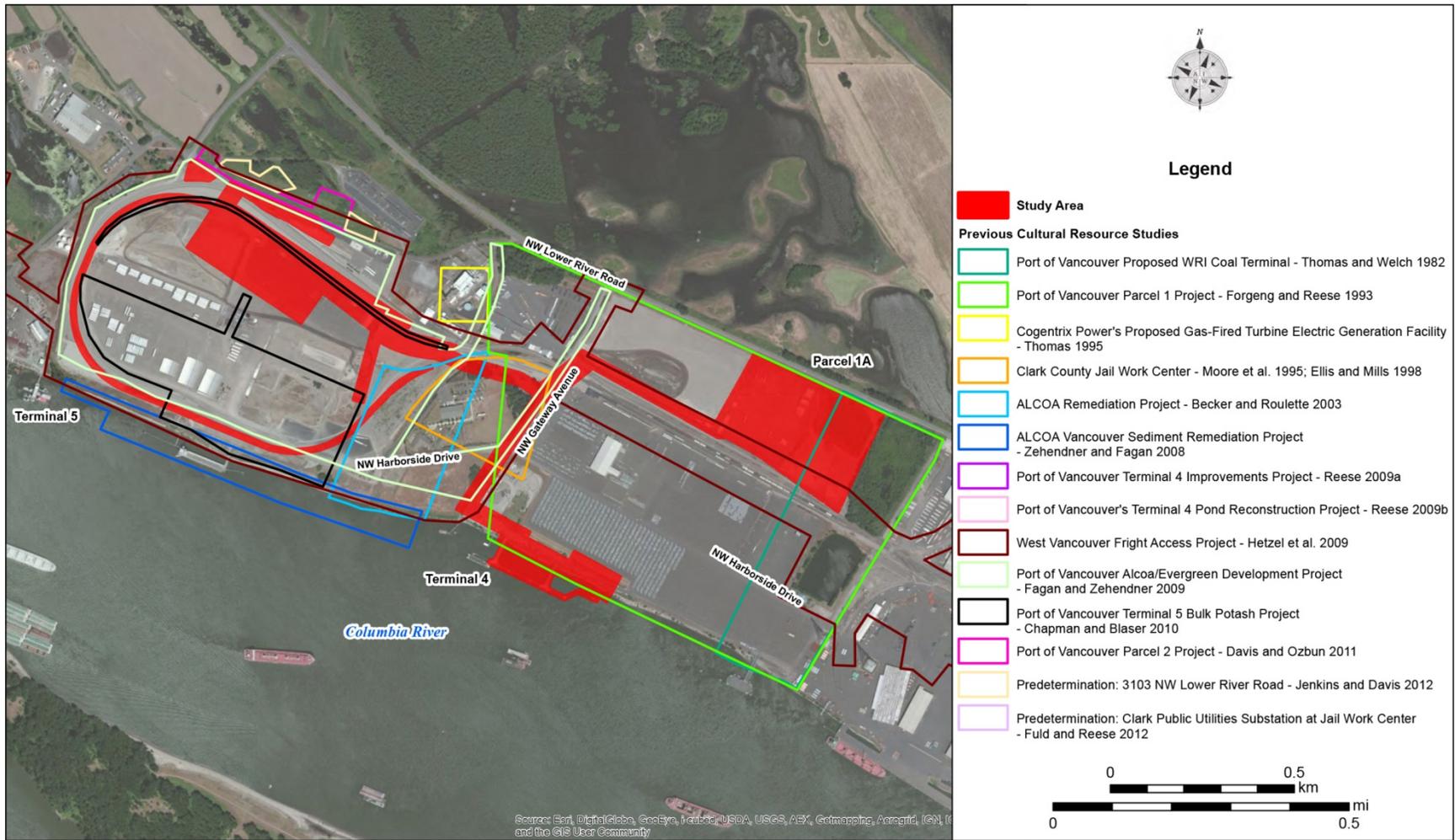
#### **4.2.5.7 Mitigation Measures**

While findings from previous studies indicate a low likelihood for encountering cultural material during construction, an inadvertent discovery plan will be prepared and implemented. The inadvertent discovery plan will include, but not be limited to, these elements:

- Because of the possibility of encountering intact soils beneath the fill in some areas of the study area, and because the study area has been included in previous surveys, if project construction reaches the depth of intact native soils, archaeological monitoring will be conducted if soils are excavated to the surface.
- Should any archaeological resources be found, ground-disturbing activities will be halted in the area of the find in accordance with RCW 27.53.060 (Archaeological Sites and Resources) and RCW 27.44.020 (Indian Graves and Records). Following the stop work, a professional archaeologist will be called to assess the significance of the find and DAHP will be notified to define a course of action.



**Figure 4.2-23. Historical Shoreline Configuration**



**Figure 4.2-24. Previous Cultural Resource Studies**

## **4.2.6 Agricultural Crops/Animals**

### **4.2.6.1 Existing Conditions**

The proposed Facility is not currently used for agricultural purposes. Terminal 5 has been used for industrial purposes since the establishment of the Alcoa facility in the early 1940s (Anchor Environmental LLC 2008) and there is no indication of the previous use of the site for agricultural crops or for grazing. As described in the cultural resource review report completed by AINW dated July 5, 2013, land where Parcel 1A is located was identified as having been used for grazing and agriculture in the late 1800s and early 1900s and the Terminal 5 property would likely have been used for the same purpose. More recently, the Port has used the site as a cargo laydown area.

Agriculture in the vicinity of the proposed Facility began in the 1950s when the wetlands associated with the Shillapoo lakebed were drained to be used for farming (WDFW 2006). The Shillapoo Wildlife Area is now managed to restore wetland and wildlife habitat, although some farming still occurs on these properties. While there are lands near the project area that are still farmed, the lands are zoned agricultural/wildlife (AG-WL), which, according to the zoning code, are lands where agricultural and wildlife uses should be protected and preserved. The following agricultural land occurs within 1.5 miles of the site. The lands zoned AG-WL just to the northeast of NW Lower River Road across from the Facility are farmed, and farming also occurs approximately 0.5 mile just downriver on land also zoned AG-WL; farming and grazing occur on Sauvie Island located approximately 1.5 miles to the northwest across the Columbia River in Oregon (zoned multiple use agriculture [MUA20] and exclusive farm use [EFU]).

### **4.2.6.2 Impacts**

The proposed Facility will not result in any impacts to agricultural crops or animals.

### **4.2.6.3 Mitigation Measures**

Because no impacts are anticipated, no mitigation measures are proposed.



## Section 4.3 – Transportation

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WAC 463-60-372

Built environment – Transportation.

*(1) Transportation systems. The application shall identify all permanent transportation facilities impacted by the construction and operation of the energy facilities, the nature of the impacts and the methods to mitigate impacts. Such impact identification, description, and mitigation shall, at least, take into account: (a) Expected traffic volumes during construction, based on where the work force is expected to reside; (b) Access routes for moving heavy loads, construction materials, or equipment; (c) Expected traffic volumes during normal operation of the facility; (d) For transmission facilities, anticipated maintenance access; and (e) Consistency with local comprehensive transportation plans.*

*(2) Vehicular traffic. The application shall describe existing roads, estimate volume, types, and routes of vehicular traffic which will arise from construction and operation of the facility. The applicant shall indicate the applicable standards to be utilized in improving existing roads and in constructing new permanent or temporary roads or access, and shall indicate the final disposition of new roads or access and identify who will maintain them.*

*(3) Waterborne, rail, and air traffic. The application shall describe existing railroads and other transportation facilities and indicate what additional access, if any, will be needed during planned construction and operation. The applicant shall indicate the applicable standards to be utilized in improving existing transportation facilities and in constructing new permanent or temporary access facilities, and shall indicate the final disposition of new access facilities and identify who will maintain them.*

*(4) Parking. The application shall identify existing and any additional parking areas or facilities which will be needed during construction and operation of the energy facility, and plans for maintenance and runoff control from the parking areas or facilities.*

*(5) Movement/circulation of people or goods. The application shall describe any change to the current movement or circulation of people or goods caused by construction or operation of the facility. The application shall indicate consideration of multipurpose utilization of rights of way and describe the measures to be employed to utilize, restore, or rehabilitate disturbed areas. The application shall describe the means proposed to ensure safe utilization of those areas under applicant's control where public access will be granted during project construction, operation, abandonment, termination, or when operations cease.*

*(6) Traffic hazards. The application shall identify all hazards to traffic caused by construction or operation of the facility. Except where security restrictions are imposed by the federal government the applicant shall indicate the manner in which fuels and waste products are to be transported to and from the facility, including a designation of the specific routes to be utilized.*

*(Statutory Authority: RCW 80.50.040 (1) and (12). 04-21-013, amended and recodified as § 463-60-372, filed 10/11/04, effective 11/11/04. Statutory Authority: RCW 80.50.040. 92-23-012, § 463-42-372, filed 11/6/92, effective 12/7/92.)*



## Section 4.3 Transportation

Construction and operation of the Facility will result in additional motor vehicle, rail, and ship traffic. Activities include construction traffic (workers, equipment, and deliveries) on area roadways and operational traffic (employees, visitors, and deliveries of equipment supplies).

### 4.3.1 Existing Conditions

#### 4.3.1.1 Regional and Site Area Transportation Facilities

The Facility will be located within the Port, on the northern shore of the Columbia River, and will be accessible through roadway, rail, and river transportation networks.

#### *Roadway Transportation*

The existing roadway system in the area of the project is shown on Figure 4.3-1. The roadways that are within the vicinity of the project include:

- **Interstate 5** – The main interstate highway on the West Coast, I-5 generally runs parallel to the Pacific Ocean and U.S. Highway 101 from Mexico to Canada. I-5 serves some of the country's largest cities, including Seattle, Portland, Sacramento, Los Angeles, and San Diego. This significant interstate freeway generally provides four travel lanes, but expands to six lanes in the region of the Fourth Plain Boulevard exit. Other exits in the vicinity of the project site, from south to north, include SR 14, Mill Plain Boulevard, East 39th Street/SR 500, and Main Street.
- **SR 501 (NW Lower River Road and Mill Plain Boulevard)** – This highway is co-managed by WSDOT and the City and is a major truck route with a 50-mph speed limit at the project site. West of I-5, the road leads out of the downtown Vancouver area along Mill Plain Boulevard and then along Lower River Road west of the Fourth Plain Boulevard/Mill Plain Boulevard intersection. As Mill Plain Boulevard, the highway has five lanes of travel and urban design features including a landscaped median, bicycle lanes, and sidewalks. West of the Fourth Plain Boulevard intersection, the highway becomes more rural in nature, slimming down to two travel lanes with left-turn lanes provided at major intersections. The highway generally has wide paved shoulders and fog line striping for bicycle travel and there is a multi-use path at intermittent locations along the south side of the road.
- **Fourth Plain Boulevard** – This is a principal arterial and state route with a 35-mph speed limit (City of Vancouver 2012) and primary access route for car and truck traffic from I-5 to the Port and the project site. West Mill Plain and West Fourth Plain boulevards connect to I-5 approximately 2.5 miles east of the site. Fourth Plain Boulevard extends west from I-5 through the northern section of downtown Vancouver, and merges into SR 501 (NW Lower River Road). Fourth Plain Boulevard is generally composed of two lanes and a turning lane. The bordering properties are both residential and commercial.
- **Old NW Lower River Road (public)** – This two-lane local access road extends south from NW Lower River Road (SR 501) and then west to provide access to local industrial businesses before it circles back to SR 501 to the northwest. The road provides access to the west end of the Port's Terminal 5, Tidewater Barge Lines, Tidewater Terminal Company, Hickey Marine, the West Van Material Recovery Center, and Old NW Lower River Road (private).

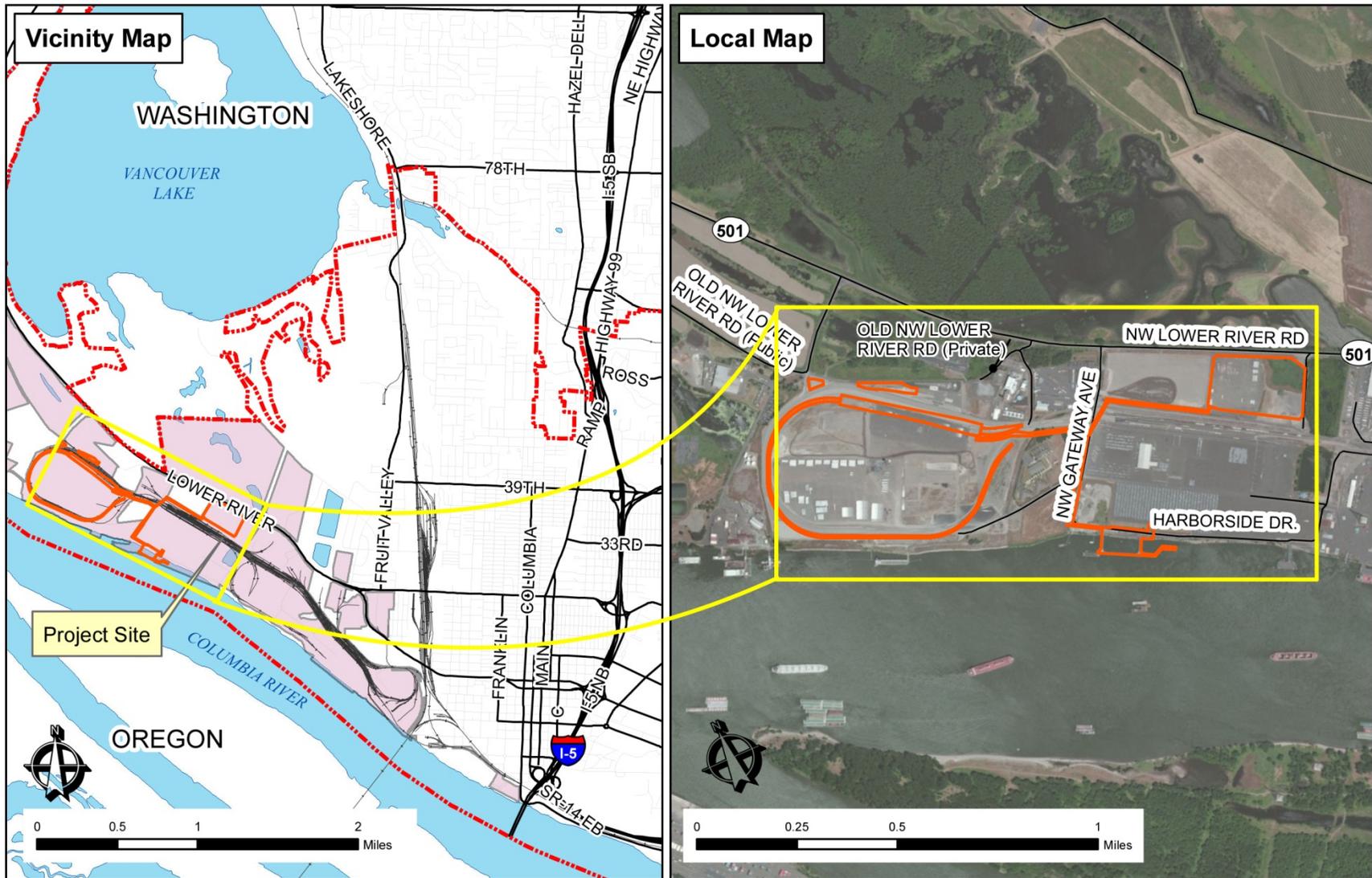


Figure 4.3-1. Existing Roadway Transportation System

- **Old Alcoa Facility Access Road (private)** – This is a private road that extends east from the public Old Lower River Road where the roadway turns from southbound to westbound. This private road has two lanes of travel, a 15-mph posted speed limit, and no sidewalks. The road, which is maintained by the Port, provides access into Port property, particularly to Area 200, the location of the proposed rail car unloading building and administrative and support buildings. The roadway continues past the project site and ends approximately 800 feet to the east at a gate and the Keyera facility. The roadway continues on to NW Lower River Road but is not open to general traffic.
- **NW Gateway Avenue** – Gateway Avenue is the main entrance to Terminal 5 at the Port. This private roadway has two travel lanes with partial sidewalks, and on-street parking is allowed. The roadway gives access to Terminal 4 and Terminal 5, the Jail Work Center, and CalPortland. The Port is constructing a new overpass for Gateway Avenue that will span Port rail lines with grade-separated access; September 2013 project completion is anticipated. An additional access will be provided into the Terminal 5 loop, with June 2015 completion anticipated.
- **Fruit Valley Road** – This roadway is a two lane minor arterial with a center turn lane and a 25 and 35 mph speed limit. It is an east/west connection to Fourth Plain Boulevard and serves as an access point to both 39th street to I-5 and mid-town Vancouver, and connects to Lakeshore Drive/78th Street, which offers access to I-5 further north. The roadway is located through mixed zoning, including residential, school zone and industrial.
- **39th Street** – This minor arterial connects Fruit Valley Road to I-5. It includes a grade separated crossing of the BNSF Railway and surface streets.

Table 4.3-1 summarizes the characteristics of the existing roadways within the project area.

**Table 4.3-1. Existing Transportation Facilities and Roadway Designations**

Roadway	Classification	Cross Section	Speed Limit	Side-walks?	Bicycle Lanes?	Median?	On-Street Parking?
Fourth Plain Boulevard	Principal Arterial	3-5 lane	35 mph	Partial	Yes	TWLTL <sup>1</sup>	No
Mill Plain Boulevard (SR 501)	Principal Arterial (State Highway Route)	5-lane	35 mph	Yes	Yes	Raised	Partial
Lower River Road (SR 501) <sup>2</sup>	Principal Arterial (State Highway Route)	2-5 lane <sup>3</sup>	45-50 <sup>4</sup>	No <sup>5</sup>	No <sup>6</sup>	No	No
Gateway Avenue	Private Street	2-lane	Not Posted	Partial (east side)	No	No	Yes
Old Lower River Road	Local Street	2-lane	Not Posted	No	No	No	No
39th Street	Local Street	2-lane	25	Yes	Yes	No	Partial

<sup>1</sup> TWLT = two-way left-turn lane with exclusive turn lanes at major street intersections.

<sup>2</sup> NW Lower River Road (SR 501) is both a Principal Arterial and state highway from Fourth Plain Boulevard to the City Limits, and then only a state highway route west of Gateway Avenue.

<sup>3</sup> Cross-section changes from 5 lanes east of 26th Avenue to 2 lanes west of 26th Avenue, with left-turn lanes at major intersections.

<sup>4</sup> Posted speed changes from 45 mph east of Centennial Industrial Park to 50 mph west of Centennial Industrial Park.

<sup>5</sup> There is a new two-way multiuse trail along the south side of NW Lower River Road (SR 501) extending from Gateway Avenue east along the Farwest Steel property as well as the frontage of the proposed Facility in the area of the tank farm.

<sup>6</sup> Although not formally designated as bike lanes, there is fog line striping and sufficient paved shoulder on both sides of SR 501 for bicycle travel.

### ***Existing Traffic Volumes and Level of Service***

Existing traffic volumes are identified in detail in Appendix J. Traffic counts were obtained at the study intersections on mid-week days in May 2013 during the weekday morning (6 to 9 AM) and afternoon (4 to 6 PM) peak periods. The counts were compiled and reviewed to identify the peak hour periods for the street system, which occurred from 7 to 8 AM and 4 to 5 PM. All study intersections operate within the acceptable operations threshold. VMC Section 11.80.130B requires signalized intersections maintain LOS E based on the 2000 *Highway Capacity Manual* and a volume/capacity ratio less than 0.95. Unsignalized intersections must maintain a volume/capacity ratio less than 0.95 for the critical movement and/or approach. Because SR 501 is under WSDOT's jurisdiction, intersections along SR 501 are subject to its traffic operation standards, which require LOS D or better. Table 4.3-2 indicates the LOS criteria for signalized intersections.

**Table 4.3-2. LOS Criteria**

<b>LOS</b>	<b>Average Delay (seconds)</b>
A	≤10
B	>10-20
C	>20-35
D	>35-55
E	>55-80
F	>80

The City bases transportation concurrency on the average peak hour travel speeds on identified arterial corridors (VMC 11.70). The two identified corridors that will receive trips from the proposed Facility are Mill Plain Boulevard (Fourth Plain Boulevard to I-5) and Fourth Plain Boulevard. The current LOS for these corridors is 12 mph for Fourth Plain Boulevard and 10 mph for Mill Plain Boulevard. The 2010-2011 concurrency corridor summary table from the City indicates that Mill Plain Boulevard currently averages 27 mph and Fourth Plain Boulevard averages 23 mph.

### ***Rail Transportation***

The project site is located at a crossroads of Washington's major north-south (I-5 corridor) and east-west (Portland to Pasco) rail lines. BNSF, a Class 1 railroad, owns and operates these lines, although it shares operating rights with the Union Pacific Railway (UP) over a significant portion of the I-5 corridor (WSDOT 2009). Currently, the Port provides rail access that extends from the main rail lines and circulates through the Port. Through the multi-phase WVFA project, the Port is constructing modifications to its rail system including a new rail entrance into the Port, expansion of the Port rail network, and loop tracks at Terminal 5.

### ***River Transportation***

The Port currently maintains five terminals and 13 berths that lie at the terminus of the Columbia River's shipping channel, creating an international transportation gateway. The Port handles a broad range of cargoes for oceangoing and river vessels including wind energy, breakbulk, project and direct transfer cargoes, containers, automobiles, forest products, steel and aluminum products, dry bulk commodities such as bauxite, mineral ores, concentrates, fertilizers, clays, and grains, and liquid commodities such as fertilizer, jet fuel, biodiesel and wood preservatives. The Columbia River navigation channel is maintained by the USACE. The channel begins at the Columbia River bar and continues five miles upriver at a depth of 55 feet and a width of

2,640 feet. After this point, the channel maintains a depth of 43 feet and a width of 600 feet for 106.55 miles to the Ports of Vancouver and Portland. The river above the rail bridge is maintained at a depth suitable for barge traffic.

The number of deep draft vessels entering the Columbia River system has declined markedly over the past two decades. There were an average of 2,100 vessel transits<sup>17</sup> between 1995 and 2000; consisting of 1,930 cargo and passenger vessels (92 percent of total vessel entries) and 170 tanker vessels (8 percent of total vessel entries). Approximately 60 percent of these transits occurred at Oregon ports and 40 percent at Washington ports. During 2011 and 2012, there were an average of 1,414 vessel entries; consisting of 1,326 cargo and passenger vessels (94 percent of total vessel entries) and 88 tanker vessels (6 percent of total vessel entries). Approximately 51 percent of these transits occurred at Oregon ports and 49 percent at Washington ports.

The number of transits declined from 2,100 (average 1995 to 2000) to 1,414 (average 2011 and 2012), which represented a decrease of 687 vessel entries. This included a decrease of 604 cargo and passenger vessels and 83 tanker vessels. The number of vessel entries decreased by 33 percent. This primarily occurred as a result of increased average vessel size. The average load per vessel increased from 16,658 tons (average load of vessels from 1995 to 2000) to 27,826 tons (average load of vessels for 2011 and 2012), which represents an increase of 67 percent. These changes reflect the increased loads that can be moved on the Lower Columbia River as a result of the channel deepening from 40 feet to 43 feet which was completed in November 2010.

With the proposed project, ship and barge loading will occur at existing berths 13 and 14 on the Columbia River south of the current Subaru facility.

Berths 13 and 14 were developed to serve as a layberth facility in the 1990s – primarily for U.S. government vessels staged to respond to requirements to deploy U.S. forces from West Coast locations. Since construction, the facility has supported U.S. governmental and commercial vessels. Aside from longer-term layberths for government vessels, commercial vessel use has been for minor maintenance and cleaning while waiting to load cargo at Columbia River ports.

### ***Air Transportation***

The nearest international airport is Portland International Airport (PDX), which is about 25 minutes away by automobile via SR 501 and I-5, then to SR 14 east to I-205, south across the I-205 Bridge, and along Airport Way to the airport. PDX has scheduled commercial passenger and freight service.

The City owns and operates Pearson Airfield for general aviation purposes (City of Vancouver 2012). This historic airport is located approximately 3 miles east of the project site. The project site is not located within the regulated airport approach services per VMC 20.570-1.

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<sup>17</sup> A transit is a single trip on the river. One ship-call requires two transits.

### ***Public Transit***

Public transit does not serve the site. C-TRAN (the area's public transit provider) Route #25 is the transit route closest to the site. It travels on West Mill Plain and Fruit Valley Road, approximately 1.5 miles east of the site. The Port is currently developing a multi-modal path that would provide access from the proposed Facility site to the existing terminus of this transit route.

### ***Parking***

No parking is located within the areas proposed for construction on the project site.

## **4.3.2 Proposed Transportation Project Elements**

The Facility will employ road, pedestrian, rail and marine vessel modes of transportation to access and serve the various areas of the Facility. Road access will be provided to all upland Facility areas. Rail access will be provided to Area 200 – Unloading, through the addition of new rail infrastructure. Marine vessel access will be provided to Area 400 – Marine Terminal through upgrades to the existing berths 13 and 14.

### **4.3.2.1 Transportation Elements by Project Area**

#### ***Area 200 – Unloading and Office***

The proposed project requires an office building and two support buildings, proposed for location in Area 200. These facilities will be located on the north side of the Terminal 5 loop adjacent to Old Alcoa Facility Access Road. Access driveways to NW Old Lower River Road will be constructed for two parking lots – one with 20 stalls and another with 78 stalls. Bicycle parking will be considered for incorporation into the site design. No improvements are anticipated to NW Old Lower River Road. The Applicant will construct, operate and maintain Facility driveways in compliance with City and Port standards; the City will maintain ownership and operation of NW Old Lower River Road.

The rail car unloading building will be located on the north side of the Terminal 5 loop. The building will be approximately 1,850 feet long by 91 feet wide, and will enclose the unloading equipment and tank cars during the unloading process. Pedestrian bridges will allow workers to pass over the unit trains during operations. Additional pedestrian bridges will allow access to the administrative and support buildings over the existing Terminal 5 rail loops. The Applicant will construct and maintain the pedestrian bridges. The bridges will be designed in accordance with applicable building codes and industry and standards for egress.

Rail lines on both sides of the proposed building will prevent direct vehicular access to the building due to the likely presence of trains. However, a surface level crossing will allow access for maintenance vehicles. The Port will construct and maintain this surface level crossing as part of the WVFA project.

#### ***Area 300 – Storage***

The storage area is approximately 20.84 acres on Parcel 1A, approximately 1,600 feet north of the Columbia River, and located adjacent to NW Lower River Road. Access to this storage area will be from an existing Port owned and maintained shared driveway from NW Lower River Road located at the northwest corner of the site. This driveway currently provides access to Farwest Steel. As proposed, this driveway will be extended along the fenced entrance to the site, and five parking spaces will be provided for maintenance vehicles. Modifications to NW Lower

River Road and the existing driveway are not proposed. The Applicant would construct the extension of the driveway for access to the Facility storage area.

Frontage improvements along the border of the tank farm area and NW Lower River Road are not anticipated. NW Lower River Road is improved with a 12-foot-wide separated shared-use path.

### ***Area 400 – Marine Terminal***

Area 400 includes ship or barge loading and support uses on approximately 4.97 acres at existing berths 13 and 14 on the Columbia River south of the current Subaru facility. This area will be accessed via Port-owned and maintained roadways, including Gateway Avenue. Workers will use an existing paved area at the berths for parking and deliveries. The parking will be restriped as necessary.

Some modifications to the existing berths will be required, such as catwalks and a mooring system and the addition of the piping, cranes, support structures, and other equipment necessary to load the vessels (see section 2.3.5.1). In the waterfront design community, it is generally recognized that the International Building Code (IBC) does not sufficiently address the unique design characteristics of waterfront structures like berths 13 and 14. For this reason, the project will adopt the applicable provisions of the Oil Companies International Marine Forum (OCIMF) Mooring Equipment Guidelines, 3rd edition, and will supplement mooring and berthing design, seismic design, and structural load combinations requirements by the applicable provisions of Chapter 31F of the California Building Code, Marine Oil Terminals Engineering and Maintenance Standards (MOTEMS).

The Applicant will construct these modifications, and will exclusively maintain and operate the berths for the duration of the lease with the Port. However, the Port will continue to be responsible for maintenance of berth bathymetry, and will conduct maintenance dredging in accordance with its existing and future dredging permits.

The improvements will be constructed to state building code, and other safety and spill control related standards and requirements discussed in sections 2.10, 4.1.2, and 4.1.4.

### ***Area 600 – West Boiler***

A boiler building of approximately 6,600 square feet will be located adjacent to Old NW Lower River Road, just northwest of the administrative and support buildings area. An access driveway from Old NW Lower River Road will be added by the Applicant to provide access and parking for approximately five spaces. The driveway will be constructed to meet city code. The Applicant will maintain this access driveway.

### ***Rail Infrastructure***

The project will require the construction of two additional rail loops consisting of approximately 18,000 linear feet of new track located on approximately 5.45 acres at Terminal 5. The additional lines, which will begin and end near the Gateway Avenue overcrossing, will form two complete loops inside the existing rail loops. Figure 2.3.4, illustrates the location of the new loops. The Applicant will work with the Port to construct these loops; the Applicant will maintain these two loops for the life of the Facility. The design and implementation of these loops fall within the criteria established and evaluated as part of the WVFA project (see section 4.2).

As described in section 2.3, the Port will construct an additional rail loop as part of the WVFA project that will transfer in the future to exclusive use of the Applicant (based on the lease term for transfer). Once transferred to the Applicant, the Applicant will control operation and maintenance of the loop. At the end of the Facility's lifetime, operation and maintenance of the loop will transfer back to the Port.

All rail facilities will be constructed to meet BNSF's standard criteria for rail facilities (BNSF, 2011), and the AREMA 2013 Manual for Railway Engineering.

#### **4.3.2.2 Estimated Future Traffic Volumes**

The analysis of baseline traffic conditions estimates operating conditions for the year 2020, when the Facility is expected to operate at full capacity and at full employment. Also, a baseline future forecast for the year 2025 was prepared, per the City's traffic impact analysis requirements, to identify how the transportation system in the study area will operate 5 years after completion of the proposed development.

This baseline analysis includes the growth in general traffic in the region and the vehicle trips generated by in-process developments in the vicinity of the site, but does not include traffic from the proposed development. The analysis also accounts for planned transportation improvement projects not associated with the proposed development

A 1.5-percent linear annual growth rate was applied to existing year 2013 peak hour traffic volumes over a 7-year period to develop year 2020 baseline traffic volumes for the weekday AM and PM peak hours. This growth rate was applied to major traffic movements at the study intersections along SR 501, but not at minor connections related to Port properties such as Gateway Avenue and Old Lower River Road. Year 2020 baseline traffic volumes were further increased by a 1.5 percent linear annual growth rate to develop year 2025 baseline traffic volumes. Consistent with the 2020 analysis, the growth rate was applied to major traffic movements at study intersections along SR 501. No additional in-process developments or planned roadway improvements were identified at the study intersections for the 2025 horizon year.

One in-process development was identified and included in the 2020 baseline traffic volumes – the Terminal 5 bulk potash handling facility. That facility, which has undergone the required approval processes, is to be located west/southwest of the proposed site. The vehicle trips generated by this in-process development were assigned to the study intersections based on the trip generation and assignment contained in the transportation impact analysis completed for that project by Parametrix.

#### **4.3.2.3 Estimated Future Level of Service**

Tables 4.3-3 and 4.3-4 illustrates the build out year 2020 and year 2025 baseline traffic conditions for the respective weekday AM and PM peak hour periods. These results reflect the assumed annual traffic growth pattern and in-process development trips. The study intersections are forecast to continue to operate acceptably under these scenarios during the weekday AM and PM peak hours.

**Table 4.3-3. Build-Out Year 2020 Baseline Traffic Conditions Summary**

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
Old Lower River Rd/Lower River Rd (SR 501)	AM	B	0.08	LOS "D"	Yes
	PM	A	0.08		Yes
Gateway Ave/Lower River Rd (SR 501)	AM	A	0.08	LOS "D"	Yes
	PM	A	0.07		Yes
Fourth Plain Blvd/Mill Plain Blvd (SR 501)	AM	B	0.68	LOS "D"	Yes
	PM	B	0.34		Yes
Old Lower River Rd/Old Alcoa Facility Access Rd	AM	B	NA	LOS "E" & V/C ≤ 0.95	Yes
	PM	A	NA		Yes

**Table 4.3-4. Forecast Year 2025 Baseline Traffic Conditions Summary**

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
Old Lower River Rd/Lower River Rd (SR 501)	AM	B	0.08	LOS "D"	Yes
	PM	A	0.08		Yes
Gateway Ave/Lower River Rd (SR 501)	AM	A	0.08	LOS "D"	Yes
	PM	A	0.07		Yes
Fourth Plain Blvd/Mill Plain Blvd (SR 501)	AM	B	0.73	LOS "D"	Yes
	PM	B	0.37		Yes
Old Lower River Rd/Old Alcoa Facility Access Rd	AM	B	NA	LOS "E" & V/C ≤ 0.95	Yes
	PM	A	NA		Yes

### 4.3.3 Impacts

#### 4.3.3.1 Traffic

Trip generation estimates of daily and weekday AM and PM peak hour vehicle trip ends for the proposed development were calculated using the standard reference manual, *Trip Generation*, 9th Edition, published by the Institute of Transportation Engineers (ITE). ITE trip rates for land use code 110 (Light Industrial) were used as the basis for estimating vehicle trips. These rates, using permanent employees as the independent variable, are based on empirical observations at similar industrial developments. Table 4.3-5 shows the estimated trip generation for the proposed industrial use.

**Table 4.3-5. Estimated Trip Generation**

Land Use	ITE Code	Size	Daily Trips	Weekday AM peak hour trips			Weekday PM peak hour trips		
				Total	In	Out	Total	In	Out
Light Industrial	110	110 Employees	332	48	40	8	46	10	36

**Truck Traffic**

Because the primary function of the proposed Facility is to transfer petroleum from rail cars onto nearby vessels, post-construction operations of the proposed development are not expected to generate tractor-trailer trucks trips on the external street network on typical days. Instead, typical delivery and service vehicle trips are expected.

**Site Trip Distribution and Assignment**

The estimated vehicle trip distribution pattern was based on a review of the existing weekday AM and PM traffic counts at the Lower River Road (SR 501)/Old Lower River Road intersection (where all external trips are expected to enter and exit the site) as well as the existing patterns observed at the Mill Plain Boulevard (SR 501)/Fourth Plain Boulevard intersection. All site trips were assigned to points east along SR 501, reflecting the location of the Port and major destinations to the east such as the downtown area of Vancouver and I-5.

**2020 Year of Opening with Project Traffic Conditions**

This analysis of traffic conditions in year 2020 identifies how the study area’s transportation system will operate with the proposed development complete and operating at full capacity and full employment. This analysis includes general regional traffic growth, traffic generated due to in-process developments, and the vehicle trips generated from the proposed development.

Table 4.3-6 summarizes the year 2020 total traffic conditions. As shown, all study intersections are forecast to continue operating adequately during the weekday AM and PM peak hours.

**Table 4.3-6. Build-Out Year 2020 Total Traffic Conditions Summary**

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
Old Lower River Rd/Lower River Rd (SR 501)	AM	B	0.10	LOS "D"	Yes
	PM	A	0.12		Yes
Gateway Ave/Lower River Rd (SR 501)	AM	A	0.08	LOS "D"	Yes
	PM	A	0.07		Yes
Fourth Plain Blvd/Mill Plain Blvd (SR 501)	AM	B	0.70	LOS "D"	Yes
	PM	B	0.36		Yes
Old Lower River Rd/Old Alcoa Facility Access Rd	AM	B	NA	LOS "E" & V/C ≤ 0.95	Yes
	PM	A	NA		Yes

**Future Year 2025 5-Year Buildout Traffic Conditions**

This analysis of traffic conditions in year 2025 identifies how the study area’s transportation system will operate 5 years after the proposed development reaches its peak capacity and full employment. Table 4.3-7 summarizes total traffic conditions in future year 2025 and show that the study intersections are forecasted to continue to operate acceptably during the weekday AM and PM peak hours.

**Table 4.3-7. Forecast Year 2025 Total Traffic Conditions Summary**

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
Old Lower River Rd/Lower River Rd (SR 501)	AM	B	0.10	LOS "D"	Yes
	PM	A	0.13		Yes
Gateway Ave/Lower River Rd (SR 501)	AM	A	0.08	LOS "D"	Yes
	PM	A	0.07		Yes
Fourth Plain Blvd/Mill Plain Blvd (SR 501)	AM	B	0.75	LOS "D"	Yes
	PM	B	0.38		Yes
Old Lower River Rd/Old Alcoa Facility Access Rd	AM	B	NA	LOS "E" & V/C ≤ 0.95	Yes
	PM	A	NA		Yes

**Vehicle Queuing Analyses**

Vehicle queuing analyses were prepared for the study intersections as shown in Appendix J. Based on the analysis, forecast queues can be accommodated within the available storage area at the identified study intersections during the AM and PM peak periods.

**Concurrency Corridor Trip Assignment**

The transportation impact analysis included an evaluation of the number of trips assigned to the two corridors affected by the development: Mill Plain Boulevard (Fourth Plain Boulevard to I-5) and Fourth Plain Boulevard (Mill Plain Boulevard to I-5). Under the City’s “Transportation Concurrency Management: Administrative Manual,” both corridors are classified as Category 1 corridors. Between periodic measurements of corridor LOS, Category 1 transportation concurrency corridors are presumed to operate within acceptable LOS and are not evaluated with each development application. However, the City tracks trips distributed to each corridor from approved developments. Where there is a dramatic increase in approved trips in a Category 1 corridor LOS measurement, the City may review the corridor’s designation as a Category 1 corridor. As shown by Table 4.3.8, the project will not result in a significant increase in the total number of weekday PM peak hour trips entering the City’s concurrency corridors. Assigned trips were recorded by counting trips only once along each section.

**Table 4.3-8. Concurrency Corridor Weekday PM Peak Hour Trip Assignment**

Corridor	Corridor Limits	PM Peak Hour Trips to Corridor
Mill Plain Boulevard	Fourth Plain to I-5	20
	I-5 to Andresen	0
	Andresen to I-205	0
	I-205 to 136th Avenue	0
	136th Avenue to 164th Avenue	0
	164th Avenue to 192nd Avenue	0
St. Johns/Fort Vancouver Way	Mill Plain to 63rd Street	0
Fourth Plain Boulevard	Mill Plain to I-5	26
	I-5 to Andresen	0

Corridor	Corridor Limits	PM Peak Hour Trips to Corridor
	Andresen to I-205	0
	I-205 to 162nd Avenue	0
Andresen Road	Mill Plain to SR 500	0
	SR 500 to 78th Street	0
112th Avenue	Mill Plain to 28th Street	0
	28th St. to 51st Street	0
164th/162nd Avenue	SR 14 to SE 1st Street	0
	SE 1st Street to Fourth Plain	0
Burton Road/28th Street	18th Street to 112th Avenue	0
	112th Avenue to 138th Avenue	0
	138th Avenue to 162nd Avenue	0
18th Street	112th Avenue to 138th Avenue	0
	138th Avenue to 164th Avenue	0
136th/137th Avenue	Mill Plain to 28th Street	0
	28th Street to Fourth Plain	0
192nd Avenue	SR 14 to NE 18th Street	0

#### 4.3.3.2 Rail

At startup, the operations of the Facility will accommodate up to 2 train arrivals per day and 661 train arrivals per year; at full capacity, operations will accommodate an average of 4 train arrivals per day and 1,713 train arrivals per year. Counting the return trips of empty trains, Facility operations will result in up to 12 trains per day and 3,426 trains per year on the section of the BNSF rail lines that serve the Port (Monty Edberg, Port of Vancouver, Personal Communications, August 12, 2013). Most trains will arrive from the east on the BNSF Pasco to Vancouver line, entering Washington near Spokane. Empty trains will be returned to BNSF control upon leaving the facility, and BNSF will route them to their future use. BNSF states that rail traffic is highly variable and that the railroad can serve the proposed use (F.E. “Skip” Kalb, Jr., Director of Strategic Development, BNSF, July 8, 2013).

The Port is completing the WVFA project, a multi-phase project that will increase rail capacity at the Port and construct new rail access into it. The new access is expected to reduce delays in rail traffic by as much as 40 percent (see Section 4.2). In addition, the City is completing a number of improvements associated with the street and rail system in downtown Vancouver; these changes will close two at-grade rail crossings permanently, thus improving the efficiency of train operations in the area.

#### 4.3.3.3 Ship

The operations of the Facility will accommodate up to 365 ship calls per year at full operations. This results in additional ship traffic of 730 transits to and from the Facility berth per year. Information from the Columbia River Pilots indicates that the number of inbound vessels (1 transit) varied from as low as 1,404 vessels in 2009 to 2,086 vessels in 2000. 2012 data indicated a total of 1,474 vessels. At maximum capacity, the Facility could increase this number

by 365 vessels per year, a lower volume than the recent peak year of 2000; no impacts to river traffic are anticipated. Current and historical practices to handle vessel traffic in the Lower Columbia River reach would continue to be sufficient to manage all vessel traffic.

#### 4.3.3.4 Parking

The project will provide parking for employees, visitors, deliveries, and maintenance for all project elements as indicated in section 2.23. All parking areas will be paved and stormwater will be collected and treated in accordance with City and other applicable regulatory requirements as described in section 2.11. The total of approximately 119 parking spaces that will be provided exceeds the minimum number of spaces required by VMC 20.945 and no impacts or unmet parking needs are anticipated to result from the project.

#### 4.3.3.5 Construction

Construction is expected to require about one year. Because construction increases the numbers of workers and deliveries in the area of the proposed project temporarily, construction activity can increase traffic and cause occasional delays. Approximately 125 construction workers could be working at a single time in the various areas that are part of the project site. In addition, approximately 83 daily round trip truck deliveries are estimated over the construction period. The 125 construction workers were assumed to arrive during the a.m. peak period and depart during the p.m. peak period. The 83 roundtrip truck deliveries were distributed across the 10-hour daily construction schedule; as such, an estimated 16 total truck deliveries were assumed during both the a.m. and p.m. peak periods (8 in, 8 out), respectively. Based on trip distribution pattern estimates, all construction worker traffic will use the Old Lower River Road entrance from Lower River Road (SR 501). Truck deliveries will be made on a daily basis and are assumed to be spread out evenly over the 10-hour construction period. This resulted in an estimate of 16 truck trips during the a.m. and p.m. peak hours, with an assumed 50% in/50% out distribution (8 in, 8 out). Tesoro Savage also estimates that 11 percent of trucks will use Old Lower River Road entrance from Lower River Road (SR 501), 3 percent will use Gateway Avenue, and 86 percent will use the private access drive east of Farwest Steel.

The typical access route for construction workers and deliveries will be from I-5 to Mill Plain Boulevard and the Mill Plain Extension and then to NW Lower River Road and Old NW Lower River Road. Because this route is accustomed to Port traffic, difficulties with the additional construction traffic along this route are not expected. The impact of construction site generated trips on intersection operations are shown in Table 4.3-9 for the a.m. and p.m. peak periods, respectively. As shown, the study intersections operate acceptably in both the a.m. and p.m. peak hours.

**Table 4.3-9. Impact of Construction Traffic**

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
Old Lower River Rd/Lower River Rd (SR 501)	AM	B	0.10	LOS "D"	Yes
	PM	B	0.32		Yes
Gateway Ave/Lower River Rd (SR 501)	AM	A	0.06	LOS "D"	Yes
	PM	B	0.35		Yes
Fourth Plain Blvd/Mill Plain Blvd	AM	B	0.70	LOS "D"	Yes

Intersection	Peak Hour	LOS	V/C	Standard	Meets Standard?
(SR 501)	PM	B	0.37		Yes
Old Lower River Rd/Old Alcoa Facility Access Rd	AM	C	NA	LOS "E" & V/C ≤ 0.95	Yes
	PM	B	NA		Yes

Construction workers and vehicles making deliveries can park adjacent to the construction areas. In the area of the tank farm, construction workers can park along the existing driveway and gravel roadway that extend along the southwest border. Construction workers and deliveries bound for the area of the rail car unloading building and administration building can park adjacent to NW Lower River Road and to the proposed permanent parking areas. Parking for the west boiler area can occur adjacent to the driveway and outside the rail loop, with overflow parking near the area of the administration building. Temporary construction parking for berths 13 and 14 can occur along the Port-owned access roads coming up to the berth areas.

The Port expects to commission a traffic study for Terminal 5 if construction of the BHP Billiton project and the Facility occur concurrently (Monty Edberg, Port of Vancouver, Personal Communications, August 13, 2013). The Applicant will participate in jointly implementing any traffic mitigation measures identified by such a study to ensure safe access conditions to the Terminal 5 location.

**Transfer Pipeline Corridor** – Crude oil will be transported between the rail car unloading building, the tank farm, and berths 13 and 14. The piping will be a combination of above and below-ground installation of either one or two 36-inch-diameter pipelines. Per the current alignments, construction of these pipelines is not expected to affect traffic significantly (see Figures 2.3-9). Some interior Port roadways could be blocked temporarily as the pipeline is constructed.

Temporary traffic control and construction signage will be provided along the alignment so that any impacts are properly managed. A traffic management plan will be required from the Contractor so as to ensure any impacts are mitigated.

**Marine Terminal** – With respect to the berth modifications at Area 400, some of the work may be performed from the waterside. A small number of tugs or barges will be positioned to conduct this work for a temporary period of time. These construction-related vessels will not be positioned in the main Columbia River navigation channel and will therefore not create any impacts to other river users.

#### 4.3.4 Movement/Circulation of People and Goods

The Facility is being proposed at a location that has been developed specifically for the circulation of bulk goods by train with the capability to transfer goods to marine vessel shipping. Through its development of the WVFA project and the various environmental and permit reviews conducted as described in section 4.2 above, the Port has addressed changes to how tenants will use its facilities for their activities (many of which include the transportation of goods), as well as the impacts to road and river transportation systems serving the Terminal 5 area. The Port has designed and implemented the WVFA project as a means to improve the capacity of its operations, thereby improving access to the movement of goods in general.

Members of the public are generally not allowed access to the tenant controlled areas in vicinity of the site. Members of the public can access the Jail Work Center using Gateway Avenue. Impacts to the current movement or circulation of the general public have been addressed through the traffic analysis above and in Appendix J. Impacts to the circulation of goods have been addressed through the analysis of impacts to road, rail, and vessel traffic systems, also addressed above.

Construction of the WVFA Gateway Avenue Grade Separation (“Gateway overpass”) is addressing conflicts between rail activities and road transportation at Terminal 5, by building a bridge that separates vehicle traffic from train traffic below. The new bridge, expected complete in late 2013, will allow cars and trucks to travel over the Port’s internal rail corridor while accessing two of the Port’s five marine terminals, as well as the Jail Work Center.

The Applicant has carefully sited Facility elements to minimize disruption to the activities conducted by current tenants, and to accommodate future activities as directed by the Port. For example, the transfer pipeline corridor has been carefully routes to avoid conflicts with existing easements; portions of the transfer pipeline will also be located underground to avoid conflict with existing road and rail uses.

The public will not be allowed admittance to any construction or operation areas established as part of the Facility, unless in accordance with the Facility’s construction or operations site safety plan and applicable federal security requirements (see Section 2.19).

#### **4.3.5 Mitigation**

Based on the results of the transportation impact analysis, the proposed Facility can be developed while maintaining acceptable levels of service and safety on the surrounding transportation system. The analysis developed the following findings:

- All study intersections currently operate acceptably during the weekday AM and PM peak hours and are projected to do so in 2020 and 2025 with site development.
- A review of historical crash data identified no safety-related mitigation needs at the study intersections.
- Intersection sight distance is adequate at all study intersections.
- The proposed development is estimated to generate 332 additional daily trips, 48 weekday AM peak hour trips (40 in, 8 out), and 46 weekday PM peak hour trips (10 in, 36 out). Concurrency corridors receiving trips from the proposed development are operating within the established standards.

The study concluded that specific mitigation was not necessary to address project impacts. However, the study developed the following recommendations to address existing safety or operational issues within the project vicinity:

- The Applicant should work with the Port and City to post a 25 MPH speed limit on Old Lower River Road south of SR 501, where no posted speed sign exists.
- The Applicant should work with the Port and WSDOT to post a YIELD sign to control the channelized northbound right-turn maneuver from Old Lower River Road onto SR 501.
- The Applicant should work with the Port and City to reconfigure traffic control devices at the Old Lower River Road/Old Alcoa Facility Access Road intersection.

- The Applicant should work with the Port to add texturing/coloring treatments to the striped crosswalk on the private access approach to Lower River Road (SR 501), between the Far West Steel property and the proposed Storage area. This treatment is intended to enhance the safety of bicyclists and pedestrians using this crosswalk as part of the adjacent multi-use path.

## Section 4.4 – Socioeconomic Impact

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WAC 463-60-535

Built environment – Socioeconomic impact.

*The application shall include a detailed socioeconomic impact analysis which identifies primary, secondary, positive as well as negative impacts on the socioeconomic environment in the area potentially affected by the project, with particular attention to the impact of the proposed facility on population, work force, property values, housing, health facilities and services, education facilities, governmental services, and local economy. The study area shall include the area that may be affected by employment within a one-hour commute distance of the project site. The analysis shall use the most recent data as published by the U.S. Census or state of Washington sources.*

*(1) The analysis shall include: (a) Population and growth rate data for the most current ten-year period for the county or counties and incorporated cities in the study area; (b) Published forecast population figures for the study area for both the construction and operations periods; (c) Numbers and percentages describing the race/ethnic composition of the cities and counties in the study area; (d) Average per capita and household incomes, including the number and percentage of the population below the poverty level for the cities and counties within the study area; (e) A description of whether or not any minority or low-income populations would be displaced by this project or disproportionately impacted; (f) The average annual work force size, total number of employed workers, and the number and percentage of unemployed workers including the year that data are most recently available. Employment numbers and percentage of the total work force should be provided for the primary employment sectors; (g) An estimate by month of the average size of the project construction, operational work force by trade, and work force peak periods; (h) An analysis of whether or not the locally available work force would be sufficient to meet the anticipated demand for direct workers and an estimate of the number of construction and operation workers that would be hired from outside of the study area if the locally available work force would not meet the demand; (i) A list of the required trades for the proposed project construction; (j) An estimate of how many direct or indirect operation and maintenance workers (including family members and/or dependents) would temporarily relocate; (k) An estimate of how many workers would potentially commute on a daily basis and where they would originate.*

*(2) The application shall describe the potential impact on housing needs, costs, or availability due to the influx of workers for construction and operation of the facility and include the following: (a) Housing data from the most recent ten-year period that data are available, including the total number of housing units in the study area, number of units occupied, number and percentage of units vacant, median home value, and median gross rent. A description of the available hotels, motels, bed and breakfasts, campgrounds or other recreational facilities; (b) How and where the direct construction and indirect work force would likely be housed. A description of the potential impacts*

*on area hotels, motels, bed and breakfasts, campgrounds and recreational facilities; (c) Whether or not meeting the direct construction and indirect work force's housing needs might constrain the housing market for existing residents and whether or not increased demand could lead to increased median housing values or median gross rents and/or new housing construction. Describe mitigation plans, if needed, to meet shortfalls in housing needs for these direct and indirect work forces.*

*(3) The application shall have an analysis of the economic factors including the following: (a) The approximate average hourly wage that would likely be paid to construction and operational workers, how these wage levels vary from existing wage levels in the study area, and estimate the expendable income that direct workers would likely spend within the study area; (b) How much, and what types of direct and indirect taxes would be paid during construction and operation of the project and which jurisdictions would receive those tax revenues; (c) The other overall economic benefits (including mitigation measures) and costs of the project on the economies of the county, the study area and the state, as appropriate, during both the construction and operational periods.*

*(4) The application shall describe the impacts, relationships, and plans for utilizing or mitigating impacts caused by construction or operation of the facility to the following public facilities and services: (a) Fire; (b) Police; (c) Schools; (d) Parks or other recreational facilities; (e) Utilities; (f) Maintenance; (g) Communications; (h) Water/storm water; (i) Sewer/solid waste; (j) Other governmental services.*

*(5) The application shall compare local government revenues generated by the project (e.g., property tax, sales tax, business and occupation tax, payroll taxes) with their additional service expenditures resulting from the project; and identify any potential gaps in expenditures and revenues during both construction and operation of the project. This discussion should also address potential temporal gaps in revenues and expenditures.*

*(6) To the degree that a project will have a primary or secondary negative impact on any element of the socioeconomic environment, the applicant is encouraged to work with local governments to avoid, minimize, or compensate for the negative impact. The term "local government" is defined to include cities, counties, school districts, fire districts, sewer districts, water districts, irrigation districts, or other special purpose districts*

*(Statutory Authority: RCW 80.50.040 (1) and (12). 04-21-013, amended and recodified as § 463-60-535, filed 10/11/04, effective 11/11/04. Statutory Authority: RCW 80.50.040. 92-23-012, § 463-42-535, filed 11/6/92, effective 12/7/92. Statutory Authority: RCW 80.50.040(1) and Chapter 80.50 RCW. 81-21-006 (Order 81-5), § 463-42-535, filed 10/8/81. Formerly WAC 463-42-620.)*

## **Section 4.4 Socioeconomic Impact**

### **4.4.1 Existing Conditions**

The proposed Facility is located adjacent to the Columbia River in Vancouver, which is the largest city in the County. The County is also within the reach of the larger Portland, Oregon, metropolitan area. Most immediate services, such as police, fire, and ambulance, will be supplied by City of Vancouver providers, but the larger metropolitan area and other surrounding counties are likely to supply a portion of workers and construction material.

For this socioeconomic analysis, the study area is defined as those counties within a 1-hour commute of the project site. These include Clark, Skamania, and Cowlitz counties in Washington, and Multnomah, Clackamas, Marion, Yamhill, and Washington counties in Oregon. Small portions three other counties (Wahkiakum County in Washington and Clatsop and Tillamook counties in Oregon) may fall within a 1-hour commute of the project site (depending on traffic conditions), but these small areas are sparsely populated and workers associated with the project are unlikely to live there .

The following analysis provides county-level detail for each county in the study area and city-level detail for municipalities in the County. The complete socioeconomic report is attached as Appendix K.

#### **4.4.1.1 Population Trends**

According to data from the Washington Office of Financial Management (OFM) and the Oregon Office of Economic Analysis (OEA), the population of the study area grew by nearly 800,000 between 1992 and 2012, to approximately 2.8 million. This represents an increase of 38.8 percent over the period. Growth was faster between 1992 and 2002 (i.e., 450,000 new residents, or 22.4 percent than it was between 2002 and 2012 (i.e., 330,000 new residents, or 13.4 percent).

During the same periods, the County experienced faster growth than the study area as a whole. Between 1992 and 2012, the population of the County grew from approximately 257,000 to 431,000, or 68.1 percent. Between 1992 and 2002, the population grew by 98,000, or 38.2 percent, and between 2002 and 2012, by nearly 77,000, or 21.6 percent.

Neighboring counties within the study area experienced varying levels of growth between 1992 and 2012. The two Washington counties (i.e., Cowlitz and Skamania) are mostly rural and saw relatively limited population growth. Together, they account for approximately 25 percent of the population of the County.

In contrast, the Oregon counties in the study area are in a fast-growing urban area, and experienced strong population growth between 1992 and 2012. Nearly 75 percent of the study area population growth over that period occurred in Oregon.

Construction of the project is anticipated to be completed during 2016. Based on population projections from the Washington OFM and Oregon OEA, the population of the study area is projected to grow by 6.3 percent between 2012 and 2016, or by more than 176,000. Growth in the County is anticipated to be slightly faster, with the population rising by 28,000, or 6.5 percent.

The long-term forecast projects growth in the total study area population by an additional 789,000 between 2016 and 2036, or a total of 26.6 percent. In the County, the population is projected to grow by a total of nearly 113,500, or 24.7 percent.

**Table 4.4-1. Total Population and Forecast Growth by County in Project Vicinity**

County Name	(Thousands)					Growth Rate			
	1992	2002	2012	2016	2036	Actual		Forecast	
						1992-2002	2002-2012	2012-2016	2016-2036
<b>Washington</b>	5,072.1	6,022.9	6,817.8	7,175.6	8,619.1	1.7%	1.2%	1.3%	0.9%
Clark	256.5	354.5	431.3	459.2	572.7	3.3%	2.0%	1.6%	1.1%
Cowlitz	84.1	94.2	103.1	106.5	116.5	1.1%	0.9%	0.8%	0.4%
Skamania	8.6	10.0	11.3	11.4	13.0	1.5%	1.2%	0.2%	0.7%
<b>Oregon</b>	2,985.8	3,515.5	3,883.7	4,100.0	5,089.1	1.6%	1.0%	1.4%	1.1%
Clackamas	294.0	349.2	381.7	404.7	524.2	1.7%	0.9%	1.5%	1.3%
Columbia	38.9	44.8	49.7	52.6	65.3	1.4%	1.0%	1.4%	1.1%
Hood River	17.7	21.1	22.9	24.4	32.7	1.8%	0.8%	1.7%	1.5%
Marion	241.8	293.5	320.5	340.9	440.7	2.0%	0.9%	1.6%	1.3%
Multnomah	603.5	675.4	748.4	783.8	922.2	1.1%	1.0%	1.2%	0.8%
Polk	52.6	65.1	76.6	83.3	116.7	2.2%	1.6%	2.1%	1.7%
Washington	341.4	463.1	542.8	590.8	803.8	3.1%	1.6%	2.1%	1.6%
Yamhill	69.9	88.2	100.6	108.1	147.0	2.4%	1.3%	1.8%	1.5%
<b>Study Area</b>	2,008.9	2,459.0	2,788.8	2,965.7	3,754.8	2.0%	1.3%	1.5%	1.2%

Source: Washington OFM, Oregon OEA

According to data from OFM, most Clark County residents live in incorporated areas of the county, but a large minority lives in unincorporated areas. Even as the total County population grew between 2002 and 2012, the share living in incorporated areas remained near 48 percent.

Vancouver is the largest incorporated municipality in the County, and was home to 37.9 percent of all County residents in 2012. However, even though Vancouver added 13,000 new residents between 2002 and 2012, its population did not increase as fast as other parts of the County, such as Battle Ground, Camas, and Washougal, and its share of County population declined from 40.9 percent.

**Table 4.4-2. Total Population and Forecast Growth by City in Clark County**

City Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Change 2002-2011
Clark County	364.9	374.1	385.4	394.6	404.7	412.7	419.1	423.8	425.4	425.4	428.0	66.4
Uninc.	176.0	181.7	186.9	192.5	197.8	199.5	202.3	203.4	203.3	203.3	204.6	29.8
Incorp	188.8	192.4	198.5	202.2	206.9	213.2	216.8	220.4	222.0	222.0	223.4	36.6
Battle Ground	11.2	12.4	14.0	14.7	15.6	16.0	16.7	17.2	17.6	17.6	17.8	6.7
Camas	13.9	14.7	16.1	16.4	17.0	17.7	18.4	18.8	19.4	19.4	19.6	6.1
La Center	1.8	1.9	2.0	2.2	2.4	2.6	2.7	2.7	2.8	2.8	2.8	1.1

City Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Change 2002-2011
Ridgefield	2.2	2.2	2.3	2.7	3.4	3.8	4.2	4.6	4.8	4.8	5.0	3.0
Vancouver	149.3	150.1	152.1	153.5	154.9	158.6	159.8	161.6	161.8	161.8	162.3	13.9
Washougal	9.1	9.7	10.7	11.3	12.2	12.9	13.5	13.9	14.1	14.1	14.2	5.2
Woodland	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.0
Yacolt	1.1	1.1	1.1	1.2	1.2	1.4	1.5	1.5	1.6	1.6	1.6	0.5

Source: Washington OFM

Nearly one-quarter of the study area population is under 18 years of age, and 15 percent are 62 years old or older. The remaining 61 percent are working age adults, a total of 1.66 million people. The population of Clark County is somewhat younger than that of the study area, with nearly 27 percent under 18 years of age and less than 15 percent aged 62 years or more. The working-age adult population in the County is approximately 248,000.

Females outnumber males in the study area, with 0.978 males for each female. The male-female ratio in the County is nearly identical, with 0.976 males for each female.

**Table 4.4-3. Population Age Distribution in Project Vicinity**

County Name	Total		Under 18 Years		18 Years to 61 Years		62 Years and Older	
	Pop.	M/F Ratio	Pop.	% of Total	Pop.	% of Total	Pop.	% of Total
<b>Washington</b>	6,652,845	0.993	1,563,419	23.5	4,071,541	61.2	1,017,885	15.3
Clark	421,154	0.976	112,448	26.7	248,060	58.9	60,646	14.4
Cowlitz	101,901	0.980	24,966	24.5	57,676	56.6	19,259	18.9
Skamania	10,979	0.996	2,459	22.4	6,609	60.2	1,910	17.4
<b>Oregon</b>	3,801,991	0.980	866,854	22.8	2,284,997	60.1	650,140	17.1
Clackamas	373,832	0.969	89,346	23.9	220,935	59.1	63,551	17.0
Columbia	49,247	1.002	11,918	24.2	28,711	58.3	8,618	17.5
Hood River	21,962	0.991	5,710	26.0	12,980	59.1	3,272	14.9
Marion	313,020	0.996	82,950	26.5	180,613	57.7	49,457	15.8
Multnomah	724,803	0.977	149,309	20.6	479,820	66.2	95,674	13.2
Polk	74,734	0.940	18,086	24.2	42,897	57.4	13,751	18.4
Washington	524,275	0.970	134,739	25.7	323,478	61.7	66,059	12.6
Yamhill	98,293	1.009	24,770	25.2	57,796	58.8	15,727	16.0
<b>Study Area</b>	2,714,200	0.978	656,701	24.2	1,659,574	61.1	397,926	14.7

Source: U.S. Census Bureau, 2007-2011 American Community Survey

According to 2012 estimates from the U.S. Census Bureau, the ethnic mix of the study area population is primarily white, with white residents accounting for 86.3 percent of the total. Residents of Asian ethnicity accounted for 5.3 percent of the population, African-American accounted for 2.7 percent American Indian and Alaska Natives accounted for 1.5 percent, Hawaiian and other Pacific Islanders accounted for 0.5 percent, and two or more races accounted

for 3.7 percent of the population. Residents of Hispanic origin (of all races) accounted for 12.9 percent of the study area population.

In the County, non-white residents account for a smaller share of the population, although the share of Native Hawaiian/Pacific Islander and two or more races is slightly higher than in the study area as a whole. Hispanic residents (of all races) account for 8.1 percent of the County population.

**Table 4.4-4. Race Composition by County in Project Vicinity**

	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Two or More Races	Total	Hispanic (all races)
<b>Washington</b>	5,625.34	268.66	126.53	531.40	46.14	298.95	6,897.01	807.6
Clark	385.13	9.24	4.58	19.42	3.20	16.72	438.29	35.4
Cowlitz	93.92	0.83	1.94	1.69	0.29	3.33	102.00	8.2
Skamania	10.46	0.06	0.20	0.11	0.01	0.34	11.19	0.6
<b>Oregon</b>	3,444.77	77.56	68.96	156.08	15.85	136.14	3,899.35	474.2
Clackamas	348.69	3.78	4.10	14.89	1.03	11.38	383.86	31.0
Columbia	46.08	0.25	0.72	0.48	0.11	1.66	49.29	2.2
Hood River	21.24	0.16	0.25	0.34	0.05	0.54	22.58	6.8
Marion	287.97	4.33	7.97	6.90	2.61	10.21	319.99	80.3
Multnomah	614.11	43.75	11.40	52.23	4.73	33.05	759.26	84.3
Polk	69.53	0.55	1.86	1.54	0.27	2.60	76.35	9.7
Washington	454.77	11.49	6.44	50.85	2.90	21.23	547.67	87.8
Yamhill	92.41	1.03	2.02	1.65	0.23	2.92	100.26	15.4
	2,424.31	75.45	41.47	150.09	15.44	103.97	2,810.72	361.44
<b>Share of Total</b>								
<b>Washington</b>	81.6%	3.9%	1.8%	7.7%	0.7%	4.3%	100.0%	11.7%
Clark	87.9%	2.1%	1.0%	4.4%	0.7%	3.8%	100.0%	8.1%
Cowlitz	92.1%	0.8%	1.9%	1.7%	0.3%	3.3%	100.0%	8.0%
Skamania	93.5%	0.5%	1.8%	1.0%	0.1%	3.0%	100.0%	5.5%
<b>Oregon</b>	88.3%	2.0%	1.8%	4.0%	0.4%	3.5%	100.0%	12.2%
Clackamas	90.8%	1.0%	1.1%	3.9%	0.3%	3.0%	100.0%	8.1%
Columbia	93.5%	0.5%	1.5%	1.0%	0.2%	3.4%	100.0%	4.4%
Hood River	94.1%	0.7%	1.1%	1.5%	0.2%	2.4%	100.0%	30.2%
Marion	90.0%	1.4%	2.5%	2.2%	0.8%	3.2%	100.0%	25.1%
Multnomah	80.9%	5.8%	1.5%	6.9%	0.6%	4.4%	100.0%	11.1%
Polk	91.1%	0.7%	2.4%	2.0%	0.4%	3.4%	100.0%	12.6%
Washington	83.0%	2.1%	1.2%	9.3%	0.5%	3.9%	100.0%	16.0%
Yamhill	92.2%	1.0%	2.0%	1.6%	0.2%	2.9%	100.0%	15.3%
<b>Study Area</b>	86.3%	2.7%	1.5%	5.3%	0.5%	3.7%	100.0%	12.9%

Note: Population figures are Census estimates for 2012

Source: U.S. Census Bureau

#### 4.4.1.2 Poverty

The number of people living in poverty in the study area climbed 70.0 percent between 2002 and 2011, according to the U.S. Census Bureau. During that period, the number of residents living in poverty increased in both years, growing from approximately 252,000 in 2002 to 428,000 in 2011.

In Clark County, the growth in poverty was slightly lower than in the larger study area, but the share of residents living in poverty still grew by 61.2 percent, climbing from approximately 36,000 in 2002 to nearly 59,000 in 2011. Only one county in the study area (Skamania County) saw poverty levels grow by less than 50 percent, and in several counties, the growth was greater than 80 percent.

**Table 4.4-5. Population Living Below the Poverty Level – All Ages**

County	Thousands										Change 2002- 2011	% Change
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011		
<b>Washington</b>	623.0	671.2	715.3	732.0	736.9	722.6	727.2	803.3	890.3	931.6	308.6	49.5
Clark	36.4	41.0	44.8	45.9	41.6	39.2	41.6	50.6	53.7	58.7	22.3	61.2
Cowlitz	11.8	13.0	13.8	14.3	15.4	15.2	14.7	16.0	20.8	19.6	7.8	66.5
Skamania	1.2	1.1	1.2	1.2	1.3	1.3	1.3	1.3	1.5	1.6	0.5	38.7
<b>Oregon</b>	396.2	423.3	462.2	497.3	487.4	476.6	501.5	536.8	596.6	655.2	259.1	65.4
Clackamas	27.3	30.4	33.1	32.5	29.7	34.2	34.7	35.9	38.8	41.5	14.2	52.1
Columbia	3.7	4.0	4.5	5.0	4.3	4.3	5.5	5.8	6.6	6.0	2.3	62.4
Hood River	2.4	2.6	2.7	3.1	3.1	2.6	2.8	2.7	2.9	3.3	0.9	36.8
Marion	38.3	41.1	44.5	44.7	44.0	45.8	48.0	50.5	55.0	63.4	25.2	65.8
Multnomah	78.7	85.3	93.9	112.8	103.7	103.2	99.0	107.6	130.6	142.3	63.6	80.8
Polk	6.3	6.8	7.7	10.4	9.4	7.9	9.0	10.0	11.6	10.5	4.2	67.0
Washington	36.9	42.2	46.5	48.0	49.1	44.7	50.1	53.3	50.9	67.5	30.7	83.2
Yamhill	8.9	9.3	9.8	11.2	11.9	10.7	11.7	11.5	13.8	13.4	4.5	50.2
<b>Study Area</b>	251.7	276.8	302.6	329.1	313.6	309.1	318.4	345.3	386.2	427.7	176.1	70.0

Source: U.S. Census Bureau

Between 2002 and 2011, the share of the population living below the poverty level grew from 10.1 to 15.6 percent in the study area. County residents fared somewhat better during this time, but the share of residents living below the poverty level grew from 9.6 percent in 2002 to 13.7 percent in 2011. Directly north of Clark County, the poverty rate in Cowlitz County grew from 12.5 to 19.5 percent, and directly to the south, the poverty rate in Multnomah County grew from 11.8 to 19.4 percent.

**Table 4.4-6. Poverty Rates (%) in Study Area – All Ages**

County	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Change 2002-2011
<b>Washington</b>	10.3	11.0	11.6	12.0	11.8	11.4	11.3	12.3	13.5	13.9	3.6
Clark	9.6	10.5	11.2	11.5	10.2	9.5	9.9	11.8	12.7	13.7	4.1
Cowlitz	12.5	13.6	14.3	15.0	15.7	15.4	14.8	16.0	20.6	19.5	7.0
Skamania	11.6	10.9	11.5	11.1	12.5	11.9	12.2	12.4	13.8	14.9	3.3
<b>Oregon</b>	11.3	12.0	12.9	14.1	13.4	13.0	13.5	14.3	15.8	17.3	6.0
Clackamas	7.6	8.4	9.0	8.9	8.0	9.2	9.2	9.4	10.4	11.0	3.4
Columbia	8.0	8.6	9.5	10.5	8.8	8.8	11.3	11.9	13.4	12.3	4.3
Hood River	11.7	12.5	13.0	15.3	14.7	12.7	13.2	12.9	13.0	14.7	3.0
Marion	13.2	14.1	15.1	15.4	14.7	15.2	15.8	16.4	17.9	20.5	7.3
Multnomah	11.8	12.9	14.2	17.3	15.5	15.0	14.1	15.1	18.0	19.4	7.6
Polk	9.7	10.3	11.3	15.4	13.2	10.8	11.9	13.2	15.7	14.1	4.4
Washington	7.7	8.7	9.3	9.7	9.6	8.6	9.5	10.0	9.7	12.6	4.9
Yamhill	10.5	10.8	11.2	13.0	13.3	11.7	12.5	12.3	14.7	14.1	3.6
<b>Study Area</b>	10.1	11.0	11.8	13.0	12.1	11.7	11.9	12.7	14.3	15.6	5.5

#### 4.4.1.3 Housing

According to data from the U.S. Census Bureau, the study area has more than 1.1 million housing units, with more than 166,000 in Clark County. Results from the most recent American Community Survey indicate that there are more than 9,000 vacant housing units in the County, and that the vacancy rate for rental housing in the County is 5.2 percent. Within the larger study area, there are an estimated 73,000 vacant housing units, and vacancy rates for rental housing range between 4.1 and 8.1 percent.

**Table 4.4-7. Housing Units and Vacancy by County in Study Area**

County	Housing Units			% Vacancy	
	Total	Occupied	Vacant	Homeowner	Rental
<b>Washington</b>					
Clark	166,270	157,179	9,091	1.9	5.2
Cowlitz	43,227	39,793	3,434	1.9	5.3
Skamania	5,577	4,435	1,142	3.3	5.1
<b>Oregon</b>					
Clackamas	156,150	144,588	11,562	1.6	6.3
Columbia	20,600	19,173	1,427	1.7	4.3
Hood River	9,193	8,204	989	1.9	5.8
Marion	120,482	112,841	7,641	1.9	5.5
Multnomah	322,567	302,224	20,343	2.5	4.1
Polk	30,044	28,111	1,933	2.6	4.2
Washington	211,045	198,593	12,452	2.2	5.3
Yamhill	36,831	33,804	3,027	2.2	8.1
<b>Study Area</b>	1,121,986	1,048,945	73,041		

Source: U.S. Census Bureau, 2007-2011 American Community Survey

County-wide median house values in the study area range between \$193,800 and \$326,300, according to data from the U.S. Census Bureau 2007–2011 American Community Survey. In Clark County, the median house value is \$254,200. The largest number of housing units in both the study area and in the County is valued between \$200,000 and \$299,999, but there is also a large number of housing units valued at less than \$200,000. In the study area, one out of four housing units is valued at less than \$200,000, and in Clark County, nearly one-third of housing units are valued at less than \$200,000.

**Table 4.4-8. Housing Values by County in Study Area**

County	Less than \$50,000	\$50,000 to \$99,999	\$100,000 to \$149,999	\$150,000 to \$199,999	\$200,000 to \$299,999	\$300,000 to \$499,999	\$500,000 to \$999,999	\$1,000,000 or more	Median (dollars)
<b>Washington</b>									
Clark	4,124	2,157	5,739	16,597	39,112	27,929	8,730	1,132	\$254,200
Cowlitz	1,638	1,955	3,996	6,451	6,951	4,534	999	258	\$193,800
Skamania	151	179	291	416	1,053	910	200	123	\$257,600
<b>Oregon</b>									
Clackamas	5,848	1,471	2,542	7,227	27,631	36,422	16,622	3,893	\$326,300
Columbia	1,072	668	1,604	2,831	4,702	2,854	873	117	\$221,200
Hood River	197	257	298	414	1,333	1,789	1,045	212	\$326,900
Marion	5,053	2,632	8,270	16,710	19,766	11,801	3,971	586	\$206,700
Multnomah	5,415	2,201	6,915	19,664	58,394	51,365	20,105	2,857	\$281,900
Polk	877	605	1,742	4,038	6,055	4,344	1,070	163	\$231,900
Washington	4,247	1,449	3,638	10,253	42,238	44,612	15,393	1,944	\$300,200
Yamhill	1,909	991	1,888	3,911	6,951	5,238	2,363	384	\$237,700
<b>Study Area</b>	30,531	14,565	36,923	88,512	214,186	191,798	71,371	11,669	

Source: U.S. Census Bureau, 2007-2011 American Community Survey

A second source of housing information is the Washington OFM, which provides detail at the municipality level. As shown in the tables on the following two pages, approximately 55 percent of the housing in the County is located in incorporated parts of the County and 45 percent is in unincorporated areas. Vancouver accounts for most of the housing in the incorporated areas, with an estimated 70,249 out of 93,319 housing units in 2012, or 75.7 percent. Battle Ground, Camas, and Washougal account for most of the other housing in incorporated areas

Between 2002 and 2012, the number of housing units in Clark County grew by more than 27,600. Vancouver accounted for more than 28.4 percent of this total, adding more than 7,800 new housing units. Battle Ground, Camas, and Washougal each added more than 2,000 new housing units, while unincorporated parts of the County added nearly 11,800 new units.

Housing vacancy rates have remained steady over the past 10 years in the County, ranging between 5.2 and 5.8 percent. In Vancouver, the vacancy rate has generally ranged between 6.2 and 6.7 percent and, in 2012, it was estimated that there were 45,316 unoccupied housing units in Vancouver.

**Table 4.4-9. Housing Characteristics by City in Clark County**

City Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
<b>Housing Units</b>											
Clark County	142,050	146,196	150,712	154,819	158,999	162,191	164,926	166,721	167,413	168,416	169,667
Unincorporated	64,562	66,722	68,725	70,868	72,951	73,672	74,784	75,302	75,498	75,908	76,348
Incorporated	77,488	79,474	81,987	83,951	86,048	88,519	90,142	91,419	91,915	92,508	93,319
Battle Ground	3,857	4,311	4,809	5,119	5,375	5,465	5,706	5,857	5,952	6,042	6,084
Camas	5,251	5,533	6,026	6,122	6,382	6,574	6,796	6,925	7,072	7,182	7,341
La Center	652	671	723	765	884	903	941	965	981	996	1,061
Ridgefield	797	815	827	1,022	1,273	1,431	1,544	1,641	1,695	1,779	1,857
Vancouver	62,816	63,785	64,845	65,865	66,655	68,375	69,159	69,875	70,005	70,249	70,663
Washougal	3,695	3,942	4,337	4,627	5,021	5,276	5,468	5,628	5,673	5,717	5,764
Woodland	57	55	53	56	59	47	52	53	53	53	53
Yacolt	363	362	367	375	399	448	476	475	484	490	496
<b>Occupied Housing Units</b>											
Clark County	134,671	138,146	142,394	145,885	149,723	152,780	155,350	157,242	158,099	158,841	160,021
Unincorporated	61,600	63,640	65,529	67,551	69,512	70,176	71,212	71,680	71,843	72,257	72,676
Incorporated	73,071	74,506	76,865	78,334	80,211	82,604	84,138	85,562	86,256	86,580	87,339
Battle Ground	3,687	4,086	4,596	4,807	5,071	5,207	5,402	5,554	5,652	5,729	5,769
Camas	4,938	5,200	5,650	5,731	5,935	6,125	6,333	6,472	6,619	6,709	6,857
La Center	614	635	685	726	809	859	894	920	942	951	1,013
Ridgefield	753	770	781	935	1,156	1,302	1,429	1,529	1,591	1,658	1,731
Vancouver	59,207	59,730	60,698	61,462	62,210	63,795	64,542	65,404	65,691	65,744	66,132
Washougal	3,483	3,705	4,070	4,275	4,610	4,864	5,046	5,191	5,256	5,282	5,325
Woodland	54	45	45	51	55	43	49	49	51	50	50
Yacolt	335	335	340	347	365	409	443	443	454	458	463
<b>Occupancy Rate</b>											
Clark County	94.8%	94.5%	94.5%	94.2%	94.2%	94.2%	94.2%	94.3%	94.4%	94.3%	94.3%
Unincorporated	95.4%	95.4%	95.3%	95.3%	95.3%	95.3%	95.2%	95.2%	95.2%	95.2%	95.2%
Incorporated	94.3%	93.7%	93.8%	93.3%	93.2%	93.3%	93.3%	93.6%	93.8%	93.6%	93.6%
Battle Ground	95.6%	94.8%	95.6%	93.9%	94.3%	95.3%	94.7%	94.8%	95.0%	94.8%	94.8%
Camas	94.0%	94.0%	93.8%	93.6%	93.0%	93.2%	93.2%	93.5%	93.6%	93.4%	93.4%
La Center	94.2%	94.6%	94.7%	94.9%	91.5%	95.1%	95.0%	95.3%	96.0%	95.5%	95.5%
Ridgefield	94.5%	94.5%	94.4%	91.5%	90.8%	91.0%	92.6%	93.2%	93.9%	93.2%	93.2%
Vancouver	94.3%	93.6%	93.6%	93.3%	93.3%	93.3%	93.3%	93.6%	93.8%	93.6%	93.6%
Washougal	94.3%	94.0%	93.8%	92.4%	91.8%	92.2%	92.3%	92.2%	92.6%	92.4%	92.4%
Woodland	94.7%	81.8%	84.9%	91.1%	93.2%	91.5%	94.2%	92.5%	96.2%	94.3%	94.3%
Yacolt	92.3%	92.5%	92.6%	92.5%	91.5%	91.3%	93.1%	93.3%	93.8%	93.4%	93.4%
<b>Unoccupied Housing Units</b>											
Clark County	7,379	8,050	8,318	8,934	9,276	9,411	9,576	9,479	9,314	9,575	9,646
Unincorporated	2,962	3,082	3,196	3,317	3,439	3,496	3,572	3,622	3,655	3,651	3,672
Incorporated	4,417	4,968	5,122	5,617	5,837	5,915	6,004	5,857	5,659	5,928	5,980
Battle Ground	170	225	213	312	304	258	304	303	300	313	315
Camas	313	333	376	391	447	449	463	453	453	473	484

City Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011 <sup>1</sup>	2012 <sup>2</sup>
La Center	38	36	38	39	75	44	47	45	39	45	48
Ridgefield	44	45	46	87	117	129	115	112	104	121	126
Vancouver	3,609	4,055	4,147	4,403	4,445	4,580	4,617	4,471	4,314	4,505	4,531
Washougal	212	237	267	352	411	412	422	437	417	435	439
Woodland	3	10	8	5	4	4	3	4	2	3	3
Yacolt	28	27	27	28	34	39	33	32	30	32	33

<sup>1</sup>For 2011 and 2012, the number of occupied housing units, occupancy rate, and unoccupied housing units were estimated on based on occupancy rates for 2008 through 2010.

Source: Washington Office of Financial Management

#### 4.4.1.4 Workforce

According to data from the Bureau of Labor Statistics, between 2002 and 2012, the workforce in the study area grew from 1.33 million to 1.43 million, an increase of more than 108,000 workers or 8.1 percent. In the County, the number of workers increased from approximately 187,000 to 211,000, an increase of approximately 24,000 workers or 12.9 percent.

During the same period, the number of workers employed grew by 7.4 percent in the study area. The number of workers employed grew from 1.22 million to 1.32 million, an increase of more than 91,000 workers. In the County, the number of workers with jobs grew by more than 19,000 (from approximately 170,000 to 189,000), an increase of 11.4 percent.

Because the size of the workforce grew faster than the number of workers employed, the number of unemployed workers in the study area grew by nearly 17,000 between 2002 and 2012.

However, this is a significant improvement over the situation of the period between 2010 and 2012, which saw the number of unemployed jump to nearly 155,000 before slowly declining in subsequent years.

In the County, the number of unemployed workers was 4,800 higher in 2012 than in 2002, with approximately 22,000 workers not employed. The number of unemployed workers in the County had dropped to less than 12,000 in 2006 and 2007, but grew to nearly 29,000 in 2009 and to more than 30,000 in 2010 during what is referred to as the Great Recession.

The unemployment rate in the study area declined from 7.8 percent in 2002 to 5.0 percent in 2007, but the impact of the recent recession was a doubling of that rate, to 10.8 percent in 2009 and 10.6 percent in 2010. By 2012, the unemployment rate had dropped to 8.4 percent, an improvement over the situation during the height of the recession but substantially higher than in 2007.

In the County the unemployment rate fell from 9.2 percent in 2002 to a low of 5.6 percent in 2007, before the recession. During the recession, the County unemployment rate grew for three consecutive years, to a high of 14.0 percent in 2010. The rate dropped in both of the most recent two years, but was still 10.2 percent in 2012.

**Table 4.4-10. Size of Workforce by County in Project Vicinity**

County Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Change 2002-2012	% Change
<b>Washington</b>	3,481,463	2,913,230	2,999,526	3,075,972	3,155,384	3,232,652	3,284,836	3,194,251	3,166,880	3,161,818	3,197,293	376,765	12.1%
Clark	211,442	170,968	180,700	188,730	192,679	196,119	198,829	188,747	186,527	187,179	189,421	24,123	12.9%
Cowlitz	43,067	38,553	39,051	39,637	39,843	40,581	40,493	38,659	38,590	37,912	38,380	284	0.7%
Skamania	5,060	4,295	4,510	4,624	4,688	4,666	4,687	4,415	4,501	4,461	4,515	292	6.1%
<b>Oregon</b>	1,962,908	1,699,679	1,714,447	1,740,990	1,792,039	1,821,827	1,827,032	1,753,853	1,761,867	1,785,400	1,791,730	119,168	6.5%
Clackamas	199,576	175,118	177,506	180,656	185,938	187,337	188,717	181,268	178,777	181,905	183,824	9,838	5.2%
Columbia	24,221	20,823	21,102	21,619	22,409	22,380	22,476	21,357	21,526	21,683	21,912	1,143	5.0%
Hood River	14,497	11,155	11,441	11,538	11,922	12,296	12,632	12,815	13,196	13,304	13,487	2,406	19.9%
Marion	154,899	136,976	137,804	138,962	142,018	143,510	145,044	140,510	141,020	140,720	140,106	7,600	5.2%
Multnomah	404,357	342,767	338,901	340,275	349,215	360,495	365,458	351,922	360,613	369,121	373,015	24,841	6.5%
Polk	38,442	31,996	32,680	33,733	35,249	36,560	37,458	36,391	35,548	35,352	35,198	4,660	13.8%
Washington	293,472	245,736	249,121	255,825	266,761	271,610	273,971	263,334	262,950	269,929	272,777	28,109	10.6%
Yamhill	48,611	40,330	40,790	41,581	43,273	44,232	44,778	42,767	43,386	44,010	44,475	4,866	11.1%
<b>Study Area</b>	1,437,644	1,218,717	1,233,606	1,257,180	1,293,995	1,319,786	1,334,543	1,282,185	1,286,634	1,305,576	1,317,110	108,162	8.1%

Source: Bureau of Labor Statistics

**Table 4.4-11. Employment by County in Project Vicinity**

County Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Change 2002- 2012	% Change
<b>Washington</b>	2,877,022	3,146,154	3,199,234	3,255,527	3,319,252	3,386,775	3,473,010	3,523,739	3,516,008	3,482,239	3,481,463	320,271	11.1
Clark	170,096	189,109	195,202	201,564	204,406	207,853	214,101	217,536	216,991	213,635	211,442	19,325	11.4
Cowlitz	38,218	42,820	42,663	42,724	42,607	43,327	44,119	44,627	44,376	43,072	43,067	162	0.4
Skamania	4,293	4,779	4,928	5,002	5,042	5,001	5,126	5,075	5,188	5,103	5,060	222	5.2
<b>Oregon</b>	1,704,131	1,850,024	1,849,720	1,856,062	1,893,267	1,921,081	1,954,125	1,972,962	1,973,793	1,975,393	1,962,908	87,599	5.1
Clackamas	176,583	189,349	190,199	191,232	195,283	196,328	200,108	201,930	198,863	199,654	199,576	7,241	4.1
Columbia	20,899	23,233	23,207	23,340	23,771	23,737	24,188	24,586	24,484	24,265	24,221	1,013	4.8
Hood River	11,095	12,200	12,353	12,321	12,612	12,878	13,346	13,936	14,384	14,438	14,497	2,392	21.6
Marion	136,577	148,851	149,066	148,651	150,558	151,714	155,295	157,808	158,598	156,976	154,899	3,529	2.6
Multnomah	348,945	374,435	366,118	362,362	368,171	379,016	388,198	392,741	400,065	404,114	404,357	24,070	6.9
Polk	31,647	34,348	34,993	35,752	37,090	38,455	39,688	40,136	39,198	38,834	38,442	3,551	11.2
Washington	247,008	265,300	265,583	269,807	279,060	283,871	289,259	290,455	288,873	292,843	293,472	25,769	10.4
Yamhill	40,511	43,915	43,969	44,285	45,617	46,566	47,868	48,294	48,538	48,604	48,611	3,964	9.8
<b>Study Area</b>	1,225,872	1,328,339	1,328,281	1,337,040	1,364,217	1,388,746	1,421,296	1,437,124	1,439,558	1,441,538	1,437,644	91,238	7.4

Source: Bureau of Labor Statistics

**Table 4.4-12. Unemployment by County in Project Vicinity**

County Name	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Change 2002- 2012	% Change
<b>Washington</b>	227,676	232,924	199,708	179,555	163,868	154,123	188,174	329,488	349,128	320,421	284,170	56,494	24.8
Clark	17,223	18,141	14,502	12,834	11,727	11,734	15,272	28,789	30,464	26,456	22,021	4,798	27.9
Cowlitz	4,565	4,267	3,612	3,087	2,764	2,746	3,626	5,968	5,786	5,160	4,687	122	2.7
Skamania	475	484	418	378	354	335	439	660	687	642	545	70	14.7
<b>Oregon</b>	139,609	150,345	135,273	115,072	101,228	99,254	127,093	219,109	211,926	189,993	171,178	31,569	22.
Clackamas	13,155	14,231	12,693	10,576	9,345	8,991	11,391	20,662	20,086	17,749	15,752	2,597	19.7
Columbia	2,179	2,410	2,105	1,721	1,362	1,357	1,712	3,229	2,958	2,582	2,309	130	6.0
Hood River	996	1,045	912	783	690	582	714	1,121	1,188	1,134	1,010	14	1.4
Marion	10,722	11,875	11,262	9,689	8,540	8,204	10,251	17,298	17,578	16,256	14,793	4,071	38.0
Multnomah	30,571	31,668	27,217	22,087	18,956	18,521	22,740	40,819	39,452	34,993	31,342	771	2.5
Polk	2,135	2,352	2,313	2,019	1,841	1,895	2,230	3,745	3,650	3,482	3,244	1,109	51.9
Washington	18,355	19,564	16,462	13,982	12,299	12,261	15,288	27,121	25,923	22,914	20,695	2,340	12.7
Yamhill	3,234	3,585	3,179	2,704	2,344	2,334	3,090	5,527	5,152	4,594	4,136	902	27.9
<b>Study Area</b>	103,610	109,622	94,675	79,860	70,222	68,960	86,753	154,939	152,924	135,962	120,534	16,924	16.3

Source: Bureau of Labor Statistics

**Table 4.4-13. Unemployment Rate by County in Project Vicinity**

<b>County Name</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
<b>Washington</b>	7.3%	7.4%	6.2%	5.5%	4.9%	4.6%	5.4%	9.4%	9.9%	9.2%	8.2%
Clark	9.2%	9.6%	7.4%	6.4%	5.7%	5.6%	7.1%	13.2%	14.0%	12.4%	10.4%
Cowlitz	10.7%	10.0%	8.5%	7.2%	6.5%	6.3%	8.2%	13.4%	13.0%	12.0%	10.9%
Skamania	10.0%	10.1%	8.5%	7.6%	7.0%	6.7%	8.6%	13.0%	13.2%	12.6%	10.8%
<b>Oregon</b>	7.6%	8.1%	7.3%	6.2%	5.3%	5.2%	6.5%	11.1%	10.7%	9.6%	8.7%
Clackamas	6.9%	7.5%	6.7%	5.5%	4.8%	4.6%	5.7%	10.2%	10.1%	8.9%	7.9%
Columbia	9.4%	10.4%	9.1%	7.4%	5.7%	5.7%	7.1%	13.1%	12.1%	10.6%	9.5%
Hood River	8.2%	8.6%	7.4%	6.4%	5.5%	4.5%	5.3%	8.0%	8.3%	7.9%	7.0%
Marion	7.3%	8.0%	7.6%	6.5%	5.7%	5.4%	6.6%	11.0%	11.1%	10.4%	9.6%
Multnomah	8.1%	8.5%	7.4%	6.1%	5.1%	4.9%	5.9%	10.4%	9.9%	8.7%	7.8%
Polk	6.3%	6.8%	6.6%	5.6%	5.0%	4.9%	5.6%	9.3%	9.3%	9.0%	8.4%
Washington	6.9%	7.4%	6.2%	5.2%	4.4%	4.3%	5.3%	9.3%	9.0%	7.8%	7.1%
Yamhill	7.4%	8.2%	7.2%	6.1%	5.1%	5.0%	6.5%	11.4%	10.6%	9.5%	8.5%
<b>Study Area</b>	7.8%	8.3%	7.1%	6.0%	5.1%	5.0%	6.1%	10.8%	10.6%	9.4%	8.4%

Source: Bureau of Labor Statistics

According to data from the U.S. Census Bureau 2011 County Business Patterns, health care and social assistance are the largest sources of jobs in the study area, accounting for approximately 150,000 of the 1 million jobs. Retail trade is the second-largest source of employment, accounting for 126,000 jobs, followed by manufacturing (110,000 jobs), accommodation and food services (99,000 jobs), and wholesale trade (69,000 jobs).

The Facility falls into the transportation and warehousing sector, which accounted for nearly 37,000 jobs in the study area in 2011.

Average wages vary significantly by sector and county. According to the County Business Pattern data, the average annual wage for the region, across all sectors, was \$45,700. In the transportation and warehousing sector, the average annual wage is slightly lower, at \$44,300, and in the County, it is \$39,200. This information is shown in greater detail by the tables on the following pages.

**Table 4.4-14. Employment by Sector in 2011**

NAICS	Description	Clark County, Washington	Cowlitz County, Washington	Skamania County, Washington	Clackamas County, Oregon	Columbia County, Oregon	Hood River County, Oregon	Marion County, Oregon	Multnomah County, Oregon	Polk County, Oregon	Washington County, Oregon	Yamhill County, Oregon	Study Area Total
0	Total for all sectors	107,452	30,312	1,185	121,901	6,948	8,501	93,122	375,965	10,795	223,496	26,599	1,006,276
11	Agriculture, forestry, fishing and hunting	110	737	2	243	245	150	1,152	700	410	258	232	4,089
21	Mining, quarrying, and oil and gas extraction	277	89		50	54		286	50	10	66	50	872
22	Utilities	50	50		300	150	50	251	4,272	50	700	50	4,523
23	Construction	8,710	2,872	101	8,347	357	378	5,005	15,509	807	10,936	1,089	54,111
31-33	Manufacturing	11,195	5,974	150	15,779	1,177	1,095	8,247	31,389	1,564	26,982	5,547	109,099
42	Wholesale trade	5,601	1,109	14	9,180	56	300	3,735	22,714	289	26,003	300	69,001
44-45	Retail trade	15,238	4,678	142	17,281	1,347	1,269	15,420	37,000	1,606	28,400	3,312	125,693
48-49	Transportation and warehousing	2,986	983	10	4,087	296	106	3,551	20,718	244	3,088	560	36,629
51	Information	3,751	369	14	1,909	55	192	1,827	10,789	50	9,146	188	28,290
52	Finance and insurance	4,633	877	50	5,053	292	142	3,540	20,119	245	9,911	800	45,662
53	Real estate and rental and leasing	2,067	344	10	2,450	89	50	2,034	8,631	181	4,713	257	20,826
54	Professional, scientific, and technical services	6,535	838	50	8,294	251	385	3,891	29,224	333	16,581	614	66,996
55	Management of companies and enterprises	1,872	700		2,751	10	50	1,347	14,282	10	11,640	199	32,801
56	Administrative and support and waste management and remediation services	6,693	741	10	6,304	165	139	6,029	25,117	270	18,065	833	64,366
61	Educational services	1,369	294		2,051	47	50	3,000	14,799	187	5,739	2,778	30,264
62	Health care and social assistance	18,946	5,634	85	17,213	999	1,790	18,616	56,182	2,455	24,088	4,357	150,365
71	Arts, entertainment, and recreation	1,817	349	10	1,773	69	653	1,132	6,390	161	3,291	216	15,851
72	Accommodation and food services	10,477	2,572	504	12,284	914	1,241	9,498	40,086	1,247	16,415	3,976	99,214
81	Other services (except public administration)	5,065	1,176	27	6,549	300	356	4,731	18,026	653	7,402	1,079	45,364

Source: 2011 County Business Patterns (U.S. Census Bureau)

**Table 4.4-15. Average Wage by Sector in 2011**

NAICS	Description	Clark County, Washington	Cowlitz County, Washington	Skamania County, Washington	Clackamas County, Oregon	Columbia County, Oregon	Hood River County, Oregon	Marion County, Oregon	Multnomah County, Oregon	Polk County, Oregon	Washington County, Oregon	Yamhill County, Oregon	Study Area Total
0	Total for all sectors	\$43,100	\$42,000	\$30,000	\$42,800	\$30,200	\$28,900	\$33,300	\$47,300	\$29,100	\$54,600	\$35,100	\$45,700
11	Agriculture, forestry, fishing and hunting	\$60,700	\$47,200	\$55,500	\$27,800	\$40,400	n/a	\$22,600	\$34,100	\$37,700	\$36,400	\$36,200	\$34,600
21	Mining, quarrying, and oil and gas extraction	\$72,100	\$73,000	n/a	n/a	\$54,300	n/a	\$72,400	n/a	n/a	\$53,400	\$42,900	\$64,000
22	Utilities	n/a	n/a	n/a	n/a	n/a	n/a	\$75,300	\$97,300	n/a	n/a	n/a	\$96,100
23	Construction	\$53,100	\$53,700	\$47,100	\$49,400	\$34,900	\$31,400	\$46,400	\$61,200	\$49,000	\$54,400	\$39,800	\$53,900
31-33	Manufacturing	\$53,500	\$64,100	n/a	\$57,300	\$46,300	\$35,800	\$38,800	\$51,700	\$36,500	\$59,300	\$50,700	\$53,700
42	Wholesale trade	\$74,200	\$51,500	\$56,200	\$56,900	\$52,000	n/a	\$46,800	\$55,200	\$42,200	\$117,700	\$76,300	\$80,000
44-45	Retail trade	\$27,200	\$24,100	\$20,000	\$26,500	\$23,700	\$24,400	\$24,000	\$26,900	\$23,700	\$26,900	\$25,600	\$26,300
48-49	Transportation and warehousing	\$43,200	\$39,200	\$24,400	\$38,600	\$32,800	\$29,500	\$44,100	\$45,100	\$34,000	\$44,600	\$83,300	\$44,300
51	Information	\$77,300	\$42,900	\$37,200	\$55,200	\$31,900	\$47,300	\$38,200	\$67,100	\$33,300	\$64,600	\$44,200	\$64,200
52	Finance and insurance	\$55,200	\$42,500	\$14,600	\$57,900	\$36,700	\$50,900	\$47,400	\$78,600	\$34,000	\$58,200	\$45,700	\$65,200
53	Real estate and rental and leasing	\$34,700	\$21,600	\$19,300	\$35,000	\$25,700	\$34,200	\$28,200	\$38,000	\$16,800	\$36,600	\$23,100	\$35,400
54	Professional, scientific, and technical services	\$50,600	\$39,900	\$40,100	\$69,100	\$31,100	\$47,600	\$43,600	\$70,600	\$32,400	\$57,800	\$40,900	\$62,600
55	Management of companies and enterprises	\$99,700	\$77,800	n/a	\$73,700	n/a	n/a	\$61,900	\$92,900	\$45,200	\$114,600	\$78,700	\$97,700
56	Administrative and support and waste management and remediation services	\$27,100	\$25,000	\$15,900	\$30,600	\$24,500	\$21,600	\$23,900	\$28,400	\$27,700	\$29,900	\$25,400	\$28,400
61	Educational services	\$19,700	\$17,300	n/a	\$22,400	\$14,600	n/a	\$21,700	\$26,600	\$20,000	\$22,800	\$20,700	\$24,100
62	Health care and social assistance	\$48,300	\$42,200	\$30,400	\$49,300	\$27,100	\$30,600	\$40,700	\$53,000	\$28,400	\$46,000	\$36,600	\$47,600
71	Arts, entertainment, and recreation	\$19,500	\$16,200	n/a	\$20,300	\$13,000	\$15,100	\$18,400	\$33,400	\$10,900	\$27,600	\$20,900	\$26,500
72	Accommodation and food services	\$15,900	\$14,700	\$20,600	\$16,200	\$12,800	\$16,100	\$14,600	\$17,900	\$13,700	\$16,500	\$22,200	\$16,900
81	Other services (except public administration)	\$23,800	\$21,900	\$18,600	\$23,500	\$20,800	\$22,600	\$23,700	\$29,900	\$21,900	\$29,600	\$19,000	\$26,900

Source: 2011 County Business Patterns (U.S. Census Bureau)

**Table 4.4-16. Employment Trends and Forecast in Southwest Washington**

Industry	Est. Emp. 2009	Est. Emp. 2014	Est. Emp. 2019	Avg. Annual Growth Rate 2009-2014	Avg. Annual Growth Rate 2014-2019	Avg. Annual Growth Rate 2009-2019	State Rate
Natural Resources And Mining	1,000	1,100	1,100	1.9%	0.0%	1.0%	1.4%
Construction	11,500	12,000	13,300	0.9%	2.1%	1.5%	1.1%
Manufacturing	17,800	20,200	21,500	2.6%	1.3%	1.9%	1.1%
Wholesale Trade	6,900	7,700	8,500	2.2%	2.0%	2.1%	1.4%
Retail Trade	19,300	21,000	22,200	1.7%	1.1%	1.4%	1.0%
Transportation, Warehousing And Utilities	5,800	6,600	7,400	2.6%	2.3%	2.5%	1.6%
Information	3,300	3,800	4,100	2.9%	1.5%	2.2%	2.3%
Financial Activities	7,400	7,800	7,900	1.1%	0.3%	0.7%	0.3%
Professional And Business Services	16,200	19,000	22,400	3.2%	3.3%	3.3%	2.9%
Education And Health Services	24,100	27,100	31,100	2.4%	2.8%	2.6%	2.0%
Leisure And Hospitality	15,800	16,800	18,100	1.2%	1.5%	1.4%	1.3%
Other Services	5,800	6,100	6,200	1.0%	0.3%	0.7%	0.4%
Government	30,200	31,500	33,700	0.8%	1.4%	1.1%	0.9%
Total Nonfarm	165,100	180,700	197,500	1.8%	1.8%	1.8%	1.4%

Note: Southwest Washington is Clark, Cowlitz, and Wahkiakum County Washington Employment Security Department

Most of the largest employers in the County fall into one of four sectors: medical services, education, manufacturing, and government. The medical sector includes the largest employer in 2012, PeaceHealth Southwest Washington; other medical providers in the top 28 employers include the Vancouver Clinic, Legacy Salmon Creek Medical Center, Veterans' Administration Medical Center, and Kaiser Permanente Northwest. These five providers account for more than 22 percent of the jobs generated by the top employers

Education accounts for nearly one-third of the jobs generated by the top 28 employers. Major agencies include the Evergreen, Vancouver, Battle Ground school districts as well as Clark College and Washington State University Vancouver.

Manufacturing accounts for nearly 15 percent of the jobs provided by the top 28 employers in the County. Top manufacturers include WaferTech, Northwest Natural Products, SEH America, Georgia-Pacific, Frito-Lay, and Columbia Machine.

Government agencies represent two of the top 28 employers, and account for more than 9 percent of the jobs.

**Table 4.4-17. Major Employers in County**

2012 Rank	Employer	2012 FTE
1	Southwest Washington Medical Center	2,841
2	Evergreen Public Schools	2,455
3	Vancouver Public Schools	2,203
4	Clark County, Washington	1,561
5	Fred Meyer Stores, Inc.	1,500
6	Battle Ground Public Schools	1,213
7	Bonneville Power Administration	1,181
8	WaferTech, LLC	1,040
9	Clark College	985
10	City of Vancouver	932
11	The Vancouver Clinic	912
12	Legacy Salmon Creek Medical Center	860
13	VA Medical Clinic	809
14	BNSF Railway Railroad	800
15	Northwest Natural Products, Inc.	790
16	Camas School District No. 117	750
17	Kaiser Permanente Northwest	724
18	SEH America	711
19	Wells Fargo	654
20	Dick Hannah Dealerships	650
21	Charter Communications	605
22	Educational Service District No. 112	600
23	Georgia-Pacific LLC	508
24	Frito-Lay, Inc.	475
25	Columbia Machine, Inc.	400
26	Clark Co. Public Transportation Benefit Area	384
27	Washington State University, Vancouver	352
28	CPU	340

Source: Columbia River Economic Development Council

A recent study completed for the Port included an analysis of where workers live. Excluding rail crew and rail headquarters employment, more than 75 percent of the workers with jobs directly related to the Port (and its tenants) are residents of the County. This includes 45.8 percent who are residents of Vancouver, and 29.9 percent who live elsewhere in the County. Nearly 20 percent of Port-related workers commute from Oregon, including 12.1 percent from Multnomah County.

**Table 4.4-18. Distribution of Port of Vancouver Direct Jobs by Place of Residence**

Location	Percent	Direct Jobs
Vancouver	45.8%	579
Other Clark	29.9%	378
Skamania	0.5%	7
Other WA	3.5%	45
Multnomah	12.1%	152
Washington	1.1%	14
Clackamas	3.2%	40
Other OR	3.2%	41
Other U.S.	0.7%	8
Total	100.0%	1,265

#### 4.4.1.5 Lodging

Clark County is one of seven counties in the Portland, Oregon, lodging market, as defined by STR Lodging. According to STR Lodging, the Portland market currently has total of 25,903 hotel rooms, of which approximately 10 percent are in the County.

Two-thirds of the hotel rooms in the County are at hotels rated as upper economy, midscale, or upper midscale. The two least-expensive hotel types, economy and midscale, each account for approximately 20 to 23 percent of the available rooms in the County, and there are a total of approximately 1,100 such rooms.

In the Portland market, these three least expensive tiers of hotels account for 56 percent of the total rooms available. Nearly 11,000 available rooms in the Portland market are in economy or midscale hotels.

**Table 4.4-19. Hotel/Motel Rooms in Portland Market**

County	Economy	Midscale	Upper Midscale	Upscale	Upper Upscale	Luxury	Total
Clark County, WA	521	587	571	642	226	-	2,547
Clackamas County, OR	517	525	464	685	230	-	2,421
Columbia County, OR	90	112	40	-	-	-	242
Multnomah County, OR	2,750	2,328	2,417	3,358	3,971	581	15,405
Washington County, OR	1,207	588	1,314	1,013	366	124	4,612
Yamhill County, OR	276	221	66	20	-	93	676
Portland market total	5,361	4,361	4,872	5,718	4,793	798	25,903

Source: STR Lodging

Another source of data for the hotel market is PKF Hospitality Research, LLC. PKF provides data for sub-markets of the Portland region, as well historical occupancy data. According to PKF, occupancy at hotels in the Airport/Vancouver sub-market averaged 59.8 percent between 2008 and 2012. The revenue per available room (Revenue PAR) averaged approximately \$50.00 during that period, and the estimated revenue per occupied room was approximately \$82.50.

The Airport/Vancouver sub-market is the least expensive of the four tracked by PKF. Average occupancy is also relatively low.

**Table 4.4-20. Hotel/Motel Occupancy & Revenue in Portland Market**

Year	Downtown		Airport/ Vancouver		Beaverton/ Sunset Hwy West		Lake Oswego/ I-5 South	
	Occupancy	Revenue PAR	Occupancy	Revenue PAR	Occupancy	Revenue PAR	Occupancy	Revenue PAR
2008	72.3%	\$93.94	63.2%	\$56.20	63.3%	\$57.36	60.2%	\$53.36
2009	66.8%	\$78.01	54.2%	\$44.13	57.4%	\$45.84	54.2%	\$43.81
2010	71.3%	\$84.02	57.3%	\$44.83	66.0%	\$50.25	57.7%	\$47.48
2011	74.0%	\$91.45	59.8%	\$48.19	69.6%	\$58.73	59.4%	\$50.43
2012	75.9%	\$100.45	64.6%	\$53.90	72.3%	\$66.55	62.2%	\$55.77
2013 ytd	66.0%	\$77.72	57.2%	\$46.97	65.3%	\$63.72	54.7%	\$46.77

Source: PKF Hospitality Research, LLC

#### 4.4.1.6 Taxes

The proposed project is located on land owned by the Port. Port land is not subject to property taxes, but privately owned improvements located on land leased from the Port are subject to property tax. In this case, all of the equipment associated with the Facility will be subject to property taxes.

The total property tax at the project location is \$14.11773 per thousand dollars of assessed value. The distribution of these taxes is presented in the following table. Schools are the primary recipient of property taxes, with \$5.609446 going to Vancouver schools and \$2.489687 going to the state school fund.

**Table 4.4-21. Breakdown of Taxing District Millage Rate**

Taxing District	Tax Rate
Port Vancouver General Adref	0.000449
County General Adref	0.003626
Veterans Asst	0.009925
City Vancouver General Adref	0.010346
Dev Disability	0.012500
Mental Health	0.012500
Vancouver Library Capital Facilities	0.256084
Sd37 Vancouver M&O Adref	0.016503
Conservation Futures	0.062500
Port Vancouver Bonds	0.223412
Port Vancouver General	0.211683
County General	1.537209
Sd37 Vancouver Debt Svc	1.851094
Sd37 Vancouver M&O	3.758351
State Schools	2.489687
City Vancouver General	3.161863
Ft. Vancouver Regional Library	0.500000
<b>Totals</b>	<b>14.11773</b>

Source: Clark County Assessor

#### 4.4.1.7 Fire, Police, and Medical Services

##### *Fire Protection*

The Vancouver Fire Department provides services to 246,441 people in the combined City of Vancouver and Clark County Fire District 5 service area, which is comprised of 90.9 square miles. The Fire Department consists of 198 personnel. The Fire Department serves a population equating to the second largest city in Washington State with the highest call volume per firefighter and the fewest firefighters per thousand in population of comparable cities in the state. Vancouver Fire Department is a full service fire department, providing: fire suppression, prevention, emergency medical services, hazardous materials, trench and confined space rescue, water rescue, high angle rescue, and citywide emergency management. These services are provided by ten fire stations.

The Vancouver Fire Department maintains a Class 4 rating from the Washington Surveying and Rating Bureau. Class 1 is the best rating, classified as the ideal fire department, and Class 10 is one with the most deficiency points or no department at all. The Fire Department was downgraded one class in October 2002 due to staffing, fire prevention, and marine response deficiencies. This resulted in an increase in insurance premiums paid by most businesses in the fire service area.

**Table 4.4-22. Fire Departments in Clark County**

Department	City
City of Vancouver	Vancouver
Clark County	Camas
City of Camas	Camas
City of Washougal	Washougal
Town of Yacolt	Yacolt
Cowlitz County Fire District 1	Woodland

Source: Dun & Bradstreet

##### *Police Services*

The Vancouver Police Department covers approximately 49 square miles and provides 24-hour response for public safety and services within the City. The Facility is located approximately 5.5 miles west of the nearest police station, located at 2800 NE Stapleton Road. The VPD currently employs 185 sworn staff, with 62 Police Officers, 10 Corporals and 18 Sergeants assigned to patrol. VPD provides police services and respond to 911 calls for service.

The VPD provides a range of public safety and police services including patrol, investigations division, and special operations division. The VPD currently has on staff 3 EMT-Paramedics and 2 EMT-IV Technicians that provide medical support as part of the region's SWAT Team.

##### *Medical Services*

The closest hospital to the Facility is the Peace Health Southwest Washington Medical Center which is approximately 7.5 miles east of the Facility on Mill Plain Boulevard. Southwest Washington Medical Center is designated as a Level II Trauma Center by the Washington State Department of Health. There are five levels of trauma centers designated by the state with Level I providing the highest level of care and Level V providing the lowest level. Harborview Medical Center in Seattle is the only Level I Trauma Center in Washington State. In Oregon, Legacy Emanuel and Oregon Health Sciences University in Portland are both Level I Hospitals designated by the State of Oregon. The State of Oregon has a 4 level designation with Level I

providing the highest level of definitive, comprehensive care for severely injured patients. Legacy Emanuel and Oregon Health Sciences University are approximately 10 and 14 miles south of the project site, respectively.

**Table 4.4-23. Ambulance Service Providers in Project Vicinity**

Department	City
City of Vancouver	Vancouver
Clark County	Camas
City of Camas	Camas
City of Washougal	Washougal
Town of Yacolt	Yacolt
Cowlitz County Fire District 1	Woodland

Source: Dun & Bradstreet

#### 4.4.1.8 School Enrollment

School enrollment in the study area has grown slowly over the past 6 school years. Total enrollment grew from 423,542 during the 2007–2008 school year to 425,891 during the 2012–2013 school year. The increase in enrollment of 2,349 students represents average annual growth of just 0.11 percent.

Within the study area, enrollment in the County grew at one of the fastest rates. Schools in the County saw an increase of nearly 2,000 students between the 2007–2008 and 2012–2013 school years, with growth of 0.51 percent.

**Table 4.4-24. Enrollment Trends in Project Vicinity**

County	2007–2008	2008–2009	2009–2010	2010–2011	2011–2012	2012–2013	Avg. Annual Growth
<b>Washington</b>							
Clark	76,106	76,782	76,720	76,644	77,134	78,054	0.51%
Cowlitz	17,930	17,715	17,382	17,161	17,013	16,931	-1.14%
Skamania	1,213	1,294	1,617	1,538	1,307	1,198	-0.25%
<b>Oregon</b>							
Clackamas	58,590	58,847	58,394	57,996	57,702	57,870	-0.25%
Columbia	8,639	8,584	8,281	8,241	8,139	7,835	-1.93%
Hood River	3,968	3,973	4,026	3,989	4,076	4,086	0.59%
Marion	60,051	60,268	60,068	60,474	60,324	60,691	0.21%
Multnomah	90,278	89,814	90,080	90,474	91,010	90,405	0.03%
Polk	6,749	6,749	6,710	6,666	6,569	6,514	-0.71%
Washington	83,404	83,699	84,165	85,155	85,471	85,863	0.58%
Yamhill	16,614	16,612	16,763	16,506	16,438	16,444	-0.21%
<b>Study Area</b>	423,542	424,337	424,206	424,844	425,183	425,891	0.11%

Source: Washington Superintendent of Public Instruction, Oregon Department of Education

## 4.4.2 Impacts

### 4.4.2.1 Construction

The Applicant has developed estimates of the manpower needed for the construction of the Vancouver facility. Over the nine-month construction period, a total of 250 construction workers will be employed, with a maximum of 125 workers on site per day. The trades represented by these workers will vary over the course of the project, depending on the project phase. The total number of each category of worker is presented in Table 4.4-26.

The project is located in a major metropolitan area (i.e., Portland-Vancouver MSA) that is capable of supplying most of the needed construction workforce. As demonstrated in Table 4.4-26, for most of the trades required, peak construction employment will account less than 3 percent of the available local workforce. The exceptions are ironworkers (10.7 percent of local workforce) and boilermakers (5.9 percent); a portion of these workers in these trades may need to travel from outside of the Portland-Vancouver region.

**Table 4.4-25. Impact on Local Workforce**

Trade	Regional Employment	Project Maximum	% Increase
Mechanical	2,285	50	2.2%
Electricians	4,872	35	0.7%
Operating Engineers	1,689	25	1.5%
Laborers	5,637	53	0.9%
Ironworkers	300	32	10.7%
Carpenters	5,306	20	0.4%
Concrete	876	15	1.7%
Boilermakers	339	20	5.9%
Total	21,304	250	1.2%

Over the nine months of the project the direct employment is projected to be 250 workers, with a maximum of 125 on site per day. For this analysis it is assumed that these workers earn the prevailing wage for Clark County. The total capital cost of the project is estimated to be \$110 million, of which an estimated \$10 million will be supplies purchased from out of state.

The estimated direct labor income associated with the project is estimated to \$20.6 million. Labor income includes both employee compensation (wages, benefits, and taxes) and proprietor's income. While the annual wage in the study area averages \$45,700 across all sectors (see Table 4.4-15), the construction jobs associated with the project are likely to generate direct income (including wages and all benefits) that is substantially higher than the study area average wage.

Total economic impacts were estimated using the IMPLAN input-output model. Including both indirect and induced benefits, the construction project is projected to support a total of 677 jobs in Washington, with associated total income of \$43.6 million.

**Table 4.4-26. Economic Impacts of Construction**

<b>Trade</b>	<b>Jobs</b>	<b>Labor Income</b>
Direct	250	\$20.6
Indirect and Induced	427	\$23.0
<b>Total</b>	<b>677</b>	<b>\$43.6</b>

Source: Tesoro Savage Petroleum Terminal LLC, BST Associates using IMPLAN

#### **4.4.2.2 Operations**

The proposed terminal will directly employ an estimated 120 workers at full operation. In addition, the terminal will generate work for longshore labor, vessel assist crews, ships pilots, and railroad employees. The number of additional workers in Washington State is presented in Table 4.4-28. In addition to the 120 workers estimated to be employed at the terminal, the largest impact is on line-haul rail, where the additional rail traffic is projected to support an additional 151 rail workers in Washington.

The Applicant is expected to bring a small number of management employees from out of the area, but the remaining terminal jobs are anticipated to be filled by the local workforce.

In addition to the terminal workers, the projected direct employment impacts include:

- Longshore workers will be used for mooring each vessel that calls at the terminal.
- Ship pilots are required for vessels entering and leaving the Columbia River.
- Columbia River Bar Pilots guide ships through the mouth of the Columbia River, between Astoria and the open ocean.
- Columbia River Pilots guide ships between Astoria and the ports and anchorages upriver as far as Portland and Vancouver.
- Each vessel is expected to use the services of two ship-assist tugboats for arrival and departure at the terminal.
- Railroad crews will operate trains from point of origin to the terminal, with approximately one-third of the rail trip occurring in Washington.

**Table 4.4-27. Direct Employment from Operation at Full Build-Out**

<b>Type of Worker</b>	<b>Jobs</b>
Terminal workers	120
Longshore	2
Pilots – Bar	4
Pilots – River	11
Tug ship assist	15
Line-Haul Rail	151
<b>Total</b>	<b>303</b>

Source: BST Associates, Tesoro Savage Petroleum Terminal LLC

The direct labor income associated with the full operation is estimated to be \$33.0 million (in 2013 dollars). Labor income includes both employee compensation (wages, benefits, and taxes) and proprietor's income.

Total economic impacts were estimated using the IMPLAN input-output model. Including both indirect and induced benefits, the operation of the terminal is projected to support a total of 890 jobs in Washington, with associated total income of \$64.1 million.

As illustrated in Table 4.4 15, the average wage in the study area is \$45,700 per year across all sectors, and \$44,300 in the transportation and warehousing sector. Including wages and benefits, the jobs directly associated with operation of the project are likely to generate employee income that is substantially higher than the study area average wage.

**Table 4.4-28. Economic Impact of Full Operation**

Trade	Jobs	Labor Income
Direct	303	\$33.0
Indirect and Induced	587	\$31.1
Total	890	\$64.1

Source: Tesoro Savage Petroleum LLC, BST Associates using IMPLAN

### 4.4.3 Taxes

The project will be subject to a variety of state and local taxes. Taxes on the construction will be assessed on a one-time basis, while taxes on operations will be on-going. Construction-related taxes evaluated for this analysis include Business and Occupation tax (B & O) and retail sales taxes. For operations, the annual property tax impact was evaluated.

#### 4.4.3.1 Construction-related Taxes

Businesses in Washington are subject to the B & O tax, which is levied on gross sales. Construction of the terminal would be subject to the state B & O tax rate of 0.00471. With a construction value of \$110 million, the total state B & O tax associated with construction would be \$518,100.

In addition to the state B & O tax, a number of cities levy a local B & O tax. However, there is no local B & O tax in the City of Vancouver.

Retail sales tax is assessed against the value of the construction project. In Vancouver total sales tax rate is 8.4%, of which 6.5% goes to the State and 1.9% to local government. The \$110 million in construction is projected to generate a total of \$9.24 million, of which the State would receive \$7.15 million and local government \$2.09 million.

In total, construction of the terminal is expected to generate \$9.76 million in non-recurring taxes, of which Washington State can be expected to receive \$7.67 million and local government \$2.09 million.

**Table 4.4-29. Summary of Construction-related Tax  
(\$ millions)**

Trade	State	Local	Total
Business and Occupation	\$0.52	\$0.00	\$0.52
Retail Sales	\$7.15	\$2.09	\$9.24
Total	\$7.67	\$2.09	\$9.76

Source: BST Associates

#### 4.4.3.2 Operations-related Tax

The project is located on land owned by the Port of Vancouver. Port land is not subject to property taxes, but privately owned improvements located on land leased from the Port are

subject to property tax. In this case, all of the equipment associated with the Project would be subject to property taxes.

Based on the taxing millage rate of an adjacent parcel, the property tax rate at the project location is \$14.11773 per thousand dollars of assessed value. The distribution of these taxes is presented in the following table. Schools are the primary recipient of property taxes, with \$5.609446 going to Vancouver schools and \$2.489687 going to the state school fund.

The value of the project is estimated to be \$110,000,000. Based on this value, the annual property tax generated is estimated to be \$1,552,951 in current (2013) dollars.

**Table 4.4-30. Property Tax**

<b>Taxing District</b>	<b>Tax Rate</b>	<b>Est Property Tax</b>
Port Vancouver General Adref	0.000449	\$49
County General Adref	0.003626	\$399
Veterans Asst	0.009925	\$1,092
City Vancouver General Adref	0.010346	\$1,138
Dev Disability	0.012500	\$1,375
Mental Health	0.012500	\$1,375
Vanc Library Capital Facilities	0.256084	\$28,169
SD37 Vancouver M&O Adref	0.016503	\$1,815
Conservation Futures	0.062500	\$6,875
Port Vancouver Bonds	0.223412	\$24,575
Port Vancouver General	0.211683	\$23,285
County General	1.537209	\$169,093
SD37 Vancouver Debt Svc	1.851094	\$203,620
SD37 Vancouver M&O	3.758351	\$413,419
State Schools	2.489687	\$273,866
City Vancouver General	3.161863	\$347,805
Ft Vancouver Reg Library	0.500000	\$55,000
<b>Totals</b>	<b>14.11773</b>	<b>\$1,552,951</b>

Source: Clark County Assessor, BST Associates

#### **4.4.4 Mitigation**

The socioeconomic conditions will not be negatively affected; therefore, no mitigation measures will be required.