



January 25, 2018

Brian Shay
City Administrator
City of Hoquiam
609 8th Street
Hoquiam, Washington 98550
Sally Toteff
Director, Southwest Regional Office
Washington Department of Ecology
300 Desmond Drive SE
Lacey, Washington 98503

Re: Contanda Terminals Expansion Project

Dear Mr. Shay and Ms. Toteff,

As discussed at the pre-application meeting held on July 27, 2017, Contanda Terminals, LLC (Contanda), formerly Westway Terminals, LLC (Westway), is proposing to expand its existing bulk liquid export facility located at the Port of Grays Harbor in the Cities of Hoquiam and Aberdeen as part of the Contanda Terminals Expansion Project (proposed project). Contanda is proposing to construct new bulk liquid storage tanks and associated facilities to provide storage services for hire by its customers.

In 2013, prior to rebranding, Westway submitted an application packet for the expansion of the existing facility (Westway Expansion Project). This packet included, among other materials, an application for a Substantial Shoreline Development Permit (SSDP), an application for a Conditional Use Permit (CUP), a Joint Aquatic Resources Permit Application (JARPA), a critical areas report, and a checklist for the purposes of complying with the State Environmental Policy Act (SEPA). Subsequently, the City of Hoquiam (City) and the Washington Department of Ecology (Ecology) completed an Environmental Impact Statement (EIS) analyzing the potential impacts associated with the Westway Expansion Project. The Final EIS was issued in October 2016. With the exception of the CUP, which was approved by the hearing examiner on May 28, 2016, no other associated permit decisions have been made.

Since that time, Contanda has continued to market the project site for expansion and has modified the proposed project to accommodate changing markets and to address some of the issues of concern related to the former project. In comparison to the Westway Expansion Project, the proposed project would include a lower total annual throughput volume and a different mix of bulk liquids. As a result, Contanda is submitting a new permit application packet for consideration, which includes the following items:

- SSDP application
- CUP application and the Westway CUP Record of Decision
- JARPA
- Contanda Terminal Expansion Project SEPA Evaluation
- Ocean Resources Management Act (ORMA) Evaluation



The final two evaluations (the Contanda Terminal Expansion Project SEPA Evaluation and the ORMA Evaluation) provide additional information about the proposed project, including evaluating how it compares to the Westway Expansion Project and the associated applicability of ORMA.

As discussed in those evaluations, the proposed project would result in lower impacts than those that were previously identified in the Westway Expansion Project EIS and are not expected to result in significant long-term environmental impacts on ocean resources. This is because while the proposed project would generally involve the same facilities and operations, there would be a lower throughput volume (i.e., fewer unloading and loading events and less rail and vessel traffic) and different bulk liquids that are less persistent if released into the environment.

For these reasons, Contanda considers the EIS prepared for the Westway Expansion Project to be appropriate for adoption for reference for the purposes of SEPA compliance for the proposed project consistent with Washington Administrative Code (WAC) 197-11-600(4)(a&b) – “When to Use Existing Environmental Documents.”

Contanda respectfully requests that the City and Ecology review the permit application packet, including the attached evaluations, for completeness and to confirm whether the information provided is adequate for the purposes of SEPA compliance. Contanda respectfully requests early notification of whether a determination of significance is likely (consistent with WAC 197-11-350[2]).

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Duplantis".

Terry Duplantis
Vice President of Health, Safety, Security & Environmental
Contanda Terminals, LLC

Attachments

- Substantial Shoreline Development Permit application
- Conditional Use Permit application and Westway Conditional Use Permit Record of Decision
- Joint Aquatic Resources Permits Application
- Contanda Terminal Expansion Project State Environmental Policy Act Evaluation
- Ocean Resources Management Act Evaluation