CITY OF Vancouver WASHINGTON

STAFF REPORT

Project	Vancouver Bulk Terminal Soda Ash Terminal, Port of Vancouver Terminal 2, PRJ-169248/LUP-84478
Report Date	November 25, 2024
Proposal	Site plan review approval and shoreline substantial development permit approval to convert an existing copper concentrate/bentonite clay bulk export facility to a soda ash bulk export facility. Proposed project includes demolition and construction of new dry bulk receiving, conveyance, storage, and loading equipment; modification of the existing rail system; and renovation of the facility's existing stormwater collection and conveyance system. The property is zoned Heavy Industrial (IH).
Location	2701 NW Harborside Drive
Applicant	Ted Fick, Chief Executive Officer, Vancouver Bulk Terminals, LLC, 2701 NW Harborside Drive, Vancouver, WA 98660 360-583-3974
Contact	Russell Mester, InterMat, LLC, 20333 State Hwy 249, Ste 470, Houston, TX 77070 504-273-7079
Owner	Port of Vancouver
Staff	Keith Jones, Senior Planner/Case Manager Eric Hahn, Transportation Noah Hilliker, Fire Giff Hancock, Water Mark Castle, Sewer Mike Swanson, Stormwater Ryan McTague, Building Amanda Romero, Solid Waste Charles Ray, Urban Forestry
SEPA Determination	Final Determination of Nonsignificance (DNS)

Decision Site plan review and shoreline substantial development permit approval with conditions. Project conditions are identified in the conclusion of this report.

APPEAL

A 14-day appeal period is now in effect and will expire at **4 p.m., Dec. 9, 2024**.

No building or construction permits may be issued during this time. You will be notified immediately upon receipt of any appeal of this decision.

Requests to appeal this decision must be made in writing. The letter of appeal shall state the case number designated by the city, the name of the applicant, name and signature of each petitioner, a statement showing that each petitioner is entitled to file the appeal under VMC Chapter 20.210, the specific aspect(s) of the decision.

A fee of $2,396.00 must accompany the appeal. However, if the aggrieved party is a recognized neighborhood association, the fee assessed is $181.00. The association must demonstrate at the time of appeal submittal that the decision to appeal was made pursuant to association bylaws.

Due to the limited days the permit center is open for walk-in assistance, the appeal request shall be emailed to eplans@cityofvancouver.us as well as to the case manager's e-mail address below and the appeal fee electronically paid to the City of Vancouver.

For questions or additional information, you may contact the case manager by telephone at 360-487-7887, or by e-mail at keithjones@cityofvancouver.us.

November 25, 2024
Report Prepared by Date
Keith Jones, Senior Planner/Case Manager

November 25, 2024
For Greg Turner, Manager Date
Land Use Team

BACKGROUND

The applicant requests site plan review approval and shoreline substantial development permit approval to convert an existing copper concentrate/bentonite clay bulk export facility to a soda ash bulk export facility. Proposed project includes demolition and construction of new dry bulk receiving, conveyance, storage, and loading equipment; modification of the existing rail system; and renovation of the facility's existing stormwater collection and conveyance system. The property is zoned Heavy Industrial (IH).

General Site Information

Zoning District	Heavy Industrial (IH)
Adjacent Zoning Designation	Heavy Industrial (IH)
Comprehensive Plan Designation	Industrial
Parcel Size	N/A site is made of serval larger parcels owned by the POV
Adjacent Land Uses	Port operations
Access Roads	NW Harborside Dr.
Existing Vegetation	none
Existing Structures	Industrial buildings, conveyor system, dock and dock loader
Topography	flat
Geologic Hazards	Steep slopes at the river edge
Seismic Hazard	Moderate to High Liquefaction
Habitat and Species Impacts	Riparian Habitat
Flood Plains	Floodway and 100-year floodplain
Wetlands	River
Archaeology	High Probability
Drainage Basin	Columbia Slope
Wellhead Protection	No mapping indicators
Soils	Non-Hydric / PhB Water / WAT
Park Impact Fee District	A
School Impact Fee District	Vancouver
Traffic Impact Fee District	Columbia
Transportation Analysis Zone	1508
Sewer/Water/Fire District	Vancouver
Neighborhood Association	Fruit Valley

Procedural History

Activity	Case #	Date
Pre-application Meeting	PIR-84183	4/18/2024
Application Accepted	LUP-84478	8/12/2024
Application determined fully complete		8/29/2024
Notice of Application		9/12/2024

APPLICABLE REGULATIONS

Vancouver Municipal Code

20.210 Decision Making Procedures; 20.270 Site Plan Review; 20.440 Industrial Districts; 20.710 Archaeological Resource Protection; 20.760 Shoreline Management; 20.770 Tree, Vegetation and Soil Conservation; 20.790 SEPA Regulations; 20.915 Impact Fees; 20.945 Parking and Loading; 20.970 Solid Waste Collection and Recycling

ANALYSIS

Major Issues

Staff reviewed the proposal for compliance with applicable regulations, code criteria and standards in order to determine whether the project complies with the requirements of the code. Staff's recommendation reflects review of agency and public comments received during the comment period and knowledge gained from a site visit.

Only the major issues, errors in the development proposal and/or justification for any conditions of approval are discussed below. Staff finds all other aspects of this proposed development comply with the applicable code requirements and require no discussion in this report.

Building code review is not performed during pre-application or site plan review. Filing of building permit application with required fees and review materials is required for a building code review.

AGENCY AND PUBLIC COMMENT

Public and agency comments are listed below. The proposed project has been reviewed and recommendations made in light of these comments.

Washington State Department of Ecology

A comment letter was received dated Sept. 25, 2024, see Exhibit 6. The letter indicates requirements for hazardous and solid waste management. Development of the site must be in conformance with the requirements noted in this letter.

Washington State Department of Fish and Wildlife

An e-mail dated Sept. 26, 2024 was submitted, see Exhibit 7. The e-mail indicated that best management practices should be followed for erosion and sediment control. The letter also indicated that lighting should be directed to avoid light pollution and any tall free-standing poles next to the river should be of type that will discourage nesting by birds of prey. The applicant indicates that no new light poles will be installed. The applicant will need to follow erosion and sediment control as required by the City's stormwater department.

Washington State Department of Archaeology and Historic Preservation

An e-mail dated Oct. 10, 2024 was submitted, see Exhibit 8. The e-mail indicated that the applicant's predetermination report has not been uploaded to the state WISAARD system. The applicant indicated that they have now uploaded the report.

COMPLIANCE WITH THE APPLICABLE SECTIONS OF THE VANCOUVER MUNICIPAL CODE (VMC)

VMC Title 20 – Land Use and Development Code

20.200 – Land Use Decisions

20.210 Decision Making Procedures

Finding: The applicant requests site plan review approval and shoreline substantial development permit. Per Table 20.210.020-1 the request is classified as a Type II procedure. The application was deemed fully complete Aug. 29, 2024. A notice of application with a 30-day comment period was issued Sept. 21, 2024. Comments received are summarized in the Public and Agency Comment section above.

20.270 Site Plan Review

20.270.050 Approval Criteria

Finding: The proposal can comply with the standards of Title 20 and other applicable regulations as conditioned in this report. Public facilities have been determined adequate as noted and conditioned in the engineering sections of this report.

20.400 – Zoning Districts

20.440 Industrial Districts

20.440.030 Uses

Finding: Per Table 20.440.030-1, the facility is permitted use under Warehouse/Freight Movement.

20.440.040 Development Standards

Finding: There is no maximum lot coverage, maximum height or minimum landscaping in the IH zone. Setbacks are subject to the screening and buffering standards of the landscaping Section VMC 20.925.030. Since the site is internal to the port facilities landscape buffering will not be required and therefore zoning setbacks do not apply.

20.700 – Environmental Regulations

20.710 – Archaeological Resource Protection

Finding: The applicant's archaeologist prepared an archaeological predetermination for the project. The study concluded no additional work or monitoring is necessary. The Washington State Department of Archaeology and Historic Preservation (DAHP) requested that the applicant upload the report to the state WISAARD system. The applicant indicated that this has been completed, no additional comments from DAHP have been received.

20.760 – Shoreline Management Area

Finding: The applicant indicates that the following project scope items will occur within shoreline jurisdiction, measured 200 feet landward from ordinary high water mark:

- Removal of existing shiploader and installation of new larger shiploadeder at Port Berth 7
- Removal of conveyor and installation of new conveyor system
- Relocation of stormwater sump and installation of force main piping

The work is located within the High Intensity and Aquatic shoreline designations and is permitted as a water-dependent industrial use. The applicant has provided a memorandum dated Aug. 5, 2024 responding to the applicable sections of the Vancouver Shoreline Master Program (SMP). Staff finds that the applicant has demonstrated compliance with the SMP.

20.770 – Tree, Vegetation and Soil Conservation

Finding: Prior to civil approval the applicant must show how the project is meeting the tree density requirements of 30 tree units per acre. Calculate the area of disturbance and based on this area calculate the tree units. The city has an agreement with the Port that tree units can be planted off-site. The tree units will need to be added to the spreadsheet kept by the Port. Contact Matt Harding with the Port of Vancouver.

20.790 – SEPA Regulations

Finding: A final determination of nonsignificance is issued with this staff report. After review of comments received (see public and agency comments section) City as the lead agency for SEPA finds that a determination of nonsignificance is appropriate. **A final DNS is hereby issued with this report.**

20.900 – Additional Development Regulations

20.915 - Impact Fees

Finding: The Transportation Impact Fees (TIF) are based upon the approved traffic study. An estimate of impact fees is attached.

Impact fees are paid prior to issuance of building permits, per VMC 20.915. **The applicable impact fees will be calculated and paid at the time of building permit.**

20.945 – Parking and Loading

Finding: Warehouse and freight movement requires one space per 5,000 square feet. At 45,000 square feet for the soda ash storage building, nine spaces are required. The site plan indicates 15 spaces.

20.970 – Solid Waste Collection & Recycling

Concerning Solid Waste Storage Volume Requirements

Finding *Concerning Solid Waste Storage Requirements*

Existing solid waste storage area is adequate. No changes needed. Current services include one, 2-yard mixed recycling collected once a week and two 90-gallon mixed recycling carts collected once a week and one 3-yard garbage container collected once a week.

> ***VMC 20.970.030(C)(2)(d) Other-*** *Nonresidential buildings shall provide a minimum storage area of 100 square feet plus 4 sq. ft. / 1,000 sq. ft. of gross floor area (GFA).*

Per **VMC 20.970.040(B)(1)** plans shall show footprints of all intended receptacles using dimensions from city provided solid waste receptacle standards. See

https://www.cityofvancouver.us/publicworks/page/solid-waste-development-review for Solid Waste Access and Design Standards.

Per **VMC 20.970.040(B)(3)** exterior storage areas shall be enclosed by a screen comprised of a sight-obscuring wall, fence and/or vegetation. A gate(s) through the fence shall allow access to users and haulers. The gate(s) for haulers shall be capable of being secured in closed and open positions.

Conclusion: The proposal has satisfied solid waste storage requirements.

Concerning Solid Waste Collector Access
Finding: The existing access for front end and side loader solid waste trucks is acceptable and is not impacted by the proposed development. No changes needed.

Per **VMC 20.970.040(C)(3)** all circulation and turnaround designs must be feasible using city-provided solid waste truck turning modelling templates and truck specifications. Collection vehicles shall be able to circulate the development and service receptacles with minimal backing required.

Per **VMC 20.970040(A)(4)**, outdoor enclosures shall not be located in a side or rear yard setback that abuts a property not within the same development.

Conclusion: The proposal has satisfied solid waste collector access requirements.

VMC Title 11 – Streets and Sidewalks
Chapter 11.70 – Transportation Concurrency
Finding: The applicant submitted a Trip Generation and Distribution Memo dated July 18, 2024, from Lancaster Mobley. Trip generation rates in the report were based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, utilizing Land Use Code 30 (Intermodal Truck Terminal). Based on this information, the proposed project will generate 82 new Average Daily Trips (ADT) including eight new a.m. peak hour trips and eight new p.m. peak hour trips. The existing use on the site generates 3,118 daily trips, therefore the new ADT is less than a 10 percent increase in daily trips. **Therefore, per the provisions of VMC 11.70.020.B, the concurrency requirements of VMC 11.70 are not applicable.**

Conclusion: The proposed development meets the requirements of VMC 11.70 as submitted.

Chapter 11.80 – Transportation
Finding: The applicant is proposing to convert an existing copper concentrate and bentonite clay export terminal to a soda ash export terminal. Access to the site is taken from W 26th Avenue and will remain unchanged.

Per the provisions of VMC 11.80.080.B-1, the project is only required to construct street frontage improvements as necessary to provide minimally safe access. The

existing access is adequate to continue serving this site. **Therefore, no street frontage improvements or access improvements are required for this project.**

Conclusion: The proposed development meets the requirements of VMC 11.80 as conditioned.

VMC Title 14 – Water and Sewers
Water
Finding: City records indicate that there is:
- 10-inch Ductile Iron (DI) water main within West 26th Ave
- 12-inch DI transmission main within NW Lower River Rd
- 24-inch DI transmission main within NW Lower River Rd
- There are multiple fire hydrants connected to the 10-inch DI water main within West 26th Ave
- The nearest fire hydrant is located on the east side of W 26th Avenue, south of the railroad tracks.

To obtain water supply for the project:
- Project narrative proposes demolition of existing copper concentrate storage and distribution facility and construction of new soda ash storage enclosure. Facility will be unoccupied except for equipment maintenance or equipment monitoring.
- Port water system currently services existing facilities which is a private system. Proposed fire hydrant shown connecting to private system. If there are any additional systems proposed, connect to the Port water system.

Conclusion: The submitted plan indicates the City of Vancouver requirements for water can be met. The applicant shall meet the water requirements as per the *General Requirements & Details for the Design and Construction of Water, Sanitary Sewer and Surface Water Systems* (latest revision). Additional fees associated with permits, System Development Charges (SDC) and Main fees will/may also be required.

Further requirements may be necessary depending on the final project configuration.

Sewer
Finding: Public sanitary sewer is not located on-site. Instead, the site is served by private sewer facilities, including an existing on-site private treatment system. Sewage is ultimately discharged to public sewer off-site.

Developments typically are required to extend public sewer to and through the site, and across frontages (VMC 14.04.280). In this case, the proposed improvements that will need to be discharged to sanitary sewer are very limited, and the existing private system will continue to be utilized.

Operations at the bulk terminal include the transfer of bulk commodities from rail cars and trucks to storage buildings to ships on the Columbia River, that are connected by conveyor belts. The conveyor belts cross over impervious surfaces

between the rail, storage, and ship facilities along with vehicles and earth moving equipment. Consequently, airborne fallout and tracking of raw materials on impervious surfaces causes subsequent mixing with stormwater runoff. The facility operates under Industrial Wastewater Discharge Permit (IWDP) No. 2024-07 that conditionally authorizes discharge of pretreated wastewater to the sanitary sewer system. IWDP No. 2024-07 requires the operation of a wastewater pretreatment system to remove identified pollutants from the wastewater prior to discharge to the sanitary sewer system. The operation currently handles copper concentrate and bentonite clay commodities but plans to transition to handling soda ash exclusively. The bulk terminal operator shall comply with IWDP No. 2024-07 requirements and conditions.

The application was reviewed for sanitary sewer in August 2024. Sewer service is briefly mentioned on pages 10 and 22 of the narrative. The improvements directly related to sewer will be limited to a new eyewash station, which will be connected to the existing private system.

The proposal is generally acceptable to the city.

14.24 Erosion Control

Finding: The site is currently covered mostly impervious surfaces. About 25 acres of hard surfaces will be disturbed during construction and the requirements of the ordinance will apply. The applicant will be required to obtain a General Stormwater Construction Permit from the Department of Ecology and produce a Stormwater Pollution Prevention Plan (SWPPP). The applicant has submitted preliminary erosion control plans and has demonstrated the requirements of the ordinance can be met for the project. A final erosion/sediment control plan and SWPPP shall be submitted for civil review.

14.25 Stormwater

Finding: The prosed project will replace about 25 acres of hard surfaces and the requirements of the ordinance apply. The site currently has a water treatment facility that will be modified for the new material being handled. One portion of the site will drain to sanitary sewer though an approved permit. Some to the area that is currently being routed to sanitary will be rerouted to the existing storm system ant the Terminal 4 treatment pond due to revisions to the site. The applicant has submitted preliminary stormwater plans and a stormwater memo and has demonstrated that the requirements of the ordinance can be met for the project. A final stormwater plan and a final stormwater report shall be submitted for civil review.

14.26 Water Resource Protection

Finding: This proposed operation will manage unleaded fuel and diesel and preform maintenance on loading vehicles; therefore, it will most likely be considered a “classified” facility subject to the Greater Standards of the city’s Water Resources

Protection Ordinance, VMC 14.26. Classified facilities shall implement all applicable best management practices (BMP's) listed in ordinance sections 14.26.120 and 14.26.130.

Fueling and maintenance areas shall not drain directly into the storm system or to sanitary sewer. The fueling area shall be covered and the drain in the fueling area should connect to a dead-end sump to handle potential spills.

A spill plan, training program and inspection schedule shall also be prepared by the owner/operator within 90 days of occupancy if this facility is determined to be classified.

Container and tank storage areas shall have containment systems capable of collecting and holding spills and leaks. Loading areas shall be designed and constructed to contain spills and leaks that might occur during loading and unloading.

The installation of floor or trench drains inside any buildings is not allowed unless approved by Industrial Pretreatment for connection to sanitary sewer.

Conclusion: As conditioned, the applicant has demonstrated that applicable provisions of the city's water resources protection ordinance can be met.

VMC Title 16 – Fire
Finding: The preliminary submittal demonstrates that the project can be approved through the fire and life safety fire plans review and permit process with compliance with applicable related code and national standard requirements.

VMC Title 17 – Buildings and Construction
Finding: 17.08.090 a building department plan review and permit will be required for this project. Building and site shall comply with the applicable codes listed in 17.08.010 in effect at the time of building permit application. A complete building code review of plans is not performed during site plan review. Filing of building permit application with required fees and review material is required for a complete building code review. At this time, plans, and information necessary to verify compliance with all applicable building code provisions is neither required nor provided. Building permit applications received after March 14, 2024, will be reviewed under the 2021 building codes.

Separate building permits will be required for any site structures requiring a permit, including, but not limited to, trash enclosures/fences over six feet in height or covered, retaining walls over four feet, automated gates, and flag poles.

IBC 1104 Accessible routes within the site shall be provided from public transportation stops, accessible parking, accessible passenger loading zones and public streets or sidewalks to the accessible building entrance served. The exterior accessible route must be 48 inches clear in width for new sites. Wherever practical, the accessible route shall not cross lanes of vehicular traffic. Where crossing traffic lanes is necessary, the route shall be designated and marked as a crosswalk.

WAC 51-50-0429 New buildings and accessory structures, including parking garages and parking lots, are required to provide Electric Vehicle Supply Equipment (EVSE). EV charging stations, EV-ready parking spaces, and EV capable parking spaces shall be provided for each occupancy per Table 429.2. For this site, it appears as if the only parking is from retaining an existing parking lot. If any new spaces are created EV parking requirements would apply to those spaces.

WAC 51-50-0429 Ten percent of the accessible parking spaces, rounded to the next whole number, shall be EV Charging Stations. Additional 10 percent of the accessible parking spaces, rounded to the next whole number, shall be EV Ready. Not fewer than one for each type of EV charging system shall be accessible. The electric vehicle charging infrastructure may also serve adjacent parking spaces not designated as accessible parking. A maximum of 10 percent of the accessible parking spaces, rounded to the next whole number, are allowed to be included in the total number of electric vehicle parking spaces required under Section 429.2.

17.08.090 a separate demolition permit for removal of each existing building is required. Accessory buildings may be included in same demolition permit in some cases. If asbestos or lead paint is present, the applicant will also need to notify Southwest Clean Air Agency and Labor & Industries for additional requirements.

As submitted, project could be approved for 2021 building code requirements pertaining to the site plan.

DECISION

Based upon the findings and conclusions herein, the criteria for approval have been satisfactorily met, or shall be met with the conditions of approval. Staff concludes the request meets the requirements of the zoning district and other applicable development codes and hereby grants **approval as conditioned**.

Be advised that this approval does not grant the rights to permits, but only determines that the site can meet the requirements of the applicable ordinances as described in this report.

CONDITIONS OF APPROVAL

Prior to Civil Plan Approval

1. Upload the civil plan review set showing the revisions requested as well as all necessary reports (geotechnical, hydrology, traffic analysis, road modification, etc.). Include a detailed site plan in the civil plan review set. For questions on these requirements please contact 360-487-7804.
2. Grading plan review fees will be due upon submittal of civil plans for review. Contact Permit Center staff at 360-487-7802 to obtain a fee quote.
3. Place a note on civil plans that reads, "If any cultural or historical resources are discovered during development, construction shall cease until a qualified archaeologist assesses the find."
4. Demonstrate how the project is complying with the tree density requirements of 30 tree units per acre. Calculate the area of disturbance and based on this area calculate the tree units. The city has an agreement with the Port that tree units can be planted off-site. The tree units will need to be added to the spreadsheet kept by the Port. Contact Matt Harding with the Port of Vancouver.
5. Add a note on the water utility pages as follows: Underground fire sprinkler supply mains shall be installed only by contractors in compliance with WAC 212-80 and endorsed in accordance with VMC 16.04.095 under separate permit.
6. Provide a fire response plan including the following:
    - Fire hydrant locations related to the project.
    - Fire lane marking locations and details.
    - Aerial apparatus location along one side of the building shown as hashed area (where applicable).
    - Vehicle gate locations (where applicable).
    - Emergency vehicle tracks.
    - Fire Department Connection location.
    - Sprinkler riser location(s).
    - Fire-pump location (where applicable).
    - Fire alarm panel room location.
    - Fire Command Center location or Fire Control Room (where applicable).
    - Electrical and gas utility control room location(s).
    - Electrical meter land gas meter location(s).
    - Generator location.
    - Mechanical room location(s).

- Knox-Box location (at main entry, or at fire protection equipment exterior door where adjacent to a fire lane).
- Standpipes and floor control valves.
- Location of elevator and stairwell shafts
- Roof access door/hatch location (where standpipes and sprinkler floor control valves are required, this shaft shall be the roof access shaft).
- Fire access doors (where applicable)
- Emergency or standby power generator location (where applicable).
- Hazardous materials locations (if known or where applicable).
- Fuel dispensing locations
- Anticipated hazards to emergency operations (overhead power lines, slopes/cliffs or hazardous processes)
- Presence of car stackers (where applicable)
- Hash line the required fire rated walls.

Prior to Combustible Construction

7. All fire hydrants for emergency use shall be established and maintained clear for emergency use.
8. Fire apparatus access roads shall be established.

During Construction

9. Secure construction permits and schedule and attend a pre-construction meeting. Construct any new sewer facilities as shown on the approved plans. Satisfy construction services testing and inspection requirements, if any, and secure construction acceptance.
10. Satisfy submittal and other requirements itemized in the Notification of Civil Plan Approval and secure final civil project acceptance.
11. Stormwater impacted by construction activities and dewatering wastewater shall not be discharged to the sanitary sewer system unless specifically authorized in writing by the city Industrial Pretreatment Program.
12. Temporary address signage shall be visible and legible from the street fronting the property for emergency response during construction.
13. Fire hydrants shall not be obstructed in any manner.
14. Fire apparatus access roads shall be maintained clear for emergency response.
15. FDC/Standpipes shall be provided and accessible during construction, if applicable.
16. Fire Extinguishers and no smoking signs shall be provided during construction.

Prior to Issuance of Certificate of Occupancy

17. Pay fees and secure any required permits. Complete and return an updated IWDP application. The applicant may be required to complete and submit an Engineering Report, an Operation & Maintenance Manual, and Plans and Specifications that meet the requirements of WAC 173-240-110 through 173-240-150.

EXHIBITS

1. Application
2. Applicant Narrative
3. Applicant response to shoreline master program
4. Site Plan
5. Agency Comments
6. Transportation Impact Fee Estimate

EXHIBIT 1

CITY OF Vancouver WASHINGTON

Planning Permit Application

LAND USE PRELIMINARY APPLICATION (LUP)

415 W 6th ST ~ Vancouver, WA 98660, P.O. Box 1995 ~ Vancouver, WA 98668, Phone (360) 487-7800

Email completed application to eplans@cityofvancouver.us

REVIEW TYPE (Check one review and one process type)

Review Type: ☐ Type I ■ Type II ☐ Type III ☐ Type IV ☐ Tree Removal Only (nuisance or hazard)

Process Type: ■ Standard ☐ Streamline (Type I & II applications only. Pre-submittal Meeting required. By selecting streamline process, applicant waives all land use review timelines in VMC Title 20)

USE

☐ Single-Family	☐ Commercial	☐ Multi-family	☐ Mixed Use (commercial with multi-family)	■ Industrial	☐ Residential
☐ Duplex	☐ Wireless Communications Facility (new) see VMC 20.890				

PROJECT INFORMATION

Site Acres: 25 acres	Disturbed Acres: 25 acres	Zoning: IH	Sewer: ☐ Septic ■ Public	Water: ☐ Well ■ Public
Proposed # of Lots: N/A	Proposed Dwelling Units: No dwelling units are proposed			
Non-Residential Bldg. Square Footage: ~164,157 sq. ft.	Ground Floor: ~164,157 sq. ft.	Total of **All** Upper Floors: No upper floors proposed		
Hard Surface Area Square Feet - New: 0 sq. ft.	Replacement: ~1,089,000 sq. ft.	Total: ~1,089,000 sq. ft. (i.e., the entire project site)		

PROJECT NAME AND LOCATION

Proposed project name: Vancouver Bulk Terminal (VBT) Soda Ash Terminal

Project site address: 2701 NW Harborside Drive, Vancouver, WA 98660 | Parcel #(s): See Attachment 1

PROJECT DESCRIPTION

(Briefly describe the proposed project. Provide more detail in project narrative)

The proposed project involves converting an existing bentonite clay and copper concentrate dry bulk export facility at the Port of Vancouver's Terminal 2, Berth 7 to handle natural soda ash.

PRIMARY APPLICANT	CONTACT
Business Name: Vancouver Bulk Terminals, LLC	Business Name: InterMat, LLC
Contact Name: Ted Fick, Chief Executive Officer	Contact Name: Russell Mester
Address: 2701 NW Harborside Drive	Address: 20333 State Highway 249, Suite 470
City/State/Zip: Vancouver, WA 98660	City/State/Zip: Houston, TX 77070
Phone: (360) 583-3974	Phone: (504) 273-7079
Email: ted.fick@VBT-LLC.com	Email: russellmester@intermatllc.com
ELECTRONIC PLANS SUBMITTER (required) (responsible for ePlans uploading and correspondence)	**OWNER** (attached additional sheets for multiple owners)
Name: Anchor QEA, Inc., Contact: Matt Kuziensky	Name: Port of Vancouver USA; Contact Greg Westrand, PE
Address: 6720 S. Macadam Avenue, Suite 300	Address: 3103 NW Lower River Road
City/State/Zip: Portland, OR 97209	City/State/Zip: Vancouver, WA 98660-1027
Email (required): mkuziensky@anchorque.com	Email: gwestrand@portvanusa.com
Phone: (503) 459-6243	Phone: (360) 823-5320

ONLINE PAYMENT

Existing ePermits User Name: mgkuziensky — Request an ePermits Account

REQUIRED SIGNATURES

As evidenced by my signature below, I/we agree that City of Vancouver staff has my/our full permission to enter upon the subject property at any reasonable time to consider the merits of the application, to take photographs and to post public notices.

Applicant Signature: Ted Fick	Date: 7/17/2024
Property Owner or Owner's Authorized Agent Signature: Greg Westrand	Date: 7/25/24

LUP APPLICATION SUB TYPES

Please check all applicable applications and information where necessary

☐ **Airport Height Overlay District**

☒ **Archaeological Pre-determination**

☐ **Binding Site Plan**
- ☐ Conceptual (without Site Plan Review)
- ☐ Detailed (with Site Plan Review)

☐ **Boundary Line Adjustment** # of lots to be adjusted:

☐ **Comprehensive Plan Amendment**
(Including Zone Map Amendment with Comp Plan)

☐ **Conditional Use Permit**
- ☐ Initial (Type III) (Comm. Centers, Group Meal Service, Shelters)
- ☐ Major Modification (Type III)
- ☐ Minor Modification (Type I)

Engineering Review Required ☐ Yes ☐ No

☐ **Covenant Release**

☐ **Critical Areas** (not used when in Shoreline)

Check one → ☐ Duplex/Single Family ☐ All Other Uses

Check one → ☐ Permit ☐ Statement of Exemption (No Fee)

Check the applicable critical area(s)
- ☐ Fish & Wildlife
- ☐ Frequently Flooded
- ☐ Geological Hazards
- ☐ Wetlands
- ☐ Minor Exception (not common)
- ☐ Reasonable Use (not common)

☐ **Design Review**
- ☐ Exterior Modification Only
- ☐ All Others

☐ **Development Agreement**
- ☐ Initial
- ☐ Modification
- ☐ Extension

☐ **Historic Preservation** ☐ Modification ☐ Registry

☐ **Historic Preservation – Special Valuation**

☐ **Legal Lot Determination**
# of lots to be reviewed:

☐ **Master Plan (Mixed Use)** ☐ **Public Facilities MP**
- ☐ Conceptual (without Site Plan Review)
- ☐ Detailed (with Site Plan Review)
- ☐ Hybrid (Some areas with Site Plan Review)

☐ **Planned Development**
- ☐ Commercial
- ☐ Residential
- ☐ Mixed Use*

*Ground Floor SF: Upper Floor SF:

☐ **Plat Alteration**

☐ **Post Decision Review/Modification**
(Includes Planned Development/Master Plan Modifications)
- ☐ Type I ☐ Type II ☐ Type III

Engineering Review Required ☐ Yes ☐ No

☐ **Road Modification**
- ☐ Minor
- ☐ Technical
- ☐ Major

Submitted: ☐ Before ☐ After Decision
(submitted after decision is not common)

☒ **Shoreline Permits**
- ☒ Substantial Development Permit
- ☐ Shoreline Permit - Statement of Exemption (no fee)
- ☐ Shoreline Conditional Use
- ☐ Shoreline Variance

☒ **Site Plan Review** ☐ Type I ☒ Type II

Check Use Type below
- ☐ Residential
- ☒ Non-Residential
- ☐ Qualified Planned Action
- ☐ Unoccupied Commercial/Utility Structure
- ☐ Commercial Pad
- ☐ Land Extensive

Stormwater ☐ Yes ☐ No Transportation ☒ Yes ☐ No

☒ **State Environmental Policy Act (SEPA)**

☐ Check if for Single-Family Residential house (only)
- ☐ Residential Site Plan Review (SPR)
- ☐ Grading Only
- ☐ Subdivision or Planned Development
- ☐ Non-Project Actions (not common)
- ☐ All Other (Includes Comm/Indust SPR)

(When more than one applies check All Other)

☐ **Subdivision/Short Subdivision**
- ☐ Short Subdivision (2-9 lots)
- ☐ Subdivision (10+ Lots)

☐ **Temporary Use**
- ☐ Commercial/Industrial
- ☐ Unforeseen Emergency
- ☐ Seasonal Event
- ☐ Model Home
- ☐ Sales Office

☐ **Tree Plan**
Enter Tree Plan Level (1 to 7):
(Tree Removal for nuisance or hazard tree(s) is Level 3)

☐ **Variance**

☐ Check if for Single Family Residential house
- ☐ Type I - # requested:
- ☐ Type II - # requested:

Stormwater ☐ Yes ☐ No Transportation ☐ Yes ☐ No

☐ **Zoning Map Amendment**
(Not involving Comprehensive Plan Amendment)

Revised 06/03/2022

EXHIBIT 2

PROJECT DESCRIPTION		
PROJECT TITLE: Vancouver Bulk Terminal LLC, Soda Ash Export Terminal	**DOCUMENT NUMBER:** PRD-001	
	REVISION: 1	**DATE:** 6/10/2024

Document No.	**230-01_PRD-001**
Revision No.	**1**

Vancouver Bulk Terminal LLC
Soda Ash Export Terminal, Vancouver, WA

Project Description

DOCUMENT CONTROL					
Rev	**Date**	**BY**	**CHK BY**	**APPROVED**	**REMARKS**
0	3/5/24	IM			Issued for Use
1	6/10/24	IM			Increased Capacity, Maintenance Bldg Addition

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Figures

1. INTRODUCTION

Nautilus International Holding Corporation and Neltume Ports together formed Vancouver Bulk Terminals ("VBT") as a joint venture to develop a natural soda ash export terminal at the existing dry bulk export terminal at the Port of Vancouver, Washington, USA, Terminal 2 (T-2), Berth 7 (Figure 1). The existing facility at T-2, Berth 7 currently receives copper concentrate and bentonite clay in railcars, stores these commodities, and exports these commodities via ocean vessel. VBT is proposing to redevelop the existing terminal into a Soda Ash Export Terminal ("VBT Project"). Upon implementation of the VBT Project, copper concentrate and bentonite clay will no longer be handled at the T-2, Berth 7 facility.

The proposed facility is designed to receive natural soda ash by rail, from where it will be offloaded for export either directly onto ocean-going marine vessels or into flat storage, where it will be temporarily held prior to being transferred onto ocean-going marine vessels. VBT currently leases certain upland parcels at T-2, Berth 7, and will also lease new parcels from the Port of Vancouver ("Port") for new rail tracks for the VBT Project. VBT will construct thereon the infrastructure needed to support and sustain the proposed natural soda ash export operation.

2. SODA ASH AND ITS USES

Soda ash is the common term for sodium carbonate (Na_2CO_3), a naturally occurring chemical derived from trona, a non-marine evaporite mineral that occurs in salt deposits associated with former freshwater lakes. Trona is also a natural source for bicarbonate of soda, which is commonly known as baking soda. Soda ash is a white crystalline solid that typically occurs in granular form. It is non-toxic, non-flammable, and non-combustible. It is also water soluble, meaning that, if it becomes wet, it breaks down and can dissolve, thus requiring a dry location for storage.

Soda ash is an essential raw material used to make many everyday items, including glass, fiberglass, internet cables, lightbulbs, and laundry detergent. It is used to treat water and make electric vehicle batteries. Soda ash also serves as a key ingredient in sweetened/carbonated beverages as well as certain types of bread, noodles, and other processed foods. As a food additive, it is commonly used as an acidity regulator, anticaking agent, leavening agent, and/or stabilizer.

Commercial production of soda ash occurs via both natural and synthetic processes. Natural soda ash comprises approximately one-quarter of the soda ash produced worldwide. Natural soda ash is produced from naturally existing trona deposits. Trona is extracted from underground deposits, crushed, and injected with heated water to create a brine solution, which is then filtered, crystallized, separated, and dried to form natural soda ash.

Approximately three-quarters of soda ash produced worldwide is produced synthetically. The synthetic process involves treating sodium chloride with ammonia and carbon dioxide to create sodium bicarbonate, which is heated to become soda ash. The synthetic process is carbon-intensive to make and results in substantial toxic byproducts. Because of this, natural soda ash production has a lower environmental impact as compared to synthetic soda ash production.[1]

The Unites States has the world's largest natural deposit of trona, which occurs in the Green River Basin in southwestern Wyoming. Natural soda ash from the Unites States is a cost-effective option in international markets versus more expensive, synthetically produced soda ash. The soda ash market is expected to grow an average of 4% per year from 2023 through 2033,

[1] USGS Publications Warehouse – Soda Ash

amounting to approximately one (1) million new tons per year.[2] Meanwhile, several synthetic soda ash plants have been idled or closed worldwide, leaving natural soda ash from the United States to fill the gap between supply and demand.

The proposed VBT Project will primarily receive soda ash from Solvay's natural soda ash facility in Green River Basin, Wyoming, which has been owned and operated by Solvay since 1992. The VBT Project will also have capacity available to receive soda ash from producers other than Solvay, and this soda ash will also be produced in and shipped from Green River, Wyoming.

3. EXISTING OPERATIONS

Solvay currently exports soda ash through two locations on the Pacific Coast to supply the market demand in the Pacific Rim: Port of Portland and Port of Longview. Both of those ports use the Columbia River for vessels exporting soda ash. Multiple other soda ash producers export through these terminals, and it is a common practice to co-mingle soda ash from different producers into an export shipment.

Solvay's current volumes of soda ash exported through the Port of Longview and the Port of Portland are approximately 800,000 metric tons per year and 200,000 metric tons per year, respectively. Union Pacific Railroad (UPRR) operates the only Class I railroad servicing the Green River Wyoming soda ash basin. Therefore, all existing soda ash export facilities in the Pacific Northwest and Canada are serviced by the UPRR through Portland. The transit to the Bridgeview Terminal at the Port of Longview represents the longest transit from Green River, and the T-4 Terminal in the Port of Portland is the shortest transit. The transit to the proposed VBT Project is only slightly longer than the Portland transit. Figure 2-1 depicts the rail routes for existing rail transit from Green River to Port of Longview and Port of Portland, and Figure 2-2 depicts the rail route of the proposed rail transit through Portland to Port of Vancouver.

The Bridgeview Terminal at the Port of Longview is a direct transfer terminal that does not have any storage. Bridgeview can receive 135-car unit trains that can transport approximately 13,716 metric tons (MT) per train. The T-4 Terminal in the Port of Portland is also primarily a direct transfer terminal, but with gravity reclaim storage that has a rated capacity of 25,000 MT. However, due to the configuration of the storage and the reclaim system, the actual working storage capacity is only 10,000 to 15,000 MT. The T-4 terminal can receive 142-car unit trains that can transport approximately 14,427 MT of soda ash.

The VBT Project will be able to receive 142-car unit trains. When the VBT Project is operational, it is expected to receive approximately 106 unit trains per year for a total of approximately 1,500,000 MT per year[3]. Approximately 72 of these unit trains will be diverted from the Bridgeview and T-4 Terminals. Therefore, at 1,500,000 MT per year, the VBT Project will receive approximately 34 unit trains more than the current number of unit trains transporting to Bridgeview and T-4 combined.

The VBT Project's full capacity will be approximately 3,300,000 MT per year. This will be comprised of approximately 2,000,000 MT per year of Solvay soda ash and approximately 1,300,000 MT per year of third-party soda ash. At full capacity of 3,300,000 MT per year, the VBT Project will receive a total of approximately 249 unit trains per year, of which 141 are expected to be 142-car Solvay unit trains and 108 of which are expected to be 120-car third-party unit trains, with railcars of approximately 100 MT each. Of the 249 total unit trains received at the VBT Project, 72 will be diverted from the Bridgeview and T-4 Terminals. Therefore, at full capacity of

[2] *Future Market Insights, Soda Ash Market by Density, End-Use Industry & Region – Forecast 2023 to 2033*

[3] At minimum expected throughput

3,300,000 MT per year, the VBT Project will receive approximately 177 unit trains more than the number of unit trains currently transporting to the Bridgeview and T-4 Terminals. Refer to Section 4.1 Facility Capacity and Throughput for more information.

Vessel types calling at both the Bridgeview Terminal and the T-4 Terminal are generally the same and include both Handymax and Supramax size classes. Vessels transporting soda ash are often co-loaded with some other product. The most common configuration is three holds of soda ash and two holds of another commodity. It is common for a vessel to load soda ash at the Bridgeview Terminal or T-4 Terminal and then go to Vancouver, another Columbia River port, another port in the Pacific Northwest, or a Canadian port to load another product. This process is commonly referred to as "two-porting". Determining the current number of vessel calls at Bridgeview and T-4 is complicated due to two-porting vessels with partial cargoes. Calculating the impact to vessel traffic may inappropriately double count vessels, and therefore, averaging vessels calls and cargo size to provide a range of vessels would more accurately represent the number of vessels calling at each of the existing terminals. A certain number of vessels calling at the VBT Project may follow the same two-port pattern, but the majority of vessels will be fully loaded at the VBT Project. Operations of the VBT Project also anticipates loading a high percentage of the larger Supramax class vessels meaning that fewer vessels can be used to transport the same overall volume of soda ash. Reducing the number of two-port vessel calls and reducing the number of total vessel calls on the Columbia River will result in fewer overall vessel transits between the Pacific Ocean and river.

At Solvay's current export volume of 1,000,000 MT per year, approximately 75% of the vessels calling at these existing terminals are Supramax and 25% are Handymax, loaded with 38,000 MT and 35,000 MT soda ash, respectively. This results in approximately 19 to 25 vessels, for an average of 22, being loaded per year at Bridgeview and 3 to 7 vessels, for an average of 5 vessels, being loaded per year at T-4.

For the VBT Project, total vessel calls per year at the minimum capacity and full capacity will be approximately 33 calls and 73 calls, respectively.[4] Therefore, at 1,500,000 MT per year, the VBT Project will load approximately 6 additional vessels more than are currently loaded at Bridgeview and T-4[5]. At full capacity of 3,300,000 MT per year, the VBT Project will load approximately 46 more vessels than are currently being loaded at Bridgeview and T-4[6]. Refer to Section 4.1 Facility Capacity and Throughput for more information.

Note that train and vessel traffic for copper concentrate and clay have not been considered in the additional unit train and vessel counts discussed above. These have been preserved for potential future copper concentrate and clay handling at another Port terminal.

4. PROPOSED OPERATIONS

The existing bulk export facility operation at T-2, Berth 7 at the Port currently receives, handles, stores, and loads into vessels copper concentrate and bentonite clay. The existing facilities include a railcar unloading station, a series of conveying systems that transfer product to storage and to the dock for loading into vessels, a fabric-covered storage enclosure for copper concentrate (Coverall Building), a corrugated steel storage building for bentonite clay (A-frame

[4] Based on Solvay projection of over 80% of calls as Supramax vessels loaded at 48,000 MT and 20% Handymax vessels loaded with 35,000 MT

[5] Approximately 6 additional vessel calls = approximately 33 vessels at 1,500,000 MT per year at VBT Project, less 27 current average vessel calls to Bridgeview and T-4.

[6] Approximately 46 additional vessel calls = approximately 73 vessels at 3,300,000 MT per year at VBT Project, less 27 current vessel calls to Bridgeview and T-4.

Building), a linear shiploader, a wastewater treatment plant, and various buildings for operations and administration use. Refer to Figure 3. The proposed soda ash facility will utilize some of the existing structures, equipment, and foundations, demolish some of the existing infrastructure, and construct new infrastructure in its place.

The proposed facility will receive soda ash by rail from Solvay's existing soda ash operations in Green River, Wyoming. From Green River, the trains will utilize the existing train routes from Wyoming to Oregon and follow the mainline tracks on the Oregon-side of the Columbia River. In north Portland, the trains will head north, crossing the existing Columbia River Railroad Bridge (approximately 1 mile downstream of the Columbia River Interstate Bridge that carries Interstate 5 over the river) into the state of Washington. Refer to Figure 2-2. At the Amtrak Station, the UPRR crew will hand over the train to the BNSF crew. The BNSF crew will divert west into the Port of Vancouver.

In total, the distance from Solvay's Green River operations to the Port is approximately 890 miles, or approximately 5 miles longer than the current route to the Port of Portland. The trains will then proceed in a counter-clockwise direction around Terminal T-5 loop before arriving at the T-2 receive/departure tracks, where the trains will be set and handed over to the terminal's International Longshore and Warehouse Union (ILWU) crew. Refer to Figure 2-3, which depicts the proposed route through the Port for trains servicing the VBT Project.

Loaded Solvay trains will arrive at T-2 via 142-car unit trains of fully enclosed, bottom dump hopper cars and with a 2-0-1 locomotive arrangement[7]. The VBT Project will also have the ability to receive soda ash from other soda ash producers via 120-car unit trains. The VBT Project will be able to co-mingle soda ash from different producers into a single shipment.

After arriving at T-2, the train will be routed through an existing railcar unloading building, and as each car passes through the building, the soda ash will be transferred into the dumper pit.

Because soda ash is soluble in water, the facility will be designed to prevent exposure of soda ash to the elements by utilizing a series of fully enclosed conveying systems. The conveyor systems will be fully enclosed with roofing, floors, siding, and spill plates, and transfer points will be outfitted with dust collectors. These design features will help to prevent fugitive releases of soda ash.

From the railcar unloading building, the soda ash will be transferred to a new tunnel conveyor (BC-1), which in turn will discharge onto new enclosed belt conveyor BC-2. BC-2 will be a new conveyor but will re-use the existing foundations of the current conveyor system. The transfer from BC-1 to BC-2 will be located within an existing transfer building T-1. BC-2 will feed into a new surge bin, housed in a new structure with a new foundation. The surge bin, which will allow for a regulated output flow to the downstream conveyor systems, will feed new conveyors BC-3 and BC-4, which will both be located at ground level on the existing A-frame building foundation and enclosed within a pre-engineered metal enclosure for protection from the outside elements. In new Transfer Tower TT-4, soda ash will either be transferred directly to the dock for loading into vessels, or, if a ship is not available, diverted to the new soda ash storage enclosure for temporary storage.

For direct transfer to the dock for vessel loading, BC-4 will transfer the soda ash onto conveyor BC-8, which will be a fully enclosed gallery-style conveyor. BC-8, which will replace the existing conveyor R-1, will run over the existing Port main access road to the shiploader tower T-8. The shiploader will be a pedestal-style shiploader, equipped with an onboard dust collector and a cascade-style, retractable loading spout for dust-controlled loading within the vessel hold. A

[7] A 2-0-1 locomotive arrangement refers to two locomotives at the head of the train, one locomotive at the rear of the train, and zero locomotives in the middle of the train for distributive power.

separate funnel attachment for connection to the bottom of the telescoping spout will be provided to allow for soda ash to be loaded through vessel cement hatches during light rain or drizzle. As soda ash is water soluble, ship loading operations will not be conducted during a heavy rain event. When not in use, the funnel attachment will be stowed on a moveable cradle on the dock. The telescoping spout will be stowed over the dock. The dock[8] will have a curb, so any spilled material would be contained within the confined area. The curbed area will be equipped with a sump to pump any contact water and spilled material to the wastewater treatment plant.

For transfer of soda ash to temporary storage, BC-4 will transfer the soda ash onto new conveyor BC-5, which in turn transfers the soda ash onto new portal stacker/reclaimer (PSR) conveyor BC-6 located inside the new soda ash storage enclosure. The new PSR will be a traveling portal frame scraper style PSR, which performs stacking functions when receiving soda ash from railcars or reclaim functions when reclaiming from stockpile to send the soda ash to vessel. The design and programming of the PSR will allow it to be operated unmanned for both stacking and reclaiming operations. The PSR will have on-board dust control at the transfer points and will be located inside the storage enclosure, thus helping to prevent fugitive dust emissions of soda ash material.

The new soda ash storage enclosure will be used for temporary storage of the soda ash stockpile and will consist of a pre-engineered metal enclosure approximately 220’ x 507’ in area with an estimated maximum height of 90 feet. The overall storage capacity of the new storage enclosure is estimated to be 45,000 MT. The storage enclosure will be unoccupied except for equipment maintenance that will typically be performed in a dedicated maintenance bay on the south end of the storage enclosure, or for equipment monitoring. There will be no planned equipment loads on the storage enclosure, meaning there will be no equipment hanging from or supported by the storage enclosure. The storage enclosure will have its own large dust collector for providing negative pressure inside the enclosure, thus helping to prevent fugitive dust emissions from the enclosure. Additionally, all areas around the storage enclosure will be paved and curbed, so any potential contact water would be captured and conveyed to the wastewater treatment plant prior to discharge. To provide room for the new enclosure, the existing Coverall Building, which currently houses copper concentrate storage and the copper concentrate distribution and reclaim conveyors, will be demolished.

During reclaim operations[9], the PSR will transfer the soda ash from the stockpile in the storage enclosure onto BC-6, with transfer to BC-7 and BC-4, which, in TT-4, will transfer the product to BC-8 for sending the soda ash to vessel loading.

Existing operations utilize diesel-powered front-end loaders to reclaim product. Because the proposed soda ash facility will utilize an automatic, electric reclaim system, there will no longer be diesel-powered front-end loaders needed for reclamation (i.e., stockpile management).

The existing ILWU building will continue to be utilized for crew use (quarters, restrooms, lunchroom, etc.). The existing portable trailer will continue to be used for the VBT Project’s administrative offices. A new pre-engineered electrical building will be required for the facility, to be located near the existing wastewater treatment facility. A new approximately 7,000 sq ft maintenance building will be constructed on an existing slab located to the southeast of the new storage enclosure.

Refer to Figure 5 for a site plan of the proposed facility, with proposed VBT Project features

[8] Dock repair and maintenance work would be performed under a separate project by the Port.

[9] Reclamation, or reclaim operations, refers to the recovering of soda ash from the stockpile for transfer to vessel loading

labeled.

4.1. Facility Capacity and Throughput

The facility will be capable of handling between 1.5 million and 3.3 million MT per year of soda ash. Of the soda ash being moved through this facility, 1.0 million MT per year will be diverted from Solvay's current Port of Portland and Port of Longview exports. The remaining throughput[10] capacity will support Solvay's soda ash capacity expansion at its Green River, Wyoming, operations, plus the potential export of up to 1.3M ton soda ash for other soda ash producer(s).

Table 1 lists the number of loaded, one-way trains and vessels at minimum and maximum throughput, plus the number of trains and vessels that will be diverted from other ports.

Table 1: Throughput and Number of Trains & Vessels

Description	Min Throughput	Max Throughput	Tonnage to be Diverted	
			Diverted from Port of Portland	Diverted from Port of Longview
Annual Throughput (metric tons/year)	1,500,000	3,300,000	200,000	800,000
Trains per Year[1]	106	249	14	58
Trains per Week[2]	2.12	4.98	0.28	1.16
Trains per Day[3]	0.30	0.71	0.04	0.17
Ships per Year[4]	33	73	5	22
Ships per Week[2]	0.66	1.46	0.10	0.44
Ships per Day[3]	0.094	0.21	0.014	0.063

Notes:

1. Based on approximately 14,200 MT per unit train for Solvay trains (the first 2.0 MTPY) and 12,000 MT per unit train for 1.3 MTPY.
2. Based on 50 terminal operating weeks per year.
3. Based on 7 terminal operating days per week.
4. Based on 35,000 MT of product cargo capacity per ship for Handymax size Vessels (20% of calls) and 48,000 MT of product cargo per ship for Supramax class bulk carriers (80% of calls).
5. Train and vessel numbers are calculated as one-way (loaded-only) trips. For loaded plus empty train and vessel trips, the numbers above should be multiplied by two.
6. Numbers in Table 1 are approximated. Vessel counts shown in the table are averages, and actual accounts may vary based on the ranges presented in Section 3.
7. Train and vessel traffic for copper concentrate and clay have not been considered in the unit trains and vessel counts shown in the table above. These have been preserved for potential future copper con and clay handling at another Port terminal.

4.2. Rail and Railcar Unloading

The facility will receive a loaded unit train with a maximum length of approximately 8,000 ft on a modified rail network and unload railcar strings circulated through the existing, modified, bottom dump railcar unloading system using a 'linear loop' operating plan. The rail design will accommodate landing a second unit train while the first unit train is still on site.

An inbound, loaded unit train headed to T-2 will utilize the Port's existing north lead and loop track at Terminal 5. The soda ash facility will require enough track at T-2 to accommodate two, 142-car unit trains to arrive, unload, and depart. The 142-car unit train arrangement will consist of purpose

[10] "Throughput" refers to the amount of a commodity that flows through a terminal. For the VBT Project, the throughput specifically refers to the amount of soda ash that is received by rail and departs by vessel.

built railcars that range from 50'-1/2" to 51'-10 ½" in length and will be specifically built for Solvay, the primary soda ash supplier for the VBT Project. Unit trains could also be a 120-car arrangement with cars that are approximately 60' in length for third party soda ash suppliers. While unit trains will arrive and depart as unit trains, unloading will require trains to be broken for unloading through the railcar unloading station (on track 4851). When there is only one (1) unit train onsite, this unit train will be chambered, without breaking the train, on the receive/departure tracks (4856 / 4857). When a second unit train is onsite, the second unit train will be broken into various length consists[11] and chambered on ladder tracks (4852 / 4853 / 4854 / 4855). Refer to Figures 4-1 and 4-2 for the planned East and West Track Layouts and Figure 2-3 for the proposed entry, departure, and routing of trains through the Port.

To provide the track needed for proper staging and unloading of the unit trains, the VBT Project will entail construction of new track and modifications to the existing track in the Port rail corridor and the VBT terminal track system. Proposed rail work will include relocating the existing terminal south lead, installing new tracks 4857 and 4126, and relocating existing switches. It is estimated that approximately 14,000 track feet of new track will be installed and approximately 4,000 track feet of existing track will be relocated.

The VBT Project involves using and modifying the existing, bottom dump railcar unloading system. The existing railcar progressor, located on the west side of the railcar unloading building, will be utilized to move strings of railcars through the unloading building. The plan will be to unload the railcar strings moving in a west-to-east direction. Railcar unloading will be performed via a traditional car-in-motion system, with each gate opened as the consist is continually indexed over the receiving hopper. The VBT Project will include the installation of two new rail-mounted hydraulic railcar gate openers, one for opening the railcar gates and one for closing the railcar gates. When each railcar compartment is nearly empty, handheld hopper vibrators will be inserted in the railcar hopper brackets to vibrate the car and release residual soda ash. The existing compressed air system will be used for the vibrators. The railcar gate will be closed before the car leaves the unloading building. The hopper length will be adequate to place the first gate of the second car over the hopper to start unloading while all three gates of the lead car are still over the hopper.

The existing railcar unloading station consists of a shallow receiving hopper approximately 48' long at the top opening. The hopper is subdivided into eight (8) individual hoppers, each with an approximate capacity of three (3) short tons. The existing receiving hopper will have self-closing baffles installed below the existing central grizzly to help control displaced air. The existing grizzly is a screen located on top of the existing hoppers used to help prevent clogging of the hoppers and/or conveyance system by foreign material or larger chunks of material. Existing Dust Collector DC1 at the railcar unloading building will be reused in place, and new ducting and pickup hoods will be provided for the railcar unloading hopper and BC-1 and BC-2, the belt conveyors downstream of the hopper.

The small hopper volume coupled with the length of the railcars, spacing between railcar gates, and downtime between strings of railcars will result in instances when soda ash will not be flowing on the conveyors. To absorb surges from the railcar unloading operation, and to provide a regulated output flow to the downstream conveyor system (BC-3), the VBT Project will include a surge bin, equipped with a bin vent style dust collector.

4.3. Soda Ash Storage

[11] A consist is a string of railcars moved by a locomotive

If rail and vessel schedules do not allow soda ash to be directly transferred from the train to the vessel, soda ash will be stored in a storage enclosure until ready for loading in marine vessels for export. The soda ash storage enclosure will provide a storage buffer between receipts by train and vessel loading, allowing for higher volumes of soda ash to be exported.

The storage enclosure will be a new pre-engineered metal structure, measuring approximately 220' wide x 507' long with a maintenance bay on the south end of the storage enclosure. The storage capacity is estimated to be 45,000 MT. The structure will be unoccupied except for equipment maintenance or monitoring. Per American Society of Civil Engineers (ASCE) 7-16, Chapter 11.1.3, the Soda Ash Storage Enclosure is a single-story structure whose purpose is to enclose equipment and whose occupants are engaged in maintenance or monitoring of that equipment or their associated processes and shall be permitted to be classified as a nonbuilding structure designed and detailed in accordance with ASCE 7-16, Section 15.5 – Nonbuilding Structures Similar to Buildings.

There are no planned equipment loads on the structure. The storage enclosure will be constructed at the site of the existing Coverall Building, which will need to be demolished. The soda ash storage enclosure will be vented by a dust collector to create a negative pressure to prevent the release of soda ash dust during stacking or reclaiming operations in the storage enclosure.

Existing copper concentrate operations at T-2 utilize diesel-powered front end loaders for reclamation. All stacking and reclaim operations within the new, proposed enclosure will be fully electric and automated, with the installation of a new traveling portal frame scraper style PSR. The PSR will perform stacking functions when receiving from railcars or reclaim functions when reclaiming from stockpile to send the soda ash to vessel. Front end loaders will no longer be used for normal reclaim operations at the VBT Project[12]. A dust collection system will be provided for the PSR by the PSR vendor. The design and programming of the PSR will allow it to be operated unmanned for both stacking and reclaiming operations. Soda ash will be reclaimed from storage and conveyed to the dock for marine loading operations.

The stacking rate of the PSR will be variable to match the output of the surge bin described in Section 4.2, Rail and Railcar Unloading. The normal stacking operating rate will be in the range of 1,200 to 1815 MT per hour (MTPH). The reclaim rate for vessel loading will be variable, allowing for: a) topping up the shipping conveyors if needed during direct transfer from the railcar unloading station, b) providing a full rate of 1,815 MTPH to vessel when not combined with railcar unloading, and c) providing a reduced rate of 1,000 MTPH to vessel when loading with the funnel attachment through the vessel cement hatches (during inclement weather).

4.4. Vessels and Ship Loading at Berth 7

The soda ash facility will use the Port's dock at Berth 7 for vessel loading. The Port will refurbish the existing dock as required to meet code and load requirements. This dock repair and maintenance work is a separate project from the VBT Project.

Vessels used to ship soda ash at the VBT Project will generally range from Handymax (40,000-50,000 DWT) to Supramax (50,000-60,000 DWT). Vessel parameters are provided in the table below.

[12] Although front end loaders would no longer be used at the VBT Project for normal reclaim operations, they could still be used for emergency reclaim operations.

Description	Smallest	Largest
Class	Handymax	Supramax
Deadweight Tons (DWT)	40,000-50,000 DWT	50,000-60,000 DWT
Typ. Cargo Capacity (maximum)	38,000 MT	48,000 MT
Overall Length, LOA	150 to 170 meters 492 to 558 feet	150 to 200 meters 492 to 656 feet

Table 2: Vessel Parameters

Vessels calling on the facility will operate in the Columbia River navigational channel and will require a tug assist during berthing and de-berthing. Each vessel will be moored at the dock for between approximately 70 hours to 95 hours, or approximately 3 to 4 days.

The Port currently dredges Berth 7 as part of its current maintenance dredging program authorized by U.S. Army Corps of Engineers (USACE). No additional dredging beyond that authorized under the Port's current maintenance permit will be necessary for the VBT Project.

Conveying systems to the new pedestal shiploader will be fully enclosed to maximize dust containment. The shiploader will be equipped with onboard dust collector and a cascade-style, retractable loading spout for dust-controlled loading within the vessel hold. The spout will extend to near the bottom of the vessel hold, thereby minimizing the distance that the soda ash would need to drop. The spout would also be equipped with internal baffles, and these baffles slow the velocity of the soda ash during its descent through the telescoping loading spout. These design features help to prevent the potential for fugitive emissions during loading. A dust collector will also be provided for the shiploader by the shiploader vendor. A funnel attachment will be provided for connection to the bottom of the telescoping spout to allow soda ash to be loaded through vessel cement hatches during light rain or drizzle. As soda ash is water soluble, ship loading operations will not be conducted during a heavy rain event. The funnel attachment will be stowed on a moveable cradle on the dock when not in use.

4.5. Stormwater and Wastewater

Past operations involved both stormwater and wastewater discharge. The westerly portion of the site, representing <20% of the impervious area, has been managed under Washington State Department of Ecology (Ecology) National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP), currently held by VBT, where runoff routed to the Port of Vancouver's Terminal 4 (T-4) stormwater pond. Due to the copper concentrate operation's commingling of process water and stormwater during copper concentrate operations, all other site stormwater runoff from pavement and roofing has been routed to the City of Vancouver's publicly owned treatment works (POTW). The commingled process wastewater/stormwater discharge is permitted as industrial wastewater (IW) under City of Vancouver IW discharge permit (IWDP) No. 2019-10, which requires pre-treatment.

Soda ash is a non-hazardous powder that increases the alkalinity and pH of water when dissolved. Soda ash conveyance equipment will be sealed against water or moisture contact allowing for dry best management practices (BMPs) such as sweeping and vacuuming. Steam cleaning will be used by VBT to clean equipment, on an episodic as needed basis, generating limited volume of contact wastewater disposed of offsite or in accordance with the IDWP.

The T-2 site surfaces will consist of approximately 9 acres of impervious roofing and pavement, approximately 0.25 acres of a curbed, gravelly and fully pervious office building area and approximately 7 acres of railroad tracks with fully pervious ballast constructed with perforated surficial underdrains. As is practicable, all runoff from impervious areas will be prevented from

flowing outside the site boundary or into pervious areas. This will be achieved using current or modified grading to contain stormwater runoff for collection, conveyance, treatment (if needed), and controlled discharge.

There are existing sumps at the railcar unloading building and the dock that would be re-used. No groundwater is anticipated to collect within the sumps. Process water accumulation would be disposed of offsite or in accordance with the IDWP.

Treatment requirements for stormwater may be based on contact with fugitive soda ash and the surfaces that stormwater runoff comes in contact with. Stormwater contamination and water quality projections may vary based on the types of surfaces. A primary variation within the project area is between pavement and roof runoff. Site vehicular traffic and associated tire and brake wear are identified sources of copper and zinc. Previous site operations, which included bulk handling of copper concentrate, may lead to copper residual concentrations. Runoff from all areas may have turbidity levels that require reduction. Contact with fugitive soda ash could elevate pH above typical. For these reasons, stormwater may be considered wastewater in the future consistent with past determinations.

Collection and conveyance system routing will be designed to accommodate centralized treatment (if needed) or be arranged to account for anticipated water quality variations between pavement and roof runoff.

Based on consultation with the Port of Vancouver, Ecology, and the City of Vancouver, an appropriate discharge authorization will be obtained either through the ISGP, IDWP, or combination thereof. Accordingly, the VBT Project will be operated in accordance with the applicable discharge permit(s) requirements and regulations.

4.6. Potable and Fire Water

The facility will require potable water at the new safety eye wash stations located at the new soda ash storage enclosure and near the ship loading area. The existing rail unloading building currently has a safety eye wash station that will be re-used for the VBT Project.

The Port owns and maintains its water system in parallel with nearby City potable water service. Potable water is available from the existing Port's or City's water lines at T-2. Water will be conveyed to the new eye wash station(s) from new buried water lines that tie into existing water lines as part of project construction. These connections will occur within the paved area and will not impact any undisturbed or vegetated areas.

It is expected that the proposed facility will utilize the fire hydrants currently in place at T-2, which are supplied by the Port's existing water system, plus the addition of one hydrant. If it is determined that the existing hydrants will be impacted by project construction or more hydrants will be required, additional hydrants will be provided as required by code. Any additional hydrants will also be supplied by the existing Port water system.

4.7. Sanitary Waste

Sanitary wastewater will be generated from the new safety eye wash stations located at the new storage enclosure and near the ship loading area. Sanitary wastewater will be routed and discharged to the Port's existing sanitary sewer system downstream of the wastewater treatment plant tie-in for treatment at the City's WWTP.

4.8. Dust Collection and Dust Containment

The new facility will include a complete dust collection and containment system designed for soda ash. Exterior conveyors and all conveyor-to-conveyor transfers will be enclosed. Transfer chutes

will be designed to minimize induced airflow and equipped with dust collectors to capture generated dust. Conveyor transfer towers will be fully enclosed. The existing rail unloading receiving hopper will have self-closing baffles installed below the existing central grizzly to help control displaced air.

The vendors for the new PSR and shiploader will provide dust collectors at each transfer point on both units. New dust collectors will consist of a combination of bin vent style baghouses mounted directly to equipment and traditional baghouses with ducting that is better suited to the layout and application. Two existing dust collectors located on site will be repurposed for the VBT Project. Existing Dust Collector DC1 at the railcar unloading building will be reused in place, and all new ducting and pickup hoods will be provided for the railcar unloading hopper and the first two downstream conveyors, BC-1 and BC-2. Dust Collector DC2 located at the north end of the existing A-Frame storage building is currently used to vent the A-Frame storage building. DC2 will be retained, relocated, and repurposed to vent the soda ash storage enclosure to maintain negative pressure on the building to prevent the release of soda ash dust. New bin vent style baghouses will be provided and mounted directly to equipment at conveyor-to-conveyor transfers and the surge bin.

The existing compressed air equipment at the facility will be reused for the new VBT Project. All new air piping will be required.

4.9. Electrical and Communications

Existing electrical is provided by Clark Public Utilities, and existing telecommunications are provided by Comcast.

The existing T-2, Berth 7 facility currently receives 480-volt secondary power at two locations. A 1500 kVA transformer feeds a 1,600 amp switchboard near the rail unloading building, and a 1000 kVA transformer feeds a 1200 amp switchboard near the dock electrical room. To accommodate the additional load of the new facility, it is expected that the VBT Project will utilize an existing 480 volt service near the wastewater treatment plant and upgrade it from a 500 kVA transformer to a 1,500 kVA transformer.

An existing underground fiber optic line serves the existing facility at the office located east of the Coverall Building. The new automation system will require fiber optic cable between electrical rooms and the office, which will be isolated from the fiber optic internet service.

Power and control wiring will be installed along conveyor galleries and structures. Where power distribution will not run on conveyor structures, trenching and installation of underground connections will occur within the disturbed gravel and paved areas at the site.

The new facility will incorporate the usage of LED lighting, which is detailed in Section 4.11.

4.10. Safety

Soda ash is not classified as being flammable, combustible, explosive, or toxic by the US Occupational Safety and Health Administration (OSHA), and it is a categorized as a generally recognized as safe (GRAS) substance for use in foods by the US Food and Drug Administration. In accordance with CFR § 184.1(b)(1), sodium carbonate, or soda ash, is used in food with no limitation other than current good manufacturing practice.

Safety provisions at the facility will meet or exceed safety code and requirements and industry standards. VBT will have and enforce a facility safety plan, and company personnel and contract employees will undergo safety and process operations training on a routine basis, including training in emergency response.

Fire hydrants (existing or new) will be in accordance with City Fire Code (VMC 16.04) and the International Fire Code. It is anticipated that the Port's existing T-2 fire hydrants will be utilized for the proposed facility with one new additional hydrant . If it is determined that project construction will impact existing fire hydrants, then additional hydrants will be provided as needed. The code review indicates that a fire suppression system or a fire detection system is not required. Only fire extinguishers will be provided. The local Fire Marshall has the authority for the final determination.

Audible annunciations (horns) will be provided to indicate equipment has a start request and will annunciate prior to physical motion according to Occupational Safety and Health Administration (OSHA) and American Society of Mechanical Engineers (ASME) B20.1 safety standards. Also, emergency pull cords will be provided along conveyors according to OSHA 29 CFR 1917.48 and the Conveyor Equipment Manufacturers Association (CEMA) Belt Conveyor Handbook.

Arc Flash calculations will be performed and labels applied to electrical equipment according to National Fire Protection Association (NFPA) 70E and OSHA requirements.

Lightning protection for new towers and the new storage enclosure will be provided according to NFPA 780.

4.11.Security and Lighting

The US Coast Guard (USCG) requires the Port to work within a Facility Security Plan (FSP) that includes manned gates, roving officers, and surveillance cameras. Under the Maritime Transportation Security Act, the berth is subject to security requirements such as access controls, personnel identification, screening procedures and other measures as required by USCG, the Port and Solvay. The Port will continue to provide physical security, fencing, and access control to the Port. VBT will have its own FSP, which will include policies pertaining to access to the VBT Project. Existing surveillance cameras will be utilized to monitor the facility. Additional cameras at the shiploader, railcar unloading building, and storage building will be provided for operations support and security. Transportation Worker Identification Credentials (TWIC) will be required for access as per the Maritime Transportation Security Act. Operation of the facility will adhere to Process Safety Management practices as required by industry regulation. These practices will be implemented prior to construction and will be designed for the handling and storage of materials. Safety and security measures will be further defined during the hazard and operability process.

No appreciable changes will be made to the existing site lighting. Exterior building lights used for vehicle and worker traffic, rail unloading facility lighting, and shiploader lighting will be in use when ship loading operations extend into nighttime hours. The VBT Project will incorporate lighting design and associated directional lighting to minimize glare and light spillage to the extent practicable. Lighting will be used from dusk until dawn, consistent with existing lighting in the area. Lighting fixtures will all be LED with the following details:

- Streetlight: along road, rail line, and side of storage building (50-meter spacing)
- Floodlight: on shiploader mast
- Wallpacks: at personnel entrances on all buildings
- Stanchion/Ceiling-mounted Lights: along conveyor walkways (9-meter spacing) and in transfer towers over equipment
- Shiploader: 2 x 250 watt LED floodlights mounted 15 meters above deck level and pointed straight down
- Walkways and Stairs: stanchion-mounted lights

4.12.Employment

The facility will operate 24 hours per day, 350 terminal operating days (50 weeks) per year. At startup of the facility in 2026, the facility will employ approximately 39 full-time equivalents per year comprised of both salaried and hourly positions. During normal operations, longshoremen will be dispersed over typical ILWU 1st and 2nd shifts. Rail crew will be approximately 15 longshoreman per shift, and the vessel crew will consist of 7 longshoreman per shift. However, rail operations will be scheduled during a 9-hour shift to allow 8 hours of unloading. Routine maintenance will occur during both the 1st and 2nd ILWU shifts with an estimated 4 ILWU mechanics per day shift and 2 ILWU mechanics per night shift. Cleaning (approximately 6 cleaners) and major maintenance will be scheduled during non-operating hours. A third shift will only be used to deal with a non-standard operating event[13]. Administration, consisting of approximately 6 Metro and 2 VBT personnel, will occur during the day shift (8:00 AM to 5:00 PM). Including one locomotive operator and 4 ship tug employees, the total number of workers onsite during the day shift could reach 45.

At maximum capacity (3.3 million MT per year), the facility will require the same number of longshoremen per shift, but additional shifts will be required to operate the VBT Project at this higher capacity. The approximate full-time equivalents will increase to 74 per year.

Employee parking will continue to be provided in the existing locations, which are east of the existing Coverall Building and south of the existing rail unloading building. No new permanent parking is proposed. The storage enclosure and transfer towers will be unoccupied except during maintenance activities, and no additional parking at those locations is proposed. While the railcar unloading building is occupied, the location of the building provides adequate spacing for parking to the south. Longshoremen will utilize the existing parking at Berth 7 near the crew building, so no additional parking at Berth 7 is proposed.

4.13.Vehicular Access

It is anticipated that employees at the VBT Project will use the existing main entrance to the Port at the intersection of NW Lower River Road and NW 26th Avenue (public road). No changes to the existing access are proposed.

Those accessing T-2 currently use and will continue to use NW Harborside Drive (private road) as the primary access road to Berth 7 and the other areas of T-2. Additional striping may be added to the pavement around the storage enclosure to establish clearances for fire access, if required by any applicable code. No new roads or pedestrian access is proposed for the VBT Project.

4.14.Rail Transit

Existing trains carrying copper concentrate to the Port utilize both the BNSF railway and UPRR to deliver product to the existing terminal. The BNSF railway routes west along Highway 14 through the City of Vancouver. This route traverses several City neighborhoods to get to the Port. The UPRR accesses the Port via the Columbia River Railroad Bridge.

For the proposed facility operations, soda ash will be shipped by rail on the UPRR from Solvay's (or other soda ash producers') operations in Green River, Wyoming, via unit trains of fully enclosed, bottom dump hopper cars. Trains will travel along existing train routes from Wyoming to Oregon and follow the UPRR mainline tracks along Interstate 84 on the Oregon side of the Columbia River. This route through Portland is highly industrial. At Portland, Oregon, the trains will head north, crossing the existing Columbia River Railroad Bridge into the state of Washington.

[13] A 3rd shift outside the normal ILWU 1st or 2nd shift could be required in the event of a non-standard operating event in order to make up an earlier delay and so as to finish railcar unloading or vessel loading.

At the Amtrak Station, the UPRR crew will hand over the train to the BNSF crew. The BNSF train crew will divert west into the Port of Vancouver.

Trains destined for T-4 Terminal in the Port of Portland or the Bridgeview Terminal in the Port of Longview currently travel the same rail route except that the trains to Bridgeview continue on the main line for an additional 39 miles from the Columbia River Railroad Bridge to Longview while the trains to Portland T-4 stop at Barnes Yard in Portland and then are locally switched to Portland T-4.

Trains headed to the VBT Project will travel through the Port, counterclockwise around the rail loop at T-5 and then proceed back to T-2. Trains will arrive at the VBT Project on the new receive/departure tracks, at which point the trains will be handed over to the terminal's ILWU crew. The UPRR locomotives will remain with the unit trains and will be operated by the terminal's ILWU crew. When ready, the terminal's crew will break trains into cuts of cars to route through the railcar unloading building. After each cut is unloaded, it will be moved back to the receive/departure tracks and recoupled to the opposite end of the unit train. After all cuts are unloaded and reassembled, the master control for the locomotives will be switched to the opposite end by either the ILWU crew or a UPRR mechanic. The BNSF local crew will board the train and the unit train will continue to the T-5 loop. Inspection and air testing will be performed at either T-5 or at the VBT industry track.[14] BNSF will cut out any bad order cars[15], which will be stored on new track 4126. The BNSF crew will drive the unit train clockwise around the T-5 loop and then in the eastbound direction on the north lead to Thompson Avenue. The UPRR crew will board the unit train at that location and depart the Port.

4.15.Vessel Transit

Upon the opening of the VBT Project, Solvay's soda ash exports will be diverted from its Port of Portland and Port of Longview export facilities to the VBT Project. Refer to Sections 3 and 4.1 for throughput and vessel quantities that will be diverted from those operations.

Vessels used for the shipment of soda ash from the proposed VBT Project are projected to be primarily Supramax class bulk carriers, which typically have a DWT between 50,000 and 60,000 DWT, or Handymax class bulk carriers, which typically have a DWT between 40,000 and 50,000 DWT. For approximately 80% of the shipments, Solvay will primarily utilize the Supramax carriers, loading shipments upwards of 48,000 MT. The Supramax vessels typically range between 150 to 200 m in length, have five cargo holds, and typically have four onboard cranes with a lift capacity of between 25 MT and 40 MT each. For the other approximately 20% of the shipments, Solvay will utilize the Handymax carriers, loading shipments upwards of 35,000 MT. The Handymax vessels typically range between 150 to 170 meters in length, have five cargo holds, and have four onboard cranes with a lift capacity of between 25 MT to 30 MT each.

The vessels will operate in the Columbia River navigation channel calling at the Port of Vancouver and will require a tug assist during berthing and de-berthing from Berth 7. Vessels will arrive at the VBT Project from the Pacific Ocean via the Columbia River navigation channel and transit to and from the existing Berth 7 at approximate River Mile (RM) 105 of the Columbia River. The current depth of the Columbia River navigation channel is maintained to a minimum depth of -43 feet Columbia River Datum (CRD). The depth of Berth 7 currently is maintained by the Port at -43 feet +2 feet CRD to match the navigational channel depth.

[14] If testing is done at the VBT industry track, it would be performed by VBT prior to handover to BNSF. If testing is done at T-5, it would be performed by BNSF after handover by VBT to BNSF.

[15] Railcars needing repair to their running gear or safety equipment.

The typical speed of the types of vessels that will serve the facility is 15 knots in the ocean and 10 knots in the Columbia River. Vessels will be piloted across the Columbia River Bar and up the river to the VBT Project as required by state regulations. Assist tugs will help vessels berthing and de-berthing at Berth 7.

Based on the typical vessel size and the proposed loading capacity of the VBT Project, one marine vessel is anticipated to take approximately 3 to 4 days of berth occupancy, for a total of 73 vessels loaded per year at maximum capacity of 3,300,000 MT per year, based on an average cargo of 48,000 MT per Supramax vessel and 35,000 MT per Handymax vessel. Note that, based on Solvay's expected vessel distribution for soda ash export out of the Port, there will be approximately 58 Supramax vessels and 15 Handymax vessels, for a total of 73 vessels loaded every year or approximately 1.46 vessels per week.

4.16.Operational Best Management Practices

The following BMPs will be incorporated into the project design and operations to minimize environmental impacts:

- Soda ash will be unloaded via bottom dump railcars inside a covered and contained rail unloading building. When each railcar compartment is nearly empty, handheld vibrators will be used to release residual soda ash, and the railcar gate will be closed prior to exiting the building. The soda ash will be unloaded into a below grade rail unloading pit, feeding a conveyor. The pit conveyor will feed a conveying system for transferring the soda ash to the storage enclosure or to the vessel loading system.
- Doors will remain closed in the rail unloading building and storage enclosure during unloading operations and stacking/reclaim operations respectively to prevent and minimize fugitive dust emissions from operations. Door curtain strips will be installed and maintained at railcar entrance/exit into rail unloading building.
- Dust collection systems will be on and operating during bulk cargo unloading, transfer, and loading activities.
- VBT will conduct preventative maintenance on dust collection systems and replace filters according to manufacturer recommendations.
- VBT will be responsible for ensuring compliance with any applicable Southwest Clean Air Agency requirements.
- During periods between ship loading operations, the ship loading boom will be stowed over the deck to avoid dust in the folds of the shroud from dropping into the river. All chutes and funnel attachments will be stowed on the dock in cradles and cleaned/maintained over collection bins.
- Following loading, any fugitive material on the dock will be cleaned up with the use of vacuum trucks, street sweepers, or by hand.
- The current water collection and conveyance system on the dock will be reused. A sump on the dock connected to the existing conveyance system will convey stormwater collected on the dock to the existing IWDP point of discharge or modified ISGP discharge location.
- VBT will be responsible for any applicable NPDES ISGP requirements relative to stormwater management.
- All bulk cargo material handling equipment associated with the operations will be kept inside or stored under cover and not exposed to stormwater.
- Any process water, including contact water from steam cleaning of equipment, that escapes the facility and into the Port's storm system will be considered an illicit discharge and is a violation of the Port's Illicit Discharge Detection and Elimination (IDDE) policy as required by the NPDES Western Washington Phase II Municipal Stormwater Permit. In the event of an illicit discharge, the Port will be notified immediately. All wastewater and/or process water (any water that comes in contact with bulk cargo) will be collected and conveyed to sanitary sewer

under a City of Vancouver wastewater discharge permit held by the facility operator.

- VBT will perform general housekeeping on a regular basis. VBT will also clean as required in the event of an upset condition or equipment failure.
- VBT will stage spill kits where spill from equipment would be most likely to occur. The Port also has spill sheds and response trailers located throughout T-2. The Port's sheds contain oil absorbents capable of absorbing 15 gallons of fuel, a storm drain plug or cover kit, a non-water containment boom a minimum of 10 feet in length with a 12-gallon absorbent capacity, a non-metallic shovel, and two five-gallon buckets with lids. In the event of a spill from any bulk cargo facility operation, the spill will be reported immediately to the Port Security Main Gate. If any Port spill kit materials were to be used, then VBT will notify the Port so materials can be replaced.

5. CONSTRUCTION

Multiple contractors will be working on the site at various times during the construction period. The duration for each contractor's work on site varies from a low of approximately 3 months to a high of approximately 9 months. It is anticipated that the following prime contractors will be performing on-site construction: i) demolition, ii) civil, foundation, and ground improvements, iii) rail, iv) structural and mechanical and v) electrical power and controls.

Construction crews will be performing demolition work, excavation, clearing and grading, installation of ground improvement systems, foundations installation, rail modifications, and new rail installation work. Contractors will use typical construction methods for cast in place concrete, while others will be erecting elements of the various structures and the associated mechanical, electrical, and dust control equipment. These various construction activities will include the use of diesel and gasoline-power construction equipment including cranes, forklifts, welding machines, bulldozers, excavators, backhoes, loaders, drill rigs, rollers/compactors, ballast tampers, track laying machines, dump trucks, water trucks, equipment maintenance trucks, light-duty trucks, work boats/barges, concrete/asphalt cutters, portable generators, and portable lighting.

Building materials, conveyor components, and pre-assembled structures will be delivered by truck to laydown areas located onsite at T-2, with the exception of the new shiploader and one section of BC-8, both of which are expected to be brought in via water transport barges and set via floating crane. Permanent equipment will be brought to the site and assembled or placed according to design requirements. All concrete, asphalt, soil, and aggregate materials required for construction will be sourced from local suppliers. No on-site production of concrete or asphalt is anticipated.

5.1. Construction Schedule

Demolition of the existing structures and components that require demolition is expected to begin in March 2025 and be completed in December 2025. Construction of the proposed facility is expected to begin in April 2025 and be completed in July 2026. Facility Commissioning is expected to begin in May 2026 and be completed in July 2026, with Initial Start-up of the proposed facility thereafter.

The Port-owned dock maintenance and repair will be performed as a separate project by the Port, with an expected construction timeline extending from September 2025 through February 2026. Existing bentonite clay handling operations would cease at T-2, Berth 7 in February 2025. Existing copper concentrate cargo handling operations will be interrupted during the dock repair and maintenance project but would resume after completion of the dock project until November 2025.

An approximate schedule of construction activities for the proposed project is shown in the table below.

Construction Activity	Approximate Timeline
Demolition Activities	Mar 2025 to Dec 2025
Excavating and Grading	April 2025 to Aug 2025
Ground Improvements	Aug 2025 to Sept 2025
Other Foundation Work (concrete, stockpile surface)	July 2025 to Oct 2025
Storage Enclosure Erection/Cladding	Jun 2025 to Apr 2026
Rail Modifications	Aug 2025 to Mar 2026
Transfer Towers and Conveyors (Struct & Mech)	Nov 2025 to May 2026
Rail Dumper Upgrades	Jan 2026 to Feb 2026
Portal Stacker Reclaimer Installation	Jan 2026 to May 2026
Shiploader Installation	Dec 2025 to May 2026
Electrical & Instrumentation	Dec 2025 to July 2026
Facility Commissioning	May 2026 to July 2026

Table 3: Construction Activities Timeline

Section 5.14 includes information pertaining to anticipated days and hours of construction.

5.2. Staging and Material Storage

The construction site is relatively small with little available space for construction laydown, staging, equipment storage, and construction trailer/contractor parking. Therefore, various areas on and adjacent to the project site will be used for such activities during construction (Figure 6). The area south and southeast of the existing wastewater treatment building and existing Coverall Building including the old sand slab area will be used for construction staging and material storage. The areas west of the existing A-frame and west of NW Harborside Drive will also be used as a laydown area. The rail contractor will use the open area in the rail corridor to store fill material, ballast, ties, rails, and other materials required for rail-related work. These areas will also be used for re-fueling and routine maintenance of construction equipment. Except for the rail work in the rail corridor, no major earthwork is envisioned. Therefore, no other laydown areas will be used to store fill materials. Trenching will likely be required for modification of the existing stormwater/wastewater conveyance systems, which will involve minor stockpiling of aggregate and materials required for pipe installation. The excavation for the new storage enclosure will produce some material but the quantity is minimal. With the exception of contaminated soils that will be containerized, material will be temporarily placed on the paved area south of the existing Coverall Building until hauled off site by the civil contractor. It is anticipated that the construction activities will be managed by the contractor under the Ecology administered Construction Stormwater General Permit (CSGP). The contractor will manage material stockpiles in accordance with CSGP requirements prior to discharging to the Port's or the existing T-2, Berth 7 stormwater collection, conveyance, and treatment system, as applicable. No new clearing, grading or other improvements are required for construction material staging or storage.

Since the construction contractors' work is spread out during the construction period, not all contractors will be on site at the same time. Therefore, contractor trailers and parking will only be needed for certain contractor crews working at certain times. Construction trailers will be placed near the laydown and storage area, to the south of the existing rail dumper building and west of the existing A-Frame Building. Contractor parking will be in various locations including east of the

laydown and storage area and to the south of the construction trailers. Refer to Figure 6 for a proposed layout for Temporary Facilities.

5.3. Demolition

The existing facilities include a railcar unloading station, a series of conveying systems that transfer product to storage and to the dock for loading into vessels, a shiploader, the Coverall and A-Frame buildings, and various other buildings for operations and administration use. The proposed soda ash facility will utilize some of the existing structures, equipment, and foundations. All existing equipment, structures, foundations, and facilities that will not be utilized in the soda ash facility will need to be demolished. Existing items that will require demolition include the following:

- Railcar unloading station components including horizontal slide gate, skirt boards, transition chute to BC-1, DC1 dust collection ductwork, excavator support bridge, and above ground foundation walls inside building
- Excavator receiving hopper, excavator bridge, and bridge foundations
- Conveyors BC-1, BC-2, O-1, R-1, R-2, and R-3, and associated support structures
- Coverall Building, interior conveyor equipment and supports, perimeter of existing foundations. Bunker walls to be removed but retained and stored at the site,
- A-Frame Building steel structures and above-ground concrete walls
- A-Frame Building's interior conveyors and equipment
- Shiploader, complete removal of all components, including the rails on the existing dock
- Equipment, conduit, and wire inside the existing Electrical Buildings at the dock area and the existing A-frame area
- Certain rail sections and rail components
- Former tire shredder shed

A classification survey and sampling of the existing facilities will be performed prior to the start of demolition. Any contaminated soil, waste or building materials found to need special handling during demolition will be identified during this survey, and these contaminated or hazardous materials would be containerized by the construction contractor, characterized, and properly disposed of. Non-contaminated materials and general construction wastes would be disposed of offsite by the various contractors.

Prior to the demolition of the various components of the existing facilities, the terminal staff will first hand clean and then washdown the existing facilities. Existing facilities to be cleaned include the Coverall Building, existing conveyors, the A-frame Building and associated equipment. Wastewater from the washdown will be collected in the existing collection and conveyance system and transferred to the existing wastewater treatment plant for treatment prior to disposal to the City sanitary sewer pursuant to the volume limitations set forth in the current permit.

All demolition work will be done from land, except for potentially the demolishing/dismantling of the existing shiploader. Construction contractor performing demolition of the existing shiploader will determine whether this work will be performed from land or via floating crane.

Demolition work will be conducted in a phased manner. Demolition of certain existing conveyors (BC-1, BC-2, R-1, R-2, and R-3), certain railcar unloading station components, and the existing shiploader will be performed by the Structural/Mechanical contractor. Demolition of existing conveyor O-1 and existing hopper D-1 will be performed by VBT. Removal of any existing tracks and turnouts that require modification will be performed by the Rail contractor. Any removal of underground utilities that require modification will be performed by the Civil contractor. The remaining components that require demolition will be performed by the Demolition contractor. This will include the Coverall Building, the A-Frame building, and any remaining equipment, structures, and facilities that require demolition.

BMP's to be implemented prior to and during demolition work include the following:

- Limit operations to pre-approved project areas
- Protect existing utilities and structures not scheduled for demolition or removal
- All equipment to be mobilized to the site must be "clean" and in good working condition
- Abate/remove, segregate, and dispose of/recycle identified regulated materials and equipment, as warranted based on the survey results
- Provide temporary site traffic control measures
- Provide fugitive dust control measures (e.g., applying water spray during activities that have potential to generate fugitive dust)
- Management of contact water (i.e., water that comes in contact with demolition debris)
- Waste management (except impacted soil to be managed by the Port)
- Good housekeeping practices

For more information on BMPs during general construction please refer to Section 5.15.

5.4. New and Relocated Rail Lines

The Port's existing rail corridor contains areas of pavement and compacted gravel. Track work associated with the VBT Project will be within the Port's existing rail corridor and the T-2 track system. Proposed rail work includes relocating the Port's existing south lead, installing new tracks 4126 and 4857, and relocating existing switches. It is estimated that approximately 20,800 track feet of new track will be installed and approximately 8,000 track feet of existing track will be relocated.

In the areas that are not already at the required base elevation, construction of the rail lines for both new and relocated tracks includes shallow excavation (approximately 2 to 3 feet below ground surface), and grading and resurfacing to level the site and prepare it for track placement. Fill material consisting of existing soils, import borrow, and crushed surfacing base course (sub ballast) will be placed followed by installation of the rail and ties. The depth of fill material would vary across the project site but is anticipated to be approximately 12 inches in depth. After the sub ballast is placed, specialized construction equipment will be used to construct the track. The track consists of railroad ballast (rock), steel rails mounted on wooden or concrete cross ties, and other miscellaneous materials. A specialized piece of construction equipment called a tamper will be used to raise the track through the ballast, and the ballast will be compacted under the crossties. The ballast will then be shaped to form a uniform ballast section. Tracks will be tested and aligned prior to use. Some special-purpose tracks at Terminal T-5 feature buried compressed air lines and electrical conduit to facilitate switching operations and air testing and inspection of cars prior to departure.

While no new drainage improvements are anticipated in the rail corridor, should drainage of the new VBT Project tracks in the Port's rail corridor be required, storm water will be conveyed to the Port's existing stormwater collections, conveyance, and pond system prior to discharge into the Columbia River pursuant to the Port's existing discharge permits.

5.5. Clearing and Grading

Site preparation activities include grading and excavation for the storage enclosure, track modifications, and minor improvements to the stormwater management system. Standard and heavy earth-moving and grading equipment will be used for the clearing and grading activities. No excavated material will be used as fill elsewhere at the project site. Excavated material will be disposed of offsite by the construction contractor at an approved and regulated facility. Should any hazardous materials be encountered during excavation, these materials will be containerized by the civil contractor and disposed of by the Port.

Fill will be required following grading activities to level the site for construction of the storage enclosure and new rail lines. The fill will consist of imported, clean material from an offsite source selected by the construction contractor and sub ballast and ballast material selected by the rail contractor. The total quantities of excavation and fill that will be required are under evaluation.

5.6. Ground Improvements

Based on geotechnical information received for the site, ground improvements will be required to mitigate seismic lateral spreading at the bents for conveyor BC-8 prior to construction of those components. Refer to Figure 8 which depicts ground improvements anticipated for the VBT Project. It is anticipated that ground improvements would be accomplished by means of deep soil mixing to form a seismic buttress with increased soil-cement composite shear strength. Deep soil mixing will be performed using a drill rig to push a mixing tool into the soil for injecting a cementitious binding agent into the soil. The mixing tool will advance down to the design depth and then return to the surface while continually mixing the binding agent with native soils to increase seismic performance. It is expected that the buttress concept will treat a volume approximately 30 feet wide by 60 feet long by 50 feet deep at each of the three bents where lateral spreading is an issue. A temporary mobile grout batch plant consisting of two cement storage tanks would be installed by the contractor inside of the lease area on an existing concrete slab.

The ground improvement installation method results in excess soil (or spoils) being brought to the surface during installation, which must be managed. The estimated spoils volume is 700 C.Y. per bent, for a total of 2,100 C.Y. Any groundwater brought to the surface would be absorbed into the soil-cement spoils. The following BMPs may be implemented as needed during installation and are consistent with Ecology's Guidance on Controlling Turbidity in Nearby Waters from Ground Improvement Work for Seismic Events (Ecology 2010):

- Perimeter controls such as silt fencing or straw wattles will be used to circumscribe the installation area, thereby containing any ejected soils within the installation area.
- If necessary, the installation area may be protected by covering the working surface with a layer of gravel.
- Stormwater runoff from adjacent areas will be routed away from the installation area.
- Excess water including equipment wash water collected at the ground surface during installation will be detained by the perimeter controls and allowed to infiltrate back into the ground at the source location. Alternatively, the water may be characterized and then either routed to the temporary sediment pond/tank or removed off site in accordance with the CSGP, or managed and treated in accordance with the existing IDWP. The Ground Improvements contractor will determine which approach will be used.
- If the grout used during installation causes a notable change in pH of the water collected at the ground surface, the water will be routed to a temporary pond/tank and neutralized using carbon dioxide (or other equivalent technology) and then discharged. The facility may utilize a CSGP authorization or the existing IWDP for construction water management.
- If a significant accumulation of excess soil occurs at the installation site, the soil will be characterized and appropriately managed based on its chemical profile, potentially including on-site reuse or off-site disposal as appropriate.
- Proper concrete handling practices will be employed for handling the grout in the installation area. This includes the use of a concrete washout area to prevent concrete discharge to surface waters, and this area will be located in one of the laydown/staging areas identified in Section 5.2.

During nearshore ground improvement installation, the ground improvements contractor may implement BMPs as needed, including but not limited to the following:

- A berm could be installed around the ground improvements area to prevent contact water with the ground improvements operation. Any contact water collected will be sent to the wastewater treatment plant.
- Instrumental pH monitoring will be conducted during grout installation in the nearshore installation area. Monitoring will be conducted along the shoreline closest to the location of grout installation. As a contingency measure, if pH monitoring indicates the migration of grout or impacted groundwater, additional BMPs or engineering controls may be implemented.
- Grout spoils will be pumped, hauled, or otherwise conveyed to an upland location (one of the laydown/staging areas identified in Section 5.2) for management, treatment and/or discharge/disposal. Grout spoils generated during grout installation will be contained by the use of berms, waddles, or other perimeter controls.

Spoils generated during any ground improvement program will be collected, hauled offsite, and disposed of in accordance with current regulations.

5.7. Pile Installation

Separate from the proposed VBT Project, the Port will execute a dock repair and maintenance project. The VBT Project will include no in-water work as part of the project.

No deep foundations are proposed for the VBT Project.

5.8. Other Foundations

The proposed VBT Project includes the planned re-use of various foundations, including those for belt conveyors BC-2, BC-3, BC-4, Transfer Tower TT-1, Transfer Tower TT-2, Transfer Tower TT-3, the maintenance building, and existing Dust Collector DC-2. Refer to Figure 7, which shows the foundations for the VBT Project, including existing foundations that are planned for re-use.

The foundations for the remaining conveyor bents, transfer towers, storage enclosure, PSR, containment walls, PSR maintenance bay on the south end of the storage enclosure, clean-up slabs under or adjacent to conveyors and towers, and other miscellaneous project features will be new and constructed using typical cast-in-place shallow footings and slabs. Foundations for BC-8 will be supported on top of new ground improvement buttresses as discussed in Section 5.6.

5.9. Soda Ash Storage Enclosure

Construction of the soda ash storage enclosure will first require a pre-demolition classification of the materials in and around the enclosure and demolition as described in Section 5.3. Any hazardous materials will be handled and disposed of as set forth herein. The resulting clean demolished structure materials will be stockpiled temporarily at pre-designated storage area(s) described in Section 5.2 or at the building footprint, and disposed of or recycled offsite at approved disposal/recycling facilities licensed to accept these materials, to be proposed by the demolition contractor. It is anticipated that all scrap steel will be sold to a local scrap yard to offset the demolition cost.

The storage enclosure's foundation (approximately 228' x 509', including foundation for north end of BC-4) will consist of cast-in-place concrete footings, slabs and curb walls. The enclosure will be a pre-engineered metal structure. The enclosure will strictly be an unoccupied shelter for soda ash storage and will not support any equipment loads. The foundation for the PSR enclosure plus south end of BC-4 is a cast-in-place base slab measuring approximately 68' x 132' in area.

5.10. Conveyor Systems and Supporting Structures

It is expected that some of the bents for conveyor BC-8 will require ground improvements. All other conveyor systems and transfer towers will either re-use existing foundations or will require new cast-in-place footings and slabs to support the structures.

One section of BC-8 may be brought to the site via water transport and set via floating crane. All other structural components will be brought in on trucks and assembled onsite.

5.11.Shiploader

All structural, mechanical, electrical, and piping components of the existing shiploader will need to be removed from the dock prior to installation of the new shiploader. To limit the amount of field labor required, the new pedestal shiploader will be brought to the site in pre-assembled, major assemblies. Transportation of the shiploader assemblies to the site will be performed via water transport, and the assemblies set in place on the refurbished dock via floating crane.

5.12.Roads

The proposed facility will utilize the roads already in place for T-2. No new roads are proposed.

5.13.Utilities

Upland existing utilities and infrastructure will either be abandoned and/or relocated dependent on final design including electrical, sanitary sewer, water, stormwater lines, catch basins, manholes, communications, and power distribution. Utility work will include open cutting of trenches to access and remove existing utilities as well as installation of new utilities. The expected trench widths range from 4 to 10 feet wide and will be approximately 4 to 8 feet below ground surface.

Electrical: The expansion project will add significant load and require an upgraded electrical service to the west of the new storage enclosure. It is expected that, in addition to utilizing two existing transformers, to accommodate the additional load of the new facility, the VBT Project will utilize an existing 480 volt service near the wastewater treatment plant and upgrade it from a 500 kVA transformer to a 1,500 kVA transformer. The upgraded transformer will feed a new prefabricated electrical building, which will be located to the west of the new storage enclosure and near the wastewater treatment facility. The potential for conversion to primary power is also still under evaluation.

Communications: The existing internet and phone service will be maintained, and it is anticipated that no update will be needed.

5.14.Construction Workers and Traffic

Estimated average construction management and construction staff over the total 16-month construction period are as follows: five (5) FTE VBT salaried construction management staff, eleven (11) FTE contractor salaried staff, and thirty (30) FTE contractor hourly staff. Equipment vendors will provide on-site supervision during installation, start-up and commissioning of their equipment and the material handling system.

Construction is anticipated to require an average of forty-one (41) full time salaried or hourly construction workers onsite. Construction is expected to take place five days per week, during one daylight hours shift. Depending upon the contractor the shift may vary from 8 to 12 hours working shift. It is expected that an 8-hour construction shift will take place between 8:00am and 5:00pm, and a 12-hour shift will take place between 8:00am and 8:00pm. A second shift may be required for certain limited activities (e.g., ground improvements), but a second shift is not anticipated. The exact breakdown of workers and number of shifts could change based on the contractor but is not anticipated to exceed fifty (50) full time workers at any given time.

Construction laydown areas and parking for construction workers are described in Section 5.2 above.

In association with the proposed project, the Port will be performing routine maintenance work on its dock at T-2 Berth 7. This work will require an additional 7 FTE construction workers for a duration of three (3) months offsite and three (3) months onsite.

5.15. Best Management Practices During Construction

The VBT Project will be constructed within a Model Toxics Control Act (MTCA)-agreed order cleanup site with known, existing, and not fully determined contamination in soil, groundwater, and riverbank.

During construction, appropriate erosion control measures will be implemented prior to clearing, grading, or excavation activities. These control measures will be identified in the project plans and construction specifications and implemented as required by the City building permits and the Stormwater Pollution Prevention Plan (SWPPP) and Temporary Erosion Control Plan prepared in compliance with the NPDES CSGP.

BMPs for construction activities will include, but not be limited to:

- Development, implementation, and maintenance of a SWPPP to minimize erosion of sediments due to rainfall runoff at construction sites, and to reduce, eliminate, and prevent the pollution of stormwater during construction.
- Installation of filter fabric fences around disturbed areas.
- Installation of silt traps in storm drain inlets.
- Installation of gravel construction entrances.
- Stabilization of temporary soil stockpiles and exposed soils.
- Regular street cleaning for mud and dust control.
- Permanent stabilization of disturbed areas after construction is completed.
- Use of appropriate means to minimize tracking of sediment onto public roadways by construction vehicles.
- Designation of personnel to inspect and maintain temporary erosion and sediment control measures.
- A Contaminated Media Management Plan (CMMP) is currently being developed. Handling of soils or other contaminated materials will be conducted in accordance with the BMPs identified in the CMMP.
- Notifications will be provided to the ISGP permit manager and the City of Vancouver IWDP permit manager as required.
- Development, implementation, and maintenance of a Spill Prevention, Control, and Countermeasures (SPCC) plan to manage toxic materials associated with construction activities (e.g., equipment leakage, disposal of oily wastes, cleanup of any spills, storage of petroleum products/chemicals in contained areas away from streams and wetlands). The SPCC plan will outline BMPs, responsive actions in the event of a spill or release, and notification and reporting procedures. The plan also will outline management elements such as personnel responsibilities, project site security, site inspections, and training.
- Establishment of a communication protocol for handling spills. Applicable spill response equipment and material designated in the SPCC will be maintained at the job site. Refuel construction equipment and vehicles away from surface waters whenever practical.
- Containment of equipment and vehicle wash water associated with construction and keep it from draining to surface waters.
- Groundwater extracted during construction of the ground improvements will be either containerized and analyzed for contaminants or conveyed to the wastewater treatment

facility for treatment. Based on the results of the analyzed, containerized groundwater or the conveyed groundwater, the groundwater will be disposed of by discharging to the surface to infiltrate, conveyed to the stormwater system or City's sanitary system, or disposed of at an approved offsite facility.

- Storing fuels and other potential contaminants away from excavation sites and surface waters in secured containment areas.
- No oil, fuels, or chemicals will be discharged to surface waters, or onto land where there is a potential for entry into surface waters.
- Conduct regular inspections, maintenance, and repairs of fuel hoses, hydraulically operated equipment, lubrication equipment, and chemical/petroleum storage containers.

5.15.1. Disposal of Construction Waste

Non-hazardous waste to be disposed of by the contractor at an approved disposal site of its choosing. Steel will be recycled offsite at approved recycling facilities or sold to a local scrap yard.

GRAPHIC SCALE 1" = 500'-0"

0 500' 1000' 1500' 2000' 2500'

THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

PROJECT AREA

PROJECT TRACKS

STORAGE ENCLOSURE

LA FRAMBOIS DR

WASHINGTON

HWY 501

NW LOWER RIVER RD

EXISTING LADDER TRACKS

W 26TH AVE

NW GATEWAY AVE

NW HARBORSIDE DR

STORAGE ENCLOSURE

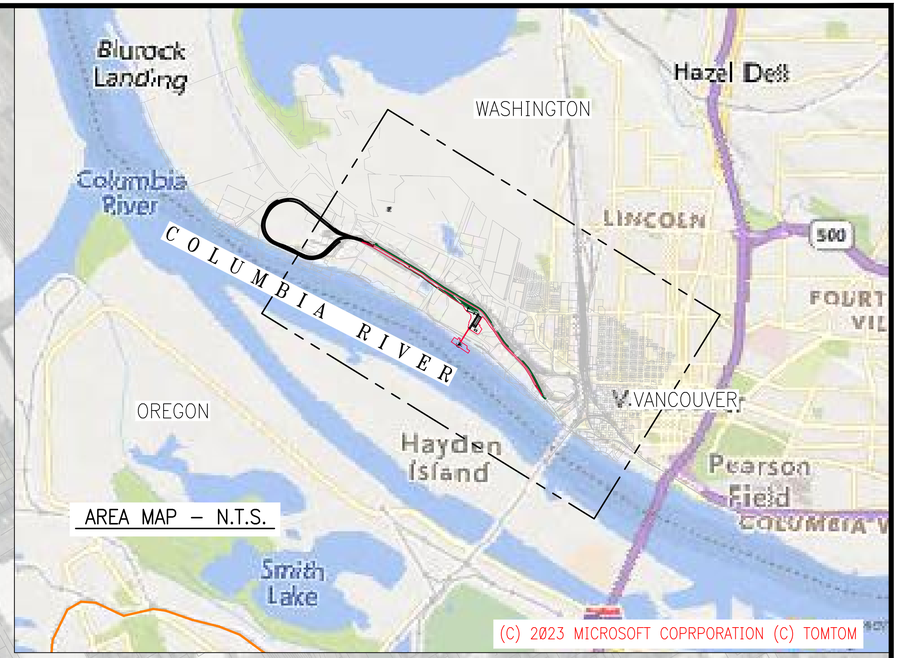
WEST TRACKS

EAST TRACKS

C O L U M B I A R I V E R

BURLINGTON NORTHERN RAILROAD BRIDGE 9.6

OREGON



AREA MAP – N.T.S.

VBT PROJECT LOCATION MAP
FIGURE 01

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INTERMAT JOB NUMBER: 230-01
CLIENT JOB NUMBER: XX-XXX
DATE: SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

VBT PROJECT LOCATION MAP
FIGURE 01

DWG. NO. FIG01

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GRAPHIC SCALE 1" = 35MI

Ø 35MI 70MI 105MI 140MI 175MI

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WASHINGTON

WA

PORT OF LONGVIEW

PORT OF VANCOUVER

PORT OF PORTLAND

OREGON

OR

890 MI±

IDAHO

ID

MONTANA

MT

NORTH DAKOTA

SOUTH DAKOTA

WYOMING

WY

NEBRASKA

SOLVAY SODA
ASH OPERATIONS
GREEN RIVER

CALIFORNIA

NEVADA

UTAH

COLORADO

N

EXISTING RAIL ROUTES
FIGURE Ø2.1

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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

EXISTING RAIL ROUTES
FIGURE 02.1

DWG. NO. FIG02.1

PORT OF VANCOUVER TO
PORT OF LONGVIEW
(APPROXIMATELY 39MI)

PORT OF
VANCOUVER

BERTH 7

PORT OF
PORTLAND

TERMINAL
T-4

COLUMBIA RIVER

WILLAMETTE RIVER

GRAPHIC SCALE 1" = 3500'-0"

0 3500' 7000' 10500' 14000' 17500'

THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

PORT OF PORTLAND / PORT OF VANCOUVER
PROPOSED RAIL ROUTE – FIGURE Ø2.2

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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

PORT OF PORTLAND / PORT OF VANCOUVER
PROPOSED RAIL ROUTE – FIGURE 02.2

DWG. NO. FIG02.2

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0 500' 1000' 1500' 2000' 2500'

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PROJECT AREA

PROJECT TRACKS

STORAGE ENCLOSURE

TRAIN ROUTE IN/OUT

LA FRAMBOIS DR

WASHINGTON

EXISTING LADDER TRACKS

NW LOWER RIVER RD

HWY 501

W 26TH AVE

<<ENTRY<<
>> DEPARTURE >>

NW GATEWAY AVE

>> ENTRY >>
<<DEPARTURE<<

TERMINAL 5

AUTO TERMINAL

NW HARBORSIDE DR

BERTH 14 BERTH 13 BERTH 10 BERTH 9 BERTH 8 BERTH 7 BERTH 5 BERTH 4 BERTH 3 BERTH 2 BERTH 1

WEST TRACKS

STORAGE ENCLOSURE

EAST TRACKS

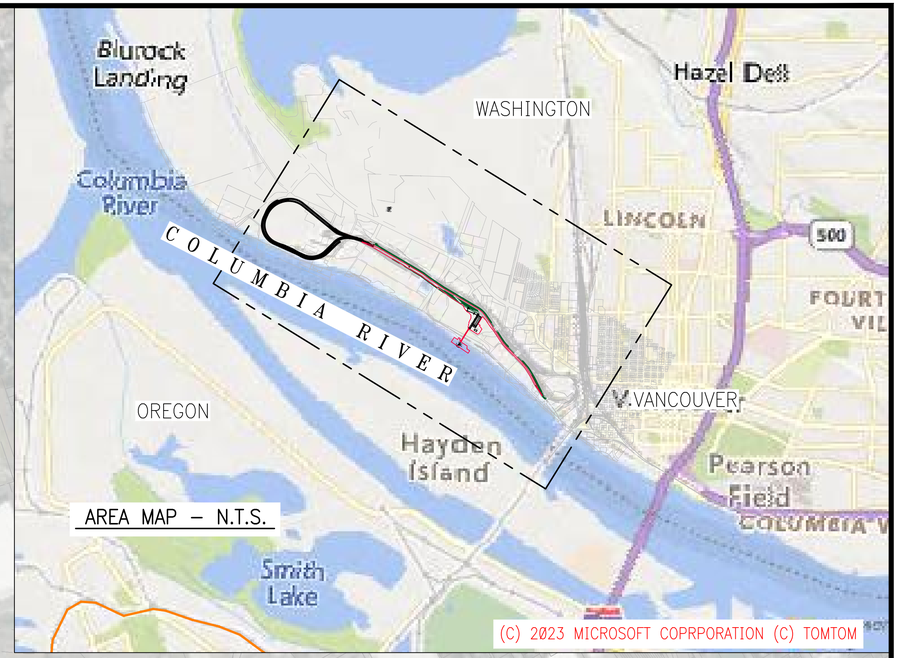
GRAIN ELEVATOR

BERTH 17

COLUMBIA RIVER

OREGON

>> ENTRY >>
BURLINGTON NORTHERN RAILROAD BRIDGE 9.6
<<DEPARTURE<<



AREA MAP – N.T.S.

PROPOSED RAIL ROUTING THROUGH PORT
FIGURE 02.3

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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

PROPOSED RAIL ROUTING THROUGH PORT
FIGURE 02.3

DWG. NO. FIG02.3

GRAPHIC SCALE 1" = 100'-0"
0 100' 200' 300' 400' 500'
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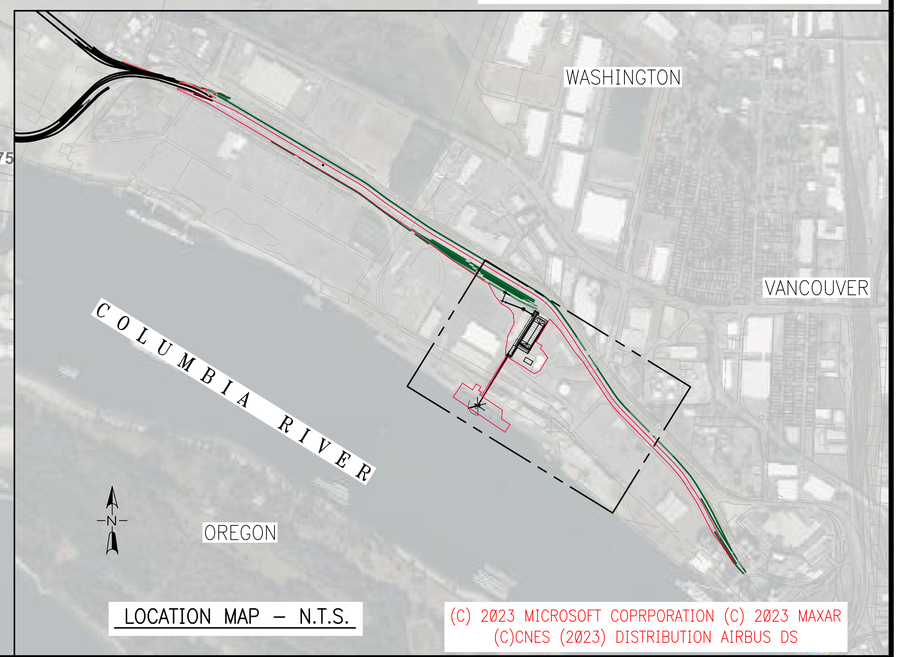
FEEDER CONV. FC-1
RAILCAR UNLOADING BUILDING #2877
DUST COLLECTOR DC-2
DUST COLLECTOR DC-1
CONVEYOR BC-1
TRANSFER BUILDING T-1 #2875
LONGSHOREMAN TRAILER
CONVEYOR BC-2
A-FRAME BLDG #2725
COVERALL BLDG #2745
PARKING
OFFICE
TRAILER
SAND SHED
SAND SLAB
WASTE WATER TREATMENT
D-1 HOPPER
CONV. O-1
NW HARBORSIDE DR
W 26TH AVE
CONV. R-1
LONGSHOREMAN BUILDING
CONVS. R-2, R-3
LINEAR SHIPLOADER
SHIPLOADER BOOM CONV. R-4
BERTH 7
YELLOW HIGHLIGHT INDICATES EQUIPMENT AND STRUCTURES TO BE DEMOLISHED
PROJECT AREA
COLUMBIA RIVER
EXISTING FACILITIES – FIGURE 03

4852 4851 4856 4857 4125 4124 4803 4801 4805 4806 4802 3372 3110 3142 3141 3501 3369 3371 3373 4266 4274 4273W 4270 4267 4275



LOCATION MAP – N.T.S.

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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

EXISTING FACILITIES
FIGURE 03

DWG. NO. FIG03

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GRAPHIC SCALE 1" = 200'-0"

0 200' 400' 600' 800' 1000'

THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

TERMINAL 4
STORMWATER
TREATMENT POND

NW HARBORSIDE DR

NW HARBORSIDE DR

BERTH 7

COLUMBIA RIVER

WASHINGTON

VANCOUVER

COLUMBIA RIVER

OREGON

LOCATION MAP – N.T.S.

TRACK LAYOUT WEST – FIGURE 04.1

- PROJECT AREA
- PROJECT TRACKS
- SHIPLOADER BOOM CONVEYOR
- CONVEYORS
- STORAGE ENCLOSURE
- ADMINISTRATION BUILDING
- RAILCAR UNLOADING BUILDING
- TRANSFER TOWERS
- WASTE WATER TREATMENT FACILITY

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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

TRACK LAYOUT WEST
FIGURE 04.1

DWG. NO. FIG04.1

GRAPHIC SCALE 1" = 200'-0"

0 200' 400' 600' 800' 1000'

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USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

W 26TH AVE

NW HARBORSIDE DR

WASHINGTON

VANCOUVER

OREGON

COLUMBIA RIVER

COLUMBIA RIVER

TRACK LAYOUT EAST – FIGURE Ø4.2

LOCATION MAP – N.T.S.

- PROJECT AREA
- PROJECT TRACKS
- SHIPLOADER BOOM CONVEYOR
- CONVEYORS
- STORAGE ENCLOSURE
- ADMINISTRATION BUILDING
- RAILCAR UNLOADING BUILDING
- TRANSFER TOWERS
- WASTE WATER TREATMENT FACILITY

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CLIENT JOB NUMBER: XX-XXX
DATE: SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

TRACK LAYOUT EAST
FIGURE 04.2

DWG. NO. FIG04.2

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0 100' 200' 300' 400' 500'
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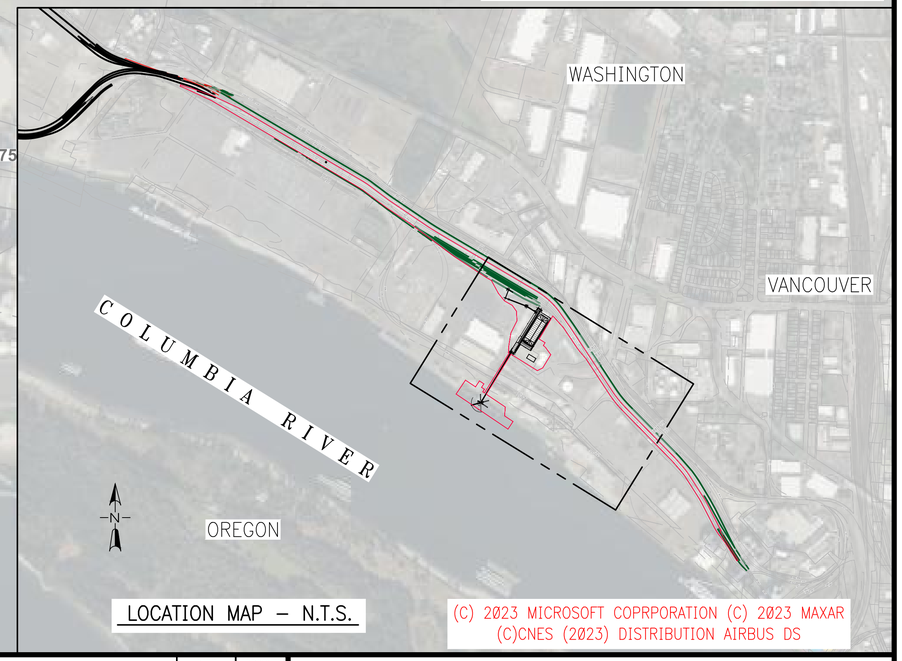
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

RAILCAR UNLOADING BUILDING #2877
FC-1
LONGSHOREMAN TRAILER
CONVEYOR BC-07
TRANSFER TOWER T-3
DUST COLLECTOR DC-1
CONVEYOR BC-01
TRANSFER BUILDING T-1 (#2875)
CONVEYOR BC-02
CONVEYOR BC-03
SURGE BIN SB1
DUST COLLECTOR DC-2 (MOVED HERE)
CONVEYOR BC-04
CONVEYOR BC-06
PARKING
OFFICE
TRAILER
WASTE WATER TREATMENT FACILITY
MAINTENANCE SHOP
TRANSFER TOWER T-4
CONVEYOR BC-05
BC-08 GALLERY CONVEYOR
LONGSHOREMAN BUILDING
BERTH 7
NW HARBORSIDE DR
W 26TH AVE
COLUMBIA RIVER

PROJECT AREA
PROJECT TRACKS
SHIPLOADER BOOM CONVEYOR
CONVEYORS
STORAGE ENCLOSURE
ADMINISTRATION BUILDING
RAILCAR UNLOADING BUILDING
TRANSFER TOWERS
WASTE WATER TREATMENT FACILITY

FACILITY SITE PLAN
FIGURE 05



LOCATION MAP – N.T.S.

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CHECKED
APPROVED

InterMat INTERNATIONAL MATERIAL HANDLING

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REV. No.	DESCRIPTION	DATE	APPROVED
E	CURRENT REVISION	6/4/24	

CITY, STATE	INTERMAT JOB NUMBER	CLIENT JOB NUMBER	DATE
VANCOUVER, WASHINGTON	230-01	XX-XXX	SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

FACILITY SITE PLAN
FIGURE 05

DWG. NO. FIG05

FILE: C:\Users\John\Intermatllc.com\Intermatllc.com – Share\Projects\230_VancouverBulkTerm\230_VanBulkTerm\01_Basic Design & Permit Asst_WA\04_Production\02_TecDocs\Project Descr\Ref\230-01_PRD-figures.dwg LAST PLOT: 6/4/2024 5:09 PM LAST SAVE:6/4/2024 5:05 PM

RAIL LAYDOWN AREA
AND PARKING
DURATION __MOS(±)
(Ø.923 AC)

4852

4851

VBT PARKING AREAS
DURING CONSTRUCTION
(Ø.197 AC)

TRAILER & CONTRACTOR PARKING
DEMOLITION __MOS(±)
CIVIL/FOUNDATIONS __MOS(±)
STRUCT/MECH/ELEC __MOS(±)
RAIL __MOS(±)
(Ø.199 AC)

S/M LAYDOWN AREA
DURATION __MOS.(±)
(Ø.5Ø5 AC)

S/M LAYDOWN AREA
DURATION __MOS.(±)
(1.453 AC)

A-FRAME
BLDG #2725

SAND SLAB

CIVIL LAYDOWN AREA
DURATION __MOS(±)
STRUCT/MECH/ELEC
DURATION __MOS(±)
(Ø.88Ø AC)

COVERED EQUIPMENT
STORAGE (AS AVAILABLE)
PRIOR TO DEMOLITION
(Ø.413 AC)

WASTE WATER
TREATMENT FACILITY

TRANSFER TOWER
T-4

3110

4805

4801

4803

4856

4851

4857

4125

4124

4806

4802

W 26TH AVE

NW HARBORSIDE DR

GRAPHIC SCALE 1" = 60'-Ø"

Ø 60' 120' 180' 240' 300'

THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

TEMPORARY FACILITIES – FIGURE Ø6

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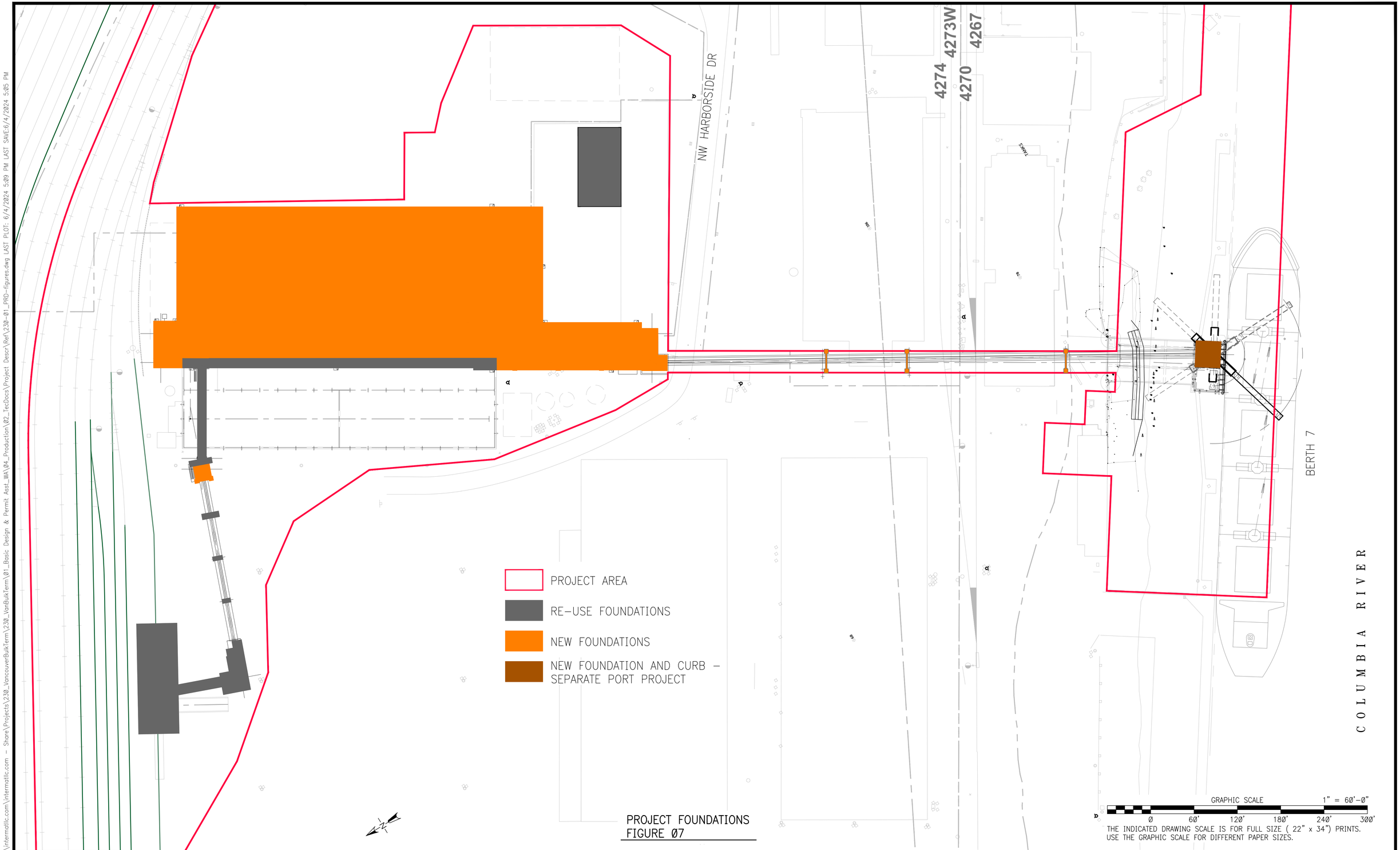
VANCOUVER, WASHINGTON	230-01	XX-XXX	SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

TEMPORARY FACILITIES
FIGURE 06

DWG. NO. FIG06



THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

PROJECT FOUNDATIONS
FIGURE Ø7

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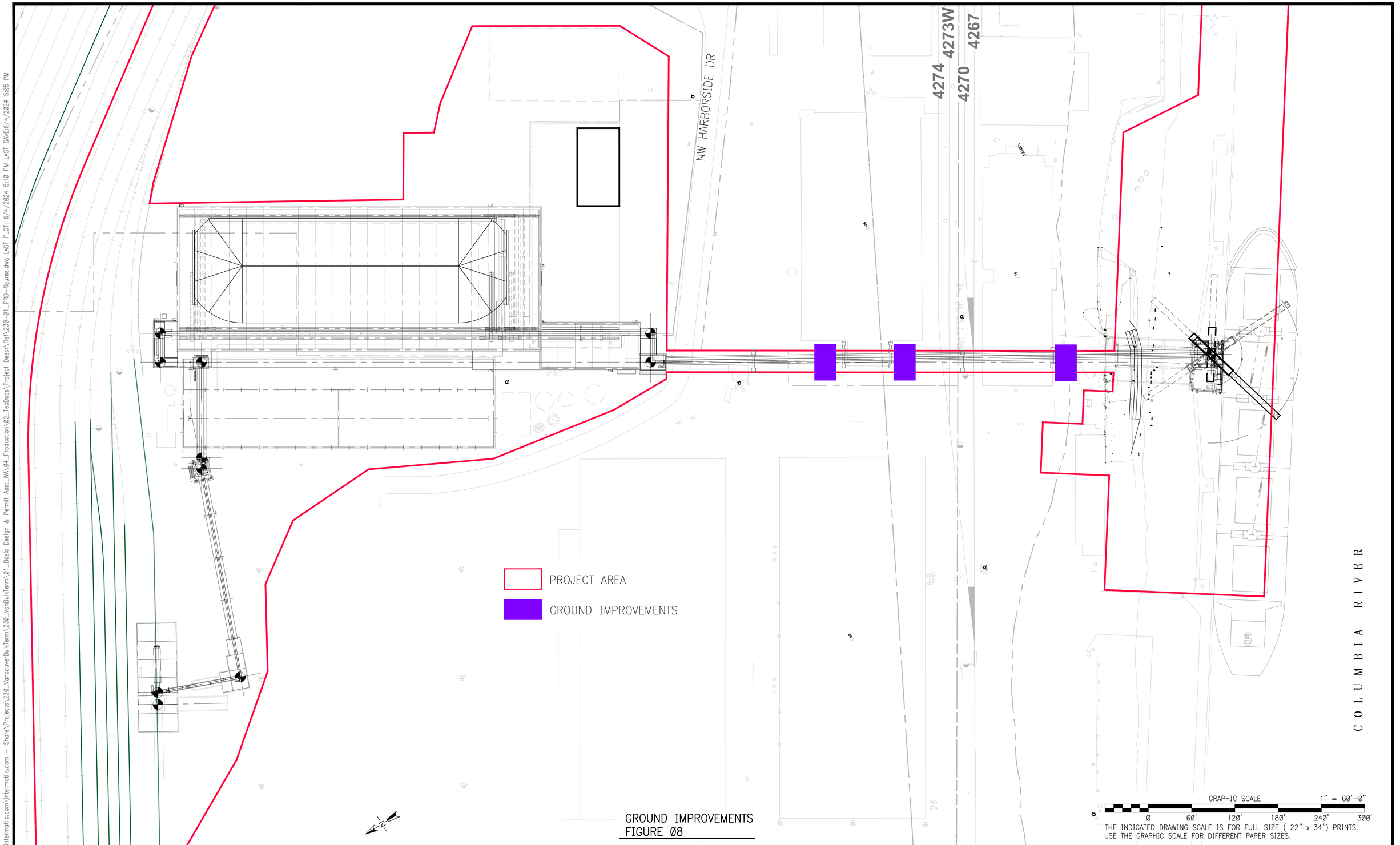
REV. No.	DESCRIPTION	DATE	APPROVED
E	CURRENT REVISION	6/4/24	

CITY, STATE	INTERMAT JOB NUMBER	CLIENT JOB NUMBER	DATE
VANCOUVER, WASHINGTON	230–01	XX–XXX	SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

PROJECT FOUNDATIONS
FIGURE 07

DWG. NO. FIG07



GROUND IMPROVEMENTS
FIGURE 08

THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22" x 34") PRINTS.
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VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

GROUND IMPROVEMENTS
FIGURE 08

DWG. NO. FIG08

DRAFT

EXHIBIT 3

6720 South Macadam Avenue, Suite 300
Portland, Oregon 97219
503.670.1108

ANCHOR QEA

Memorandum

August 5, 2024

To: Ted Fick and Johannes Viljoen, Vancouver Bulk Terminal, LLC

From: Jakob Rowny and Matt Kuziensky, Anchor QEA

cc: Russell Mester and Dixon Betz, InterMat, LLC

Re: Vancouver Shoreline Master Program Review and Compliance Summary – VBT Soda Ash Export Terminal Project

Introduction

The purpose of this memorandum is to demonstrate how Vancouver Bulk Terminal, LLC's (VBT's) proposed Soda Ash Export Terminal Project (VBT Project) in the City of Vancouver (City), Clark County, Washington will comply with the *Vancouver Shoreline Master Program* (SMP; City of Vancouver 2021) and the overarching Washington State Shoreline Management Act of 1971 (SMA) promulgated under Revised Code of Washington (RCW) Chapter 90.58 and Washington Administrative Code (WAC) Chapter 173-26 as amended.

Project compliance with the SMP was identified as required by the City in the April 17, 2024, *Preapplication Conference Report* for the VBT Project (Case File PRJ-169248/PIR-84183; City of Vancouver 2024). This memorandum provides supplemental information to support the Land Use Preliminary (LUP) submittal for the VBT Project (LUP-84478).

Project Description

VBT is a joint venture between Nautilus Holding Corporation and Neltume Ports that was formed for the purpose of developing a natural soda ash export terminal on the Columbia River at the Port of Vancouver USA (Port) in Clark County, Vancouver, Washington. VBT operates a copper concentrate and bentonite clay bulk export facility at the Port's Terminal 2, Berth 7 (Figure 1). That facility currently receives copper concentrate and bentonite clay in railcars, stores those commodities in covered storage, and later exports them via oceangoing marine vessels. The VBT Project involves converting the existing facility to handle soda ash. The project area for the VBT Project includes VBT's current leasehold with the Port plus any proposed modifications to that area that are necessary to accommodate the VBT Project.

The existing bulk export facility at Berth 7 is approximately 15.93 acres in size and handles both copper concentrate and bentonite clay. As shown in Figure 2, infrastructure at the existing facility includes the following:

- Railcar unloading building (Port Building #2877)
- Transfer building (Transfer Building T-1; Port Building #2875)

- Series of conveying systems that transfer product to storage and to the dock for loading into vessels (Conveyors BC-1, BC-2, O-1, R-1, R-2, R-3, and R-4)
- Fabric-covered storage enclosure for copper concentrate (Coverall Building; Port Building #2745)
- Corrugated steel storage building for bentonite clay (A-frame; Port Building #2725)
- Linear shiploader
- Wastewater treatment plant (Port Building #2715) and associated tanks
- Metal shed that partially encloses a former tire shredder hopper (D-1 Hopper) and its associated conveyance machinery that is no longer in use
- Office (Port Building #2701)
- Two mobile mini breakrooms/trailers (Port Buildings #2735 and #2873)
- Maintenance building that is currently shared with the Port (Port Building #2805)
- Rubb building (Port Building #2695)
- Slab associated with previously removed sand shed

Upon implementation of the VBT Project, copper concentrate and bentonite clay would no longer be received or exported from the Berth 7 facility. It is also expected that the export of bentonite clay from Columbia River ports would cease altogether once construction begins for the VBT Project.

The VBT Project is designed to receive soda ash by rail, from which it would be offloaded for export either directly onto oceangoing marine vessels or into flat storage, where it would be temporarily stored prior to being transferred onto oceangoing marine vessels. The VBT Project would primarily receive soda ash from Solvay America's (Solvay's) natural soda ash mining operation in Green River Basin, Wyoming, which has been owned and operated by Solvay since 1992. The VBT Project is intended to consolidate Solvay's Pacific Northwest soda ash export operations at one facility in Vancouver. Once the terminal is operational, Solvay's existing soda ash export operations at the Port of Portland's Terminal 4 and Port of Longview's Bridgeview Terminal would cease, and those shipments would be directed to the VBT Project.[1] The VBT Project would also have capacity available to receive natural soda ash from producers other than Solvay. That material would also be produced in and shipped from Green River, Wyoming.

For their existing copper concentrate and bentonite clay export operation, VBT currently leases a 15.93-acre area from the Port that includes multiple upland parcels. Those parcels are listed in Attachment 1, along with their related location information and legal description. Under the VBT Project, that leasehold would be maintained and expanded by approximately 9 acres to accommodate rail modifications needed to support the future soda ash export operation. The new leasehold area would total approximately 25 acres.

[1] Both of the Port of Portland and Port of Longview soda ash export facilities would retain the ability to export soda ash or similar bulk materials under a different operator.

Within the new leasehold area, the following groups of activities are proposed (Figure 3):

- Staging and storage of construction equipment and materials
- Demolition of existing receiving, material handling, and storage equipment and infrastructure
- Construction of new material receiving, handling, and storage equipment and infrastructure, including the following:
  - New pre-engineered metal storage enclosure for soda ash
  - New automated portal stacker/reclaimer that performs linear stacking functions inside the storage enclosure when receiving soda ash from railcars or stockpile reclaim functions when transferring soda ash to the outbound conveyor system for loading onto marine vessels
  - New fully enclosed tunnel, belt, and gallery-style conveyors systems for transferring soda ash from railcars to storage or for direct loading onto vessels
  - New surge bin to regulate output flow to downstream conveyors
  - New dust control systems
  - New supporting electrical and mechanical equipment
  - New maintenance building
- Modification of the existing rail system serving the export facility
- Replacement of the existing outdated linear shiploader with a new, modern pedestal shiploader
- Modification of the existing stormwater/wastewater management facilities and practices
- Resurfacing of existing paved areas

Additional details on these activities are provided in the LUP Engineering Package (InterMat 2024a) and the project description document, *Vancouver Bulk Terminal, LLC Soda Ash Export Terminal, Vancouver, WA* (InterMat 2024b), which have both been provided to the City as a part of the LUP submittal for LUP-84478.

Vancouver Shoreline Master Program

According to the City's Preapplication Conference Report (City of Vancouver 2024), the VBT Project must comply with the applicable standards of the Vancouver SMP (City of Vancouver 2021). The general goals of the Vancouver SMP (Chapter 3) are as follows:

- Use the full potential of shorelines in accordance with the opportunities presented by their relationship to the surrounding area, their natural resource values, and their unique aesthetic qualities offered by water, topography, and views
- Develop a physical environment that is both ordered and diversified, and which integrates water and shoreline uses while achieving a net gain of ecological function

The purpose of the Vancouver SMP (Vancouver Municipal Code [VMC] 20.760) is to implement the policies and procedures set forth by the Washington State Shoreline Management Act of 1971, as amended, and all applicable provisions contained in WAC 173-27. The Vancouver SMP standardizes the administration and enforcement of a permit system for shoreline management by providing the following:

- Definitions of the boundaries of the Shoreline Management Area
- Development standards for uses within the Shoreline Management Area
- Permit procedures for development within the Shoreline Management Area

Project Setting

The VBT Project will occur within two shoreline environments designated in Chapter 4.3 of the Vancouver SMP (Figures 3 and 4):

- Aquatic shoreline environment, which occurs waterward of the ordinary high water mark (OHWM)
- High Intensity shoreline environment, which extends landward 200 feet as measured on a horizontal plane from the OHWM

The purpose of the Aquatic shoreline environment designation is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the OHWM (City of Vancouver 2021). Portions of the project area that occur in the Aquatic shoreline environment include the Berth 7 dock and the trestle that connects the dock with the shoreline (Figure 4). The existing linear shiploader, which moves back and forth across the dock on rails, also extends into the Aquatic shoreline environment when it is actively loading ships. Off site, Aquatic shoreline mapping continues across the Columbia River to the southern boundary of Clark County, which also coincides with the Washington-Oregon state boundary.

The purpose of the High Intensity shoreline environment designation is to provide for high-intensity, water-oriented, commercial, transportation, and industrial uses while protecting existing shoreline ecological functions and restoring ecological functions in areas that have been previously degraded (City of Vancouver 2021). High Intensity shoreline mapping extends 200 feet landward from the OHWM and encompasses portions of the project area, including a portion of the Berth 7 dock trestle; the existing shiploader; one of the bent foundations and an aerial portion of existing conveyor R-1; and an existing stormwater collection sump, pump station, valve vault, and multiple catch basins and manholes. The stormwater facilities occur at or belowground (Figure 4). Other existing industrial features that are not part of the existing facility (e.g., maintenance shop, metal storage building) also occur in the High Intensity shoreline environment. All portions of the High Intensity shoreline environment on and adjacent to the project area are developed with industrial infrastructure or pavement.

In addition to the Aquatic and High Intensity shoreline environment designations, a portion of the Columbia River is also mapped as "Associated Wetlands" by the Vancouver SMP (City of Vancouver 2021; Figure 4). Associated Wetlands are identified as wetlands that are in proximity to and either influence or are influenced by tidal waters or a lake, river, or stream subject to the SMA. It is noted on the Vancouver SMP map that the Associated Wetlands mapping unit is unconfirmed and that their definitive presence must be determined on a case-by-case basis. The Associated Wetlands mapping unit does not extend onto the project area for the VBT Project.

Work Proposed Within Shoreline Jurisdictional Areas

The VBT Project components within the shoreline environments include the following:

- **Aquatic Shoreline Environment Designation:**
  - No in-water work is proposed.
  - Overwater work includes installation of new shiploader and new conveyor BC-8.
- **High Intensity Shoreline Environment Designation:**
  - New shiploader installation:
    - Demolition and removal of all overwater structural, mechanical, electrical, and piping components of the existing shiploader from the dock prior to installation of the new shiploader
    - Installation of new pre-assembled pedestal shiploader and associated assemblies
  - New conveyor BC-8 installation:
    - Demolition and removal of existing belt conveyor R-1
    - Ground improvements required to mitigate seismic lateral spreading at the southernmost bent for new conveyor BC-8
    - Installation of bent foundation and bent for new conveyor BC-8 and new aerial conveyor structure
  - Stormwater conveyance system modifications:
    - Relocation of existing collection sump (Sump 1) and valve vault
    - Installation of new force main between relocated valve vault and existing force main

Based on a review of the Vancouver SMP, these activities are allowed uses in the High Intensity shoreline environment and qualify for authorization under a Shoreline Substantial Development Permit (SSDP). As such, VBT is requesting the following authorizations from the City:

- An SSDP for installation and operation of the new pre-assembled pedestal shiploader

  - The new shiploader will be located on the Berth 7 dock and will occupy a larger footprint than then the existing loader,[2] and the approval of a Shoreline Substantial Development Permit will be required (SMP Chapter 2.2).
- An SSDP for installation and operation of new conveyor BC-8 and associated ground improvements required to mitigate lateral spreading at the location of the southernmost bent for that conveyor
- An SSDP for relocation of existing collection sump and valve vault and installation of new force main piping

It is VBT's understanding that a single SSDP can be issued for these activities.

Table 1 summarizes elements of the VBT Project that would occur within City designated shorelines. Earthwork would only affect areas in the High Intensity shoreline environment designation. Volume estimates for such work are provided for proposed excavation, fill placement, and grading work required to construct the various project components. The estimated area of proposed work in the High Intensity shoreline environment associated with those activities is also provided. No in-water work would occur as part of the project nor would there be any ground disturbance of Aquatic shoreline environments. The new shiploader would be placed on a foundation established on the Berth 7 dock by the Port's ongoing dock refurbishment work but would not require any excavation, fill placement, or grading for installation. Both the end of proposed conveyor BC-8 and the boom of the new shiploader would also extend over areas of both Aquatic and High Intensity shoreline environments.

Table 1
Project Work Proposed Within City Shoreline Jurisdiction

Project Component(s)	Shoreline Environment Designations Affected	Excavation/Fill/Grading Quantity Within Shoreline Jurisdiction (cubic yards)	Approximate Area Within Shoreline Jurisdiction (square feet)	Approximate Length of Shoreline Jurisdiction Disturbance (linear feet)[1]
Shiploader				
Demolition and removal of existing shiploader	HI	None Proposed	3,373[2]	70
Installation of new pedestal shiploader on Berth 7 dock	A	None Proposed	1,277[3]	37
Conveyor BC-8				
Demolition and removal of existing conveyor R-1	HI	13[4]	60[5]	25

[2] The existing linear shiploader is mounted on rails and can move back and forth between the Berth 7 dock and the mainland over an existing causeway that connects the dock with the mainland. The existing shiploader is kept on the mainland when not in use.

Project Component(s)	Shoreline Environment Designations Affected	Excavation/Fill/Grading Quantity Within Shoreline Jurisdiction (cubic yards)	Approximate Area Within Shoreline Jurisdiction (square feet)	Approximate Length of Shoreline Jurisdiction Disturbance (linear feet)[1]
Ground improvements to provide seismic buttressing for BC-8 bents	HI	3,333[6]	1,800[7]	60
Installation of new conveyor BC-8 bend foundations	HI	47[8]	350[9]	35
Stormwater Conveyance System				
Relocation of Sump 1 and valve vault	HI	220[10]	216	6
Installation of force main piping	HI	88[11]	402	92

Notes:

1. As measured parallel to the Columbia River.
2. Area within shoreline jurisdiction that is occupied by the existing shiploader.
3. Area of the base of the new shiploader on the existing Berth 7 dock; the area of the overall dock footprint is unchanged.
4. Volume of existing R-1 bent foundation that will be removed below grade followed by patching to repair pavement.
5. Area of existing bent foundations for conveyor R-1.
6. Estimated volume of existing soil that would be treated by deep soil mixing for ground improvements in the shoreline zone. The actual amount will be less. Approximately 700 cubic yards of spoils would be produced during this process. Those spoils, which would consist of a mix of existing soil and grout, would be removed from the site and hauled to appropriate disposal facility.
7. Area where deep soil mixing would be performed to provide seismic buttressing for new conveyor BC-8 bents.
8. Volume of concrete needed for southernmost bent foundation for conveyor BC-8.
9. Area of new southernmost bent foundation for conveyor BC-8.
10. Includes excavation and backfill volumes for sump and valve vault relocation and for refilling the former sump and valve vault locations.
11. Includes excavation and backfill volumes for new force main installation.

A: Aquatic shoreline environment
HI: High Intensity shoreline environment

City of Vancouver Shoreline Master Program Compliance

The tables provided in Attachment 2 list the applicable sections of the Vancouver shoreline regulations and how the VBT Project would comply with them. This includes the following City code sections that apply to the Project:

- **Table 2-1:** Aquatic Shoreline Designation (SMP Chapter 4)
- **Table 2-2:** High Intensity Shoreline Designation (SMP Chapter 4)
- **Table 2-3:** General Shoreline Use and Development Regulations (SMP Chapter 5)
- **Table 2-4:** Specific Shoreline Use Regulations (SMP Chapter 6), General Provisions (SMP Chapter 6.1) and Shoreline Use, Modification and Standards Table (SMP Chapter 6.2)
- **Table 2-5:** Standards for Industrial Uses (SMP Chapter 6.3.6)

- **Table 2-6:** General Provisions for City of Vancouver Shoreline Substantial Development Permits, Shoreline Conditional Use Permits, and Shoreline Variance Permits (WAC 173-27, VMC Chapter 20.760 and SMP Chapter 7)

City of Vancouver Shoreline Master Program Conclusions

As demonstrated in the tables provided in Attachment 2, the VBT Project would comply with the Shoreline Management Act per WAC 173-27 and City shoreline regulations as codified in the SMP per VMC 20.760.

References

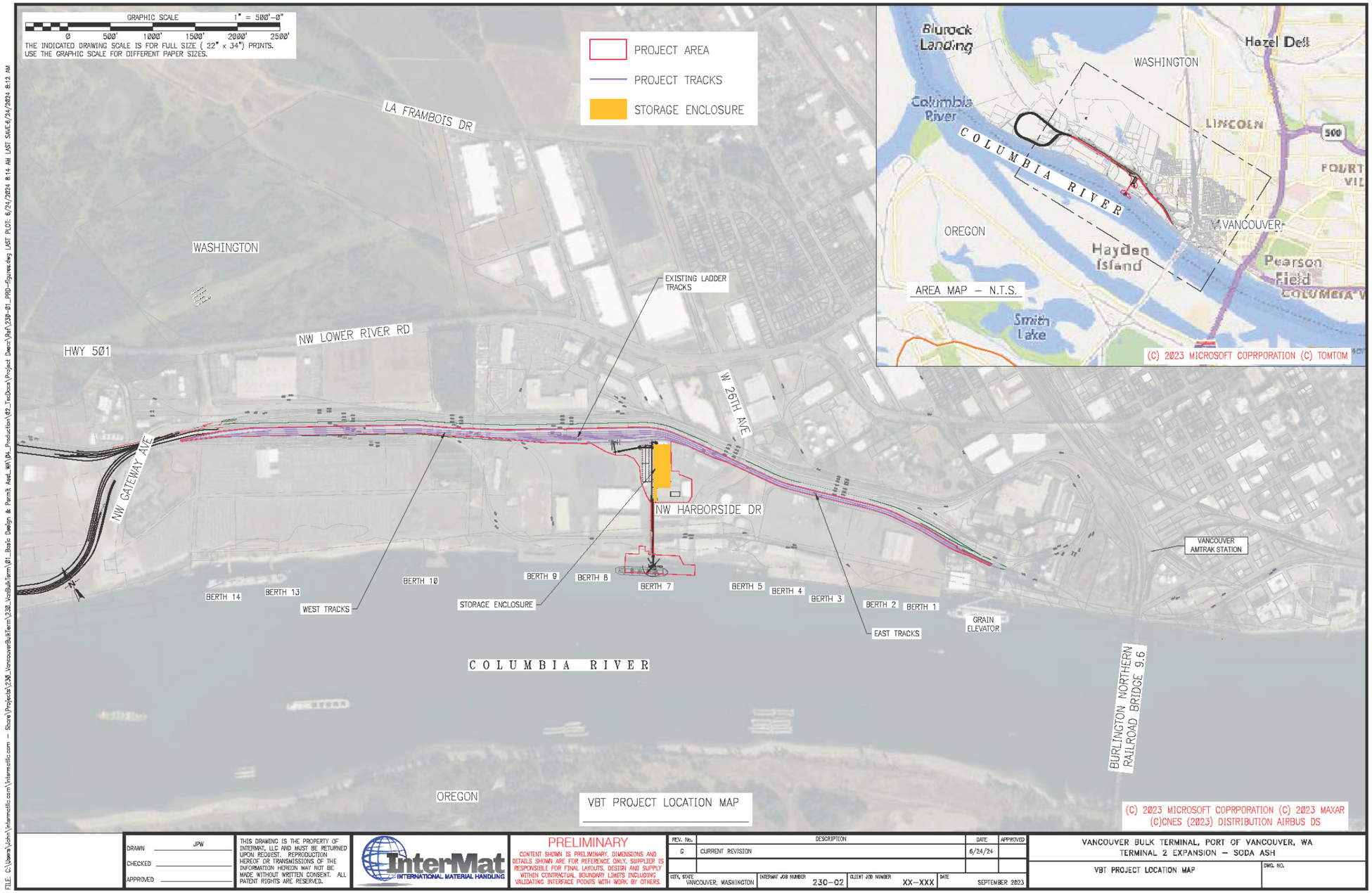
City of Vancouver, 2021. *City of Vancouver Shoreline Master Program*. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.

City of Vancouver, 2024. *Preapplication Conference Report.* Soda Ash Terminal (Port of Vancouver Terminal 2 – Berth 7) PRJ-169248/ PIR-84183. April 17, 2024.

InterMat (InterMat, LLC), 2024a. 2024a. *Vancouver Bulk Terminal LLC, Soda Ash Export Terminal, Vancouver Washington – Project Description.* Document No. 230-01_PRD-001. June 10, 2024.

InterMat, 2024b. Terminal 2 Expansion, Land Use Permit Application Engineering Package for Vancouver Bulk Terminal, Port of Vancouver – Vancouver Washington. InterMat Project #230-01. July 23, 2024.

Figures



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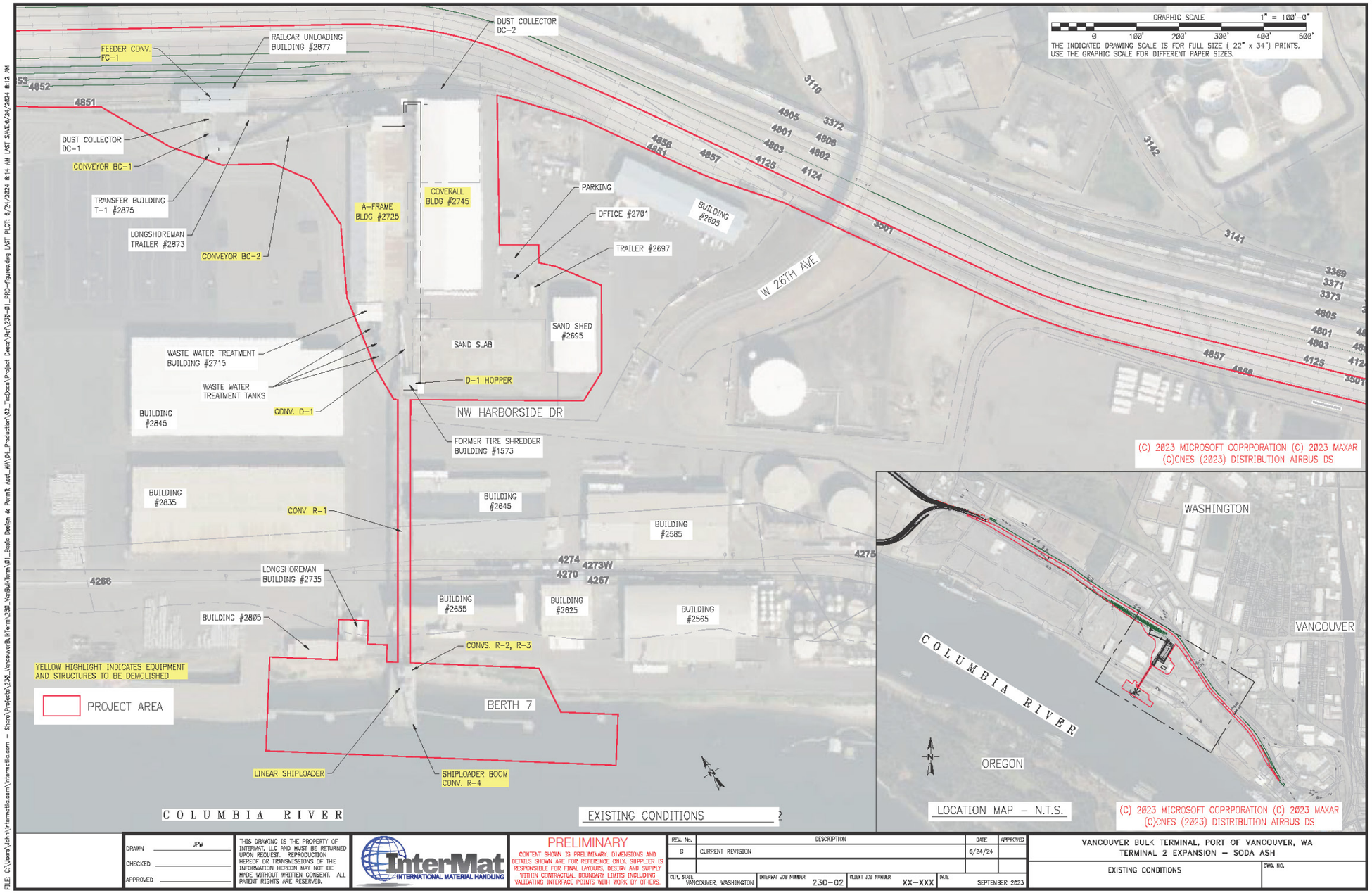
ANCHOR QEA

Figure 1
Project Location Map
Vancouver Shoreline Master Program Review and Compliance Summary
VBT Soda Ash Export Terminal Project



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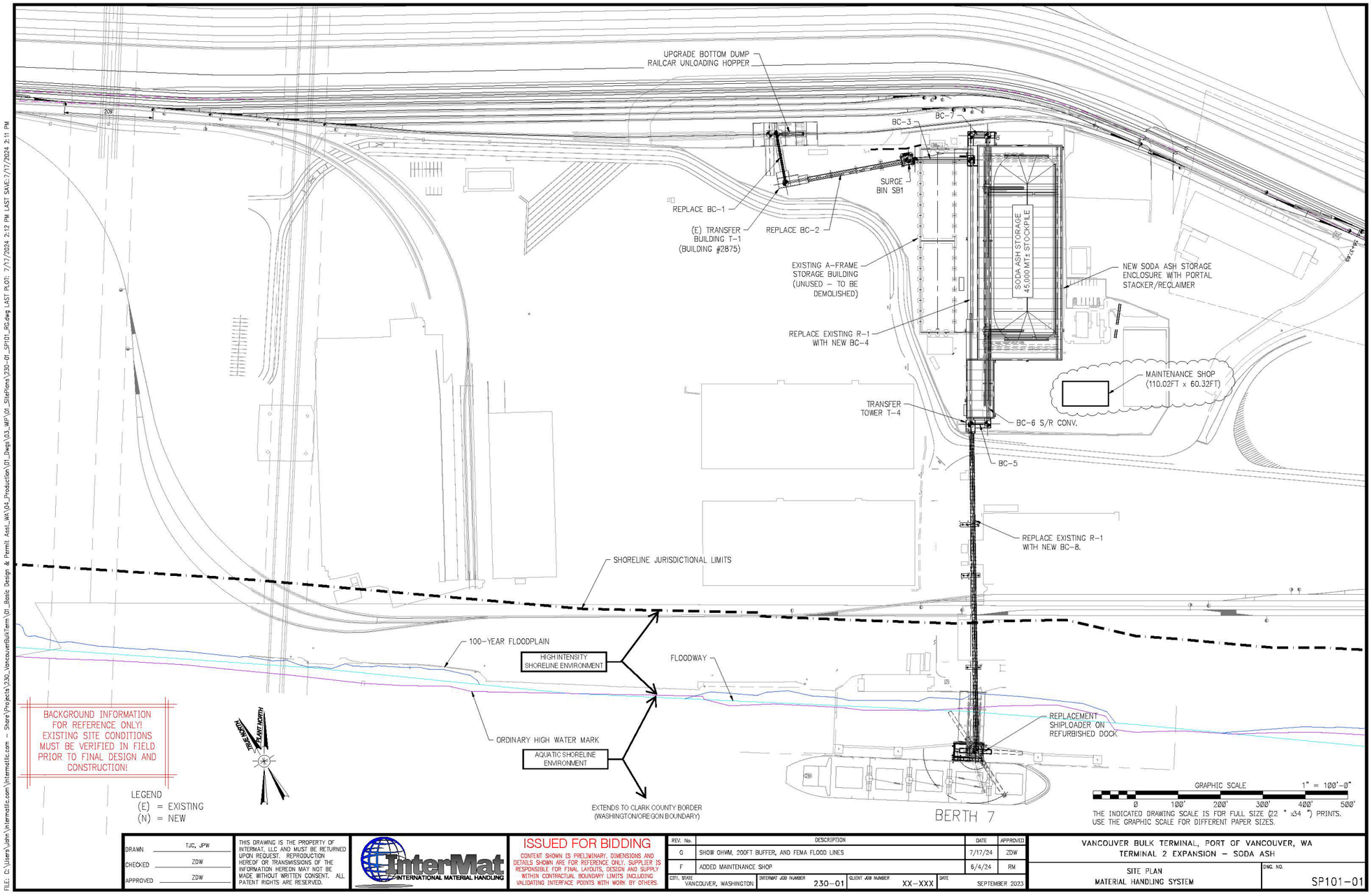
ANCHOR QEA

Figure 2
Existing Conditions
Vancouver Shoreline Master Program Review and Compliance Summary
VBT Soda Ash Export Terminal Project



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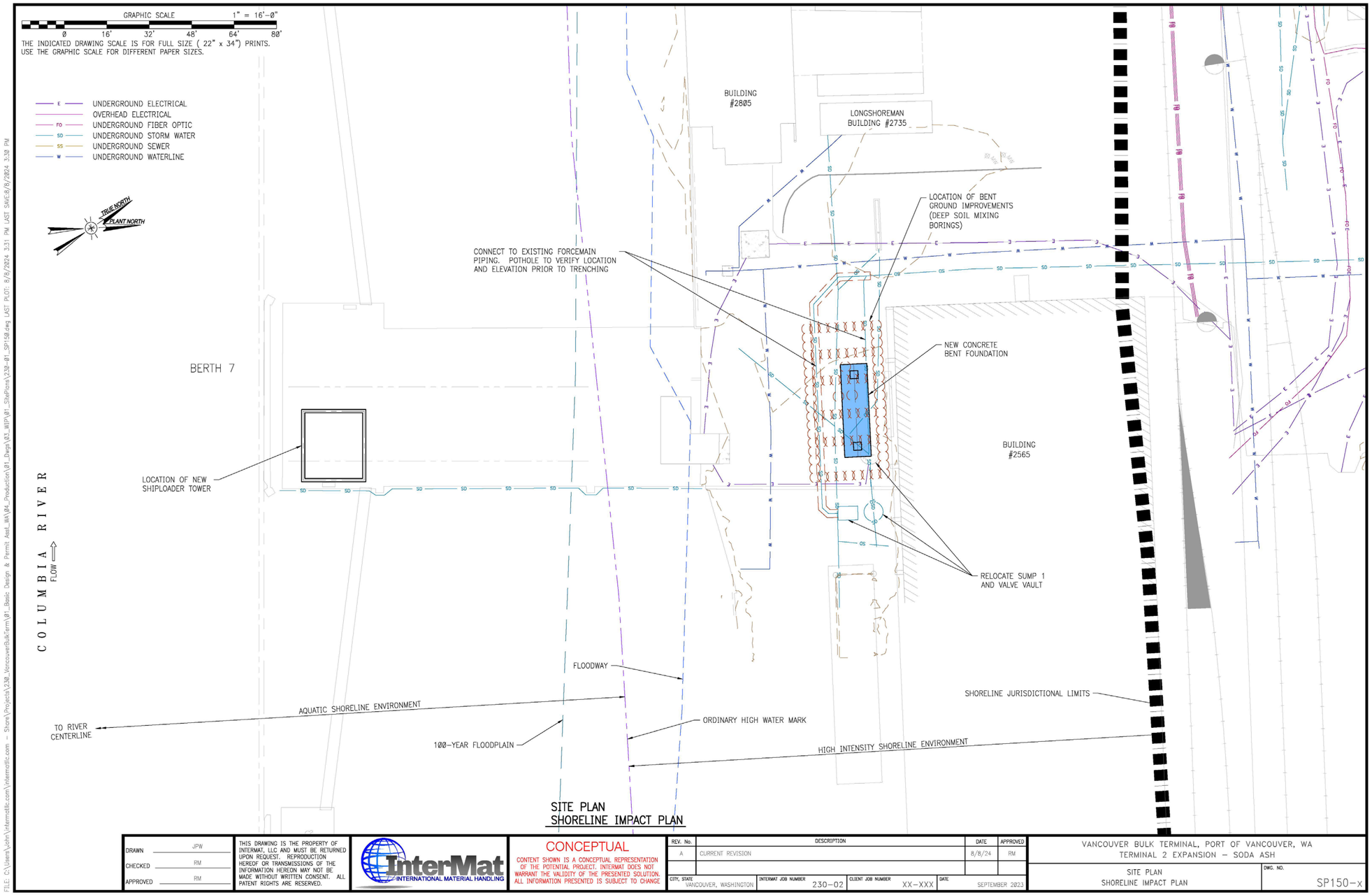

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Figure 4
Proposed Shoreline Impacts
Vancouver Shoreline Master Program Review and Compliance Summary
VBT Soda Ash Export Terminal Project

Attachment 1
Project Parcel Table

Table 1-1
Project Parcel Information Summary for the VBT Project

Tax Parcel No.	Site Address	Legal Description	Quarter Section Map
152174-000	3309 NW Gateway Ave, Vancouver, WA 98660	#9 Henry Van Alman DLC 40.02a	NW 1/4, Section 20, Township 2 North, Range 1 East
152175-000	3555 NW Harborside Dr, Vancouver, WA 98660	#10 Henry Van Alman DLC 9.89a	NW 1/4, Section 20, Township 2 North, Range 1 East NE 1/4, Section 20, Township 2 North, Range 1 East SW 1/4, Section 20, Township 2 North, Range 1 East SE 1/4, Section 20, Township 2 North, Range 1 East
152186-000	3305 NW Harborside Dr, Vancouver, WA 98660	#21 Henry Van Alman DLC 7.77a	NE 1/4, Section 20, Township 2 North, Range 1 East SW 1/4, Section 20, Township 2 North, Range 1 East SE 1/4, Section 20, Township 2 North, Range 1 East
986028-561	3600 NW Lower River Rd, Vancouver, WA 98660	#28 Henry Van Alman DLC 8.69a	NE 1/4, Section 20, Township 2 North, Range 1 East SE 1/4, Section 20, Township 2 North, Range 1 East
152189-000	No Site Address	#24 Henry Van Alman DLC 2.81a	NE 1/4, Section 20, Township 2 North, Range 1 East SE 1/4, Section 20, Township 2 North, Range 1 East
151977-000	2735 NW Harborside Dr, Vancouver, WA 98660	#39 Charles Proulx DLC 4.89a	SE 1/4, Section 20, Township 2 North, Range 1 East
151981-000	No Site Address	#43 Charles Proulx DLC 18.93a	SE 1/4, Section 20, Township 2 North, Range 1 East SW 1/4, Section 21, Township 2 North, Range 1 East NW 1/4, Section 28, Township 1 North, Range 1 East NE 1/4, Section 28, Township 1 North, Range 1 East
59118-030	2695 NW Harborside Dr, Vancouver, WA 98660	#30 Charles Proulx DLC 10.27a	SE 1/4, Section 20, Township 2 North, Range 1 East SW 1/4, Section 21, Township 2 North, Range 1 East
151978-000	2705 NW Harborside Dr, Vancouver, WA 98660	#40 Charles Proulx DLC 1.59a	SE 1/4, Section 20, Township 2 North, Range 1 East
59117-884	3015 NW Harborside Dr, Vancouver, WA 98660	#4 Henry Van Alman DLC 45.68a	SE 1/4, Section 20, Township 2 North, Range 1 East
151979-000	2645 NW Harborside Dr, Vancouver, WA 98660	#41 Charles Proulx DLC 3.77a	SE 1/4, Section 20, Township 2 North, Range 1 East SW 1/4, Section 21, Township 2 North, Range 1 East
502010-002	No Site Address	Tidelands Tax Lot 502010-002 2.81a	SE 1/4, Section 20, Township 2 North, Range 1 East
502010-001	No Site Address	Tidelands Tax Lot 502010-001 1.46a	SE 1/4, Section 20, Township 2 North, Range 1 East
502010-000	2799 NW Harborside Dr, Vancouver, WA 98660	Tidelands Tax Lot No 502010 1.20a	SE 1/4, Section 20, Township 2 North, Range 1 East

Note:
DLC: Donation Land Claim

Attachment 2
Analysis of Compliance with City of Vancouver SMP Regulations

Table 2-1
Aquatic Shoreline Designation (SMP Chapter 4)

Code Reference	Project Compliance
***4*.3.1.4 – Management Policies in the Aquatic Shoreline Designation**	
1. New over-water structures should be allowed only for water-dependent uses, public access, recreation, or ecological restoration.	The VBT Project is requesting an SSDP for proposed water-dependent overwater uses and activities within the Aquatic shoreline designations. The VBT Project is a marine bulk export terminal that exports dry bulk commodities via marine oceangoing vessels. As such, it is considered a water-dependent use.
2. Shoreline uses and modifications should be designed and managed to prevent degradation of water quality and natural hydrographic conditions.	The VBT Project has been designed and will be managed to prevent degradation of water quality and natural hydrographic conditions. Under VBT's preferred option, stormwater that falls in the leasehold area[1] will be collected and conveyed to the on-site wastewater treatment facility for treatment prior to discharge to the City's POTW. Those discharges will be subject to the requirements of the facility's existing IWDP, which will be modified to address the potential changes in flows and water quality associated with the new facility. As an alternative plan, stormwater would be discharged to a new force main that flows to an existing Port-owned outfall on the Columbia River. Under that option, a new ISGP will be obtained under Ecology's NPDES program, and a revised treatment approach would be implemented to address discharging to the river.
3. In-water uses should be allowed where impacts can be mitigated to ensure no net loss of shoreline ecological functions. Permitted in-water uses must be managed to avoid impacts to shoreline ecological functions. Unavoidable impacts must be minimized and mitigated.	The VBT Project design avoids the need for in-water work and minimizes the amount of overwater work required for project construction. As such, associated impacts on water quality and hydrographic conditions are not expected to occur. Project impacts on ecological functions will be limited to above-water installation of the pre-assembled pedestal shiploader on the Berth 7 dock and the new BC-8 conveyor that will connect with that shiploader. Overall, such impacts are expected to be minimal. The VBT Project will occur along a section of shoreline that is developed for industrial uses at an existing bulk export facility. No adverse impacts on shoreline ecological functions are expected as a result of construction or operation of the proposed facility. Should mitigation be required, the applicant will develop a mitigation plan to compensate for impacts in coordination with USACE and other agencies through the permit consultation process to ensure that no net loss of functions is achieved.

Code Reference	Project Compliance
4. On navigable waters or their beds, all uses and developments should be located and designed to: a. Minimize interference with surface navigation; b. Consider impacts to public views; and c. Allow for the safe, unobstructed passage of fish and wildlife, particularly species dependent on migration	The VBT Project will occur adjacent to the Columbia River, a navigable water of the United States. All uses and developments associated with the VBT Project are located and designed to minimize interference with surface navigation; have little to no impact to public views; and allow for safe, unobstructed passage of fish and wildlife, including those species dependent on migration.
5. Multiple or shared use of over-water and water access facilities should be encouraged to reduce the impacts of shoreline development and increase effective use of water resources.	The VBT Project uses and activities are highly specific to the safe and efficient storage, handling, and shipment of soda ash. Because of this, no multiple or shared use of overwater and water access facilities is proposed at this time. However, the infrastructure proposed for installation on the project site has the potential to be used for other commodities in the future.
6. Structures and activities permitted should be related in size, form, design, and intensity of use to those permitted in the immediately adjacent upland area. The size of new over-water structures should be limited to the minimum necessary to support the structure's intended use.	The proposed VBT Project structures and activities are similar in size, design, and intensity when compared to other permitted water-dependent uses in adjacent upland areas. The new overwater shiploader is taller than the existing shiploader but has been designed to the minimum parameters necessary to safely and efficiently load oceangoing marine vessels with soda ash. The proposed new structures are similar in height and appearance to other infrastructure at the Port's other facilities and at other Columbia River ports.
7. Natural light should be allowed to penetrate to the extent necessary to discourage salmonid predation and to support nearshore habitat unless other illumination is required by state or federal agencies.	The proposed pedestal shiploader for the VBT Project is largely constructed of a lattice of structural steel. Because of this, it will allow natural light to penetrate to the extent necessary to discourage salmonid predation and to support nearshore habitat. The proposed shiploader is much taller than the existing shiploader. That height, in combination with the relatively open steel lattice support structure, is expected to cast limited shadows onto the water and nearshore habitats in the vicinity.
8. Aquaculture practices should be encouraged in those waters and beds most suitable for such use. Aquaculture should be discouraged where it would adversely affect the strength or viability of native stocks or unreasonably interfere with navigation.	The VBT Project area is defined by existing industrial uses and is not suitable for aquaculture practices. No legally established aquaculture enterprises are located near the project area.
9. When shoreline uses, development, activities, and modifications in the Aquatic shoreline designation require use of adjacent landward property, that landward property should be in a shoreline designation that allows that use, development, activity or modification.	The VBT Project proposes shoreline uses, development, and modifications in the adjacent landward "HI" shoreline designation. Those proposed uses, developments, and modifications are allowed used in the "HI" shoreline designation.

Code Reference	Project Compliance
10. Over-water structures constructed prior to the adoption of this Program and located from the Interstate 5 Bridge downstream to the railroad bridge (a portion of the Columbia River Shoreline Enhancement Plan District) may be used for water-dependent, water related and/or water enjoyment commercial uses. a. Permitted development should include designs that are reflective of the local history and/or prior structures on the site. b. Shoreline uses and modifications should be consistent with the policies set forth in the VCCV Subarea Plan, including providing public access to the shoreline.	Not applicable. The overwater structure to be replaced is located downstream of the railroad bridge.[2]

Notes:

1. Excluding a small area in the northwestern portion of the leasehold that currently drains to the Port's Terminal 4 stormwater pond.
2. Columbia River Railroad Bridge

A: Aquatic shoreline designation
City: City of Vancouver, Washington
Ecology: Washington State Department of Ecology
HI: High Intensity shoreline designation
ISGP: Industrial Stormwater General Permit
IWDP: Industrial Wastwater Discharge Permit
NPDES: National Pollution Discharge Elimination System
Port: Port of Vancouver USA
POTW: publicly owned treatment works
SMP: Shoreline Master Program
SSDP: Shoreline Substantial Development Permit
USACE: U.S. Army Corps of Engineers
VBT: Vancouver Bulk Terminal, LLC (applicant)
VBT Project: VBT's proposed Soda Ash Export Terminal Project

Reference:
City of Vancouver, 2021. City of Vancouver Shoreline Master Program. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.

Table 2-2
High Intensity Shoreline Designation (SMP Chapter 4)

Code Reference	Project Compliance
***4*.3.5.4 – Management Policies in the High Intensity Shoreline Designation**	
1. Encourage regulations that ensure no net loss of shoreline ecological functions as a result of new development.	The VBT Project is requesting an SSDP for proposed water-dependent industrial uses and activities within the High Intensity shoreline designation. The VBT Project is consistent with regulations that ensure no net loss of shoreline ecological functions as a result of new development.
2. Promote infill and redevelopment in developed shoreline areas and encourage environmental remediation and restoration of the shoreline, where applicable with the goal of achieving full utilization of designated high-intensity shorelines.	The VBT Project has been designed to redevelop a previously developed shoreline area at the Port's Terminal 2, Berth 7, with the goal of achieving full utilization of designated High Intensity shorelines.
3. Encourage the transition of uses from non-water-oriented to water-oriented uses.	Previous use and proposed use are water-oriented, so there will be no change in use type under the VBT Project.
4. Water-oriented uses are encouraged; however new non-water oriented uses may be allowed if that use has limited access to the shoreline or when included in a master plan or part of a mixed-use development.	The VBT Project proposes water-oriented uses; no non-water-oriented uses are included as part of the project.

Notes:
HI: High Intensity shoreline designation
Port: Port of Vancouver USA
SMP: Shoreline Master Program
SSDP: Shoreline Substantial Development Permit
VBT Project: VBT's proposed Soda Ash Export Terminal Project

Reference:
City of Vancouver, 2021. City of Vancouver Shoreline Master Program. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.

Table 2-3
General Shoreline Use and Development Regulations (SMP Chapter 5)

Code Reference	Project Compliance
SMP Chapter 5.1 – General Shoreline Use and Development Regulations	
SMP Chapter 5.1.1 – Shoreline Use	
1. Water-dependent uses shall be given priority.	The VBT Project is a marine bulk export facility, a water-dependent use that qualifies as a priority use.
2. Non-water-oriented uses shall not adversely impact or displace water-oriented shoreline uses.	Not applicable. The VBT Project proposes no non-water-oriented uses. No adverse impacts on or displacement of water-oriented shoreline uses will occur as a result of the VBT Project.
3. Single family residential uses shall be allowed on all shorelands not subject to a preference for commercial or industrial water-dependent uses, and shall be located, designed and used in accordance with applicable policies and regulations of this Program. However, single family residences are prohibited in the Natural shoreline designation, and new floating homes and floating on-water residences are prohibited in the "A" shoreline designation.	Not applicable. There are no single-family residential uses proposed under the VBT Project.
4. Shoreline uses and developments shall not cause impacts that require remedial action or loss of shoreline ecological functions on other properties.	Impact from the VBT Project on ecological functions will be limited to above-water installation of the pre-assembled pedestal shiploader and new BC-8 conveyor at the Port's Berth 7 dock. Upland impacts will be minimal due to the installation of project components within existing developed areas that are currently used for the same purposes (bulk marine export). A list of BMPs to be implemented during construction to avoid or minimize potential impacts on the shoreline environment are provided in the Project Description (InterMat 2024).
5. Shoreline uses and developments shall be located and designed in a manner such that shoreline stabilization is not necessary at the time of development and will not be necessary in the future for the subject property or other nearby shoreline properties unless it can be demonstrated that stabilization is the only alternative that allows a reasonable and appropriate water-dependent use to become established or expand or protects public safety and existing primary structures.	The VBT Project does not require or include shoreline stabilization measures at the time of the development, and shoreline stabilization is not expected to be made necessary by the VBT Project in the future.

Code Reference	Project Compliance
6. Land shall not be cleared, graded, filled, excavated or otherwise altered prior to issuance of the necessary permits and approvals including a statement of exemption for a proposed shoreline use or development to determine if environmental impacts have been avoided, minimized and mitigated to result in no net loss of ecological functions.	The VBT Project proposes no work prior to the issuance of the necessary permits and approvals including those required under the City's SMP (City of Vancouver 2021).
7. On navigable waters or their beds, all uses and developments should be located and designed to: a. Minimize interference with surface navigation; b. Consider impacts to public views; and c. Allow for the safe, unobstructed passage of fish and wildlife, particularly species dependent on migration.	The VBT Project will occur adjacent to the Columbia River, a navigable water of the United States. All uses and developments associated with the VBT Project are located and designed to minimize interference with surface navigation, have little to no impact to public views, and allow for safe, unobstructed passage of fish and wildlife, including those species dependent on migration.
8. Hazardous materials shall be disposed of and other steps be taken to protect the ecological integrity of the shoreline area in accordance with the other policies and regulations of this Program as amended and all other applicable federal, state, and local statutes, codes, and ordinances.	Measures to protect the ecological integrity of the shoreline area will be implemented throughout construction and operation of the VBT Project in accordance with the other policies and regulations of this program as amended and all other applicable federal, state, and local statutes, codes, and ordinances. The contractor will be responsible for the preparation and implementation of an SPCC plan to be used for the duration of the project. The contractor will also maintain the applicable equipment and materials designated in the SPCC plan at the job site. Excess or waste materials, petroleum products, concrete, chemicals, or other toxic or deleterious materials will not be allowed to enter surface waters. The contractor will regularly check fuel hoses, oil drums, oil or fuel transfer valves, and fittings for leaks and maintain and store materials properly to prevent spills. VBT has prepared a CMMP to address the potential discovery of soils and groundwaters contaminated by past activities on the site and will coordinate with the Port on implementation of that plan.
9. Previous approvals of master plans for projects in shoreline jurisdiction should be accepted. New phases of projects for which no master plan has yet been approved, or for which major changes are being proposed, or new projects for which master plans are being submitted shall be subject to the policies and regulations of this Program.	The VBT Project has not been previously approved as part of a master plan and is not a new phase of a project not yet approved or for which major changes are being proposed. The VBT Project is new, and site development plans are being submitted and will be subject to the policies and regulations of this program.

Code Reference	Project Compliance
SMP Chapter 5.1.2 – Adverse Impacts and Mitigation	
1. The applicant shall demonstrate all reasonable efforts have been taken to avoid and where unavoidable, minimize and mitigate impacts such that no net loss of critical area and shoreline ecological function is achieved. Mitigation shall occur in the following order of priority: a. Avoiding the impact altogether by not taking a certain action or parts of an action. This may necessitate a redesign of the proposal; b. Minimizing unavoidable impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts. The applicant shall seek to minimize fragmentation of the resource to the greatest extent possible; c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment. d. Reducing or eliminating the impact over time by preservation and maintenance operations; e. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments. The compensatory mitigation shall be designed to achieve the functions as soon as practicable; and f. Monitoring the impact and the compensation projects and taking appropriate corrective measures.	The VBT Project has been designed to follow mitigation sequencing requirements. Upland work will occur within previously disturbed areas. The project design avoids the need for in-water work, and it minimizes the amount of overwater work required, as well as potential water quality impacts associated with such work. The VBT Project proposes no adverse impacts on critical area and shoreline ecological functions. Should mitigation be required, VBT would develop a mitigation plan to compensate for impacts in coordination with USACE and other agencies through the permit consultation process to ensure that no net loss of functions is achieved.
2. In addition to compensatory mitigation, unavoidable adverse impacts may be addressed through voluntary restoration efforts.	The VBT Project proposes no adverse impacts on critical area and shoreline ecological functions. Should unavoidable adverse impacts be identified, VBT may develop voluntary compensatory restoration to address those impacts.
3. In-water work shall be scheduled to protect biological productivity (including but not limited to fish runs, spawning, and benthic productivity). In-water work shall not occur in areas used for commercial fishing during a fishing season unless specifically addressed and mitigated for in the permit.	The VBT Project has been designed to avoid in-water work and minimize the amount of overwater work required. Overwater work will be scheduled to protect biological productivity (including but not limited to fish runs, spawning, and benthic productivity) and will occur during the approved regulatory work window.
4. The effect of proposed in-stream structures on bank margin habitat, channel migration, and floodplain processes should be evaluated during permit review.	The shiploader and conveyor are located within the FEMA floodway. The applicant will demonstrate how the shiploader and dock are floodproofed to withstand a flood event per the City's Community Development Department and building code (VMC Title 17 and Title 20).

Code Reference	Project Compliance
5. On land within urban growth areas as defined in RCW 36.70A.030 that is brought under shoreline jurisdiction due to a shoreline restoration project creating a landward shift in the ordinary high water mark (RCW 90.58.580(3)), relief may be granted when: a. A shoreline restoration project causes or would cause a landward shift in the OHWM creating a hardship meeting specific criteria in RCW 90.58.580. b. The proposed relief meets specific criteria in RCW 90.58.580. c. The application for relief is submitted to Ecology in writing requesting approval or disapproval as part of a normal review of a shoreline substantial development permit, conditional use permit, or variance. If the proposal is not connected to a shoreline permit review, the City may provide a copy of a complete application to Ecology along with the applicant's request for relief. A substantial development permit is not required on land within urban growth areas as defined in RCW 36.70A.030 that is brought under shoreline jurisdiction due to a shoreline restoration project creating a landward shift in the ordinary high water mark (RCW 90.58.580(3)).	Not applicable. The VBT Project proposes no use or activities that may change to the location in the OHWM.
6. Developments permitted in the Aquatic Shoreline Designation along the Columbia River shall be sited waterward of -15 feet CRD unless adverse impacts to shallow water habitat are addressed through mitigation to ensure no net loss. Mitigation can include enhancement, creation and/or payment of mitigation bank credits.	Not applicable. The VBT Project proposes no in-water work within the Aquatic shoreline designation along the Columbia River.
SMP Chapter 5.2 – Archaeological, Cultural and Historic Resources	
1. All shoreline uses and development shall comply with the applicable requirements of VMC 20.710, Archaeological Resource Protection.	The VBT Project uses and activities comply with VMC 20.710.
2. When a shoreline use or development is in an area known or likely to contain archaeological artifacts and data, the applicant shall provide for a site inspection and evaluation by a professional archaeologist prior to issuance of any shoreline permit or approval including a statement of exemption. Work may not begin until the inspection and evaluation have been completed and the City has issued its permit or approval.	Because the VBT Project is located within an area of high probability for discovery of archaeological resources, an archaeological predetermination was prepared by a professional archaeologist licensed in the state of Washington per RCW 261 27.53.030(8). That predetermination report has been provided to the City as part of the LUP application package. The report will also be sent to DAHP. Project work will not begin until the inspection and evaluation have been completed and the City has issued its permit or approval.

Code Reference	Project Compliance
3. If any item of possible archaeological interest (including human skeletal remains) is discovered on site, all work shall immediately stop, and the City, State Department of Archaeology and Historic Preservation (DAHP) and affected City of Vancouver Shoreline Master Program 5-4 Effective June 2021. Native American Tribes shall be notified of the discovery. A stop-work order will be issued. The shoreline permit will be temporarily suspended. All applicable state and federal permits shall be secured prior to commencement of the activities they regulate and as a condition for resumption of development activities. Development activities may resume only upon receipt of City approval.	This requirement is acknowledged by VBT. If any cultural or historical resources are discovered during construction activity, construction will cease until a qualified archaeologist assesses the find. VBT will contact all applicable authorities as required by the applicable section(s) of the SMP.
4. If the discovery includes human skeletal remains, the find must be secured and protected from further disturbance; the Clark County Medical Examiner and local law enforcement shall be notified in the most expeditious manner possible. The County Medical Examiner will assume jurisdiction over the site and the human skeletal remains and will make a determination of whether they are crime related. If they are not, DAHP will take jurisdiction over the remains and report them to the appropriate parties. The State Physical Anthropologist will make a determination of whether the remains are Native American and report that finding to the affected parties. DAHP will handle all consultation with the affected parties	This requirement is acknowledged by VBT. Any human skeletal remains found during construction of the VBT Project will be secured and protected from further disturbance. The Clark County Medical Examiner and local law enforcement will be notified in the most expeditious manner possible. The Clark County Medical Examiner will assume jurisdiction over the site and the human skeletal remains, and these parties will determine whether or not the remains are crime-related. If they are found not to be crime-related, VBT understands that DAHP will take jurisdiction over the remains.
SMP Chapter 5.3 – Critical Areas Protection	
1. Applicable Critical Areas Regulations Critical areas and the buffers necessary to protect critical areas shall be regulated in accordance with the provisions of Chapter 5A of this SMP. Terms stated in Chapter 5A can be clarified by definitions provided in both the VMC or SMP.	This requirement is acknowledged by VBT. Based on the April 18, 2024, Pre-Application Conference Report issued by the City (City of Vancouver 2024), there are no critical areas present on the VBT Project site.

Code Reference	Project Compliance
2. Review Process The City will not issue a "Critical Areas Permit" within shoreline jurisdiction as is done outside shoreline jurisdiction under VMC Chapter 20.740. Instead, the City shall consolidate and integrate the review and processing of the critical area aspects of the proposal within the shoreline permit decision or review required for the proposed activity as applicable or required by this SMP. Any decision criteria and submittal requirements within Chapter 5A shall be considered supplemental to the shoreline permit or review required for the proposed activity. In cases where required by Chapter 5A, the applicant shall submit a critical areas report prepared by a qualified professional.	Noted. In addition to the purpose set forth in Chapter 1, the regulations set forth in Chapter 5A designate and protect ecologically sensitive and hazardous areas (critical areas) and their functions and values. Chapter 5A provides protection for wetlands, fish and wildlife habitat conservation areas and geologically hazardous areas. VMC Chapter 20.740.120 Frequently Flooded Areas regulations apply within shoreline jurisdiction but are not incorporated into this SMP. The Project area is defined by existing pavement and industrial uses; no wetlands, wetland buffers, fish and wildlife buffers or shoreline vegetation are present, so none of those areas would be disturbed by the project. The shiploader and conveyor are located within the FEMA floodway. The applicant will demonstrate how the shiploader and dock are floodproofed to withstand a flood event per the City's Community Development Department and building code (VMC Title 17 and Title 20).
3. Critical Areas Exemptions Critical Areas exemptions do not apply. Exemptions are limited to those listed in Section 2.3.2 and must comply with the standards of the SMP, including Chapter 5A.	Not applicable. All uses and developments associated with the VBT Project are considered substantial developments pursuant to RCW 90.58.030(3)(e), WAC 173-27-040, and Section 2.3 of this Program and will require an SSDP.
4. Conflicting Provisions Unless otherwise stated, no development shall be constructed, located, extended, modified, converted, or altered, or land divided without full compliance with Chapter 5A and this Shoreline Master Program. Chapter 5A shall be liberally construed together with all other chapters of the Shoreline Master Program to give full effect to the objectives and purposes of the provisions of the Shoreline Master Program and the Shoreline Management Act. If there is a conflict or inconsistency between any of the adopted provisions in Chapter 5A and the Shoreline Master Program, the most restrictive provisions shall prevail.	Noted. All proposed uses and activities associated with the VBT Project comply with Chapter 5A, the Vancouver SMP, and the Washington State SMA.
5. Appeals All appeals shall be processed per Chapter 7 of the SMP.	Noted.

Code Reference	Project Compliance
SMP Chapter 5.4 – Public Access	
1. Provisions for adequate public access shall be incorporated into all shoreline development proposals that involve public funding unless the applicant demonstrates public access is not feasible due to one or more of the provisions of Section 5.4.2 (a-e). Where feasible, such projects shall incorporate ecological restoration.	Not applicable. The VBT Project does not involve public funding.
2. Consistent with constitutional limitations, provisions for adequate public access shall be incorporated into all land divisions and other shoreline development proposals (except residential development of less than five (5) parcels), unless this requirement is clearly inappropriate to the total proposal. Public access will not be required where the applicant demonstrates one or more of the following: a. Unavoidable health or safety hazards to the public exist that cannot be prevented by any practical means; b. Inherent security requirements of the use cannot be satisfied through the application of alternative design features or other solutions; c. The cost of providing the access, easement, alternative amenity, or mitigating the impacts of public access are unreasonably disproportionate to the total proposed development; d. Significant environmental impacts that cannot be mitigated will result from the public access; or e. Significant undue and unavoidable conflict between public access requirements and the proposed use and/or adjacent uses would occur, provided that the applicant has first demonstrated, and the City determines that all reasonable alternatives have been evaluated and found infeasible, including but not limited to: i. Regulating access by such means as maintaining a gate and/or limiting hours of use; ii. Designing separation of uses and activities (including but not limited to, fences, terracing, use of one-way glazing, hedges, landscaping); and iii. Provisions for access at a site geographically separated from the proposal such as a street end, vista or trail system.	Not applicable. Public access is clearly inappropriate and will not be required because the VBT Project clearly meets the two following criteria: 1. The use and activities of the VBT Project as a marine industrial shipping facility present unavoidable health and safety hazards that cannot be prevented by any practical means. 2. The use and activities of the VBT Project as a marine industrial shipping facility require inherent security measures to protect the use that cannot be satisfied through the application of alternative design features or other solutions.

Code Reference	Project Compliance
3. Public access sites shall be connected to barrier free route of travel and shall include facilities based on criteria within the Americans with Disabilities Act Accessibility guidelines.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
4. Public access shall include provisions for protecting adjacent properties from trespass and other possible adverse impacts to neighboring properties.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
5. Signs indicating the public's right of access to shoreline areas shall be installed and maintained in conspicuous locations.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
6. Required public access shall be fully developed and available for public use at the time of occupancy of the use or activity.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
7. Public access shall consist of a dedication of land or a physical improvement in the form of a walkway, trail, bikeway, corridor, viewpoint, park, deck, observation tower, pier, boat launching ramp, dock or pier area, or other area serving as a means of view and/or physical approach to public waters and may include interpretive centers and displays.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
8. Public access easements and permit conditions shall be recorded on the deed of title and/or on the face of a plat or short plat as a condition running contemporaneous with the authorized land use, as a minimum. Said recording with the County Auditor's Office shall occur at the time of permit approval.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the Project use and activities as a marine industrial shipping facility
9. Future actions by the applicant, successors in interest, or other parties shall not diminish the usefulness or value of the public access provided.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.
10. Maintenance of the public access facility shall be the responsibility of the owner unless otherwise accepted by a public or non-profit agency through a formal agreement approved by the Shoreline Administrator and recorded with the County Auditor's Office.	Not applicable. The VBT Project does not propose public access because it is clearly inappropriate and incompatible with the project use and activities as a marine industrial shipping facility.

Code Reference	Project Compliance
SMP Chapter 5.5 – Restoration	
1. Restoration of shoreline ecological functions and processes shall be encouraged and allowed on all shorelines and shall be located, designed and implemented in accordance with applicable policies and regulations of this Program and consistent with other City programs (see Section 6.4.4). Implementation of restoration projects on shorelines of statewide significance take precedence over implementation of restoration projects on other shorelines of the state.	Noted. The VBT Project proposes no adverse impacts to shoreline ecological functions. Should unavoidable adverse impacts be identified, VBT will develop restoration to address those impacts by locating, designing, and implementing restoration in accordance with applicable policies and regulations of the SMP and consistent with other City programs (see Section 6.4.4).
2. Impacts to shoreline ecological functions shall be fully mitigated. Such mitigation may include elements from the Shoreline Restoration Plan, where appropriate.	Noted. The VBT Project proposes no adverse impacts to shoreline ecological functions. Should unavoidable adverse impacts be identified, VBT will develop mitigation to address those impacts that may include elements from the Shoreline Restoration section of the SMP where appropriate.
3. Elements of the Shoreline Restoration Plan may also be implemented in any shoreline designation to improve shoreline ecological function.	Noted.
4. Implementation of restoration projects identified in the Shoreline Restoration Plan that are focused on restoring degraded habitat in shoreline jurisdiction take precedence over other restoration projects.	Noted.
5. Restoration efforts shall be developed by a qualified professional, shall be based on federal, state, and local guidance and shall consider the following: a. Riparian soil conditions; b. In-stream fish habitats; and c. Healthy aquatic and terrestrial food webs	Noted. The VBT Project proposes no adverse impacts to shoreline ecological functions. Should unavoidable adverse impacts be identified, restoration efforts will be developed by a qualified professional; will be based on federal, state, and local guidance; and will consider riparian soil conditions, in-stream fish habitats, and healthy aquatic and terrestrial food webs.
SMP Chapter 5.6 – Site Planning and Development	
SMP Chapter – 5.6.1 General	
1. Development shall be designed, and land disturbing activities conducted to avoid impacts to healthy trees such that they are likely to become hazard trees.	The VBT Project area is defined by existing pavement and industrial uses; no trees are present. If any upland landscaping within the shoreline environment is impacted, it will be replanted to existing conditions.
2. Impervious surfaces shall be minimized to the extent feasible so as not to jeopardize public safety. Impervious surfacing for parking lot/space areas, trails, and pathways shall be minimized through the use of alternative surfaces where feasible.	The VBT Project will minimize impervious surfaces to the maximum extent feasible because no new impervious surfaces are proposed. The VBT Project area is defined by existing pavement and industrial uses.

Code Reference	Project Compliance
3. When feasible, existing transportation corridors shall be utilized. Ingress/egress points shall be designed to minimize potential conflicts with and impacts upon vehicular and pedestrian traffic. Pedestrians shall be provided with safe and convenient circulation facilities.	The VBT Project will use the streets or sidewalks already in place at Terminal 2. It is anticipated that employees at the VBT Project will use the existing main entrance to the Port at the intersection of NW Lower River Road and NW 26th Avenue (public road). No changes to the existing access are proposed.
4. Vehicle and pedestrian circulation systems shall be designed to minimize clearing, grading, alteration of topography and natural features, and designed to accommodate wildlife movement.	The VBT Project will use the streets or sidewalks already in place at Terminal 2. It is anticipated that employees at the VBT Project will use the existing main entrance to the Port at the intersection of NW Lower River Road and NW 26th Avenue (public road). No changes to the existing access are proposed.
5. Parking, storage, and non-water dependent accessory and appurtenant structures and areas shall be located landward from the OHWM and landward of the water-oriented portions of the principal use.	Not applicable. The VBT Project proposes no new parking, storage, and non-water-dependent accessory and appurtenant structures and areas in the area of shoreline jurisdiction.
6. Trails and uses near the shoreline shall be landscaped or screened to provide visual and noise buffering between adjacent dissimilar uses or scenic areas, without blocking visual access to the water.	Not applicable. The VBT Project proposes no new trails and uses in the area of shoreline jurisdiction..
7. Elevated walkways shall be utilized, as appropriate, to cross sensitive areas such as wetlands.	Not applicable. No wetlands are located within the project area for the VBT Project.
8. Fencing, walls, hedges, and similar features shall be designed in a manner that does not significantly interfere with wildlife movement.	Not applicable. The VBT Project proposes no new fencing, walls, hedges, or similar features in the area of shoreline jurisdiction.
9. Exterior lighting shall be designed, shielded and operated to: a. Avoid illuminating nearby properties or public areas; b. Prevent glare on adjacent properties, public areas or roadways; c. Prevent land and water traffic hazards; and d. Reduce night sky effects to avoid impacts to fish and wildlife.	The VBT Project area is within an existing industrial area that has substantial existing lighting to support ongoing water-dependent industrial uses at Terminal 2. Construction activities are anticipated to be performed during the day. Depending upon the final schedule of specific construction activities, temporary work lighting may be used to provide a safe work environment during low light conditions. Temporary work lighting, if necessary, is anticipated to be localized and short term. Light levels for the site will be designed to meet OSHA requirements. Lighting will be shielded and directed toward work areas, and no off-site glare impacts are expected to result from its use. Lighting on the VBT Project area will be designed to ensure compliance with local regulations, which prohibit off-site glare impacts from direct or reflected light sources.

Code Reference	Project Compliance
10. Utilities shall be located within roadway and driveway corridors and rights-of-way wherever feasible.	The VBT Project proposes no water utility improvements or modifications to existing City water utility assets. The project proposes the following new water utility uses: • The Port owns, maintains, and operates its water system in parallel with the nearby City potable water service. Potable water is available from the existing Port or City water lines at Terminal 2. Water will be conveyed to the new eyewash station(s) from new buried water lines that tie into existing water lines as part of project construction. These connections will occur within the paved area and will not impact any undisturbed or vegetated areas. • It is expected that the proposed facility will use the fire hydrants currently in place at Terminal 2, which are supplied by the Port's existing water system, plus the addition of one or two additional hydrants. If it is determined that the existing hydrants will be impacted by project construction or more hydrants will be required, additional hydrants will be provided as required by code. Any additional hydrants will also be supplied by the existing Port water system. • The Project proposes no sewer utility improvements or modifications to existing City sewer utility assets. No public sewer facilities exist on site. There is an existing Port-owned private sewer facility system on site, which includes a wastewater treatment facility. The private sewer facility system ultimately discharges to a public sewer off site. All project improvements to the Port-owned private facility system will occur within the paved area and will not impact any undisturbed or vegetated areas.
11. A use locating near a legally established aquaculture enterprise, including an authorized experimental project, shall demonstrate that such use would not result in damage to or destruction of the aquaculture enterprise, or compromise its monitoring or data collection.	Not applicable. No legally established aquaculture enterprises are located near the VBT Project area.

Code Reference	Project Compliance
SMP Chapter – 5.6.2 Clearing, Grading, Fill and Excavation	
1. Land disturbing activities such as clearing, grading, fill and excavation shall be conducted in such a way as to minimize impacts to soils and native vegetation, and shall comply with VMC 14.24, Erosion Prevention & Sediment Control; 14.25, Stormwater Control; and VMC Chapter 17.12, International Building Code.	The entire VBT Project area is developed for industrial uses. The entire site is underlain by fill material and consists of either pavement, buildings and structures, or ballasted railbed on the surface. All clearing, grading, excavation, and fill work will occur in uplands in previously disturbed areas. As such, no native soils or natural vegetation will be affected. The VBT Project will comply with VMC 14.24, Erosion Prevention & Sediment Control; 14.25, 2019 SMMWW (Ecology 2019); and VMC Chapter 17.12, International Building Code. The VBT Project will implement all applicable source control BMPs from the 2019 SMMWW to prevent potentially harmful materials from coming into contact with stormwater. Potentially harmful materials will be managed under the project-specific CMMP, separated from non-harmful materials, and prevented from entering stormwater drainage systems and the Columbia River. A preliminary TESC Plan has been prepared in conformance with VMC 14.24, the City's General Requirements and Details, and the 2019 SMMWW and is included in the LUP Engineering Package (Sheets GC100, GC110, GC111, and GC112). A construction SWPPP will be prepared in accordance with the Construction Stormwater General Permit and the 2019 SMMWW. The SWPPP will be submitted with the civil plans for review. The SWPPP includes measures to protect Port stormwater facilities from sediment and sediment-laden runoff. Stormwater and water quality protection measures will be implemented throughout construction and operation of the VBT Project. The contractor will be responsible for the preparation and implementation of a SPCC plan to be used for the duration of project construction. The contractor will also maintain the applicable equipment and materials designated in the SPCC plan at the job site.
2. Clearing, grading, fill, and excavation activities shall be scheduled to minimize adverse impacts, including but not limited to, damage to water quality and aquatic life.	The VBT Project will schedule clearing, grading, fill, and excavation activities to minimize potential adverse impacts on water quality and aquatic life. Erosion and sediment control measures and BMPs will be implemented at all work areas where those activities will occur.

Code Reference	Project Compliance
3. Clearing and grading shall not result in changes to surface water drainage patterns that adversely impact adjacent properties.	No clearing will occur under the VBT Project because there is no vegetation present in the proposed project area. Grading will be limited to minor surface preparation in the existing rail corridor to prepare work areas for new and relocated rail tracks. The entire VBT Project area is developed. As such, there are no natural surface water drainage patterns remaining on the site. With the exception of a small area in the northwestern corner of the site that drains to the Port's Terminal 4 stormwater pond via existing catch basins and piping, the project site drains to the facility's existing stormwater treatment plant via a series of catch basins, sumps, pump stations, and piping. Such conditions will remain with slight modifications to improve drainage including reconfiguring on-site drainage basins to accommodate new infrastructure; upgrading conveyance piping and pump stations; relocating collection sumps; installing low asphalt berms to both prevent runoff onto adjacent sites; and repaving to repair cracked pavement and remove low spots where stormwater currently ponds. Overall, the VBT Project will not result in any changes to surface water drainage patterns and will not adversely impact adjacent properties.
4. Developments shall comply with the VMC 14.24, Erosion Prevention & Sediment Control during construction and shall ensure preservation of native vegetation for bank stability. Disturbed areas shall be stabilized immediately and revegetated with native vegetation.	The VBT Project will comply with VMC 14.24 during construction. The VBT Project proposes no adverse impacts on native vegetation or bank stability and does not require or include any shoreline stabilization construction measures. No shoreline stabilization measures will be made necessary by the VBT Project in the future.
5. Habitat that cannot be replaced or restored within twenty (20) years shall be preserved. Peat bogs and stands of mature trees are examples of such habitat.	Not applicable. The VBT Project proposes no impacts on any natural habitats. It will only effect existing developed areas.
6. Fills shall be permitted only in conjunction with a permitted use and shall be of the minimum size necessary to support that use. Speculative fills are prohibited. City of Vancouver Shoreline Master Program Effective June 2021 5-9.	Proposed VBT Project backfills will be permitted only in conjunction with allowed uses and will be of the minimum sizes necessary to support that use. The VBT Project proposes no speculative fills.
7. Any fill activity shall comply with the fill provisions of VMC Chapter 17.12. Fill shall consist only of clean materials.	Noted. All backfill activity will comply with the fill provisions of VMC Chapter 17.12. Upland backfill material will consist primarily of material excavated from the same location, clean structural fill, and granular pipe bedding material. Grout will also be used in areas where ground improvement via deep soil mixing is proposed. All areas where backfill material will be placed will be repaved with asphalt.

Code Reference	Project Compliance
8. Soil, gravel or other substrate transported to the site for fill shall be screened and documented that it is uncontaminated. Use of any contaminated materials as fill is prohibited	Noted. All soil, gravel or other substrate transported to the site for backfill will be screened for contaminants and documented that it is clean material. No contaminated materials will be used as backfill.
9. Fills shall be designed and placed to allow surface water penetration into groundwater supplies where such conditions existed prior to filling.	Not applicable. With the exception of the rail corridor portions of the project area, all proposed work areas are occupied by impervious surfaces and will be replaced by impervious surfaces. Neither existing nor proposed impervious surfaces do/will not allow water penetration into underlying groundwater.
10. Fills must protect shoreline ecological functions, including channel migration processes.	Not applicable. Existing impervious surfaces do not support any ecological functions including channel migration.
11. Fill waterward of OHWM shall only be allowed as a conditional use, and then only when it is necessary: a. To support a water-dependent or public access use; b. For habitat creation or restoration projects; c. For remediation of contaminated sediments as part of an interagency environmental clean-up plan; d. For disposal of dredged material considered suitable under, and conducted in accordance with the dredged material management program of the Washington Department of Natural Resources: e. For expansion or alteration of transportation facilities of statewide significance currently located on the shoreline and then only upon a demonstration that alternatives to fill are not feasible: f. For a mitigation action: g. For environmental restoration: or h. For a beach nourishment or enhancement project.	Not applicable. The VBT Project proposes no fill waterward of the OHWM.
12. In the Columbia River, fills shall be prohibited between the OHWM and minus fifteen (-15) feet CRD, unless adverse impacts to shallow water habitat are addressed through mitigation to ensure no net loss. Mitigation can include enhancement, creation and/or payment of mitigation bank credits.	Not applicable. The VBT Project proposes no fill waterward of the OHWM.
13. Excavation below the OHWM is considered dredging and subject to provisions under that section in Chapter 6.	Not applicable. The Project proposes no excavation below the OHWM.

Code Reference	Project Compliance
14. Upon completion of construction, remaining cleared areas shall be replanted with native species on the City's Native Plant List available from the Shoreline Administrator. Replanted areas shall be maintained such that within three (3) years' time the vegetation is fully re-established.	Not applicable. The project area for the VBT Project is defined by existing pavement and industrial uses, which will be replaced with similar conditions and uses under the project. No vegetation, native or otherwise, is present within any of the proposed work areas.
SMP Chapter5.6.3 – Building Design	
1. Non-single family structures shall incorporate architectural features that provide compatibility with adjacent properties, enhance views of the landscape from the water, and reduce scale to the extent possible.	Not applicable. The VBT Project is a marine industrial development. No residential uses occur on or adjacent to the project area.
2. Building surfaces on or adjacent to the water shall employ materials that minimize reflected light.	No appreciable changes will be made to the existing site lighting. Exterior building lights used for vehicle and worker traffic, rail unloading facility lighting, and shiploader lighting will be in use when ship loading operations extend into nighttime hours. The VBT Project will incorporate lighting design and associated directional lighting to minimize glare and light spillage to the extent practicable. Lighting will be used from dusk until dawn, consistent with existing lighting in the area.
3. Façade treatments, mechanical equipment and windows in structures taller than two (2) stories, shall be designed and arranged to prevent bird collisions using the best available technology. Single-family residential structures are exempt from this provision.	Both the new shiploader and conveyor BC-8 will exceed the height of a typical two-story structure. Both structures are relatively narrow in profile and will be constructed of a structural steel framework. Neither structure will include highly reflective surfaces (e.g., windows) that could cause bird collisions.
4. Interior and exterior structure lighting shall be designed, shielded, and operated to: a. Avoid illuminating nearby properties or public areas; b. Prevent glare on adjacent properties, public areas or roadways; c. Prevent land and water traffic hazards; and d. Reduce night sky effects to avoid impacts to fish and wildlife.	The VBT Project area is within an industrial area that has substantial existing lighting to support ongoing water-dependent industrial uses. No appreciable changes will be made to the existing site lighting. Exterior building lights used for vehicle and worker traffic, rail unloading facility lighting, and shiploader lighting will be in use when ship loading operations extend into nighttime hours. The VBT Project will incorporate lighting design and associated directional lighting to minimize glare and light spillage to the extent practicable. Lighting will be used from dusk until dawn, consistent with existing lighting in the area.
5. Accessory uses, including parking, shall be located as far landward as possible while still serving their intended purposes.	Not applicable. The VBT Project proposes no new parking or other accessory uses in areas of shoreline jurisdiction.

Code Reference	Project Compliance
SMP Chapter 5.7 – Vegetation Conservation	
1. Existing native vegetation within shoreline jurisdiction shall be retained and allowed to grow naturally in the riparian area.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. Although there is riparian vegetation along the Columbia River shoreline below OHWM, it will not be disturbed by the proposed work.
2. Removal of native vegetation outside the riparian area shall be avoided. Where removal of native vegetation cannot be avoided, it shall be minimized and mitigated to result in no net loss of shoreline ecological functions. Lost functions may be replaced by enhancing other functions provided that no net loss in overall functions is demonstrated and habitat connectivity is maintained. Mitigation shall be provided consistent with an approved mitigation plan. See Chapter 5A on maintaining fire-defensible space.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
3. If non-native vegetation is removed, it shall be replaced with native vegetation within the shoreline jurisdiction.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
4. Development shall be located to avoid clearing and grading impacts to more mature or multi-storied plant communities and to retain habitat connectivity.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
5. Vegetation (such as a mature stand of trees) that cannot be replaced or restored within twenty (20) years shall be preserved.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
6. Maintaining vegetated riparian areas to protect shoreline stability and shoreline ecological functions takes precedence over vegetation clearing to preserve or create views.	The VBT Project will not disturb the existing riparian vegetation that is present along the shoreline of the Columbia River.
7. Topping trees is prohibited.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.

Code Reference	Project Compliance
8. Pruning of trees which are not hazard trees is allowed in compliance with the National Arborist Association pruning standards, and is limited to: a. Removal of no more than twenty-five (25) percent of the limbs of any single tree within a given five-year (5-year) period; and b. No more than twenty-five (25) percent of canopy in a single stand of trees may be removed in a given five-year (5-year) period.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
9. Hazard trees are regulated by VMC 20.770 and 17.14.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project.
10. Natural features such as snags, stumps, logs or uprooted trees, which support fish and other aquatic systems, do not intrude on the navigational channel or threaten public safety, and existing structures and facilities, shall be left undisturbed.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. There are no natural features present in the proposed work areas.
11. Aquatic weed control shall only occur to protect native plant communities and associated habitats or where an existing water-dependent use is restricted by the presence of weeds. Aquatic weed control shall occur in compliance with all other applicable laws and standards and shall be done by a qualified professional.	The VBT Project proposes no aquatic weed control.
12. Unless otherwise stated, the vegetation conservation regulations of this Program do not apply to: a. Commercial forest practices as defined by this Program when such activities are covered under the Washington State Forest Practices Act (RCW 76.09), except where such activities are associated with a conversion to other uses or other forest practice activities over which the City has authority; or b. Flood control levees required to be kept free of vegetation that damages their structural integrity.	Not applicable. The VBT Project does not include any commercial forest practices, nor does it contain a flood control levee.

Code Reference	Project Compliance
SMP Chapter 5.8 – Views and Aesthetics	
SMP Chapter 5.8.1 – Visual Access	
1. Visual access shall be maintained, enhanced, and preserved as appropriate on shoreline street-ends, public utility rights-of-way above and below the ordinary high water mark, and other view corridors.	Not applicable. The VBT Project does not propose alterations to views from shoreline street-ends, public utility rights-of-way above and below the OHWM, or other view corridors
2. Development on or over the water shall be constructed to avoid interference with views from surrounding properties to the adjoining shoreline and adjoining waters to the extent practical.	The VBT Project proposes a new pedestal shiploader on the existing Berth 7 dock that will be located over the water The new shiploader will be taller than the existing shiploader. The project will also include a new aerial conveyor that is taller than the existing conveyor. Both of these proposed structures are consistent with other similar infrastructure along a shoreline that is heavily developed for marine industrial uses. No interference with views from surrounding properties to the adjoining shoreline and associated waters is expected to occur as a result of the proposed work.
3. No permit shall be issued pursuant to this chapter for any new or expanded building or structure of more than thirty-five (35) feet above average grade level on shorelines of the state that will obstruct the view of a substantial number of residences on areas adjoining such shorelines unless overriding considerations of the public interest will be served. The Shoreline Administrator may require a view analysis including view corridors, view profiles, and vertical profiles from various locations to determine if shoreline views will be obstructed.	The VBT Project will not obstruct the view of any residences because there are no residences on or adjacent to the project area. Residential areas further to the north of the project area do not currently have a view of the shoreline.
4. Maintaining vegetated riparian areas to protect shoreline stability and shoreline ecological functions takes precedence over vegetation clearing to preserve or create views.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project. The Project proposes no impacts to vegetated riparian areas along the Columbia River that protect shoreline stability and shoreline ecological functions. No vegetation clearing to preserve or create views is proposed.
5. Clearing or pruning to preserve or create views shall be allowed as follows: a. When shoreline stability and shoreline ecological functions are maintained; and b. The applicable standards in Sections 5.6 and 5.7 are met.	Not applicable. The VBT Project area is defined by existing pavement and industrial uses within the shoreline jurisdictional area. No vegetation, native or otherwise, currently exists outside the riparian area, and no vegetation is proposed to be removed or planted as part of the project. The Project proposes no impacts to vegetated riparian areas along the Columbia River that protect shoreline stability and shoreline ecological functions. No vegetation clearing or pruning to preserve or create views is proposed.

Code Reference	Project Compliance
SMP Chapter 5.9 – Water Quality and Quantity	
1. The location, design, construction, and management of all shoreline uses and activities shall protect the quality and quantity of surface and ground water adjacent to the site.	Water quality protection measures will be implemented throughout construction and operation of the VBT Project. The VBT Project will implement all applicable source control BMPs to prevent potentially harmful materials from coming into contact with surface and groundwater. Potentially harmful materials will be separated and prevented from entering stormwater drainage systems and the adjacent Columbia River.
2. All shoreline development shall comply with the applicable requirements of the VMC Chapter 14.24, Erosion Prevention & Sedimentation Control; 14.25, Stormwater Control; and 14.26, Water Resources Protection.	An Erosion/Sedimentation Control Plan in conformance with VMC 14.24, 14.25, and 14.26; the City's General Requirements and Details; and the 2019 SMMWW will be submitted and approved prior to demolition, pavement cuts, clearing, grading, or filling. The Erosion/Sedimentation Control Plan will show detailed existing and proposed topography of the site. The plan includes measures to ensure that sediment and sediment-laden runoff does not leave the site. The contractor will regularly check fuel hoses, oil drums, oil or fuel transfer valves, and fittings for leaks and will maintain and store materials properly to prevent spills. A construction SWPPP will be prepared in accordance with the Construction Stormwater Permit and the 2019 SMMWW. The SWPPP will be submitted with the civil plans for review. The SWPPP will include measures to protect Port stormwater facilities and the adjacent Columbia River from sediment and sediment-laden runoff.
3. Best management practices (BMPs) for control of erosion and sedimentation shall be implemented for all shoreline development.	Water quality protection measures will be implemented throughout construction and operation of the VBT Project. The Project Description (InterMat 2024) includes a list of BMPs to be implemented during construction to avoid or minimize potential impacts on the shoreline environment.
4. Potentially harmful materials, including but not limited to oil, chemicals, tires, or hazardous materials, shall not be allowed to enter any body of water or wetland, or to be discharged onto the land except in accordance with VMC 14.26. Potentially harmful materials shall be maintained in safe and leak-proof containers.	The contractor will be responsible for the preparation and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) plan to be used for the duration of the VBT Project. The contractor will also maintain the applicable equipment and materials designated in the SPCC plan at the job site. Excess or waste materials, petroleum products, concrete, chemicals, or other toxic or deleterious materials will not be allowed to enter surface waters.

Code Reference	Project Compliance
5. Herbicides, fungicides, fertilizers, and pesticides shall not be applied within twenty-five (25) feet of a waterbody, except by a qualified professional in accordance with state and federal laws. Further, pesticides subject to the final ruling in Washington Toxics Coalition, et al., v. EPA shall not be applied within sixty (60) feet for ground applications or within three hundred (300) feet for aerial applications of the subject water bodies and shall be applied by a qualified professional in accordance with state and federal law	Not applicable. The VBT Project proposes no use of herbicides, fungicides, fertilizers, or pesticides.
6. Any structure or feature in the Aquatic shoreline designation shall be constructed and/or maintained with materials that will not adversely affect water quality or aquatic plants or animals. Materials used for decking or other structural components shall be approved by applicable state agencies for contact with water to avoid discharge of pollutants.	All VBT Project structures will be constructed and maintained with materials that will adversely affect water quality or aquatic plants or animals. BMPs will be employed to prevent the entry of debris and other waste materials into any waterbody. The contractor will be required to retrieve any floating debris generated during construction using a skiff and net. Debris will be disposed of at an approved upland facility. Construction materials would not be stored where high tides, wave action, or upland runoff could cause materials to enter surface water. Additionally, the contractor will be required to implement measures outlined in the SPCC plan to prevent and, if necessary, respond to any leaks or spills.
7. Conveyance of any substance not composed entirely of surface and stormwater directly to water resources shall be in accordance with VMC 14.26.	The VBT Project does not propose the conveyance of any substance not composed entirely of surface and stormwater directly to water resources.
SMP Chapter 5.10 – Septic Systems	
1. Septic systems should be located as far landward of the shoreline and floodway as possible. Where permitted, new on-site septic systems shall be located, designed, operated, and maintained to meet all applicable water quality, utility, and health standards.	Not applicable. The VBT Project proposes no septic systems.

Notes:
A: Aquatic shoreline designation
BMP: best management practice
City: City of Vancouver, Washington
CMMP: Contaminated Media Management Plan
CRD: Columbia River Datum
DAHP: Washington Department of Archaeology and Historic Preservation
Ecology: Washington State Department of Ecology
FEMA: Federal Emergency Management Agency
ISGP: Industrial Stormwater General Permit
IWDP: Industrial Wastwater Discharge Permit
LUP: Land Use Preliminary
OHWM: ordinary high water mark
OSHA: Occupational Safety and Health Administration
Port: Port of Vancouver USA
RCW: Revised Code of Washington

SMA: Shoreline Management Act
SMMWW: Stormwater Management Manual for Western Washington
SMP: Shoreline Master Program
SPCC: Spill Prevention, Control, and Countermeasures
SSDP: Shoreline Substantial Development Permit
SWPPP: Stormwater Pollution Prevention Plan
TESC: Temporary Erosion and Sediment Control
USACE: U.S. Army Corps of Engineers
VBT: Vancouver Bulk Terminal, LLC
VBT Project: VBT's proposed Soda Ash Export Terminal Project
VMC: Vancouver Municipal Code
WAC: Washington Administrative Code

References:
City of Vancouver, 2021. *City of Vancouver Shoreline Master Program*. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.
City of Vancouver, 2024. *Preapplication Conference Report.* Soda Ash Terminal (Port of Vancouver Terminal 2 – Berth 7) PRJ-169248/ PIR-84183. April 17, 2024.
Ecology (Washington Department of Ecology), 2019. *2019 Stormwater Management Manual for Western Washington*. Publication Number 19-10-021. July 2019.
InterMat (InterMat, LLC), 2024a. 2024a. *Vancouver Bulk Terminal LLC, Soda Ash Export Terminal, Vancouver Washington – Project Description.* Document No. 230-01_PRD-001. June 10, 2024.

Table 2-4
Specific Shoreline Use Regulations (SMP Chapter 6), General Provisions (SMP Chapter 6.1) and Shoreline Use, Modification and Standards Table (SMP Chapter 6.2)

Code Reference	Project Compliance
SMP Chapter 6.1 – General Provisions	
1. This chapter contains the regulations that apply to specific uses, developments, and activities in the shoreline jurisdiction.	The VBT Project has been designed to meet the code provisions that apply to specific uses, developments, and activities in the shoreline jurisdiction, as described in the tables in this attachment.
2. These regulations are intended to work in concert with all sections of this Program and in particular the Goals and Policies (Chapter 3) and General Use and Development Regulations (Chapters 5 and 5A).	The VBT Project has been designed to meet all sections of this Program and in particular the Goals and Policies (Chapter 3) and General Use and Development Regulations (Chapters 5 and 5A).
SMP Chapter 6.2 – Shoreline Use, Modification and Standards Table	
1. Each shoreline designation shall be managed in accordance with its designated purpose as described in this Program (Chapter 4). Table 6-1 identifies those uses that are prohibited, may be permitted or permitted with a conditional use approval in each shoreline designation. In the event conflicts exist between the Table 6-1 and the text in this chapter, the text shall apply.	The site is in the High Intensity shoreline designation landward of OHWM and Aquatic designation waterward OHWM. The primary proposed use is the construction of a new pre-assembled pedestal shiploader and new conveyor BC-8, which are water-dependent and industrial. Stormwater collection and conveyance system modifications are also proposed. Per Table 6-1 of the City SMP (City of Vancouver 2021), these activities are allowed with an SSDP in the High Intensity and Aquatic shoreline environments.
2. Table 6-1 also summarizes general setbacks and building heights for uses within each shoreline designation. These setbacks apply in conjunction with the critical area requirements established in Chapter 5A of this Program. In the event a conflict exists between Table 6-1 and the requirements of Chapter 5 or 5A, the most protective of shoreline ecological functions shall apply.	The site is in the High Intensity shoreline designation landward of OHWM and Aquatic shoreline designation waterward OHWM. There are no minimum shoreline setbacks or maximum shoreline heights specified for water-dependent industrial uses or underground utility uses noted in Table 6-1.
3. In Table 6-1, setbacks are measured landward from the OHWM. For transportation facilities and utilities, the setback from OHWM pertains to the right of way and not just the structure or pipeline. Building heights landward of the OHWM are calculated according to WAC 173-27-030(9). In the Aquatic shoreline designation, the setback is waterward of the OHWM and building heights in the Aquatic shoreline designation are measured from the elevation of the OHWM.	No new transportation facilities or buildings are proposed in the shoreline jurisdiction under the VBT Project. Per Table 6-1, there are no minimum shoreline setbacks or maximum shoreline heights specified for water-dependent industrial uses in either the High Intensity or Aquatic shoreline designations. There are also no setback requirements for the location of underground utilities in the High Intensity or Aquatic shoreline designations.

Code Reference	Project Compliance
4. All the shoreline designations, even if they are not applied within the City limits or urban growth area are included in Table 6-1 to maintain consistency countywide. Rural Conservancy – Residential and Rural Conservancy – Resource Lands are not applied within the City limits or urban growth area.	Noted.
5. Classification of a use or development as permitted does not necessarily mean the use/development is allowed. It means the use/development may be allowed subject to review and approval by the City and/or Ecology. The City may attach conditions of approval to any permitted use via a permit or statement of exemption as necessary to assure consistency of a project with the Act and this Program.	VBT is requesting an SSDP for the VBT Project uses and developments within the High Intensity and Aquatic shoreline designations, subject to review by the City and/or Ecology.

Notes:
SMP: Shoreline Master Program
SSDP: Shoreline Substantial Development Permit
VBT: Vancouver Bulk Terminal, LLC
VBT Project: VBT's proposed Soda Ash Export Terminal Project
VMC: Vancouver Municipal Code

Reference:
City of Vancouver, 2021. City of Vancouver Shoreline Master Program. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.

Table 2-5
Standards for Industrial Uses (SMP Chapter 6.3.6)

Code Reference	Project Compliance
SMP Chapter 6.3.6.1 – General Requirements	
1. Water-oriented industrial uses and development are preferred over non-water oriented industrial uses and development.	The VBT Project proposes water-oriented and water-dependent industrial use.
2. Water-related uses shall not displace existing water-dependent uses or occupy space designated for water-dependent uses identified in a substantial development permit or other approval.	The VBT Project does not propose water-related uses that will displace existing water-dependent uses. The Project proposes to replace an existing water-dependent use with another, equivalent water-dependent use.
3. Water-enjoyment uses shall not displace existing water-dependent or water-related uses or occupy space designated for water-dependent or water-related uses identified in a substantial development permit or other approval.	The VBT Project does not propose water-enjoyment uses.
4. Waterward expansion of existing non-water-oriented industry is prohibited.	The VBT Project does not propose the prohibited waterward expansion of existing non-water-oriented industry.
5. Proposed developments shall maximize the use of legally established existing industrial facilities and avoid duplication of dock or pier facilities before expanding into undeveloped areas or building new facilities. Proposals for new industrial and port developments shall demonstrate the need for expansion into an undeveloped area.	The VBT Project proposes to replace an existing shiploader and aerial belt conveyor with a new pedestal shiploader and new aerial belt conveyor. The new shiploader and conveyor will maximize the use of legally established facilities and avoid duplication of dock or pier facilities. The proposed work will not involve expansion into undeveloped areas.
6. Proposed large-scale industrial developments or major expansions shall be consistent with an officially adopted comprehensive scheme of harbor improvement and/or long-range port development plan.	The VBT Project is consistent with the Port Strategic Plan and overarching community, economic, environmental, marine/industrial business, financial and organizational development goals (Port 2024).
7. New facilities for shallow-draft shipping shall not be allowed to preempt deep draft industrial sites.	Not applicable. The VBT Project does not include any shallow-draft shipping facilities that will preempt deep draft industrial facilities.
8. Ship, boatbuilding, and repair yards shall employ best management practices (BMPs) with regard to the various services and activities they perform and their impacts on surrounding water quality.	Not applicable. The VBT Project does not include any ship, boat building, or boat repair yards.
9. Industrial water treatment and water reclamation facilities may be permitted only as conditional uses and only upon demonstrating that they cannot be located outside of shoreline jurisdiction. They shall be designed and located to be compatible with recreational, residential, or other public uses of the water and shorelands.	The VBT Project proposes no new industrial water treatment or water reclamation facilities. VBT intends to use the facility's existing permitted wastewater treatment plan to handle stormwater generated from the site.

Notes:
SMP: Shoreline Master Program
VBT: Vancouver Bulk Terminal, LLC

VBT Project: VBT's proposed Soda Ash Export Terminal Project

References:
City of Vancouver, 2021. City of Vancouver Shoreline Master Program. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.
Port (Port of Vancouver), 2024. Strategic Plan 2023 Annual Review. Accessed June 17, 2024. Available at: https://www.portvanusa.com/assets/Strategic-Plan-2023-Annual-Supplemental-Report.pdf.

Table 2-6
General Provisions for City of Vancouver Shoreline Substantial Development Permits, Shoreline Conditional Use Permits, and Shoreline Variance Permits (WAC 173-27, VMC Chapter 20.760, and SMP Chapter 7)

Code Reference	Project Compliance
SMP Chapter 7.1 – General Provisions	
1. Except as specifically exempted by statute, all proposed uses and development occurring within shoreline jurisdiction must conform to the Revised Code of Washington (RCW) 90.58, the Washington State Shoreline Management Act (Act) and this Shoreline Master Program (SMP).	The VBT Project is compliant with statewide standards for shoreline environmental protection consistent with RCW 90.58, the Washington State Shoreline Management Act, and the SMP (City of Vancouver 2021). No project uses and development within the shoreline jurisdiction are exempted by statute.
2. Uses and developments that are not considered substantial developments pursuant to RCW 90.58.030(3)(e), WAC 173-27-040, and Section 2.3 of this Program shall not require a Shoreline Substantial Development Permit (SDP) but shall conform to the policies and regulations of this Program and the Act and shall obtain a Statement of Exemption (Sections 2.3 and 7.4).	All VBT Project uses and development are considered substantial developments pursuant to RCW 90.58.030(3)(e), WAC 173-27-040, and Section 2.3 of the SMP and will require an SSDP.
3. A use or development that is listed as a conditional use pursuant to this Program or is an unclassified use or development must obtain a conditional use permit (Section 2.7 and 7.4.4) even if the development or use does not require a substantial development permit.	Not applicable. No proposed uses or activities under the VBT Project are listed as requiring a conditional use permit.
4. When a development or use is proposed that does not meet the bulk, dimensional, and/or performance standards of this Program, such development or use shall only be authorized by approval of a shoreline variance (Section 2.6 and 7.4.5) even if the development or use does not require a substantial development permit.	Not applicable. No proposed uses or activities under the VBT Project require authorization by approval of a shoreline variance.
5. If a shoreline SDP is required for any part of a proposed development, then a shoreline substantial development permit is required for the entire proposed development project.	The Port is applying for an SSDP to remove an existing linear shiploader, install a new pre-assembled pedestal shiploader, demolish and existing elevated belt conveyor, install a new elevated belt conveyor, and modify existing stormwater infrastructure in the High Intensity and Aquatic shoreline designations.
6. Exemptions from the requirement to obtain a shoreline substantial development permit shall be construed narrowly. Only those developments that meet the precise terms of one or more of the listed exemptions may be granted exemptions from the substantial development permit process.	Not applicable. The VBT Project proposes no uses or activities that are exempt from the SSDP process.
7. The City shall not issue any permit for development within the shoreline jurisdiction until approval has been granted pursuant to this Program.	Noted.

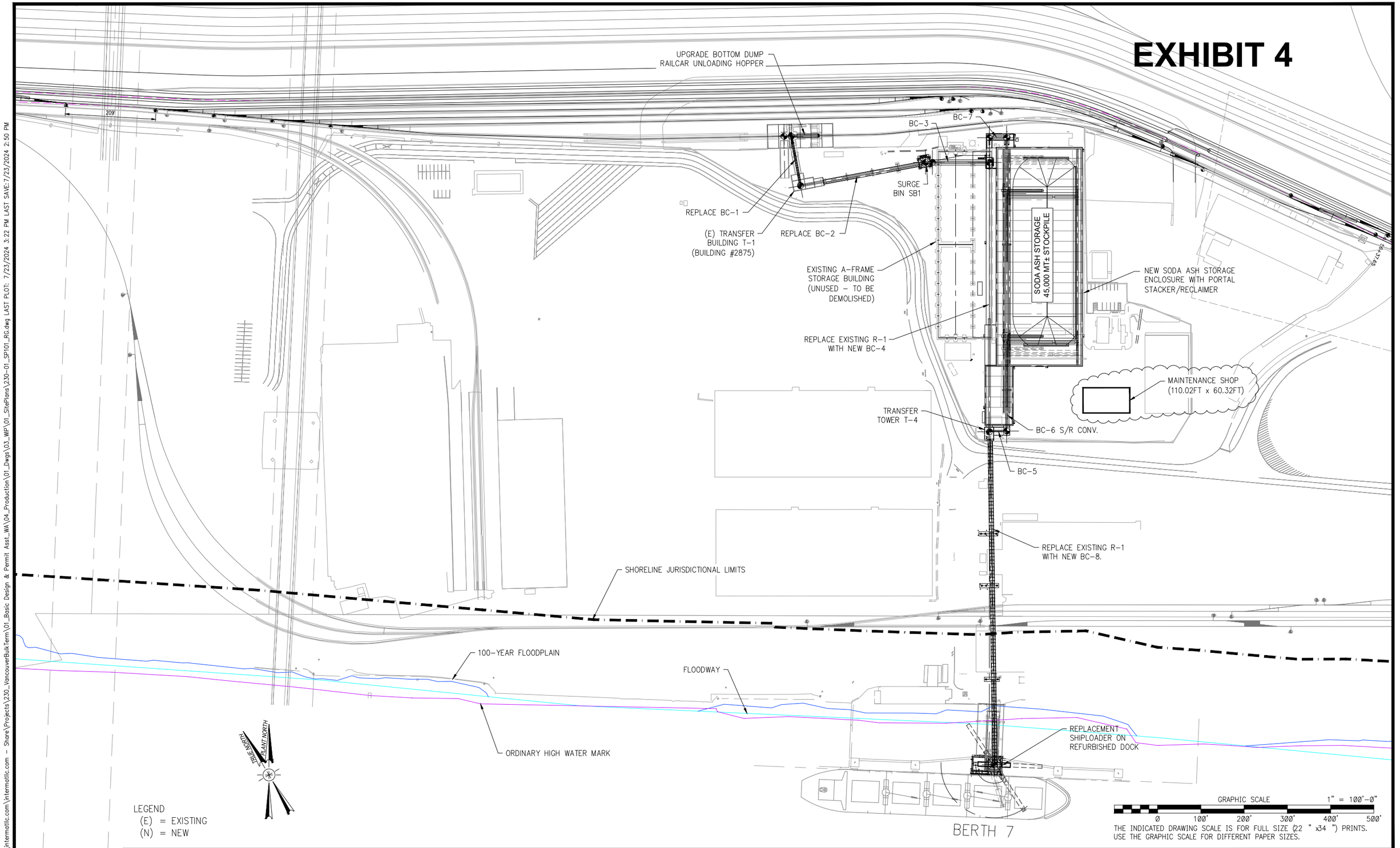
Code Reference	Project Compliance
8. A development or use that does not comply with the bulk, dimensional, and/or performance standards of this Program shall require a shoreline variance even if the development or use does not require a substantial development permit.	Not applicable. All proposed VBT Project uses and activities in the shoreline jurisdiction require an SSDP.
9. A development or use that is listed as a conditional use pursuant to this Program, or is an unlisted use, must obtain a Shoreline Conditional Use Permit even if the development or use does not require a substantial development permit.	Not applicable. All proposed VBT Project uses and activities in the shoreline jurisdiction require an SSDP.
10. Issuance of a Shoreline Substantial Development Permit, Shoreline Variance or Shoreline Conditional Use Permit does not constitute approval pursuant to any other federal, state or City laws or regulations.	Noted.
11. All shoreline permits or statements of exemption issued for development or use within shoreline jurisdiction shall include written findings prepared by the Shoreline Administrator, documenting compliance with bulk and dimensional policies and regulations of this Program. The Shoreline Administrator may attach conditions to the approval as necessary to assure consistency with RCW 90.58 and this Program. Such conditions may include a requirement to post a performance bond assuring compliance with permit requirements, terms and conditions.	Noted.
12. Proposed actions that would alter designated critical areas or their buffers, as established by this Program (Chapters 5.3 and 5A) shall be reviewed for compliance with this Program. If required, the applicable critical area report and/or mitigation plan and/or habitat management plan shall be submitted as part of the development application or request for statement of exemption. The critical area review shall be conducted and processed in conjunction with the highest threshold of review that is applicable to the primary development proposed.	Not applicable. The VBT Project proposes no actions that would alter designated critical habitat or their buffers.
13. Habitats of Local Importance may be proposed by the property owner or the City (Chapter 5A, Section 20.740.100) and shall be designated according to a Type IV legislative procedure (Chapter 5A, VMC 20.210.070).	Noted. The property owner proposes no Habitats of Local Importance.

Code Reference	Project Compliance
14. The final decision on a shoreline permit (Type II application) Shoreline Conditional Use or Shoreline Variance (Type III application) shall be made within 120 calendar days after the date of a fully complete determination is made per VMC 20.210. However, per RCW 47.01.485(1) to the greatest extent practicable, a final determination on all permits required for a project on a state highway as defined in RCW 46.04.560 shall be made no later than 90 days after a fully complete determination is made per VMC 20.210.	Noted.

Notes:
RCW: Revised Code of Washington
SMP: Shoreline Master Program
SSDP: Shoreline Substantial Development Permit
VBT: Vancouver Bulk Terminal, LLC
VBT Project: VBT's proposed Soda Ash Export Terminal Project
VMC: Vancouver Municipal Code
WAC: Washington Administrative Code

Reference:
City of Vancouver, 2021. City of Vancouver Shoreline Master Program. Accessed July 26, 2024. Available at: https://www.cityofvancouver.us/wp-content/uploads/2023/05/city_of_vancouver_shoreline_master_program_effective_june_2021.pdf.

EXHIBIT 4



LEGEND
(E) = EXISTING
(N) = NEW

GRAPHIC SCALE 1" = 100'-0"
Ø 100' 200' 300' 400' 500'
THE INDICATED DRAWING SCALE IS FOR FULL SIZE (22 " x34 ") PRINTS.
USE THE GRAPHIC SCALE FOR DIFFERENT PAPER SIZES.

DRAWN	TJC, JPW
CHECKED	ZDW
APPROVED	ZDW

InterMat
INTERNATIONAL MATERIAL HANDLING

ISSUED FOR PERMIT

CONTENT SHOWN HAS BEEN PREPARED AT LEVEL OF DETAIL TO SATISFY CITY OF VANCOUVER LAND USE PERMIT APPLICATION REQUIREMENTS

REV. No.	DESCRIPTION	DATE	APPROVED
G	SHOW OHWM, 200FT BUFFER, AND FEMA FLOOD LINES	7/17/24	ZDW
H	ISSUED FOR PERMIT	07/23/24	ZDW

CITY, STATE	INTERMAT JOB NUMBER	CLIENT JOB NUMBER	DATE
VANCOUVER, WASHINGTON	230-01	XX-XXX	SEPTEMBER 2023

VANCOUVER BULK TERMINAL, PORT OF VANCOUVER, WA
TERMINAL 2 EXPANSION – SODA ASH

SITE PLAN
MATERIAL HANDLING SYSTEM

DWG. NO. SP101-01

EXHIBIT 5

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

September 25, 2024

Keith Jones, Senior Planner
City of Vancouver
Community & Economics Development
PO Box 1995
Vancouver, WA 98668

Dear Keith Jones:

Thank you for the opportunity to comment on the optional determination of nonsignificance/notice of application for the Vancouver Bulk Terminal (Port of Vancouver Terminal 2) Project (PRJ-169248/ LUP-84478) located at 2701 Northwest Harborside Drive as proposed by InterMat, LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

HAZARDOUS WASTE & TOXICS REDUCTION: Garret Peck (564) 669-0836

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present, such as PCB-containing lamp ballasts, fluorescent lamps, and wall thermostats containing mercury, are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials.

Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," posted at Ecology's website, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Construction-and-demolition . The applicant may also contact Katy Harvey of Ecology's Hazardous Waste and Toxics Reduction Program at katy.harvey@ecy.wa.gov for more information about safely handling dangerous wastes and demolition debris.

TOXICS CLEANUP: Sam Meng (360) 999-9587

The project is located within the Vancouver Port of NuStar Cadet Swan Cleanup Site (Cleanup Site ID#3450) overseen by Ecology's Toxics Cleanup Program. The demolition of existing receiving, material handling, and storage equipment and infrastructure may release hazardous substances trapped due to the operation in the past. TCP will require Best Management Practices (BMPs) and monitoring during the demolition to prevent further release of hazardous substances to environmental media. For questions contact Sam Meng with the Toxics Cleanup Program at the Southwest Regional Office at (360) 999-9587.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202403998)

cc: Garret Peck, HWTR
Sam Meng, TCP

From: Peplinski, Joy (DFW)
To: Jones, Keith
Cc: R5 Planning (DFW)
Subject: Vancouver Bulk Terminal (Port of Vancouver Terminal 2)
Date: Thursday, September 26, 2024 4:49:38 PM
Attachments: image001.png

Hi Keith,

Thank you for sharing the SEPA DNS **for the Vancouver Bulk Terminal (Port of Vancouver Terminal 2) project.**

In general, my biggest area of concern for a construction project of this type would be that sediment, debris, and contaminated waters be prevented from entering the Columbia River. The project proponent has listed several BMPs they'll use to minimize/avoid these potential impacts, which is reassuring. While I do not have specific additional recommendations for sediment or contaminant control, I will defer to the water quality subject matter experts at the Department of Ecology, if they raise additional concerns or suggestions.

In the SEPA checklist (section 11), the project proponent provided a list of exterior lighting fixtures. We commend the choice of fixtures which provide directional lighting and minimize light pollution! An additional suggestion is that any tall, free-standing light poles in proximity to the river be amended with structures to discourage perching and nesting by birds of prey. These measures could minimize predation on salmonids and also reduce maintenance needs.

We are happy to consult with the project proponent or the City of Vancouver if any additional questions/concerns about impacts on vegetation or wildlife are raised.

Thank you,
Joy

Joy Peplinski | she/her
Habitat Biologist | Southwest Region 5
Washington Department of Fish and Wildlife
5525 South 11th Street
Ridgefield, WA 98642

joy.peplinski@dfw.wa.gov | (564) 237-1913

From: Peplinski, Joy (DFW)
To: Russell Mester
Cc: Jones, Keith; Matt Kuziensky; Johannes Viljoen; R5 Planning (DFW)
Subject: RE: Vancouver Bulk Terminal (Port of Vancouver Terminal 2)
Date: Tuesday, November 19, 2024 4:14:58 PM
Attachments: image001.png
image002.png

Hi Russell,

Thank you for reaching out and for the follow-up on these points! It sounds like you've addressed our concerns (or they weren't relevant to begin with), so we don't have further concerns at this time. Hope all goes smoothly with the project!

Best,
Joy

Joy Peplinski | she/her
Habitat Biologist | Southwest Region 5
Washington Department of Fish and Wildlife
5525 South 11th Street
Ridgefield, WA 98642

joy.peplinski@dfw.wa.gov | (564) 237-1913

From: Russell Mester <russellmester@intermatllc.com>
Sent: Tuesday, November 19, 2024 1:54 PM
To: Peplinski, Joy (DFW) <Joy.Peplinski@dfw.wa.gov>
Cc: keith.jones@cityofvancouver.us; Matt Kuziensky <mkuziensky@anchorqea.com>; Johannes Viljoen <johannes.viljoen@vbt-llc.com>
Subject: RE: Vancouver Bulk Terminal (Port of Vancouver Terminal 2)

External Email

Joy,

Thank you for your interest in our project. Your comments on the project's lighting design are appreciated. You suggested nesting deterrents on any free-standing lighting poles we might be installing. As a clarification, the project will not be adding any additional free-standing light poles. Regarding your comment on contaminant control, we are developing enhanced BMPs in cooperation with the Port of Vancouver that will be reviewed and approved by the Department of Ecology before project construction commences.

Thank you,

Russell Mester – *Principal*
russellmester@intermatllc.com
Mobile: 713.249.1384 | Office: 504.273.7097
20333 State Highway 249, Suite 470 | Houston, TX 77070
www.intermatllc.com

From: Peplinski, Joy (DFW) <Joy.Peplinski@dfw.wa.gov>
Sent: Thursday, September 26, 2024 6:49 PM
To: Jones, Keith <Keith.Jones@cityofvancouver.us>
Cc: R5 Planning (DFW) <R5.Planning@dfw.wa.gov>
Subject: Vancouver Bulk Terminal (Port of Vancouver Terminal 2)

Hi Keith,

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We are happy to consult with the project proponent or the City of Vancouver if any additional questions/concerns about impacts on vegetation or wildlife are raised.

Thank you,
Joy

Joy Peplinski | she/her
Habitat Biologist | Southwest Region 5
Washington Department of Fish and Wildlife
5525 South 11th Street
Ridgefield, WA 98642

joy.peplinski@dfw.wa.gov | (564) 237-1913

From: Jolivette, Stephanie (DAHP)
To: Jones, Keith
Subject: DAHP More Information RE: City of Vancouver REVISED NOA/DNS for PRJ-169248/ LUP-84478 Vancouver Bulk Terminal (Port of Vancouver Terminal 2)
Date: Monday, October 14, 2024 1:59:21 PM
Attachments: image010.png
image005.png
image007.png
image009.png

Hello Keith Jones,

The SEPA checklist associated with the PRJ-169248/ LUP-84478 Vancouver Bulk Terminal project states that a Predetermination report was completed. We have searched our records and could not find that this report was submitted to the DAHP for review. We request a copy of the report so that we can initiate our review process for the project. The report is listed as:

Anchor QEA, 2024e. Archaeological Predetermination Assessment – VBT Soda Ash Terminal Project.
July 22, 2024.

If the applicant has a letter from the DAHP accepting the report, please forward a copy of this letter as it will be sufficient to locate the report if it has been uploaded by the archaeological consultant into our online WISAARD system. The names of projects sometimes change making reports difficult to locate.

Feel free to contact me if you have questions about this request.
Best,
Stephanie

dahp
protect the past, shape the future
DEPT OF ARCHAEOLOGY + HISTORIC PRESERVATION

Stephanie Jolivette (*She/Her/Hers*)
Local Government Archaeologist
Email: Stephanie.Jolivette@dahp.wa.gov
Mobile: (360) 628-2755 | Main Office: (360) 586-3065
Hours: 8AM - 4:30PM Monday to Friday
Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501
Mailing Address: PO Box 48343, Olympia, WA 98504-8343

www.dahp.wa.gov

EXHIBIT 6

CITY OF Vancouver WASHINGTON

City of Vancouver Transportation Services

Trip and Traffic Impact Fee Calculation Worksheet

Application Number: PRJ-169248

Project Name:	Vancouver Bulk / Soda Terminals	Date:	9/13/2024 12:00:00 AM
Project Address:	2701 NW HARBORSIDE DR	TAZ:	TA26
Project Number:	PRJ-169248	Primary Corridor:	
ENG Number:		Parcel 1 ID:	59118030
TIF District:	Columbia	Parcel 2 ID:	
TIF Overlay District:		Parcel 3 ID:	

Existing Site Trips ^^

LU Description	ITE LU Code	Existing AM Peak Rate	Existing PM Peak Rate	Existing ADT Rate	Unit of Measure	Size**		Existing AM Peak Trips	Existing PM Peak Trips	Existing ADT
Intermodal Truck Terminal	030	1.97	1.87	18.70	1000	166780		329	312	3119
^^ equals zero if this is a new development on greenfield or if old use has been gone > 1 year.						**Existing Trips Total**		329	312	3119

New Trip Generation Calculation

LU Description	ITE LU Code	AM Peak Rate	PM Peak Rate	ADT Rate	Unit of Measure*	Size**		New AM Peak	New PM Peak	New ADT
		0	0	0	0	0				0
Intermodal Truck Terminal	030	1.97	1.87	18.7	1000	171157		337	320	3201
							New Project Trips	337	320	3201
							Net New Project Trips (new trip - existing trips)	8	8	82

*Unit of measure = ITE Unit by which total size is divided by in order to calc. trip generation

**Size - Total size of development, eg 10 dwelling units or 50,000 sqf.

***% reduction applied to trip generation, eg. .35 passby reduction for 100 trips - (1 - .35) * 100 - .65 - from approved traffic impact study only

****% reduction applied to trip generation, eg. .10 internal capture reduction for 100 trips - (1 - .10) * 100 - .9 * 100 - 90 - from approved traffic impact study only

Traffic Impact Fee Calculation

LU Description	ITE LU Code	Proposed Project ADT	Net New Proj ADT	TIF Rate/Trip	TIF Overlay rate/trip	BEF Reduction = .3 for retail commercial uses & ITE LU 912	Tax Reduction	TIF Due	Overlay TIF Due
Intermodal Truck Terminal	030	3201	82.00	240	0		0.15	$16,728.00	$0.00
	Sum	3201	82				**TIF Totals:**	$16,728.00	$0.00

Concurrency Monitoring Fees

Corridor	PM Peak Trips	Cost/Trip	max. $1500
		Calculated Total =	

Total Monitoring Fee =

Proportionate Shares

Case Number	Project	Fee/Unit	Trips/Lots	Final Fee
			Total Proportionate Share Fees =	

Disclaimer: This information is provided based on the TIF program in place as of the date shown above and is only an estimate of the fee. Per VMC 20.915.020, the fee shall be calculated at time of building permit application. See VMC 20.915 for more information.

City of Vancouver Transportation Services

Trip and Traffic Impact Fee Calculation Worksheet

Application Number: PRJ-169248

Project Name:	Vancouver Bulk / Soda Terminals	Date:	9/13/2024 12:00:00 AM
Project Address:	2701 NW HARBORSIDE DR	TAZ:	TA26
Project Number:	PRJ-169248	Primary Corridor:	
ENG Number:		Parcel 1 ID:	59118030
TIF District:	Columbia	Parcel 2 ID:	
TIF Overlay District:		Parcel 3 ID:	

COMMENTS:

Proposing to redevelop the existing terminal into a Soda Ash Export Terminal (“VBT Project”).	District: Columbia	District TIF =	$16,728.00
		Total TIF =	$16,728.00

Disclaimer: This information is provided based on the TIF program in place as of the date shown above and is only an estimate of the fee. Per VMC 20.915.020, the fee shall be calculated at time of building permit application. See VMC 20.915 for more information.