

I am the policy and technical program manager at Citizens for a Healthy Bay, also known as CHB. We closely follow activities within the Port of Tacoma, and have taken no exception on the proposed chip screening project at WestRock. We have a couple of concerns with the proposed application and related processes.

Our biggest concern is with the Department of Ecology, and their failure to consider cumulative impacts of new emissions from projects like this one. We understand that the Washington Administrative Code does not require Ecology to consider cumulative impacts when there are new or modified sources of emissions. However, Ecology is not prohibited from considering cumulative impacts in developing and approving this application, and can, in their discretion, do so.

Air emissions are a major public health concern in Pierce County. Residents, depending on where they live, face huge health disparities. Life expectancy rates in some areas are 28 years below that of our longest-lived neighbors.

Ecology's mission is to protect the land, water and air for current and future generations, so Ecology should consider the totality of impacts from new or expansion projects. If Ecology is serious about its mission, Ecology will tally the current emissions plus the projected emissions from this project and demonstrate that the new emissions total does not exceed air quality standards set to protect human health.

Additionally, the SEPA checklist for this project failed to recognize that the Commencement Bay/Nearshore Tidelands area is a Superfund site. The proposed project is adjacent to the former Simpson Tacoma Kraft site, which had to be capped to sequester soil contamination. We ask that this be acknowledged in the SEPA checklist, and that WestRock demonstrates that they have a contingency plan in place should this cap be disturbed during construction.

And I'll just also add that, in the future, when project managers change when a project is open for comment like it did for this one, a public notice would be helpful in terms of e-mail and on the website.

Thank you.