

William Kupinse

Dear Department of Ecology:

I send this email as a supplement to the public comment that I made in person at the public meeting the Department of Ecology held on December 17 regarding Tacoma WestRock pulp and paper mill's proposed Power Boiler #6 steam limit project Notice of Construction (NOC) air quality order and State Environmental Policy Act (SEPA) Mitigated Determination of Nonsignificance (MDNS). Of immediate concern is the fact that the project would adversely impact the traditional lands of the Puyallup Tribe; permitting the project would be permitting an environmental injustice. As a longtime Tacoma resident, I am also concerned about the adverse health impacts on my family and on all residents of the greater Tacoma area that will be caused by increased emissions of PM 2.5, NOx, formaldehyde, benzene, toluene, and other harmful pollutants, particularly since these pollutants will be added to the existing load of industrial toxins that Tacomans breathe daily. I am concerned as well about the impact on global climate change that an increase 60,000 tons of carbon dioxide equivalents (CO2e) per year will cause; given the recent report from the International Panel on Climate Change (IPCC). Finally, I am concerned about the contamination of ground water in the distant towns where fracking wells would be drilled to supply the natural gas that would fuel the project, particularly given that fracking wells disproportionately impact indigenous and rural communities. For these compelling reasons, I ask that you deny Tacoma WestRock's request as described in Draft modified NOC Order No. 4153-AQ07 to increase the air pollution that it emits in an already polluted region under the guise of "updating" their facility.

Before I share additional comments, I want to register my respectful criticism of the scheduling of the public comment period from November 16 – December 28, with the public meeting held on December 17. This period takes place during the busy holiday season that includes Thanksgiving, Hanukkah, and Christmas, and thus has the effect, even if unintentional, of minimizing public input. For this reason, I ask that the Department of Ecology extend or reopen the public comment period during a less busy time of the year to maximize public participation.

I will try to avoid duplicating the remarks that I made in person at the public comment meeting, but there is one issue that is so important that it bears repeating. I ask that the Department of Ecology please conduct a comprehensive, independent monitoring of the air quality at the Port of Tacoma. I was shocked to learn that it has been more than a decade since independent monitoring of any pollutants other than particulates (PM2.5 and PM10) have been measured. Tacoma is a city with substantial industry close to where people live, work, and go to school. Without comprehensive, independent monitoring of the air quality, we have no baseline against which to measure the impact of projects such as the present Tacoma WestRock project. For such measurement to have validity, monitoring would need to be truly comprehensive, measuring sulfur oxides, nitrogen oxides, volatile organic compounds, and other relevant pollutants over a substantial period of time and sampled 24 hours a day. It would also need to be conducted by an independent, third-party firm, rather than relying on industry-reported data.

I want to address two points I heard made by industry representatives at the public hearing. One industry representative made an argument that I have heard made every time an industrial project or expansion is proposed at the Port: that the project will be built somewhere, so it is better to have it in the U.S., especially in Washington State, where environmental regulations and their enforcement are robust. This argument is flawed in at least three ways.

First, arguing that an undesirable or harmful activity will take place elsewhere anyway should never serve as a justification for siting it in Tacoma. The falsity of this argument becomes apparent when we consider the range of undesirable activities that argument could be used support. Some activities are so harmful that they shouldn't take place anywhere, and producing electricity from a fossil fuel such as methane/natural gas at a time of climate crisis is such an undesirable activity. I want to stress that this is not an issue of NIMBYism; I

don't believe that anyone should be building new fossil fuel infrastructure anywhere at a time of climate crisis, and I support efforts to protect the environment and public health both here and abroad.

Second, it is unclear if at present it is in fact true that the U.S. and Washington State regulate polluting industry as robustly as industry claims. Your own Department of Ecology is significantly underfunded, as the lack of recent comprehensive air quality monitoring of the Port of Tacoma reveals. I know that the Department of Ecology staff are devoted, talented professionals who have pursued a career in public service out of a genuine desire to protect the public and the environment; I also know that the DoE's budget and staffing are but a fraction of what they need to be.

Third, in their efforts to maximize profits, corporations routinely seek out project locations in which environmental regulations and enforcement are weakest and wages are lowest, balancing their desire to minimize costs with factors such as proximity to markets and the presence of existing facilities and infrastructure. WestRock operates facilities globally, with its decision-making presumably driven by the same considerations that motivate other corporations when they site a new project. Thus it would be more honest to say that WestRock wants to increase the amount of pollution it releases in Tacoma and continue to take advantage of weaker environmental regulation in whatever regions it can be found.

This brings me to another point I heard made repeatedly at the public meeting, which is that WestRock is a good corporate citizen that holds itself to the highest environmental standards. While I wish this were true, I distrust this statement because it contradicts recent media reports. When I was visiting Portland this past summer, the big environmental news in town was that WestRock had bought up a Newberg, Oregon paper mill that had been making paper out of recycled consumer paper collected at curbside from Portland-area residents. According to the Portland Tribune, when WestRock bought the mill, the company led everyone to believe that it would be continuing the existing recycled paper operations.

Instead, what Westrock attempted to do was to sell the paper mill with the stipulation that whoever buys it destroy the paper making machines and turn them into scrap metal. According to the Portland Tribune, what Westrock was planning to do when it bought the Newburg mill was to eliminate competition, not run another paper mill in the States. The Tribune further reported that WestRock has been pursuing a policy of buy and close throughout the U.S. for several years. When the Portland was brought to light, WestRock abruptly changed course, perhaps realizing that running afoul of antitrust laws might be a bad idea. If it weren't for the mill workers' union and the Portland-area press, WestRock would have succeeded in eliminating its competition, raising paper prices, and destroying paper recycling in Portland.

I share this story to explain why I do not believe that WestRock is as genuinely concerned for the environment as it would like Tacomans to believe.

Here are some links to news reporting on WestRock from this past summer, in case the Department of Ecology would like to make its own assessment.

<https://portlandtribune.com/sl/398405-293048-destruction-of-mill-appears-imminent>

<https://portlandtribune.com/pt/10-opinion/398630-293047-our-opinion-newberg-mill-deal-smells-a-bit-fishy>

Finally, my understanding is that WestRock's plan to generate electricity at the Port of Tacoma would violate the Tacoma City Code, so permitting WestRock's project would be permitting a prohibited activity. Here is the relevant section of the City Code:

TMC 12.06.120 Resale of electric energy prohibited. A. No person shall be permitted to resell electric energy received from the City unless the schedule or contract under which service is obtained provides otherwise, and except as permitted by law, no person generating or receiving electric energy from other sources shall be permitted to sell or exchange such electric energy excepting to the City of Tacoma.

Unfortunately, the majority of the current Tacoma City Council is funded by the fossil fuel industry and is unlikely to oppose WestRock's plan. It is for this reason that I and many other Tacomans made time at the

end of our work days on December 17 to speak at the public meeting. We appeal to the Department of Ecology to protect the public health and the health of the environment.

Thank you for your time. If it is permissible to redact my email address before this comment becomes public record, I would appreciate that in the interest of reducing the email spam I will otherwise receive.

Sincerely,

William Kupinse
Tacoma, WA