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Increasing the use of the natural gas boiler to generate electricity for sale is not in Tacoma or Washington's interest.

With the legacy of air, water, soil, and various other forms of hazardous pollution already in Tacoma, adding more to the mix is not what is needed. The port of Tacoma already in its entirety acts as a "point source" for pollution in the entire region...the Tacoma Aroma does not need to be increased.

Natural gas is argued by proponents as cleaner burning but 1) this ignores the whole lifecycle assessment of natural gas and 2) adds even more air pollution to the Port of Tacoma and the surrounding areas.

WestRock Mill's plan to install "four new dual fuel Natcom Cleaver-Brooks Low-NOx Hyper mix burners to replace existing 1960's era conventional design burners" (<https://fortress.wa.gov/ecy/industrial/UIPermit/ViewDocument.aspx?DocumentId=416>) should be encouraged but should increased burning should not be a requirement for their installation.

Power generation in Tacoma is already 96% carbon free (<https://www.mytpu.org/customer-service/evergreen-options/>) and the trend in Washington is away from carbon fuels not towards.

In conclusion, when measuring the impact of natural gas and increasing the burning at the WestRock plant, the Department of Ecology must look at 1) full life cycle impacts of natural gas and 2) must use the latest research in terms of fugitive emissions and the 2017 IPCC numbers on natural gases impact on GHGs. The Department of Ecology must also consider the impact of Natural Gas on a 20 year timeline as that is what is considered the time left before it is too late for climate change (IPCC 2017). Lastly, comparison must include other ways to obtain the energy such as solar, wind, and other renewable sources.