

Claudia Riedener

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).

Dear Department of Ecology,

As a resident of Tacoma, who walks and bikes the city frequently, I am opposed to increased toxic air emissions. I am also writing you because we all have a responsibility to protect the up to 1600 asylum seekers and migrants being held against their will in the for-profit detention center. Having spent many hours down by the inhumane center, I can tell you the air is horrid and no humans should be exposed to the air toxins 24/7, especially people who live under extreme stress (often in cruel solitary confinement), lack basic health care, have no protective masks and are fed a subpar diet.

There are several issues with your analysis of the impacts. Neither Ecology nor PSCAA do any cumulative analysis for air toxins or greenhouse gasses, and this despite Tacoma having worse health outcomes than other communities. There are also an environmental justice issues with so many petrochemical and polluting industries concentrated on the Puyallup Tribe Reservation. Native women in particular are much more susceptible to air toxins and asthma according to WA Department of Health study. Toxic air emission are also having worse impacts on tribal members who fish out on the river and bay and fully exposed to harmful air. Ecology's mission is to protect health and environment. In order to live up to your mission you cannot allow any more toxic air pollutants without a complete cumulative impact study including health of people and effects on salmon, orcas, seafood other wildlife. Please conduct a cumulative health impact study before issuing any new permits for any increase in air toxins. We deserve to understand how the many different toxins from so many polluters interact with each other and what that means for our health.

I would also like to remind Ecology that city and port have climate policies that aim to curb more climate harming gases. A drastic increase such as proposed by WestRock violates those policies and harms our climate directly. The climate analysis done by Ecology uses old models that are simply not scientifically correct and would never pass peer review. . Please go back to the drawing board and use best available science for any analysis, plus life cycle analysis for the totality of GHG impacts with methane gas fugitive emissions, not just smoke stack calculations. It is abundantly clear and proven that methane is 86 times worse than CO₂, your study must reflect this. Using anything else creates the appearance of a pro-industry biased analysis and it creates the impression of a less than neutral agency. Your credibility is at risk.

We have experienced that regardless what industry proposes, the permits are issued no matter how many people oppose more toxins and greenhouse gas pollution. We urge you to create meaningful and real mitigation for both and to make sure 100% of ALL the greenhouse gases are offset, not just 50% of expansion. WestRock one of the largest greenhouse gas contributors in Tacoma and one of the largest in the state. As a company, they make hundreds of millions of dollars in profits each year. So far, they have not been held responsible for any of the negative environmental and health impacts. It's time to distribute real costs and not just burden them on local residents.

The case of WestRock is troubling for several reasons. WestRock is burning over 100 cubic yards of plastic trash each day. Burning plastics is very harmful and is only done so that WestRock does

not have to pay to dispose of it properly. WestRock recently purchased a regional competitor and forced the machinery scraped. This makes abundantly clear that WestRock cares nothing about jobs or the environment, but strictly the bottom line. This is particularly troublesome given that WestRock is a large local political campaign contributor and sponsors Citizens for a Healthy Bay, a local group that is often supporting large polluters in exchange for sponsorship, like problematic methanol refinery and polluting LNG refinery until recently. It appears money is the sole motivator for WestRock, and that's why Ecology must be a gate keeper and account for environmental and health harm and levy appropriate mitigation costs. Your job is to protect the public, not the bottom line of multi-national corporations.

There are many schools and day-cares downwind from WestRock's toxic plume. What is Ecology doing for outreach to parents? They deserve to know that there would be an increase of harmful toxins such as lead and more PM in the air. Parents have the right and responsibility to know if the air can harm the children's health and development. When high lead levels were found in Tacoma water, outreach was swift. What about lead, chloroform and formaldehyde in our air?

Finally, I am concerned about WestRock selling electricity all the way to California from burning construction debris and plastics as "green energy" with a higher profit margin, while simultaneously increasing the use of climate killing fracked gas. Tacoma residents have for decades paid for clean energy with TPU. It's ironic that we have been making the right choice and paid for it, but private money interests can pollute our city, harm our health and climate to sell dirty power via TPU. According the Tacoma municipal code, that appears illegal. '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.'

I would like to ask Ecology to take a look at procedures regardless of project proposal. I have noticed that many government agencies are in the habit of burying e-mail notifications late Friday, as happened in this case. Yet Friday was counted as a full day for comment period. Please allow for full comment period beginning when notices are being sent out. It's also common that comment deadlines fall during holidays, when the fewest people are around or not focused on such things as toxic air pollution. I would have rather done many things other than volunteer my time to contemplate cancer, climate chaos and repeat environmental injustices. Please adjust your policies to avoid such conflicts. This point also goes to credibility and neutrality of publicly funded agencies like Ecology.

Thank you

Best regards
Claudia Riedener