

Stacy Oaks

Thank you for the opportunity to comment. I am an organizer with 350 Tacoma so while I live in Tulalip my comments will be focused on Tacoma. I support Tacoma & Tulalip being listed as overburdened communities.

I suggest adding an additional criteria for identifying overburdened communities--history of toxic fires at industrial businesses. Attached is a graphic with businesses near the ancestral tideflats of the Puyallup Tribe, known today as the Port of Tacoma and the dates of fires at those facilities. We have been told by the fire dept that the fires must be reported to the EPA, so that would be a way for Ecology to find information needed to make this a criteria. These fires result in residents feeling immediate health impacts from unknown contaminants. The city currently does not even bother to alert residents about the fires. The history of these kinds of fires should be considered when any of the facilities file to expand or renew permits once this process reaches the point where solutions for overburdened are being created.

The rest of my comments are regarding ideas that should be considered as possible solutions. I know we are not at that phase yet, but historically, by the time these kinds of things reach public comment phase many plans and decisions have already been made. So I will put these ideas to you now in hopes that they make it into early parts of the solutions discussion.

1) Lead SEPA Agency: For overburdened communities, the Dept of Ecology must hold the responsibility of being lead SEPA agency for heavy industrial, fossil fuel, or toxic facilities going through a permit process. This is important because cities like Tacoma do not have staff qualified to do such processes in a good way. There is also often a large conflict of interest when the city, county or Port wants a facility and are then put in charge of determining its impact on the environment & public health. Tacoma publicly boasts about how quick & easy it is for industry to get permits approved. The Tacoma LNG of Puget Sound Energy is a prime example of this conflict of interest and lack of ability. The mayor recruited the project. Attempts by the public and Puyallup Tribe to get a health assessment & safety modeling of an explosion were ignored. Tarika Powell of Sightline testified in court that it was "the worst SEPA" she had ever seen, with it not even clear exactly what type of facility was being permitted. The Attorney General commented that some of the scenarios in the PSCAA permit were "fictional" & it was allowed to move forward using outdated methane data, cherry-picked leakage rates and unenforceable restrictions like all the gas coming from an area in B.C. for the life of the lease. Nobody was looking out for the people of Tacoma or the treaty rights of the Puyallup Tribe which should legally be above local & state laws/permit regulations.

2) Health Assessments: These should be mandated for projects in overburdened communities. The cost should be footed by the company seeking the permit, but done by impartial parties.

3) Cumulative Air Assessments: These should be mandatory in overburdened communities when new or expansion permits are filed. Sacrifice zones like the Port of Tacoma should not keep permitting additional sources of air pollution if the cumulative levels for nearby residences are already unhealthy.

4)Notification about permit processes: The notification areas should be wider to include the areas that will likely receive the air pollution when wind and other factors are considered, not just a certain amount of feet from the facility. The Port of Tacoma often only has businesses within the notification area even though nearby communities feel the effects. Perhaps there could be a way for overburdened communities to sign up for emailed notifications about projects to avoid the cost and environmental impact of printed notices if the area was wider. These notifications should come out in the top 3-5 languages spoken in the overburdened community. The cost of translation services should be borne by the company applying for the permit.

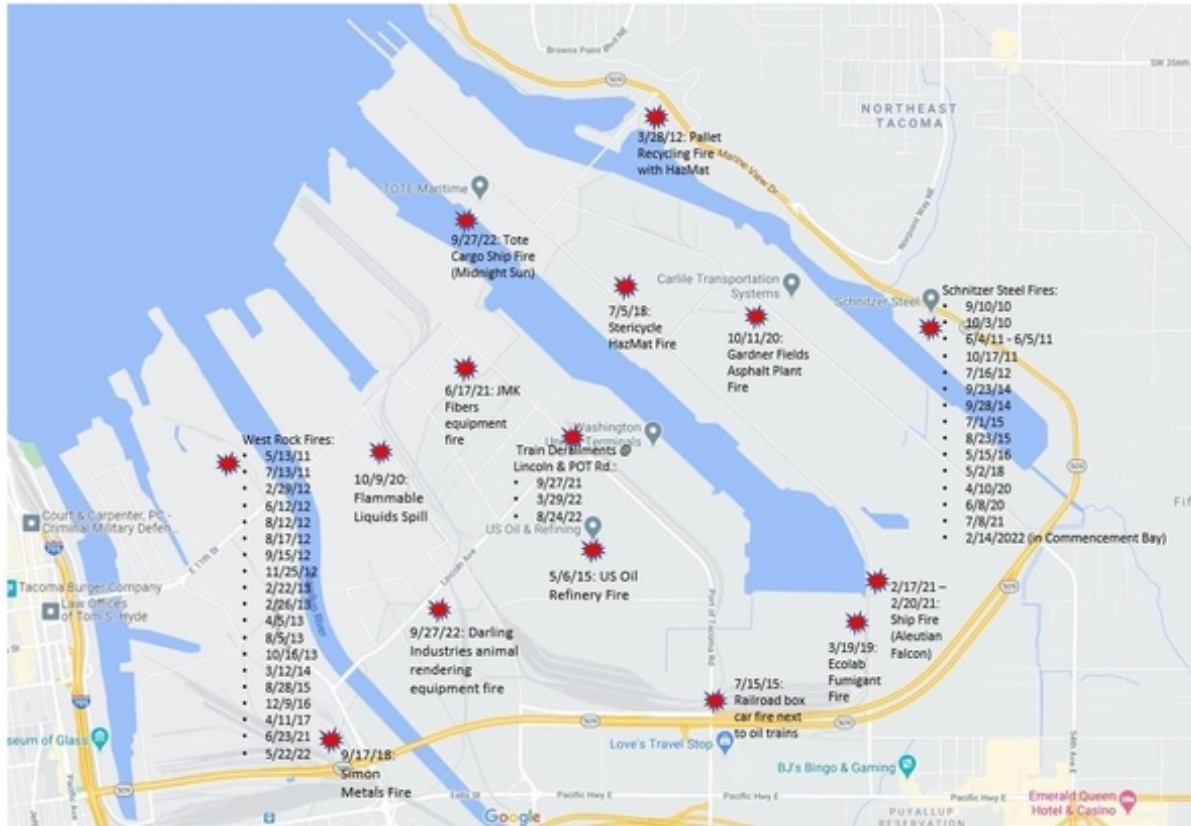
5)Mitigation Efforts: Mitigation should be done in the overburdened community impacted by a project, not somewhere else. There should be a public comment period for the proposed mitigation plans & the feedback should be given some sort of power, not just be a box that is checked off.

6)Support: There should be access for overburdened communities to ask for advice, clarification and support during permit processes. The David & Goliath fight of a well-funded company vs already overburdened communities needs to be leveled out somehow.

7)Traffic Pollution: For communities overburdened by air pollution largely due to vehicle traffic, solutions should be created to proactively upscale public transportation options, electric freight trucks, rail transport of goods & people.

Thank you again for this opportunity.

Tideflats Incidents 2010 – Present *



Sources:

- TFD Twitter
- TFD Incident Report Database
- Local TV News Websites
- Tacoma News Tribune
- Tacoma Daily Index

* Note: this is not a complete list of incidents on the Tideflats, only a partial list based on a limited amount of research.