Rosemary Moore

See attached file

I oppose VoltaGrid's application for an air quality notice of construction permit. Please schedule a public hearing on this proposal. First, adding 14 natural gas generators, makes this a significant fossil fuel project and requires greater scrutiny than a short public comment period. Second, VoltaGrid appears to be trying to circumvent Washington state's climate laws by claiming this is a short-term project, while implicitly relying on the Williams proposal to build a gas pipeline to serve the site, which will lock in gas pollution for decades. This continuing reliance on fossil fuels in makes the lifetime impact of the project much higher than the application implies. According to the SEPA Handbook, "The **total** proposal must be identified before the categorical exemptions can be applied. 'Total proposal' means all interdependent parts of a proposal, including all proposed phases. This will limit the piecemeal review of projects, and allow an evaluation of **all** parts of a proposal." Emphasis added. Third, Quincy is in the 92nd percentile nationally for particulate matter exposure. This project relies upon deliveries from 52 trucks per day to the site: 16 round-trips from diesel-powered semi-trucks delivering compressed natural gas and 10 round-trips from light-duty trucks. These diesel trucks will pollute the air with their fumes. The dust from the gravel roads is supposedly mitigated by VoltaGrid spraying a suppressant annually but there is no monitoring built into this proposal. Further, a pipeline is not a foregone conclusion, so there's no guarantee that this aspect of the project will be temporary. Fourth, Regardless, I am also concerned that there's no assessment of the cumulative impact. When you factor in wildfire smoke and fumes from the diesel generators in Vantage, adding 187,000 tons of CO2 and other pollutants will greatly increase pollution in the area and thus have health as well as environmental impacts. Finally, I am also extremely concerned that you are ignoring all of the upstream methane emissions. There's methane leakage from fracking, as well as from carrying it hundreds of miles in CNG tanks from BC to Quincy. Other gas projects such as Kalama Methanol and Tacoma LNG tried to minimize the upstream impacts too, but the DOE ultimately forced them to account for it, so there's solid precedent for requiring this now. In conclusion, this is a large, complex project that requires more than a 30 day comment period. I am asking for a public hearing and I urge you to deny the permit until the cumulative emissions can be studied.