



March 4, 2016

Board of Directors

And Staff

Ian Munce, Project Planner
City of Tacoma
747 Market St.
Tacoma, WA 98402

Officers

Art Wang
President

RE: public comment on EIS scoping for proposed NWIW methanol plant at Port of Tacoma

Vacant
Vice President

Dear Mr. Munce,

Geoff Lawrence
Treasurer

Thank you for the opportunity for the public to submit comments on what should be included in the draft Environmental Impact Statement for NWIW's proposed methanol plant at the Port of Tacoma. This letter, along with the petition signed by over 1,716 individuals is the official comments from Tahoma Audubon Society, a local environmental nonprofit organization serving Pierce County.

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Secretary

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This letter goes into further details of what is in our petition of areas we feel should be addressed in the DEIS. We request that the lead agency conducts a thorough cumulative impacts analysis of the proposed facility from cradle to grave. That means every aspect of environmental impact that would come about if this plant were to be built from the origins of its fuel sources to the end product seen by consumers. The comments and questions below are organized in this fashion.

Staff

Krystal Kyer
Executive Director

We do not support a tiered approach, as is suggested in the February 5, 2016 draft EIS. This scale of this project required a more thorough environmental review. Frankly, the details of the proposed project are inadequate or completely lacking, which makes it challenging for concerned residents, citizens, and groups to be able to understand and know which aspects are most important to focus in providing comments and questions.

Andrea Michelbach
*Development &
Community Engagement
Coordinator*

1. NATURAL GAS

A. Extraction:

- a. What is the environmental impact of the hydraulic fracturing process at its source? This means wherever the natural gas is extracted from the ground, in the Midwest, in Canada or elsewhere, what is the environmental impact to air, climate, water, associated habitats, species, and human health?

- b. Quantify the volume of impact of acres, gallons, etc and describe the chemistry of materials released into the environment, intentionally or as a byproduct, of obtaining natural gas.
- c. Answer to a-b above for all three proposed NWIW plants at the Ports of Tacoma, Kalama, and St. Helens.

B. Transport:

- a. What is the environmental impact of transporting natural gas fuel from its source to its final destination at the Port of Tacoma?
- b. How will it be transported?
- c. If a new pipeline is to be constructed, as stated, from an existing pipeline in Puyallup to the Port of Tacoma, what is the environmental impact of construction of said new pipeline?
- d. What is the exact route?
- e. What are the known geologic, hydrologic, and seismic risks along that route? What is the risk to the public, to water supplies and nearby waterways and habitats for endangered and threatened species?
- f. What cultural, historical, recreational assets may be affected the route of the new pipeline and possible risk from accidents?
- g. What is the risk to introduction of aquatic invasive species to Puget Sound associated with global ship travel and a ballast water discharge? What species? How much and where will ballast water be discharged?
- h. Answer to a-g above for all three proposed NWIW plants at the Ports of Tacoma, Kalama, and St. Helens and relevant water bodies.

C. Consumption

- a. What is the volume of natural gas to be used to fuel to plant on a daily and annual basis?
- b. How will the natural gas be used?
- c. What is the chemical make-up of to be released into the environment (air, land or water), as a result of burning natural gas? Provide a list of known chemicals and associated volumes of anticipated emissions.
- d. What form will the chemicals released be in? Such as fine particulate in the air, in steam or in water.
- e. Answer to a-d above for all three proposed NWIW plants at the Ports of Tacoma, Kalama, and St. Helens.

2. METHANOL PLANT

A. Location

- a. What toxic risks exist on the Superfund site as a result of the former Kaiser Aluminum plant operations?
- b. Have these toxic hazards been full cleaned up?

- c. Will construction of a new plant at this Superfund site expose and release any toxins that remain?
 - d. How will those toxins be safely dealt with and who will pay for any costs associated with further clean up?
 - e. Are there any known seismic fault lines on or within 5 miles of the proposed site? Provide a map and description of fault lines.
 - f. Is the proposed site located within a lahar zone?
 - g. Is the proposed site built on fill or in a known liquefaction area?
 - h. Is the proposed site at risk from king tides or tsunamis? Quantify the risk.
 - i. If the answer is yes to e, f, g, or h above, then can this kind of plant be constructed in a way that withstands earthquakes, liquefaction, flooding or tsunamis?
 - j. Answers to e-h above for proposed NWIW plants at Kalama, and Port of St. Helens.
- B. Known hazards
- a. What are the known hazards at the proposed site of the NWIW plant, including geologic, volcanic, biologic, marine, seismic hazards?
 - b. How will all known hazards be addressed and mitigated?
 - c. Answers to a-b above for proposed NWIW plants at Kalama, and Port of St. Helens.
- C. Plant Operation:
- a. How much natural gas and LNG will be used in the operations of the methanol plant on an hourly, daily, and annual basis?
 - b. What, if any, discharge will occur as a result of using natural gas and LNG in the plant's operations?
 - c. What is the volume, chemical composition, and state of matter of each and all plant discharges, including into air, land, and water?
 - d. How much fine particulate pollution 2.5 and 10 will be emitted into the air on a daily and annual basis?
 - e. How will emissions into the air affect air quality in plant's vicinity and within the entire area of the Tacoma-Pierce County Smoke Reduction Zone?
 - f. How will emissions into the air affect air quality in the EPA's designated 'non-attainment area' in Tacoma?
 - g. What will the impacts be to public health in terms of illness, deaths, hospital and emergency room visits, as a result of increased air pollution by fine particulate matter and airborne toxins?
 - h. How much fresh water will be consumed daily and yearly as a result of this plant's operations?
 - i. What water conservation measures will be used?

- j. What is the purpose of the water usage? Is that purpose a 'preferred use' by the local utility provider?
- k. How will this new demand on fresh water affect current rate-payers and residential users?
- l. Is their sufficient supply at all times of year to meet the current demand and required instream flows for fish and wildlife and farmers in the watershed to accommodate the increased volume of water to be used? If not, where will additional water come from? Who will pay for it?
- m. What will the wastewater temperature be when it is discharged into the nearby waterway? Will that water temperature affect oxygen levels in the bay? How will it affect nearby marine habitats and water dependent and protected species?
- n. Quantify the amount of wastewater to be released into natural water bodies.
- o. How will the wastewater be treated? Who will pay for it? Are there adequate wastewater treatment facilities to accommodate the increased volume of water to be treated? If not, who will pay for it?
- p. Other than water, HOH, what other chemicals and minerals will be in the water after it is treated and subsequently released into natural water bodies? What is the amount and chemical composition? What impact will those chemicals or minerals have on the natural habitats of the natural water body? If there are negative impacts, who will they be mitigated?
- q. How much energy will be used to power the plant?
- r. Is there sufficient energy supply to power the plant? How is that energy generated (hydro, coal, wind, solar)? What is the environmental impact of producing that energy in particular method? Include impacts to air, water, and land, and greenhouse gas emissions.
- s. Answer to a-r above for proposed NWIW plants at Kalama, and Port of St. Helens.

3. METHANOL TRANSPORT BY SHIP

- a. How many ships will transport methanol from the NWIW plant on the Puget Sound, Strait of Juan de Fuca and the Pacific Ocean to China?
- b. How often and how many days per year will methanol-laden ships travel in Puget Sound waters?
- c. What is the average and maximum volume of fuel on a ship carrying methanol?
- d. What other fuels or hazardous materials will be on the ship?

- e. Will there be a spill response plan in case of an accidental release of methanol due to a shipping accident or defect in the ship? What is the spill response plan? Who will pay for the related cleanup costs?
- f. How will increased ship traffic in Puget Sound affect endangered fish and wildlife, including, but not limited to, salmon, whales, feeder fish, eelgrass, sea stars, and seabirds?
- g. What is the impact of ships on the marine environment in Commencement Bay when docked, full and empty?
- h. Answer to a-h above for proposed NWIW plants at Kalama, and Port of St. Helens and all relevant water bodies (Columbia River, etc).

Beyond these stateside concerns, we should also be considering the impacts of using fossil fuels on the global climate, and in making plastics, especially disposable and one-time use plastic products, and the effects on human health, marine ecosystems, birds, and wildlife.

Given the unprecedented scale of this project and the significant contributions it may have as a new source of greenhouse gas emissions locally and in Washington State, it is important to not rush this environmental review process so there is time to identify and consider the many aspects of local and cumulative environmental impacts. We urge that a comprehensive cumulative impacts analysis be done as part of the draft Environmental Impact Statement, and eagerly await the answers to these questions.

Sincerely,



Krystal Kyer
Executive Director

