



Citizens for a Healthy Bay

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A tax-exempt
501(c)(3) Washington
nonprofit corporation

October 25, 2018

Puget Sound Clean Air Agency (PSCAA)
ATTN: Public Comment on DSEIS, PSE LNG Project
1904 Third Ave, Suite 105
Seattle, WA 98101
publiccomment@psccleanair.org

Hello,

Thank you for the information contained in the draft Supplemental Environmental Impact Statement (SEIS) for the Tacoma Liquefied Natural Gas Project (LNG project).

Citizens for a Healthy Bay (CHB) is a 28-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

We commented on the original draft EIS for this project in 2015, and had concerns that were addressed by Puget Sound Energy's modifications to the project. After that, we were neutral on the LNG project. For the SEIS, CHB's Policy and Technical Advisory Committee, staff, and board have reviewed information in light of recently published reports on climate change, and we are alarmed by the new information available on this project.

Within the SEIS is information that shows the LNG plant would have higher climate impacts than the no action alternative for the life of the project, and CHB finds that the LNG project poses unacceptable risks to Commencement Bay and the Tacoma environment. We also find important parts of the SEIS to be incomplete and misleading for the public. By unanimous vote of our board of directors, CHB opposes any further development of the LNG project. We urge PSCAA to revise and update the SEIS and re-release it for public input.

The most alarming information in the SEIS relates to the amount and impact of methane emissions during the life of the project. A key step to PSCAA's conclusion that the LNG project is better than the no action alternative is evaluating the impacts of the methane emissions after 100 years, at a time when their potency would be significantly diminished. At 100 years, after the methane emissions have lost most of their potency, the SEIS says the emissions from the plant would only be 4 or 5% better than the no action alternative. However, because methane's potency is much higher in the first few decades it is emitted,

examining the impact of methane emissions on a shorter timeline would show the climate impact of the LNG plant to be much worse than the no action alternative.

Climate change is an immediate local and global concern. The 0.5 degrees Celsius increase we have already experienced has impacted our Puget Sound communities and environment. These changes affect the planet as a whole and impact Commencement Bay. Ocean acidification is one example of a global problem from climate change impacting the Puget Sound and Commencement Bay; ocean acidification is hurting shellfish and the people who eat or sell shellfish. We know that climate change impacts Puget Sound and Commencement Bay, and that cutting greenhouse gas emissions now must be a global and local priority.

Recent reports about the progress of climate change indicate that the planet is experiencing rapid warming. Without drastic, unprecedented cuts to greenhouse gas emissions, the planet will warm by more than 1.5 degrees Celsius in the next few decades, and potentially 4 degrees Celsius by 2100. The impact of changes beyond 1.5 degrees Celsius is unacceptable to us. It will massively impact the Puget Sound fishery and ecosystem, and change our communities and economy in ways we cannot yet imagine. To prevent more than 1.5 degrees warming, scientists report that global greenhouse gas emissions must fall to zero by 2050 and then go negative. Cutting greenhouse gas emissions to zero by 2050 is a massive task, and will take drastic, unprecedented measures to accomplish.

With the scale of change that needs to happen in mind, the LNG project is a step in exactly the wrong direction. Increasing methane emissions, which are 86 times more potent than carbon dioxide as a greenhouse gas, in the next few decades is the opposite of what we should be doing. This LNG project would release hundreds of thousands of tons of a potent greenhouse gas at the exact time when we must drastically reduce greenhouse gas emissions. It is a bad idea and should not proceed.

We are also extremely concerned that this SEIS is incomplete and relies on outdated, inaccurate information and is misleading for the public. A critical table in the analysis appendix, Table C.1. uses placeholder figures rather than actual data. Although we have requested the accurate data for this table, it has not been provided.

In the SEIS, the global warming potential of methane and nitrous oxide is assessed based on an outdated standard (AR4) from 2007. The newest standard, AR5, shows that methane has a greater impact on climate change than previously thought. Bizarrely, the SEIS discusses the updated standard and includes the figures for it in its report, but then chooses to use the outdated standard from 2007 for its analysis.

Additionally, the conclusions in the SEIS rely heavily on the assertion from PSE that the plant will only use natural gas from British Columbia. The SEIS fails to provide any analysis or discussion of the potential greenhouse gas emissions if the plant's natural gas comes from another source, such as the United States or other Canadian provinces. As a result, it is impossible to assess the true impact of the project in the likely scenario that the natural gas will be sourced from multiple locations. The SEIS provides an incomplete picture of greenhouse gas impacts because it insisted on an analysis restricted to a certain geography.

Further, the SEIS fails to indicate how the LNG plant scenario compares to the no action alternative in terms of global warming impacts during the 40 year life of the project. The SEIS relies on a 100-year timescale to assess greenhouse gas emissions even though the life of the plant is only anticipated to be 40 years. The public deserves to know the true impact of the project during its lifespan, or, at least, during a timeframe that is relevant to the important changes that need to be made to address climate change. Why have an SEIS that is scoped to explore the greenhouse impacts of a project and then not disclose the greenhouse impacts in a relevant way?

Finally, we are concerned about the exclusion of tribal communities at a critical stage in the process. The City of Tacoma had a legal responsibility to meaningfully involve the Puyallup Tribe of Indians in consultation at the

early stages of this project. CHB did an open records request earlier in 2018, and found that the City did not have records to show it followed the meaningful consultation requirements under the Land Claims Settlement Act. Please do not perpetuate the illegal denial of meaningful consultation with the Puyallup Tribe about actions that impact tribal resources. Take the time to address the flaws in this process. Consult with the Tribe about the information in the SEIS and the significant risks to the Tribe's resources. Then, please revise and update the SEIS with full and complete information, and to re-release it to the public for public comment.

In its current state, the SEIS is incomplete, inaccurate and unreliable. We stand in opposition to this project. We encourage you to pause this process and reissue a complete SEIS on which the public can comment. Thank you for your consideration. Please do not hesitate to contact me with any questions about this letter.

Sincerely,

A handwritten signature in black ink that reads "Melissa Malott". The signature is written in a cursive, flowing style.

Melissa Malott
Executive Director, Citizens for a Healthy Bay
mmalott@healthybay.org, (253) 383-2429

CC: Victoria Woodards, City of Tacoma Mayor
Members of the City of Tacoma City Council
Members of the Puyallup Tribe of Indians Tribal Council
Members of the Puget Sound Clean Air Agency Board of Directors
Jay Inslee, Governor of Washington State
Rep. Jake Fey, Washington State House of Representatives
Rep. Laurie Jinkins, Washington State House of Representatives
Sen. Jeannie Darnielle, Washington State Senate
Hartleigh Caine, TOTE Maritime Alaska