City of Tacoma
Deputy Mayor Ryan Mello
At-Large Position 8

February 15, 2016

Ian Munce, Project Manager
City of Tacoma
Planning and Development Services Department
3747 Market St, Room 345
Tacoma, WA 98402
Tacoma.methanol.sepa@cityoftacoma.org

Re: Comments on Scoping for the Environmental Impact Statement for the Northwest Innovation Works Proposed Methanol Plant at the Port of Tacoma

Dear Mr. Munce,

Thank you for the opportunity to provide comment on the scope of the study related to the Environmental Impact Statement (EIS) for the proposed Northwest Innovation Works methanol refinery in the tide flats of Tacoma. First, I request a full and complete, cumulative impacts analysis of all likely impacts to the environment, climate and human health from the point of fracking the natural gas, its transport, production, shipment and end use of the products. Furthermore, I request an analysis of how permitting and operating the facility with all of its known impacts is consistent with the City's goals of achieving and maintaining our clean air, attainment status for particulate matter and ozone and also the goals set out in the newly developed Tacoma Environmental Action Plan and the City's Economic Development Strategic Framework and adopted Comprehensive Plan.

Below are a series of questions that I respectfully request be thoroughly and completely analyzed:

1. What is the chemical process to be used at this plant for the production of methanol? What are the by-products of the process? At what stages of the production facility is any of the processes potentially flammable or combustible? What mitigation, if any, is available to address these potential concerns? Have there ever been any fire or combustion incidents at other methanol refineries in America?

2. What are the greenhouse gasses to be emitted from the plant? What will that do

to Tacoma's greenhouse gas impact and its stated goals for reduction of greenhouse gasses? How is the plant and its greenhouse gas emissions consistent or inconsistent with the 2015 United Nations Climate Change Conference Agreement and Tacoma's newly developed Environmental Action Plan? What mitigation, if any, is available to address these potential concerns?

3. What are the risks of moving the necessary amount of natural gas through a pipeline from its source to the production facility? What communities will it pass through?

4. What are the air pollutants from such a plant and what affect will it have on human health? Are any of the air pollutants carcinogens? At what volumes will the gas be transported? What mitigation, if any, is available to address these potential concerns?

5. Have there been methanol plants built in other any dense, highly urbanized areas? If so, where? If not, why not? Where are other methanol plants operating in the U.S.?

6. What is the water consumption needed for the operation of the plant? Can the plant truly use "grey" water from the City's wastewater treatment plant? How much fresh water will the plant use? Analyze the available water using best available science with current climate change models in mind. How will the ratepayers of Tacoma Water be ensured there is enough water for their long-term use, especially in the face of climate change along with enough water to sustain healthy fish populations in the Green River Watershed? How will water ratepayers be ensured that the building of this plant will not adversely impact population growth and the rate stability for current ratepayers? Why is there enough water for this intense use when Tacoma ratepayers were on a voluntary water conservation plan during the summer of 2015? What mitigation, if any, is available to address these potential concerns?

7. What effluents or pollutants will be discharged in the waterway during the operation of the plant? What temperature will these effluents or pollutants be discharged at? How will this not harm fish? What mitigation, if any, is available to address these potential concerns?

8. What is the anticipated power consumption for the plant? What impact will the power consumption have on current electricity loads and will the plant have a need for new energy sources to power it? What effect will the power consumption and need have on current Tacoma Power ratepayers? How will current ratepayers along with future population growth projections be ensured this plant will not negatively impact Tacoma's ability to grow? When the current system is experiencing peak loads, does the plant have the ability to turn-off or turn-down production? What mitigation, if any, is available to address these potential concerns?

9. Under what circumstances is the operation of the plant and its various materials and processes flammable or combustible? What is the likelihood of that flammability or combustibility? With all of the surrounding land uses such as U.S. Oil refinery, Targa Sound, the future LNG facility and others, what is the flammability or combustibility impact and risk with all of these facilities so close together and cumulative risk impact if something goes wrong? What mitigation, if any, is available to address these potential concerns?

10. Is the proposed plant on a seismic fault line? What would happen to the plant in the event of a 6.0 or greater earthquake? What mitigation, if any, is available to address these potential concerns?

11. Is the proposed plant in a tsunami zone? What would happen to the plant in the event of a tsunami? What mitigation, if any, is available to address these potential concerns?

12. Is the plant in the flood zone, storm surge zone or sea level rise zone in current climate impacts modeling for the tideflats of Tacoma? What would happen to the plant in the event of salt-water intrusion as a result of a storm surge, flood or sea level rise? What mitigation, if any, is available to address these potential concerns?

13. What impacts will the plant's operation and use of natural resources impact the Muckleshoot Tribe and Puyallup Tribe of Indian's tribal treaty rights and fish harvest ability?

14. What transportation improvements would be necessary to support the operation of this plant and all of the trips it will generate?

15. How high will the various structures stand once built? What impacts will it have on visual blight in Tacoma? What mitigation, if any, is available to address these potential concerns?

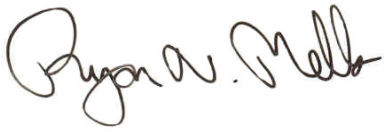
16. What will the light pollution be at the plant and what effect will it have on people and wildlife? What mitigation, if any, is available to address these potential concerns?

17. What are the various safety measures to be used at the methanol facility related to combustibility and dealing with natural disasters such as floods, sea level rise, storm surges, earthquakes, tsunamis and lahars? How are they tested for certainty of performance?

18. Specifically, what local, state, federal, tribal and other special purpose district permits are necessary to build and operate the facility including the expansion of the natural gas pipeline?

Thank you for your attention to these concerns and questions along with your thorough and complete review of the impacts of this project.

Sincerely,



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