

To City of Tacoma

Feb 14, 2017

Pursuant to 40 CFR 1502.9,¹ we request a Supplemental Environmental Impact Statement (SEIS) be conducted for the Liquefied Natural Gas (LNG) plant being proposed by Puget Sound Energy in Tacoma, Washington. Since the issuance of the final environmental impact statement (FEIS), substantial changes have occurred to the proposal that are relevant to environmental concerns, and there are new circumstances or information relevant to environmental concerns.

40 CFR 1502.9 states that agencies:

(1) Shall prepare supplements to either draft or final environmental impact statements if:

(i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or

(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

Additionally, Agencies “shall adopt procedures for introducing a supplement into its formal administrative record, if such a record exists.”

The Washington Administrative Code also provides for the conduct of an SEIS (WAC 197-11-620). The Washington Department of Ecology’s SEPA Handbook² addresses when a supplemental EIS is appropriate. Much like the Federal guidelines, the state guides agencies to conduct an SEIS when information and impacts have changed. At section 3.6, the SEPA handbook identifies several situations when a supplemental EIS is appropriate, including:

- The proposal has changed and is likely to cause new or increased significant adverse environmental impacts that were not evaluated in the original EIS.
- New information becomes available indicating new or increased significant environmental impacts are likely.

As the “lead agency,” it is your responsibility “to prepare supplements to either draft or final environmental impact statements if the above conditions exist. Below we describe the numerous ways in which the statutory requirements for an SEIS have been met. According to WAC 197-11-620, “Unless the SEPA lead agency wants to prepare the SEIS, an agency with jurisdiction which needs the SEIS for its action shall be responsible for SEIS preparation.” You accepted the responsibility from other agencies, so it is your obligation to require and prepare a SEIS.

We are prepared to pursue legal action if you are unwilling or unable to fulfill your obligations.

¹ 40 CFR 1502.9, http://www.ecfr.gov/cgi-bin/text-idx?SID=0f0829c4b3913fb5b967e5e6f3504d3e&mc=true&node=se40.37.1502_19&rgn=div8.

² <http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch03.html#3.6>

Background

Puget Sound Energy, Inc. (PSE) proposes to construct a natural gas liquefaction and storage facility in the city of Tacoma. The facility would be located at the Port of Tacoma, in an area commonly referred to as the Tidelands. The project includes pipeline segments in Tacoma, Fife, and Pierce County, and a lift station in Pierce County. The City of Tacoma, acting as Lead Agency for the purposes of State Environmental Policy Act (SEPA), prepared the environmental impact statements. The City issued a FEIS on November 9, 2015.

When the FEIS was issued, the project was proposed as follows:

- The facility would produce 87 million gallons of LNG per year. The largest portion of the LNG production (75%) would be used for marine bunkering of ships that run on LNG. The second largest portion of the LNG (18%) would be used for ground transportation fuel (tanker trucks that can run on LNG). The smallest portion of the LNG (7%) would be used for peak shaving for PSE's natural gas customers once the additional demand exists.
- The facility would have a loading pier on the Blair waterway for the bunkering of Totem Ocean Trailer Express (TOTE) ships. TOTE is in the process of converting two cargo ships on its Alaska trade route from diesel propulsion to dual-fuel propulsion. This will allow the engines to run on LNG. The proposal was to deliver LNG to Totem through a loading platform on the Blair Waterway. The FEIS stated that only TOTE's ships would be filled at the Blair Waterway pier. (FEIS 3.10.4.1)
- The facility would have a second pier on the Hylebos waterway for the bunkering of all other marine traffic. The FEIS contemplated that the Hylebos pier would receive third-party bunkering barges of various sizes. In addition to the bunkering barges, the FEIS also stated that PSE would sell LNG to "other industry merchants" whose vessels would be received at the Hylebos pier.
- The FEIS also states that two tanker trucks per day would be filled at the facility.

Substantial changes since the issuance of the FEIS

Since the issuance of the FEIS, several changes have occurred. The Puyallup Tribe appealed the project's Shoreline Development Permit to the Shoreline Hearings Board on January 19, 2016. The tribe expressed specific concerns about construction activities and in-water activities proposed by PSE on the Hylebos Waterway, where contaminants from previous industrial tenants are present. As a result of the appeal, PSE stipulated that there would be no "in-water or over-water construction, dredging or fuel bunkering in the Hylebos Waterway."³

As a result of this stipulation, several substantial changes will occur to the project as outlined in the FEIS.

³ Puyallup Tribe of Indians v. City of Tacoma, PSE, Port of Tacoma, and Washington State Dept. of Ecology, SHB No. S16-002, Stipulation Restricting SSDP Re: In- and Over-Water Work in Hylebos Waterway. January 28, 2016.

- Marine traffic will be shifted to the Blair Waterway, where the FEIS only analyzed TOTE's marine impacts. And/or
- Between 700-2000 additional LNG tanker truck trips will have to be conducted from the facility.
- If the Federal Railroad Administration expands LNG-by-rail beyond the permit it granted to Alaska, and they are expected to do so, rail could also be used to transport the "stranded" LNG.

PSE has modified their proposed activities at the Blair Waterway to accommodate ships other than TOTE's, even though they've repeatedly told the City that this was not possible and would not occur.

Additionally, when the FEIS was issued, the Federal Railroad Administration did not allow LNG to be transported by rail. The agency has since permitted a trial run of LNG-by-rail in Alaska and is expected to approve LNG-by-rail for mainline railroads. The railroads that have asked for permission to transport LNG by rail include BNSF and UP. Both of these rail lines not only run through Tacoma, but they service the Port of Tacoma. This opens up the possibility of the Tacoma LNG facility transporting LNG by rail to customers or to PSE's other LNG facility. The FEIS did not evaluate any potential rail impacts.

City of Tacoma has failed its statutory duty by not conducting an SEIS

Originally, the plant proposal considered providing a barging pier on the Hylebos Waterway. This option has since been dropped. Several members of the public requested a SEIS be conducted due to increased traffic on the Blair Waterway or upon the roads of Tacoma. The shift in traffic to the Blair Waterway is of particular concern because the FEIS identifies the Blair pier as a location where an accident would impact areas beyond the boundaries of the facility and would pose a threat to unrelated dock workers. (FEIS 3.5.7) Increasing traffic at the Blair pier to include more vessels and more vessel types would only increase the likelihood of an incident at this location. An increase in road traffic would also pose a hazard. The City failed to conduct safety analyses on the LNG tanker trucks in the FEIS. Perhaps the quantity of trucks was a consideration in omitting this analysis, but the potential increase in LNG tanker trucks now makes this omission quite dangerous.

In response to Tacoma residents' requests for a SEIS, the City issued a statement on Aug. 8, 2016 via its website. The statement concluded that a SEIS was not warranted. The City relied on PSE to make the SEPA determination rather making the determination themselves as the SEPA administrators. The City made several conclusions that are flatly incorrect or contradicted by the data. Further, the City did not follow federal law when issuing this response to SEIS requests. 40 CFR 1502.9 says that agencies:

(3) Shall adopt procedures for introducing a supplement into its formal administrative record, if such a record exists.

(4) Shall prepare, circulate, and file a supplement to a statement in the same fashion (exclusive of scoping) as a draft and final statement unless alternative procedures are approved by the Council.

The City has not communicated any procedures to the public regarding the SEIS and has been unable or unwilling to answer basic questions about its SEIS procedures. Furthermore, the City did not prepare, circulate, and file the Aug. 8, 2016 notice in the same fashion as the draft and final EIS.

Discussion of substantial barging and trucking changes since the FEIS was issued

The City made several errors in reaching a determination that removal of the Hylebos from the proposal did not require a SEIS because it was insignificant due to lessening of impacts. These are the errors the City made in its August 8, 2016 statement on the SEIS:

- (1) The City claims that changes in the PSE scope have been reductions, but there is no evidence that there is a reduction. The City asked PSE, “Does the removal of the Hylebos bunkering operation mean that PSE would liquefy less gas than originally estimated in the FEIS? Would production levels at the liquefaction facility be lower?” PSE responded that “production will be within the range analyzed in the EIS.” The EIS puts this capacity between 250,000 to 500,000 gallons per day. In order for there to be a reduction, PSE would need to reduce their production at the plant. Otherwise, the same quantity of LNG will still be bunkered, just at a different location that has not been evaluated for those impacts. The safety analysis of the Blair Waterway pier only includes 2 ships per week, both belonging to TOTE.
- (2) The City asked PSE whether they would shift the planned Hylebos pier traffic over to the Blair Waterway. In response, PSE lied to the City. PSE said that the fueling configuration of the loading arm at the TOTE platform cannot be modified to service other vessels, so no other vessels would be barged on the Blair Waterway. At the exact same time, PSE made a completely different claim to the ports of Tacoma and Seattle when they applied for a pipeline easement to the Blair Waterway pier. The July 2016 easement request said that PSE intended to use the loading platform for not only TOTE but possibly also for barges that serve other marine customers. Then in January 2017, PSE modified the easement so that they can in fact bunker non-TOTE ships at the Blair Waterway. It is potentially dangerous to increase bunkering at the Blair pier. The City’s independent safety experts, Braemar Engineering, concluded in the FEIS that in an emergency scenario at the Blair pier, LNG vapors and thermal radiation would extend beyond the facility’s boundaries and affect workers at nearby businesses. Would this location have been approved for operations if the safety analysts anticipated more than 2 trips per week? Wouldn’t the analysis have undoubtedly been different if they knew the pier would service many different customers and vessel types rather than just TOTE? These are the type of question that should be taken up by an SEIS.
- (3) Truck traffic from the facility may also greatly increase. PSE told the City, “Removal of the Hylebos bunkering facility is not expected to significantly increase truck traffic from the levels analyzed in the EIS.” The FEIS stated that there would be only two truck trips per day. An LNG tanker truck holds between 10,000 to 30,000 gallons of LNG. The Tacoma facility would produce annually 87 million gallons of LNG. 59 million gallons would go to marine customers (FEIS Appendix J). TOTE would consume 39 million gallons, leaving 20 million gallons for marine

bunkering that would've occurred on the Hylebos but now it has to be delivered in another manner. Marine bunkering can be conducted by barge or by truck. Since PSE is not being truthful about its plans for the Blair pier, let's assume all of the 20 million gallons would be transported by truck. Assuming that PSE uses trucks that hold the maximum 30,000 gallons, it would take 666.67 additional truck trips per year to transport this LNG. That doubles the number of LNG tanker trucks per day. Over a year, it raises the truck traffic quantity from 730 to 1,397. If PSE uses trucks with a 10,000 gallon capacity it would increase annual truck trips from 730 to 2,730. This increases daily truck trips from 2 to 8 – quadruple the number of trucks stated in the FEIS. It's most likely that PSE will use a combination of truck sizes, depending on the customer they are delivering to. So truck traffic will increase by a figure between two and four times as much as stated in the FEIS. These are significant increases. The FEIS did not adequately evaluate the safety of the tanker trucks. But we know that they will be traveling on roads that are not up to heavy haul standards. The City and PSE have made a contractual agreement to bring the roads around the facility up to heavy haul standards within five years of the facility commencing operations.⁴ If it was known at the time of the contract that the actual truck volume would be twice to four times as much, would five years still be considered an acceptable time frame for the LNG tanker trucks to be traveling on roads that were not up to heavy haul standards? Would the City still have decided to skim over the safety issues of the tanker trucks if they knew there would be so many? These are the type of questions that can be addressed through conducting an SEIS.

Without describing how this capacity would be used and delivered, there is now a big unknown in the FEIS. It appears that if it is not barged from the Hylebos, until LNG-by-rail is approved for other states there are only two other options to deliver that large amount of LNG: either barging from the Blair Waterway or tanker trucks. Both barging from the Blair waterway and increased tanker truck trips would require invasive operations that would require additional review. Until this capacity can be accounted for, the impact cannot be known and no further permitting or construction should be allowed.

Significant Adverse Environmental Impacts Were Not Evaluated

As stated above, the environmental impact of barging non-TOTE ships on the Blair was not evaluated, nor was the impact of 700-2000 additional tanker truck trips per year on roads not up to heavy haul standards. But there are other impacts that were not evaluated in the FEIS and we request that the following points be evaluated in an SEIS.

1. One of the most important pieces of information that is required in the FEIS is the capacity of the proposed plant. Throughout the FEIS the capacity is quoted as being "250,000 gallons to

⁴ Agreement between Puget Sound Energy and City of Tacoma providing for environmental impact funding, September 25, 2015.

500,000 gallons of LNG per year.”⁵ This is a broad range with quite different emissions ramifications at the upper end than at the lower end. Yet it appears from the project description on the city’s website and calculations within the FEIS⁶ that the emissions are calculated based on 250,000 gallons per day, meaning actual emissions might be double what is calculated in the FEIS. That is definitely not acceptable. The City should clarify what production figure was used to calculate emissions. If they chose to analyze the base level production, then significant adverse environmental impacts were not evaluated. Further, the range between 250,000 and 500,000 is quite large and we believe the permit should not be written to give PSE permission to operate at double the intended or approved capacity.

2. We would also take issue with the statements in Section 3.2.2.5, pages 3.2-3 and 4. The FEIS notes the following:

“Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews (Ecology 2011) indicates that for projects emitting at least 10,000 metric tons of CO₂e per year, but less than 25,000 metric tons per year, a qualitative disclosure of GHG emissions is required under the Washington State Environmental Policy Act (SEPA). For projects emitting more than 25,000 metric tons per year, a quantitative disclosure of GHGs is required. The quantitative analysis should include GHG emissions from all aspects of the project, including Scope 1 emissions (project direct), Scope 2 emissions (associated with purchased electricity), and Scope 3 emissions (which include construction emissions as well as new, ongoing transportation emissions associated with the project).”

PSE calculated that the facility would emit 20,751 tons per year of CO₂ equivalent per year. An accurate calculation would likely trigger a quantitative analysis of Scope 2 and 3 emissions. The SEIS fails to do a quantitative analysis of any of the emissions in Scope 2 and 3. The sources would include emissions from traffic or trucking, emissions from power plants supplying electricity, extraction or leakage from fracking wells and gas transmission lines. Methane, which is a GHG, would be considered in this category. Inclusion of these Scope 2 and Scope 3 emissions would put the GHG emissions to over 1,000,000 tons per year CO₂ eq. and definitely over the 25,000 tons per year of CO₂ eq. The City should include Scope 2 and Scope 3 emissions in the SEIS. (Note, at a 4% fracking well methane leakage rate and a 250,000 gal/day LNG production rate, the CO₂ equivalent for the leak would calculate to 1,550,000 tons per year.)

3. The impact of the LNG plant on both State and Global GHG emissions has not been addressed with a view to reaching the State imposed targets of reducing GHG emissions. In December 2014, the State of Washington set new GHG reduction limits,⁷ to achieve the following limit for Washington State: “By 2020, reduce overall emissions of greenhouse gases in the State to 1990

⁵ [http://cms.cityoftacoma.org/planning/pse/Reissued%20Final%20Tacoma%20LNG%20EIS%20\(11-9-15\).pdf](http://cms.cityoftacoma.org/planning/pse/Reissued%20Final%20Tacoma%20LNG%20EIS%20(11-9-15).pdf) See Executive Summary ES.2 page 1, Section 1.1 page 1-1, Section 1.2 page 1-2, Section 2.2.1.1 page 2-1.

⁶ See FEIS Appendix J, Economic Impact Analysis of a Natural Gas Fuels Facility in Tacoma and https://www.cityoftacoma.org/government/city_departments/planning_and_development_services/planning_services/pse_proposed_tideflats_lng_facility

⁷ Washington Greenhouse Gas Emission Reduction Limits, December 2014, Publication no. 14-01-006. <https://fortress.wa.gov/ecy/publications/documents/1401006.pdf>.

levels.” The state also recognized the impact of global warming and wanted to do its part. In RCW 70.235.020 (1)(a)(iii) the Legislature required that, “By 2050, the state will do its part to reach global climate stabilization levels by reducing overall emissions to 50 percent below 1990 levels, or 70 percent below the State's expected emissions that year.” Again, the Scope 1, 2, and 3 emissions from the plant could reach well over 1,000,000 tons per year of CO2 equivalent, which would undermine the state’s GHG reduction goals.

4. The assumption that LNG will reduce the GHG emissions by use in cargo ships has been refuted by many experts, including the Union of Concerned Scientists and emissions experts at numerous universities and research institutions. Ian Adams, who is the former CEO of the **International Bunker Industry Association (IBIA)** and now head of the **Association of Bulk Terminal Operators**, states that, “Whilst it is well documented that LNG is an excellent solution for reducing SOx and NOx emissions, I am dismayed to see it being promoted as a solution for reducing GHGs.”⁸ This would put into question the validity of the need and the benefit of the project. Again, the only proofs of needs or benefits are the statements from PSE, which has a vested interest. The assumption requires a lot of emissions factors to be omitted. For example, the FEIS does not include the nitrogen and methane gases that will be released each time equipment at the facility and the bunkering piers is purged. The FEIS focused on combustion emissions and did not take into account the uncombusted methane that will be released each time a ship is bunkered with LNG. The hoses have to be purged before and after bunkering, and this releases methane and nitrogen. The FEIS does not even attempt to quantify how much uncombusted methane will be released in Tacoma by the ongoing bunkering processes. The City should quantify fugitive emissions from the bunkering piers and tanker truck loading through a supplemental EIS. Since most of the LNG will be transferred in this manner, bunkering emissions are a glaring omission from the FEIS. They only analyzed emissions from LNG production and from combustion within the ships’ engines once they are out to sea.
5. The safety data released after several court orders is completely lacking in substance for a major accident. While PSE claimed that releasing the safety data would provide too much information to terrorist that might attack the plant, the judge twice ordered PSE to release the information. After the release of the information, it was discovered that PSE did not even run a scenario that assumed a terrorist attack. They only used that argument as a ruse to prevent releasing the information. The actual safety analysis did not include any information about a puncture or rupture of the 8,000,000 gallon storage tank. While the current regulations might not require it, if the plant were to be an export facility instead of having only domestic consumption, this would have been required. PSE was concerned enough about a terrorist attack to use it as a legal argument. Homeland Security regulations require terrorism analysis for export facilities, but bunkering facilities are very new and the regulations have not caught up to them. However, the City is undertaking numerous measures including installing more cameras at the Port because it does view the facility as a potential terrorist target. Yet it did not require PSE to do any analysis on a potential terrorist attack. It should be part of the environmental analysis until new regulations catch up to this type of domestic production.

⁸ <http://www.maritime-executive.com/editorials/lng-is-not-a-greenhouse-gas-solution>

6. Lastly, the security analysis done by PSE for the FEIS did not consider any consequences of a major accident. They only measured probabilities. A true safety analysis requires both the probability and consequences to be provided. The results of their modeling showed that any spill or fire would be contained within the 550 foot property line. This only is possible with the assumption that only small valves or pipelines could leak for no more than 10 minutes. While the probability of a large leak or rupture is small, the consequences are almost too severe to imagine. First, the probability for only one year was calculated, while the facility life might be up to 50 years. Second, the cumulative probabilities were not calculated. This gave a very low probability and many potential dangers were not considered. Many of the real worries from the public were not even included, such as acts of war, acts of God and acts of third parties such as disgruntled employees or terrorists. We have proven through modeling, using the same modeling program,⁹ that is owned by the Tacoma Fire Department, that a leak in the storage tank could create a vapor cloud that could spread at least 3.5 miles and could create a fire ball if it found an ignition source. If the storage tank were to rupture and cause a pool fire it would create a 3000 degree danger zone that could melt steel and reached 2,066 feet away and at 6,947 feet destroy homes and give humans second degree burns within 30 seconds.¹⁰ While the probability is low, the consequences are so high that nearly every recommendation is to place large LNG facilities about 3 miles from residential areas. The hazardous zone should be measured in miles not feet. No one would recommend 550 feet as a safe zone. These recommendations of a much larger hazardous zone are numerous, but would include the Federal Sandia Report, Tacoma Fire Department's PEAC model, SIGTTO, The Canadian and US Emergency Response Guide (ERG), Lloyds Register, Martin County Fire and Rescue and Dr. Jerry Havens.

Conclusion

PSE has repeatedly misrepresented the facts to the City, the public and the courts. They have no interest in protecting the environment or the public in Tacoma. Puget Sound Energy makes claims that LNG is a clean fuel and states that this project would help improve greenhouse gas (GHG) emissions. (FEIS Section 1.1, page 1-2) PSE have never given or shown any calculations to prove the validity of their claim. A study by Cornell University in 2014 called the use of methane a bridge to nowhere.¹¹ Based on the strongly conflicting data about the benefits of switching to natural gas, there is no proof that LNG is a clean fuel and any claim to that effect should not be allowed. To make matters worse, PSE is currently suing the State of Washington challenging the New Clean Air Rule. This rule requires that utilities such as

⁹ PEAC-WMD by AristaTek

¹⁰ <https://www.hSDL.org/?abstract&did=465391>

¹¹ http://www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf

PSE to cap their GHG emissions and reduce them 1.7% each year starting in 2017.¹² Until PSE can show how they intend to meet this new requirement, they should not be permitted.

For all the reasons stated above, we again request a Supplemental EIS. We have submitted numerous requests without adequate response from the City, so we also request that the City follow the statutory requirement to clarify its SEIS procedures.

It is assumed that during the Supplemental EIS, that any permitting or activities that will endanger the environment will be suspended. For example California requires: "If the supplemental EIS involves a reassessment of more than a limited portion of the overall action, the Department shall suspend any activities that would have an adverse environmental impact or limit the choice of reasonable alternatives, until the supplemental EIS is completed".

Your immediate attention to this request is necessary. The result of a Supplemental EIS is anticipated to prevent legal recourse. In addition, we are prepared to seek legal damages from PSE, the City and the Port if the plant is built.

After an explosion, accident, or environmental issues are discovered, many things might be concluded. I hope that this is not said about the City of Tacoma, "**Otherwise good people, with all the information they needed to make a good decision, made a bad one.**"

Thanks for your cooperation.

A total list of Concerned Citizens will be forwarded upon completion.

Concerned Citizens:

Steven Storms - storms123@aol.com

¹² "Puget Sound Energy Sues of Over Clean Air Rule," <http://www.king5.com/tech/science/environment/puget-sound-energy-sues-over-clean-air-rule/328052155>

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