

Huey, Lorilyn (UTC)

From: Rodger Herbst (raherbst@igc.org) Sent You a Personal Message <automail@knowwho.com>
Sent: Tuesday, February 23, 2021 11:01 PM
To: Records Management (UTC)
Subject: Protect Our Climate Future (Docket #200304 and #200305)

Categories: LH

External Email

Dear Washington UTC,

I was disappointed to learn last year that the Puget Sound Clean Air Agency approved a permit for PSE's Tacoma LNG facility.

The following comments address only the Tacoma PSE LNG FEIS, and the PSCCA FSEIS. They do not address the fact that WA senate bill 5145, prohibiting "fracking" was signed into law on May 8, 2019.

The 856 page Tacoma FEIS, including appendices, published by Ecology and Environment Inc. for Tacoma on November 9, 2015, is remarkable. The proposed facility would produce approximately 250,000 to 500,000 gallons of LNG daily. There is profound silence as to where this massive amount of NG would come from. No production area well or well head is shown in the drawings. The NG to be liquified seems to materialize from nowhere.

On the other hand, PSCCA's Tacoma LNG FSEIS references Fracking 11 times; hydraulic fracturing is referenced 47 times. Apparently massive fracking is part of the Tacoma LNG project, even if they do not admit this in the PSE FEIS made available to the public.

Argonne National Lab, which provided the GREET model PSCAA adapted for its GHG emission study, notes: "Environmental impacts associated with shale gas development occur at the global and local levels. These include impacts to climate change, local air quality, water availability, water quality, seismicity, and local communities." (Argonne NL: hydraulic fracturing and shale gas production: technology, impacts, and regulations 2013.)

Despite this, PSCAA has limited its 281 page FSEIS, dated March 29, 2019 to only address GHG emissions, claiming that other environmental impacts are addressed by the Tacoma PSE LNG FEIS. Yet the PSE LNG FEIS has not even mentioned hydraulic fracturing or fracking.

Although the Tacoma PSE LNG FEIS noted the area is in a zone of seismic activity, no mention is made of whether process water will be injected back into the earth; and no acknowledgement is made that such activity might result in triggering of a seismic event.

Fracking fluids are a blend of chemicals, often proprietary, which typically include acid, biocides, corrosion and scale inhibitors, gels or gums and friction reducers. The amount of these chemicals released into the environment are a function of depth of bore, which is not mentioned in the FIES.

The PSE Tacoma FEIS predicts significant revenue returns from this project. On the other hand, the NYT (11 Dec 2019) notes that the US natural gas boom has given way to a bust. A glut of cheap natural gas is wreaking havoc on the energy industry, and companies are shutting down drilling rigs, filing for bankruptcy protection and slashing the value of shale fields they had acquired in recent years.

There are no significant shale plays in WA state. Further, Argonne National Labs has noted that shale gas wells experience quicker production declines than conventional natural gas production. The EIS makes no estimate of the quality or quantity of any shale materials.

Construction of this facility might lead to a huge expenditure doled out by rate payers, only to deplete any available shale products in a few years. On the other hand, if depletion did not occur, WA state would be locked into continued fossil fuel use for the foreseeable future, inconsistent with transition away from a carbon economy mandated by the state legislature.

Although PSCAA's FSEIS was dated March 29 2019, and Notice of Construction (NOC) for the proposed facility was announced on Tues Dec 10, 2019, PSE construction on the Tacoma LNG project began in 2016.

PSE appears to have disregarded environmental concerns over fracking and carbon emissions, provided consumers with no evidence of the economic viability of this project, and demonstrated they are willing to skirt laws governing construction. It's proposed plan does not appear to be in the best interests of the public.

Rodger Herbst
BAAE, ME

I am writing to ask the Utilities and Transportation Commission to not allow Puget Sound Energy (PSE) to build new gas power plants for their long-range electricity plan and to reduce their use of gas for the long-range gas plan.

According to the International Panel on Climate Change (IPCC), natural gas is far more damaging to the climate than previously thought. Gas may be as bad as coal for the climate. And natural gas certainly is not "natural" when the impacts of hydraulic fracturing or "fracking" to extract gas is poisoning groundwater in communities across the country.

Our new 100% clean electricity law -- the Clean Energy Transformation Act (CETA) -- requires all utilities to be 80% fossil fuel free by 2030 and 100% by 2045. The last thing we need to do is build new gas power plants that would be around for decades. The intent of CETA is to wind down on gas power in our electricity, not ramp it up.

Our new state law that establishes science-based fossil fuel reductions that come from the IPCC, call for 95% reductions by 2050 and 70% reductions by 2040. Yet PSE's long-range plan for its gas utility shows virtually no reductions for the next 20 years. PSE fails to follow recommendations in Washington's new State Energy Strategy that identifies moving buildings from gas to electricity as a key strategy for climate protection.

Enough is enough. PSE must take climate change seriously before it is too late. Please reject PSE's electricity and gas plans.

Sincerely,

Rodger Herbst
1017 ave B
City, WA 98290
raherbst@igc.org
(425) 780-8757

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.