

**From:** [Council](#)  
**To:** [Cathy Halka](#); [Dana Brown-Davis](#); [Jill Nixon](#); [Kristi Felbinger](#); [NaDean Hanson](#)  
**Cc:** [Mark Personius](#); [Matt Aamot](#); [Becky Boxx](#)  
**Subject:** FW: Cherry Point Growth Exceeds Safe Air Quality Standards  
**Date:** Monday, September 09, 2019 12:06:58 PM

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**From:** WENDY HARRIS [mailto:w.harris2007@comcast.net]  
**Sent:** Monday, September 09, 2019 11:55 AM  
**To:** Carol Frazey; Satpal Sidhu; Tyler Byrd; Barbara Brenner; Barry Buchanan; Todd Donovan; Rud Browne; PDS\_Planning\_Commission; Council  
**Cc:** Wendy Harris  
**Subject:** Cherry Point Growth Exceeds Safe Air Quality Standards

To Whatcom county council and planning commission:

A new study from the Journal of American Medical Association was released in August that detailed the **extensive level of harm that can result from exposure to even minute amounts of air pollution, ozone (smog)** in particular. This is concerning because ozone pollution levels are rising as a result of climate change. This finding was based on an extensive, 18-year study involving more than 7,000 people with emphysema and a detailed examination of the air pollution they encountered between 2000 and 2018 in six metropolitan regions across the U.S.

[https://www.sciencedaily.com/releases/2019/08/190813180833.htm?fbclid=IwAR0cow91Xt5UOeXfLC9DYXBHtWTtQulRai\\_WeHIYpiqbboDXZyHtUhsA4QQ](https://www.sciencedaily.com/releases/2019/08/190813180833.htm?fbclid=IwAR0cow91Xt5UOeXfLC9DYXBHtWTtQulRai_WeHIYpiqbboDXZyHtUhsA4QQ)

Our lungs are extremely sensitive to ozone and are damaged by even small amounts. Just 3 ppb (parts per billion) exposure over ten years caused as much lung damage as smoking a pack of cigarettes a day for 29 years. At the same time, our national ozone standards are not adequately protective, allowing over 70 parts per billion (ppm)

This problem is recent and growing in Whatcom County. Ground-level ozone is produced when ultraviolet light reacts with pollutants from fossil fuels. I think it is a safe assumption that our increased ozone is due in part to climate change and in part to the expansion of energy production and transportation at Cherry Point. This includes particularly harmful idling trains.

Any attempt to justify more Cherry Point growth, whether new industry or expansion of existing industry; whether fossil fuel or alleged renewable biofuel or biogas, based on the excuse that it will only increase our pollution a little bit, as reflected recently in the Green Apple Notice of Construction Application at the P66 site, must be evaluated against this stark, new scientific backdrop. (I would like to attach this 270 page application, but it is more than 25MB. Please ask NWCAA for a copy, which is where I obtained my copy.)

It is more than noteworthy that the NOC application is based on a partnership with and services from the P66 Cherry Point facility, **including P66's flaring process in the production of Green Apple's biogas. It will produce up to 325 new gallons of fuel, in addition to the 225 barrels of increased holding capacity from the expanded tank farm (the logistics flexibility project) that was recently approved. We are advised that both parties retain the right to construct another dedicated railroad terminal on site.**

**Additionally, "the PTE (potential total emissions) of at least one emission unit in the project exceeds the Northwest Clean Air Agency (NWCAA) de minimis thresholds for air permitting for PM, PM10, PM2.5, SO2, NOX, VOC, and CO (criteria pollutants). Additionally the facility's PTE exceeds the de minimis thresholds for certain Toxic Air Pollutants (TAP) in the state of Washington (WAC 173-460-150). This Notice of Construction (NOC) permit application requests an approval order from NWCAA, covering PM, PM10, PM2.5, SO2, NOX, VOC, CO, and the TAP that exceed de minimis thresholds. "Renewable" energy has harmful impacts and even expansion of existing facilities involves major expansion and growth.**

DOE is currently updating the state's air quality standards for toxic air pollutants because updated science establishes that current standards do not adequately protect public health. Doctors have seen many examples of people who acquired air pollution-related health issues from air quality that meets allowable levels.

<http://lawfilesexternal.wa.gov/law/wsr/2019/12/19-12-092.htm>

All air pollution matters. It has been known for some time that this is the greatest environmental health risk for most county residents. Even small increases cause significant damage to public health, affecting virtually all of us, even if we don't have obvious symptoms. The health impacts can be sudden and/or take many years to manifest. By this point, it is often too late.

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This has affected me personally. I acquired an environmental lung disease while living in Whatcom County. My pulmonary function has declined to the point that it is not compatible with long term survival. Air pollution is air pollution and my lungs react the same way to pollution from new facilities as it does to pollution from existing facilities.

I have learned that a large portion of BP emissions are directed towards my neighborhood through prevailing winds. I can actually see it at times. The harm

caused by Cherry Point growth, including growth involving "renewable biofuels and biogas", (which are actually are not sustainable long term because they require more resources than the planet has available), creates pollution and air inversions. We must acknowledge that the benefits of high paying Cherry Point jobs are not shared equally in this county. If we hope to have a vibrant economic future, we need employment that is not heavily polluting and is not a zero-sum game.

While we often hear about the mortality associated with air pollution, it seems abstract. I tell you this because I am not an abstraction. I am a local resident standing before you asking that you restrict all expansion at Cherry Point, for new and existing facilities, for public health and safety. Today it is me, but we know that tomorrow it will be many others. All of us look to you for protection. To date, with regard to air quality, you have been lacking. How many more of us have to die before enough is enough with toxic air pollutants and unsustainable growth?

I would appreciate it if this letter could be posted with the other public comments on the Cherry Point comprehensive plan amendments.

Sincerely,

Wendy Harris