

WALLA WALLA 2020

Today's Vision for Tomorrow's Community

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Washington State Department of Ecology
Energy Facility Site Evaluation Council
Olympia WA 98504

Re: Rulemaking under 6001

Ladies & Gentlemen:

The Walla Walla 2020 citizens group is concerned about our quality of life and about the specific effects of coal plants on our county, as well as their general impact on global warming and climate change both in our state and internationally.

While the citations in these comments are to the proposed Ecology rules, they apply equally to the proposed EFSEC rules, and these comments are directed to the proposed amendments to Chapter 173-218 WAC, Chapter 173-407 WAC, and to Chapter 463-85 WAC.

The purpose of SB 6001, as we understand it, is to promote renewable energy, and to limit CO₂ and other greenhouse gas emissions, which are continuing to grow.

Any new coal or fossil fuel plants or contracts should be held to the highest efficiency and sequestration standards, and should not be permitted to contribute further to greenhouse gas emissions, or to other pollution streams.

We appreciate certain provisions of the proposed rules, we are concerned about other portions, and we believe some provisions should be added.

We appreciate:

a. the tying of the permitted emission of 1100 pounds of CO₂ per megawatt hour to net deliverable electrical production, rather than gross generation by a particular plant. This is as it should be, and it should not be altered.

b. the provisions that the maximum emission limitations of 6001 are in addition to the separate mitigation requirements of Washington law (Chapter 80.70 RCW).

We are concerned that

a. the definition of "permanent sequestration" in proposed WAC 173-407-110 is ambiguous with respect to the phrases "high degree of confidence" and "substantially ninety-nine percent." We believe this language should be changed to read,

"Permanent sequestration" means the retention of greenhouse gases in a containment system using a method and in accordance with standards approved by the department that

can be proven to contain at least ninety-nine percent of the greenhouse gases for at least one thousand years.

b. the provisions of proposed WAC 173-218-030(2)(b)(xi), requiring evaluation and data sufficient to establish that the containment system is sufficient to permanently sequester CO₂ “for the lifetime of the project” are ambiguous and should be changed to read “for the period defined in 173-407-110 under “permanent sequestration.” This change should also be made in WAC 173-218-030(2)(d) where the phrase “for the lifetime of the project” is used.

c. permitting of unspecified source contracts for Washington utilities will dilute the purpose and intent of 6001 by allowing polluting power from other jurisdictions to be supplied in Washington, defeating our goals and responsibilities as good citizens of the region and globe,

d. not defining power plant sources for Washington utilities to include those licensed by “local jurisdictions” in other states will also dilute and defeat the purpose of 6001 to protect our common climate and environment,

e. permitting up to 20% CO₂ sequestration leakage, by not requiring monitoring equipment able to detect leakage under that amount as proposed in WAC 173-407-220(1)(c), is irresponsible, and defeats the purpose of 6001

f. all contaminants in the injected CO₂ should be required to be removed, not just a reasonable attempt made under the AKART standard as proposed in 173-218-115(2)(e). Otherwise, the injected CO₂ could become a dumping ground for other significant pollutants.

We believe the rules should be expanded to provide:

a. that the emission limitations shall apply to all emissions related to the entire life cycle of the fossil fuel utilized in Washington power plants, including emissions related to mining and transportation of the fuel to the plant itself. For example, the coal to be used for the proposed coal plant at Wallula in Walla Walla County is to be mined in Wyoming, and is proposed to be shipped by rail to Wallula. The emissions related to the extraction of the coal and its shipment to Walla Walla County should be included in the calculations of the full emissions of the plant in applying the statutory limitations.

b. that Washington utility contracts require the specification of power sources for all power provided to Washington utilities, so that these sources can be clearly understood and properly regulated under 6001.

Our communities will be directly affected by the quality of these regulations, and by the climate change, pollution, and other consequences of further use of coal plants for electrical generation.

We urge you to adopt the most stringent standards available to you to protect current residents, as well as our children and grandchildren, and also their grandchildren from unwise and unsustainable actions that would support our lifestyle at the expense of the health and wellbeing of future generations.

Best wishes,

Daniel N. Clark
Vice-President