

WestRock Public Comment on the 2021 Tacoma Draft Climate Action Plan

This email provides WestRock Tacoma's comment and feedback on the draft City of Tacoma 2021 Climate Action Plan (CAP).

WestRock Tacoma recognizes that the goal of this plan is to reach net carbon neutrality in Tacoma by the year 2050 to coincide with similar national goals outlined in the Paris Climate Accord. However, the plan should acknowledge that without broad support from everyone, including communities outside Tacoma, the objective of net carbon neutrality in Tacoma by 2050 to avert extreme local climate impacts will have no measurable effect.

That said, Tacoma's action plan on climate should be designed to achieve as much improvement as we are capable, and to serve every part of our community. As the single largest consumer and manufacturer of recycled products and renewable energy in Tacoma, we are eager for a plan that makes realistic progress on climate as well as on social and economic justice issues for the people of Tacoma. WestRock Tacoma is therefore disappointed that the draft Climate Action Plan fails to meet this standard by essentially ignoring the opportunity for outreach to our Tacoma operations in creation of the Draft Plan.

We have reviewed the findings of the City of Tacoma Greenhouse Gas Inventory and Business as Usual Scenario Report (2019) which underlies the draft Climate Action Plan. The inventory identifies one of largest attributable pools of climate change emissions in Tacoma as being related to its industrial manufacturing sources. Yet while the draft CAP proposes significant goals to diminish the quantity of emissions from these sources, to our knowledge Tacoma's industrial sources were not meaningfully engaged by the City in developing or confirming the data or assumptions used.

Without the engagement of its most significant contributors, the plan offers a mixed bag of ill-defined recommendations. Because of this, the Plan appears to be more of an incomplete discussion document full of unsupported assumptions and statements than a plan that furthers sound policy. To reiterate our points of concern:

- The plan fails to make use of the knowledge and perspective of existing industrial manufacturing companies across the City that produce and move the goods we all rely on (Appendix 6, pg. 80). These organizations are made up of essential workers who worked through the pandemic and who we are depending on to help the economy recover.
- Appendix 1 analysis of energy use in Tacoma does not appear to take into account the energy produced within the City available to net against energy consumed. The draft plan therefore significantly overstates energy consumption attributed within the City, particularly in the industrial manufacturing sector.
- The Appendix 1 assumption that carbon neutral Hydrogen will be used by industrial processes for future thermal needs in place of current efficient use of natural gas is purely speculative. While WestRock Tacoma is currently engaged with development of these promising technologies, they are in the pre-pilot stages of investigation R&D, and would be premature to identify as achievable or viable technology relied on to support future local manufacturing of essential products.

- Appendix 1 also assumes that the City’s industrial manufacturing sector will reduce its GHG emissions by 90% , and reduce its energy consumption by 42% in the next 28 years. Westrock is designated by State SIC classification as an Energy Intensive Trade Exposed essential manufacturer. Given the long history of energy innovation at the Tacoma Mill, our significant past and present investments and achievements in energy conservation and renewable energy production, and our focus on continuous improvement, we do not foresee a 42% reduction in our demand for energy as a realistic expectation for our business. Nor, without the emergence and marketability of yet unproven or unimagined technologies will the Tacoma Mill be capable of reducing its GHG emissions 90% by 2050.
- The plan is silent on the need to sustain and grow existing business activity that supports good jobs and taxes. Our community needs the continued support of existing essential manufacturing activity to provide services for our residents. Leaving the most impactful manufacturing businesses out of the engagement process sets the stage for uninformed and unbalanced policy now and in the future.
- There is no evaluation of the benefits of the plan’s recommendations and no analysis of their costs. With no discussion of cumulative benefits or costs, the risk of unintended consequences in adopting the plan is too great.
- Economic justice and climate justice are impossible when job prospects in certain segments of the manufacturing economy are anticipated to be eliminated in achieving the plan’s goals. While the Plan identifies homelessness and access to housing as community concerns (Appendix 7, pg. 88), the plan would limit the community’s ability to invest in solutions to address them by systematically eliminating existing jobs. The result would be more social harm than good, which is in contrast to the plan’s goal to “advance community priorities.” (CAP, pg. 5)

WestRock acknowledges the tremendous effort behind the current draft and its call for broader collaboration, balanced participation, and attempt at rigorous analysis in developing a plan that advances sound policy. However, by excluding the existing industrial manufacturing community as a key participant in the discussion, the plan is void of fundamental understanding of the capabilities of those most impactful in actually achieving its plan goals toward GHG emissions reduction and social equity.

WestRock Tacoma shares the same overall vision of what the Tacoma Plan intends, and has GHG gas reduction goals of its own being explored. We believe we can be a significant partner in achieving all of Tacoma’s Climate Policy goals, and are only limited by the extent we are included in its vision, discussion, development.

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