



Racial Capitalism is Business as Usual: A Case Study of the Tacoma Liquefied Natural Gas Project

Mara Henderson
African American Studies Department at University of Puget Sound
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Abstract

In this paper, I argue that the Liquefied Natural Gas (LNG) project in Tacoma, Washington, is a site produced by racial capitalism. I examine theories of Critical Race Theory and racial capitalism as the framework for analysis of the Tacoma LNG case study. I argue that the commonly cited causes of environmental racism—government and democratic failure—are lacking an assessment of economic valuation. It is crucial that the causes of environmental degradation that create injustice are understood so that appropriate responses are imagined to stop current and prevent further sites of environmental injustices. Focusing on three actors involved in the Tacoma LNG project, I argue that government and private industry both devalue indigenous people and other people of color, and position their lives as subordinate to the economic goals of the city.

Introduction

Public testimony at city council meetings is a primary avenue for residents to communicate with city officials. A group of Tacoma residents attended city council meetings to state their opposition to a proposed LNG project in 2017 and asked for the city to conduct environmental reviews. But these residents were continually rebuffed, due to “the general excitement of local officials combined with the promise of tax breaks that seemed to trump their concerns.”¹ These residents included indigenous activists and Water Protectors.

The Port of Tacoma LNG plant project is a site of environmental injustice motivated by racial capitalism, which works through government and private industry to unjustly burden people of color with pollutants. Tacoma is willing to put Puyallup Tribe, and other nearby residents at risk, for the economic benefits that LNG provides. The communities in close proximity to LNG facilities have been subordinated to *municipal economic goals*. How does racial capitalism impact environmental degradation?

LNG is natural gas in a compressed liquid form, so that it has a more stable method for storage. Natural gas is often used in gas stoves and to heat homes, though more recently, methane has become a common fuel in the marine shipping industry. In that particular context, natural gas is being used as an alternative to oil, however, natural gas is methane gas, a fossil fuel, a greenhouse gas, and a contributor to environmental degradation.²

LNG tanks were designed in the 1970’s after a major natural gas shortage.³ The most common LNG tank designs are peak-shaving, used for utility companies to store fuel until peak demand times, and satellite, for treating LNG after transport from tank trucks and trains.⁴ LNG goes through many stages in its life cycle, from extraction, transport and storage; each phase with the potential to leak methane directly into the atmosphere.⁵ Though it has been acknowledged that these leaks happen, the natural gas industry is not required to monitor leakage, allowing the greenwashing⁴ of natural gas to continue.⁶

While there are debates about the health risks of LNG tanks, they are not typically located in close

¹ Brandon Jordan, “Tacoma Residents and Indigenous Communities Unite to Oppose LNG Plant,” Waging Nonviolence, 22 Feb. 2019, <https://wagingnonviolence.org/2017/08/tacoma-lng-facility-opposition-residents-indigenous/>.

² Tarika Powell, “Calling Natural Gas a ‘Bridge Fuel’ Is Alarmingly Deceptive,” Sightline Institute, Sightline Institute, 12 Feb. 2019, www.sightline.org/2019/02/12/calling-natural-gas-a-bridge-fuel-is-alarmingly-deceptive/.

³ “LNG Facility Siting,” Pipeline and Hazardous Materials Safety Administration, United States Department of Transportation, 14 May 2020, www.phmsa.dot.gov/pipeline/liquefied-natural-gas/lng-facility-siting.

⁴ “LNG Facility Siting.”

⁵ See note 2 above.

⁶ Barbara Gottlieb and Larysa Dyrszka, *Too Dirty, Too Dangerous: Why Health Professionals Reject Natural Gas*, Physicians for Social Responsibility, 2017, 1–36.

proximity to large populations, due to the potential for major human health impacts.⁷ Methane in its gaseous form is highly flammable, and though the liquid form (LNG) poses less of a threat for explosions than the gas form, the Tacoma LNG plant processes methane gas into liquid for storage and then back into gas for fuel. There have been experiments by United States government agencies to measure the burn rate and flame height of LNG tank explosions.⁸ Additionally, the United States Coast Guard published its “Guidance Related to Waterfront Liquefied Natural Gas (LNG) Facilities” in 2009, outlining the outcomes of an LNG spill over water, and providing safety recommendations based on those outcomes.⁹ The risks include vaporization of LNG and the subsequent ignition of the methane vapors. The document notes three different distances that will experience varying consequences of an LNG spill. A distance of .3 miles will have severe consequences, 1.0 miles less severe and 2.2 miles least severe.¹⁰ There are homes, schools, and even a migrant detention center within 2.2 miles of the Tacoma LNG tank. LNG used for storing and processing gas composed of methane. Methane is used as fuel in the marine shipping industry. The land where the LNG site is located is owned by the city of Tacoma and leased to PSE to manage the distribution of fuel for ships in and out of the Port. The Port is the primary economic industry of the city, where more than \$1.3 billion of goods and merchandise moved through.¹¹

LNG tanks are not typically located in close proximity to large populations, due to the potential for major human health impacts, but the 1500 immigrants held in detention in the Northwest Detention Center (NWDC), were not considered in the assessment of proximity to a large population, likely due to the zoning of the area. It should be noted that the NWDC is located in an urban-industrial area. In fact, the NWDC is in a heavy-industrial zoned area. A zone policy that is explicitly defined as non-residential, because no one should reside there and be exposed to the toxins, hazardous, and dangers of heavy industry. This policy, and the decision to place the NWDC within this zone, warrants serious consideration as to who the City and Port of Tacoma considers to be worthy of protection from these hazards and ultimately, how they value the human life of migrants.

The Puyallup Tribe will be impacted by the project in terms of the Tribe’s treaty fishing rights, access to ceremonial and cultural sites, and overall health and wellbeing, as the project includes not only an LNG tank but also a new pipeline to connect the tank to existing pipelines. Other residential

⁷ Manola Secaira, “Tacoma’s Long-Delayed Natural Gas Plant Has a Community on Edge,” *Crosscut*, Crosscut, 31 Jan. 2019, [crosscut.com/2019/01/tacomas-long-delayed-natural-gas-plant-has-community-edge](https://www.crosscut.com/2019/01/tacomas-long-delayed-natural-gas-plant-has-community-edge).

⁸ Todd Hay, “The Case For and Against the Puget Sound Energy Liquefied Natural Gas Facility in the Port of Tacoma.” Todd Hay, 24 May 2017, toddhay.com/lng.

⁹ Hay.

¹⁰ Hay.

¹¹ “Port of Tacoma.” Home - City of Tacoma. Accessed May 2, 2023.

https://www.cityoftacoma.org/government/city_departments/community_and_economic_development/economic_development_services/port_of_tacoma.

communities in northeast Tacoma are also likely to be affected by the project, particularly the residents northeast of the Hylebos waterway, within a .5 mile and 1.5 mile radius of the LNG tank. These residents are within the highest risk radius of a blast zone.

Theoretical Foundation

Critical Race Theory (CRT) provides the foundation for an examination into the contestations of the Port of Tacoma, as LNG is being sold as a method of reducing emissions without an accurate representation of the negative impacts it will have on nearby communities. To assess color blindness as it appears in the management of matters at the Port of Tacoma, there should be an assessment outside of the law. The juxtaposition of a race-conscious and a non-conscious model for decision making at the institutional level, and particularly, in the private sphere offers an assessment of decisions by the City of Tacoma and the corporations that operate in the Port. An attempt to ignore or deny race, is ultimately an attempt to conceal the existence of racial oppression, thus, a race un-conscious model at the institutional level enables the persistence of systematic racism.¹²

Taking this assessment one step further to explain environmental racism, Pulido argues that there exists an environmental racism gap, a “persistent inequality between white and nonwhite communities,” which cannot be addressed through universal methods or policies. Pollution follows segregation, so there needs to be a conscious effort to combat racism of environmental racism. This critique of the universal application of environmental action by a state serves to assess the City of Tacoma’s handling of the LNG project, as the LNG project is portrayed as an effort to universally improve emissions, while causing negative impacts on the Puyallup Tribe in particular. The suggestion then is a continuation of pressure on the government for legislation that will alleviate minorities of the disparate exposure to hazardous waste.

Racial capitalism is a critical layer of analysis for understanding the contours of the Port of Tacoma LNG fight. Within the theory of racial capitalism, racism determines how capitalism functions, and how geographic power relations are structured. Ruth Wilson Gilmore put forward an exemplary application of racial capitalism in her study of prisons in California. She exposed the state as a production site of racialized capitalism, as prisons are not a result of the state failure to act, but actually as a valued project of the state.¹³ Gilmore situated the fatal coupling of power and difference as a necessary study to develop richer analyses of how racial capitalism functions and argued that a race-conscious analysis is a requirement for effective and impactful geographic research.

¹² Neil Gotanda, “A Critique of ‘Our Constitution Is Color-Blind.’” *Critical Race Theory The Cutting Edge*, 3rd ed. (Temple University Press, 2013), 35-37.

¹³ Ruth Wilson Gilmore. “Fatal Couplings of Power and Difference: Notes on Racism and Geography.” (*The Professional Geographer*, vol. 54, no. 1, 2002), 16.

Robin D.G. Kelley explains Cedric Robinson's purpose in Black Marxism was to critique Karl Marx's ideas about capitalism as a "revolutionary negation of feudalism" and the ability to detach race from such an economic structure.¹⁴ Black Marxism states that race predates capitalism, as Europe had established racial categories and colonization practices well before the colonization of the Western hemisphere. The application of racial capitalism to the environment exposes that the environmental degradation from global warming is connected to iterations of racism. The Anthropocene, the geological epoch considered to be the time period that humans have significantly impacted Earth's ecosystems, and the reason for climate change, is occurring largely due to the structures and reiterations of racism.

However, Pulido says these scholars do so "as if the geography of wealth and power was somehow nonracial".¹⁵ There are even scholars, who attribute the problems of the Anthropocene to capitalism, and acknowledge the legacy of colonialism and the structures of racism and gender, yet "treat racism as ancillary to capitalism".¹⁶ Ultimately, the fatal impacts of environmental degradation falling along racial lines (environmental racism), is racism in a different form, yet remains a part of racialized capitalism.

A critical intervention that combines racial capitalist and environmental justice understandings of state power is one that sees the government as a perpetrator of environmental injustice. Environmental justice has often failed to fully enunciate this critique, as the movement and scholarship are too often hindered by unrecognition and disregard that ecological devastation is central to racial capitalism.

Applying a lens of racial capitalism to the Tacoma LNG project reveals the governing state as an actor incapable and unwilling to seek environmental justice. Scholars of racial capitalism consider the state an adversary, as it produces devaluation in search of power. Pulido and De Lara take up specifically an attack on the liberal state. They argue the liberal state limits the environmental justice movement because rights-based strategies are too pragmatic and will not get to the underlying structure of racial capitalism or colonialism. As suggested in CRT and demonstrated in this article, the liberal state struggles with racial recognition as a feature of decolonial thought because the state often denies producing and reproducing cities through racialized logic. Pulido and DeLara conclude the environmental justice movement needs a new framework that does not seek recognition from the liberal state, because that will only continue the unjust cycle of colonialism and racial capitalism. Instead, they suggest an abolitionist

¹⁴ Robin D. G. Kelley, "What Did Cedric Robinson Mean by Racial Capitalism?" *Boston Review*, 13 Dec. 2019, bostonreview.net/race/robin-d-g-kelley-what-did-cedric-robinson-mean-Racial-capitalism.

¹⁵ Laura Pulido, "Racism and the Anthropocene." *The Remains of the Anthropocene*, edited by Gregg Mitman, Robert Emmett and Marco Armiero, (University of Chicago Press, 2018), 116.

¹⁶ Pulido, 117.

and decolonial framework for that work. An abolitionist and decolonial framework is not being utilized to fight the Tacoma LNG project, and environmental justice activists have been unsuccessful in stopping the project.

Leanne Betasamosake Simpson draws attention to decolonial work as the way indigenous activists have always navigated social and environmental justice work, as indigenous communities have been pushing back against racialized capitalism since the beginnings of colonialism. Thus, the case study of Tacoma LNG as a site constructed by the settler colonial state and reconstructed by racialized capitalism, must consider a decolonial approach toward environmental justice.

Methods

The methodological approach of a case study is recommended for answering questions of “why” and “how” of environmental injustice.¹⁷ This research method values narrative, and other forms of knowledge. A case study is used to tell the story of people or an event, with the parameters set by the researcher,¹⁸ using documents created by the government for the permitting and allowance of this project to analyze the relationship between government and private industry actors. The method is well suited for analyzing the role of racial capitalism in the production of environmental degradation, through the Tacoma LNG project.

I assess the presence of racialized capitalism in the implementation and construction process of the LNG project from 2014 to 2020. The main actors of the case study are the Puyallup Tribe of Indians, the City of Tacoma and Puget Sound Energy. The purpose being to analyze how these institutions operate around and interact with the Puyallup Tribe. This will reveal the devaluation of the tribe, and their subordination to the economic goals of these institutions. The content for analysis includes newspaper articles, policy reports, governance and permit documents, recordings from public forums, and letter correspondence between actors.

Findings

The first set of impacts on health and safety are those that will affect the Puyallup tribe, particularly concerning fishing areas between the two waterways where the pipeline would be constructed. The city of Tacoma has been built on the native lands of the Puyallup Tribe of Indians. The

¹⁷ Pamela Baxter and Susan Jack. “Qualitative Case Study Methodology: Study Design and Implementation for Novice Researchers .” (*The Qualitative Report* , vol. 13, no. 4, Dec. 2008), 545, doi:<https://nsuworks.nova.edu/tqr/vol13/iss4/2/.545>

¹⁸ Baxter and Jack.

Puyallup Tribe has remained on these lands for generations, despite genocide, land dispossession,¹⁹ the construction of the Port and the subsequent Superfund sites²⁰, the fish wars, and many other attempts to deprive them of their livelihood.²¹ The Tacoma LNG project is yet another attack on the value of their culture, their identity and their lives.

The Tacoma LNG plant is located on the Blair and Hylebos waterways, extremely close to the placement of the Puyallup reservation (see fig. 1). The Puyallup Tribe has been an ardent critic of the LNG project for its impacts on the environment, including the land, air, and water, and the impacts it will have on their community and the broader community. The Puyallup Tribe is at the center of how this project can be analyzed through a lens of racial capitalism. The project threatens the quality of their land, water and the fish harvests, all of which are a part of their identity as Puyallup people. The LNG project is yet another threat to those that live in and near the Port of Tacoma, as the risk of the LNG tank includes hazards that will impact human health. As shown in figure 1, those that are in closest proximity to the LNG tank are the Puyallup Tribe, residents in Northeast Tacoma, and detainees in the Northwest Detention Center. This study explores how the implementation of this project is a devaluation of these people for economic gain.

In addition to GHG emissions, LNG terminals release harmful pollutants, such as volatile organic compounds (VOCs), nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO) and particulate matter (PM). All of which impact human health and close long term proximity puts humans health at the most risk.

Additionally, LNG is a fossil fuel and the emissions produced throughout the entire process of extraction, transport, condensation and storage, contributes to the global emissions of greenhouse gasses causing climate change. And it should be noted and considered that frontline communities and indigenous communities stand to bear the brunt of the environmental, social, economic and human health impacts of the climate crisis. New construction and infrastructure for anything other than renewable energy, ensures decades more of the hazards of natural gas, and ensures ongoing tensions between the city and the Puyallup Tribe for future generations.

In addition to the effect of the LNG plant on the Puyallup Tribe, the role of the firm Puget Sound Energy (PSE) is critical to understand through an analysis of racial capitalism and environmental justice. In 2013, TOTE Maritime and Puget Sound Energy (PSE) entered a contract to build an LNG plant at the

¹⁹ “Puyallup Tribal History.” Puyallup Tribe - Home, www.puyallup-tribe.com/ourtribe/.

²⁰ “What Is Superfund?” EPA, Environmental Protection Agency, 30 Nov. 2018, www.epa.gov/superfund/what-superfund.

²¹ Rachael Williamson, “Still Fighting After All These Years: A Puyallup Tribal Member’s Perspective.” Tacoma Community History Project, (University of Washington , 8 Nov. 2017), blogs.uw.edu/tchp/tag/fishing-wars/.

Port of Tacoma.²² In this case study I will focus on the PSE LNG project between 2014-2020. 2014 marks PSE's first communication about the project to an outside agency or organization. Now in 2020, the project is fully permitted and preparing to launch in 2021. This period is meaningful, as it reveals the ways racialized capitalism has driven the construction and permitting process of the LNG plant, as economic valuation, derived from social difference, has been placed on those who will be most impacted by the project.

PSE is a Canadian-owned energy and utility consortium that is in the process of launching a new \$310 million natural gas plant in Tacoma. The project consists of transporting natural gas from Canada via new and existing pipelines and trucks, to an LNG tank at the Port of Tacoma, to be used primarily as fuel for TOTE Maritime cargo ships and for other marine shipping companies.²³ PSE maintains that the LNG project is necessary for marine shipping in the Port of Tacoma to, "meet emissions standards and provide fuel to residential customers".²⁴ PSE has grounded the project as a benefactor to "Tacoma, Pierce County and the entire South Sound region," by providing support to local marine shipping in order to sustain the Port economy.²⁵

PSE has been met with public opposition at every step in the process of permitting and construction. The project has experienced opposition only as minor roadblocks, since ultimately, the project remains on track to launch in 2021 as planned. The PSE project has support from the City and Port of Tacoma. The efforts by those opposed to the implementation of LNG in their community have not been enough.

In 2014, PSE began its communication with the Puget Sound Clean Air Agency (PSCAA) "regarding the upcoming project in anticipation of an NOC [Notice of Construction] application" submission, marking the first communication PSE had with any external entity.²⁶ PSE determined the LNG plant was to be constructed on a leased parcel of land between the Hylebos and the Blair waterways (see fig. 2). The Hylebos waterway is a part of the Puyallup Tribe of Indians reservation. At this point, the Puyallup Tribe had not been consulted nor informed about the LNG project to come, and PSE began to construct the LNG plant without final permits.

²² "Frequently Asked Questions." Puget Sound Energy - Tacoma Liquid Natural Gas, tacomacleanlng.com/faqs.

²³ "PSE Proposed Tidelands LNG Facility." City of Tacoma Washington, 2018, www.cityoftacoma.org/cms/One.aspx?portalId=169&pageId=67144.

²⁴ "Tacoma LNG Facility." Citizens for a Healthy Bay, 8 Oct. 2019, www.healthybay.org/work/tacomalng/.

²⁵ "Frequently Asked Questions." Puget Sound Energy - Tacoma Liquid Natural Gas, tacomacleanlng.com/faqs.

²⁶ Steven M. Van Slyke, "092517 PSE LNG Facility Ltr." Received by Char Naylor, Lisa A. H. Anderson (Puyallup Tribe of Indians), Scott Missall, Nicholas Thomas (Short, Crossman and Burgess PLLC), Puget Sound Clean Air Agency, 25 Sept. 2017.

It is also critical to understand where this LNG plant fits into energy markets and economic factors to see the motivations clearly. The LNG project will supply methane gas for cargo ships and construction trucks used by TOTE Maritime, as well as gas for PSE's pipeline network to local customers during periods of high demand. The market factors are the import/export at the port of goods transported by marine shipping, demand for fuel alternatives for the shipping industry, and potential damages the city is not financially responsible for.

Another player in this struggle is TOTE Maritime, which is a U.S. shipping company. They specialize in moving cargo between Canada, the upper 48 states, to Puerto Rico and Alaska. TOTE Maritime contracted PSE to construct an LNG project in the Port of Tacoma to provide their cargo ships with fuel that will meet the updated emissions standards. Natural gas produces less emissions at the point of burning fuel than the currently used fuel, diesel. Natural gas emissions however, are only monitored at that point, and do not include emissions along the entire supply chain, like the emissions released during fracking.

Finally, after outlining all of the actors in the LNG plant in Tacoma, it is possible to lay out the order of events in the struggle against its construction. In September 2014, The City of Tacoma began the environmental review of the LNG Project.²⁷ After several months of preliminary review, the City of Tacoma issued a draft Environmental Impact Statement (EIS). Under the National Environmental Policy Act, an EIS requires that for any actions that might significantly impact the quality of human environment, to assess the "positive and negative effects and [list] alternatives for an undertaking".²⁸

The draft EIS was issued on July 7, 2015 and open for public commentary for a month until August 6, 2015.²⁹ There were a total of 27 written public comments submitted to the 2015 EIS, majority of comments in support of the project, "with particular emphasis on the perceived economic benefits associated with the development of the Tacoma LNG Facility".³⁰ These comments primarily came from "neighboring residents, local businesses and business groups, union members, current and former City of Tacoma and Pierce County officials".³¹ Aside from the expressed favorability of the economic impacts of the project, there were concerns from the Puyallup Tribe of Indians "regarding potential health and safety

²⁷ "Tacoma LNG Final Environmental Impact Statement (FEIS)". Ecology and Environment Inc., City of Tacoma, 9 November, 2015, 1.

[https://cms.cityoftacoma.org/planning/pse/Reissued%20Final%20Tacoma%20LNG%20EIS%20-%20Full%20Document%20\(11-9-15\).pdf](https://cms.cityoftacoma.org/planning/pse/Reissued%20Final%20Tacoma%20LNG%20EIS%20-%20Full%20Document%20(11-9-15).pdf)

²⁸ "Vocabulary Catalog." EPA, US Environmental Protection Agency.

²⁹ Shirley Schultz, "Notice of Action Taken." City of Tacoma, City of Tacoma Planning and Development Services, 30 Nov. 2015, cms.cityoftacoma.org/planning/pse/Notice%20of%20Action.pdf.

³⁰ "Tacoma LNG Final Environmental Impact Statement (FEIS)". Ecology and Environment Inc., City of Tacoma, 9 November, 2015, 382.

³¹ "Tacoma LNG Final Environmental Impact Statement (FEIS)".

hazards related to an LNG facility and potential impacts on the Tribe and wider communities,” and from the EPA “regarding certain construction methods and environmental monitoring protocols, particularly in sensitive areas along the Blair and Hylebos Waterways”.³² The City of Tacoma “accepted and incorporated... comments received through August 14, 2015, into the Final Environmental Statement Impact (FEIS) issued on October 26, 2015.³³ The FEIS was then published on November 9, 2015, which “many stakeholders found lacking,” heightening both the awareness and tension around the proposed LNG project.³⁴

In 2016, PSE began construction of the LNG plant “despite not having their environmental permits fully secured,” and received no substantial repercussions for violating those regulations.³⁵ The Puget Sound Clean Air Agency (PSCAA) “received asbestos project notifications in late 2016 for work on the site” which was to continue into 2017.³⁶ The PSCAA eventually issued a Notice of Violation to PSE for “failure to obtain a Notice of Construction approval prior to construction, installation, establishment or modification of a source”.³⁷ These actions are offered as ways to monitor and manage environmental impacts specific to air quality.

On August 30, 2017, the Puyallup Tribe contacted the Puget Sound Clean Air Agency with “a request for an investigation and possible enforcement action against Puget Sound Energy (PSE) and the Port of Tacoma with respect to compliance with [the] Notice of Construction permit application and approval requirements”.³⁸ And in response, on September 25, 2017 the PSCAA denied the Puyallup Tribe this request, stating PSE agreed to remedy their non-compliance issue with the PSCAA. Stating they were therefore without the authority to prevent further action on construction.³⁹ The PSCAA however, had yet to permit the LNG project; this process would come two years later. This effort was one among many in

³² “Tacoma LNG Final Environmental Impact Statement (FEIS)”..

³³ Schultz.

³⁴ Manola Secaira, “Tacoma's Long-Delayed Natural Gas Plant Has a Community on Edge.” *Crosscut*, Crosscut, 31 Jan. 2019, crosscut.com/2019/01/tacomas-long-delayed-natural-gas-plant-has-community-edge.

³⁵ “Tacoma LNG Facility.” Citizens for a Healthy Bay, 8 Oct. 2019, www.healthybay.org/work/tacomalng/.

³⁶ Steven M. Van Slyke, “092517 PSE LNG Facility Ltr.” Received by Char Naylor, Lisa A. H. Anderson (Puyallup Tribe of Indians), Scott Missall, Nicholas Thomas (Short, Crossman and Burgess PLLC), Puget Sound Clean Air Agency, 25 Sept. 2017, www.portoftacoma.com/sites/default/files/092517%20SVS%20ltr%20re%20PSE%20LNG%20facility%20Tacoma.pdf.

³⁷ Slyke.

³⁸ Slyke.

³⁹ Slyke.

the Puyallup Tribe's requests to halt the LNG development; yet these requests have "been ignored by all agencies to date".⁴⁰

In 2018, The Tacoma Fire Department's emergency response models from 2016 were released, after a Public Disclosure Request from Advocates for a Cleaner Tacoma. The Fire Department refused to disclose the results of their models to the public, because "it would cause too much conflict with the City of Tacoma's stated position of supporting the LNG plant".⁴¹ The Fire Department did not release the findings of any of their models to prevent outing the City for putting more of its residents at risk. The results of the models show emergency planning "in a zone up to 12.6 miles" of the LNG facility.⁴² The Fire Department model is vastly different from the safety model done by PSE, "which resulted in a 550 foot radius zone," and was the zone area the City of Tacoma used in its assessment.⁴³ PSE was required to demonstrate that any LNG malfunction and safety concern would be contained within the plant site, otherwise the plant would not be allowed to operate.⁴⁴ The City of Tacoma and the Tacoma Fire Department withheld the emergency response model results to assure PSE would be able to continue their operation.

The City of Tacoma was invested in supporting the PSE's LNG plant because of the prospect for capital growth in the city and because the LNG is framed as a cleaner alternative to diesel. This serves a method for the City, the Port and PSE to maintain their role in energy markets but with a better image of taking climate change and environmental degradation seriously.

The implementation of the LNG facility is a decision the city made for the communities that would be impacted. In February 2018, LNG expert Tarika Powell "testified in court that the City of Tacoma had "obstructed" members of the public from pursuing any legal remedies" over the environmental review process.⁴⁵ The City limited public participation in the review process just as the activists opposing the project were gaining momentum.

⁴⁰ "PSE Continues to Build LNG Fracked Gas Tank in Violation of Permits." Change.org, Puyallup Water Warriors and Redefine Tacoma, 3 Dec. 2017, www.change.org/p/jay-inslee-stand-with-the-puyallup-tribe-no-lng-fracked-gas-in-the-salish-sea/u/22093222.

⁴¹ Mara Alexandria Rae, "Evaluating Procedural Justice in the Tacoma LNG Public Review Process." Archives.evergreen.edu, Evergreen State College, 2019, archives.evergreen.edu/masterstheses/Accession86-10MES/Thesis_MES_2019_RaeM.pdf.

⁴² Steve Storms, "Did the City of Tacoma Hide LNG Safety Documents from the Public?" Advocates for a Cleaner Tacoma (ACT), 9 Aug. 2019, www.cleanertacoma.org/press-release/did-the-city-of-tacoma-hide-lng-safety-documents-from-the-public/.

⁴³ Storms.

⁴⁴ Steve Storms, "Did the City of Tacoma Hide LNG Safety Documents from the Public?" Advocates for a Cleaner Tacoma (ACT), 9 Aug. 2019, www.cleanertacoma.org/press-release/did-the-city-of-tacoma-hide-lng-safety-documents-from-the-public/.

⁴⁵ "Tarika Powell Tacoma LNG Testimony." Native Daily Network, 350 Tacoma, 10 Mar. 2018, www.youtube.com/watch?v=jeX7dcz1Enk&feature=youtu.be.

The Tribe had only received a general notice letter about the LNG project, which they do not consider “meaningful consultation,” based on guidelines written in the intergovernmental “Executive Order 13175”.⁴⁶ The City of Tacoma overlooked the Puyallup Tribe as a valid stakeholder in the LNG project. The fact the city did not properly consult the Puyallup Tribe demonstrates the city’s devaluation of the Puyallup people. Tacoma has been more concerned with the economic benefits of LNG, than the impacts on the Puyallup Tribe. When the city’s mistreatment of the tribe became public knowledge the city agreed to review their tribal consultation policy, to “improve early contact with tribal leaders”.⁴⁷

When LNG spills over the water it causes cryogenic burns, asphyxiation, dispersion, fires, and explosions. Detainees at NWDC are already exposed to poor air quality and poorly maintained air filtration inside the detention center. Already, the water in the area is known to have been contaminated with lead and arsenic from the ASARCO copper smelter, drinking water is often brown and bottled water costs detainees \$2 a bottle. Though conditions are already bad, they could be worsened by yet another fossil fuel facility in the area.⁴⁸ The detention center was built next to an EPA Superfund site, which is now home to a facility for recycling metals. In 2018, lithium-ion batteries in the facility ignited, burning car remnants and emitting fumes that the detainees could smell, according to Maru Mora Villalpando, an immigrant advocate with La Resistencia. “Everybody is saying, ‘This is gonna be terrible if something happens. Tacoma is in danger,’” Villalpando said. “Just think about the people that are detained right here”.⁴⁹

“This project leaves Tacoma as a near-perfect symbol of the climate crisis: An American city ignoring a sovereign Indigenous nation, waving a climate emergency declaration about in one hand, and a massive tank of methane gas in the other”.⁵⁰

Conclusion

⁴⁶ Mara Alexandria Rae, “Evaluating Procedural Justice in the Tacoma LNG Public Review Process.” Archives.evergreen.edu, Evergreen State College, 2019, archives.evergreen.edu/masterstheses/Accession86-10MES/Thesis_MES_2019_RaeM.pdf.

⁴⁷ Lynda V. Mapes, “A ‘Monstrosity’ or a Step Forward? Puyallup Tribe, PSE in Showdown over Tacoma Natural-Gas Plant.” The Seattle Times, 9 Apr. 2018, www.seattletimes.com/seattle-news/environment/puget-sound-energy-puyallup-tribe-in-showdown-over-lng-plant-on-tacoma-tideflats/.

⁴⁸ Rico Moore. “How a Gas Facility Started a Fight over Climate Change and Tribal Sovereignty.” Energy News Network, March 10, 2022. <https://energynews.us/2022/03/10/how-a-tacoma-gas-facility-started-a-fight-over-climate-change-sovereignty-and-human-rights/>.

⁴⁹ Moore.

⁵⁰ Moore.

No matter what happens with the LNG project, the City of Tacoma cannot be held liable for any harm.⁵¹ “Under Washington State law the act of governmental permitting does not shift liability” for any catastrophic events to any permitting agencies.⁵² The law allows for the city to put a community at risk and to not be held responsible for any harm they have authorized.⁵³ The city is extremely powerful in this situation, as there are no repercussions for their devaluation of communities like the Puyallup Tribe. The city’s economic ambition outweighs their protection of the Puyallup people, residents in Northeast Tacoma, detainees in the NWDC, and those that work at the Port. The LNG project “will allow the Port of Tacoma to continue to be an operating, thriving port, and that’s a huge contributor to the South Sound’s economy,” and the reason for an analysis of economic valuation.⁵⁴ Racial capitalism is at work in this project of environmental degradation. The Puyallup Tribe does not have enough value for the city to rightfully include them in the process, or to protect them from the hazards. The impacts of this LNG project go beyond those directly impacted by the infrastructure, as LNG is a contributor to global warming. The LNG project adds new emissions that will ultimately have racially disparate impacts around the globe.

Racial capitalism has devalued the livelihoods of Puyallup Tribe and other communities

This work began with the question: How does racial capitalism impact environmental degradation? The literary discussion of the environment was at the nexus of CRT and racial capitalism to give a framework for the Tacoma LNG project to be viewed in the case study. The case study involved three main actors around the implementation of the LNG project, the City of Tacoma, the Puyallup Tribe, and PSE. I have argued racial capitalism has produced the Tacoma LNG project, as the Puyallup Tribe is not valued enough by the City of Tacoma and PSE for their fight against the project to outweigh its perceived economic benefits. Racial capitalism is producing environmental degradation, in Tacoma and elsewhere, as indigenous, black, and people of color (bipoc) are differentiated and devalued. The pervasiveness of economic valuation in the ways society operates has allowed for environmental degradation to exist and impact those perceived as having less value. No one wants to live in a harmful environment, but the devaluation of people based on race authorizes their subjection to these places. If

⁵¹ “Port of Tacoma.” Home - City of Tacoma. Accessed May 2, 2023. https://www.cityoftacoma.org/government/city_departments/community_and_economic_development/economic_development_services/port_of_tacoma.

⁵² “Port of Tacoma.”

⁵³ “Port of Tacoma.”

⁵⁴ Tim Joyce, “Controversial Tacoma Energy Project Set to Open in 2021.” Q13 Fox, 6 Nov. 2019, q13fox.com/2019/11/05/controversial-tacoma-energy-project-set-to-open-in-2021/.

bipoc were not differentiated based on race, and economic valuation did not control the social structures of society, there would already be more clean energy solutions implemented.

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