



**Our mission:  
Promote the growth of family-wage jobs in  
the context of sound environmental practice.**

January 27, 2015

Office of Land Use Hearings  
1800 Continental Place  
Mount Vernon, WA 98273

RE: Shell Refinery Shoreline Variance and Permit

Greetings:

The Northwest Jobs Alliance is a non-partisan affiliation of citizens from across the political and philosophical spectrum who are united around the need for the retention and growth of family wage jobs under sound environmental practice. Most of our members are from Whatcom and Skagit Counties and they include business and labor leaders, elected officials, civic leaders, and citizens of various perspectives, all united in a common mission. (See above.)

Our current focus is on the growth and viability of the heavy industry in our region. This is what produces the area's high-wage jobs. A recent study of the Cherry Point heavy industrial area in Whatcom County by WWU's Center for Economic and Business Research found that, of the 7,000 employers in the County, just those eleven that operate within the heavy industrial zone generate approximately 15% of the wage base. Petrochemical plants are high-wage enterprises and have one of the highest multiplier effects on the economy. (A summary of that study is attached.)

The same principles apply to the refineries in Skagit County, which operate in an area that has long been set aside for this purpose. This job base is crucial to the welfare of working families. Every time there is a change to an existing operation, it is unreasonable to require a full EIS. Some common sense and practicality must prevail so that businesses can respond to changing factors in their markets and needs. The same is true with the use of the rail infrastructure, which is an essential element of industry and commerce.

The opponents of the Shell project are in many cases the same people who are seeking to "de-industrialize" the economy and the shorelines of Washington elsewhere. They picture an economy without basic industry, especially if it has anything to do with fossil fuels. But poll after poll shows that they are in the minority of Washingtonians. There are many stakeholders involved in this project who appreciate the benefits of refining and manufacturing employment: the project proponent, organized labor, generations of hopeful workers and their families, taxing districts, exporting states engaged in interstate commerce, and others.

We support efforts to enact sensible and effective means to protect the environment and to improve the safety of our transportation infrastructure (a matter to which the federal and state governments, as well as the BNSF, are devoting a good deal of attention). But the focus should remain on *how* industry can function while making improvements. The EIS process should not be misused as an entanglement that brings important segments of our economy to a halt.

Thank you for considering these remarks.

Respectfully,

A handwritten signature in blue ink that reads "Brad Owens".

**Brad Owens**

A handwritten signature in black ink that reads "John S. Huntley".

**John Huntley**

**Co-Chairs**