

To whom it may concern:

Comments in regard to Intel Emissions

“Enriched” version of my testimony given at The Dalles meeting of the Environmental Quality Commission on June 19, 2014 where Dale Feik and I attended and spoke.

Submitted by Dan Bloom - 7/27/14

Point #1 — Proportionality

One aspect of the Intel emissions issue that has not received enough attention is location of the point source. When the location is surrounded by high density housing and other dense land use – the risk of harm is multiplied by the number of our favorite species. Let’s not leave out all bio-diversity negatively affected. I believe the current standards for the release of air contaminants do not address the proportionality of this reality. A more stringent standard needs to be applied under these conditions, otherwise, ultimately, over time, this could change the meaning of the popular term – “smart growth”. There should be a sliding scale of regulation. Factory contaminant emissions in a crowd vs. all alone are not the same conditions and should have proportionally restrictive regulations.

Point #2 — Holistic Context for Analysis

I would also like to draw attention to the breadth of information to consider when setting direction for regulation. The assumption is that all consideration should not stop at the borders of a particular purview. A system dynamic with its various feedbacks requires contextual data and historic facts and actions to better understand the proclivities and motives for future behaviors of the prime actor – i.e. the entity – Intel.

You no doubt have heard many repeated positive aspects of Intel’s persona. Most of the time coming from Intel’s public relations team, their friends in local government, or from studies commissioned by Intel. Some people refer to the latter strategy as “buying your own facts”.

I’m asking you to look up:

- Superfund pollution sites associated with Intel
- The 20-year clean-up at Intel (Aloha Fab).
- The book “Boiling Frogs”
- The misinformational flyer formerly available at Hillsboro Planning about how many Intel employees live in Hillsboro (off by 200%). Not a high point for data driven engineers but could be an attempt to nourish the collaborative relationship with certain Hillsboro and Washington County officials while they bask in the public relations glow of the entity.

What about the 766 million in local tax breaks over the past 10 years? How about the “talks with local government on a new package of property tax exemptions that could be worth more than 1 billion to the company”. (Oregonian – Business Section, Friday June 13th, 2014).

See the same Oregonian article about how Intel successfully pushed the legislature in 1993 to allow the tax breaks. The cleverly titled Strategic Investment Program is highly controversial. Prominent Economists such as Richard Wolff, Joseph Stiglitz, and Paul Krugman do not agree

that these programs are healthy for the economy but to the contrary have the destabilizing effect of creating income disparity. It is very good for the very few. It's amazing how they sell the idea that their equipment is very expensive and without the tax breaks; business here would be financially prohibitive. What's often omitted is Intel's 50 billion per year in revenue, assuming no taxes on dollars reinvested in new Fabs, along with the exponential production advantages of smaller circuitry on larger substrate. Think train loads of money for the entity to use in their various ways. It is not Moore's Law; it's the law of MORE.

Moving on, you might find fascinating the historic record of Intel's Anti-Trust woes. Currently, further along in the business section, (Oregonian, Friday, June 13th, 2014 – (and who says bad things don't happen on Friday the 13th?) (Bloomberg News as source).

"Intel loses appeal of 1.4 billion EU fine ". Intel's argument was "rejected in its entirety" and the fine was "at the lower end of the scale". Please read the article if you somehow missed it. It could have been a \$5 billion dollar fine. They were kind to Intel.

So what's this stuff got to do with air pollution? Answer – nothing directly – but indirectly showing motive, actions and behaviors of a supposed "free market" success story, helping to define a more comprehensive and accurate persona of the entity. Please look into less illuminated aspects of Intel's history, (this is just a much abbreviated list) when you form your own opinions. What does a more complete and comprehensive historic, documented record show us about powerful multi-national entities and their cohorts? In my opinion, nothing less than best practices for constant monitoring of all emissions as they are emitted to join the common atmosphere should be acceptable.

It is well known – that with 80,000 industrial chemicals already collecting in the common air and water (and 1000 new ones each year), the first essential step must be to know what and how much contaminant is released so the research can show bio accumulation and trends toward causation of harm.

The loop hole about trade secret emissions shown on their air contaminate discharge permit is interesting. Maybe we could put some secret stuff enclosed with lab rats and look for effects. Or maybe the CEO of Intel would volunteer to breathe some air (on a daily basis) with small amounts of the secret stuff in it. It appears that secret stuff is legal to emit. It follows that if it's legal it must be ok – right? ----- Wrong!

On the bright side for Intel they should consider the good will it would generate if they would measure, (with quantitative and qualitative data), on a constant basis at the source of emission and verified by an independent and objective body – perhaps academic science. This would be the way to generate real trust – not "anti-trust". Trust should not be a faith based given – Even here in Hillsboro – the church of Intel – a public opinion shaped by Intel that is not supported by a significant preponderance of all the evidence is not useful to anyone but Intel and their closest friends.

It's good news that Intel is diversifying, (after its miscalculation of market direction), and that one of the new markets is the possible inclusion of Intel product in sophisticated air monitors. They could help fix themselves, In House, while selling product - the height of irony!

We, as biological creatures, may not need quite so much of Intel – inside – of us.