

Marcela Mulholland

August 5, 2024

Gayle Garbush
Southwest Region Office
PO Box 47775
Olympia, WA 98504-7775

SUPPORT: Project Macoma's National Pollutant Discharge Elimination System (NPDES)
Wastewater Discharge Permit

Dear Ms. Garbush:

Thank you for the Department of Ecology's continued attention to the health of our natural environment and to the department's forthcoming determination regarding Project Macoma. Project Macoma is the proposed 2-year pilot project seeking to remove legacy carbon pollution from the atmosphere and improve water quality in Port Angeles.

On behalf of the Carbon Removal Alliance, I strongly urge Ecology to issue Project Macoma a final NPDES Wastewater Discharge Permit under Chapter 90.48 Revised Code of Washington (RCW) and Chapter 173-216 of the Washington Administrative Code (WAC).

The Carbon Removal Alliance narrows the gap between innovators and policymakers working to remove carbon from our atmosphere. We're a coalition made up of 25 of the industry's most promising companies. Led by long-time carbon removal thinkers with close ties in Washington, the Alliance translates the realities of building carbon removal projects into federal programs that help the field scale. Unlike typical trade associations, we're a nonprofit driven by our principles of high-quality and permanent removals. Alliance members are responsible for virtually all of the permanent carbon removal to date and represent an emerging class of companies who can help the US meet its climate goals. We're building an industry worthy of public and private sector investment — one that's categorically good for the climate, economy, and people. We believe that Project Macoma is aligned with this vision.

We agree with the Tier II analysis that finds that the drawdown of atmospheric CO₂ affected by Ebb Carbon's technology is necessary and in the public interest. Permanently removing CO₂ from the atmosphere is necessary to keep global warming below 1.5°C or 2.0°C above pre industrial levels to avert the worst consequences of climate change. The National Academies of Science, Engineering and Medicine have emphasized that pilot projects like Project Macoma are critical for advancing the field of marine carbon dioxide removal. This 2-year pilot project offers an opportunity to rigorously test and validate a promising approach to carbon dioxide removal that is permanent, net-negative, additional, and verifiable.

Furthermore, developing this technology in Washington State will help the state meet its greenhouse gas reduction goals, combat the impacts of ocean acidification, and continue leading in the development and deployment of innovative negative emissions technologies.

Thank you for the opportunity to provide feedback on this important matter and for Ecology's continued dedication to protecting communities and ecosystems from the worst impacts of climate change.

Sincerely,

Marcela Mulholland

Marcela Mulholland
Deputy Director of Partnerships
Carbon Removal Alliance