Comment: Formal Comments on Kalama Manufacturing and Marine Export Facility Draft Second Supplemental Environmental Impact Statement, September 2020
RE: Emissions and Global Warming
Date: September 15, 2020

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To: Washington State Department of Ecology c/o Rich Doeges

Thank you for the opportunity to comment. Thank you for requiring the SEIS be redone. Thank you for the changes made.

I am very much against the building of the Kalama methanol refinery because we are in a climate crisis and must stop our use and worldwide use of fossil fuels as soon as possible. I love hiking, kayaking and studying nature. Therefore, I am a member of the Audubon Society, Sierra Club and Columbia Riverkeepers and other outdoor groups. My daughter-in-law's family lost a beloved home this month to fire in Oregon but this is nothing compared to the devastation experienced by so many worldwide due to a warming climate.

Please revise your methane leakage rates to 1 to 3% to align with current findings and the Stockholm Environment Institute. 1% leakage is far below what should be expected. As you are familiar, the Stockholm Environmental Institute wrote (SEI-1800-db-towards-a-climate-test) "the US Department of Energy estimates that an average leakage rate for natural gas supply systems nationally is 1.6%"…However, research based on atmospheric measurement suggests that bottom up estimates…consistently under estimate methane emissions. Brand finds leakage could be 25-75% higher than inventory based estimates which would mean leakage rates of more like 1.5 to 2.6% for the US average." Rodney Mountain was found to be 2.8%; global average is accepted at 4.3% for shale gas production. SEI concludes that 1-3% leakage would be plausible for the Kalama methanol refinery.

Downstream impacts for the methanol refinery should assume that all methanol produced will be burned. We do not know the end use; China can use it in any way desired. Even if a percentage is used to produce plastics, the plastics will most likely also be burned. Similar to the purchase of insurance, it is imprudent to plan for less than the worst case scenario. 100% eventually burned is likely. There is no evidence that 40% of methanol will be burned.

Looking at the big picture, the refinery would encourage significant fracking at a time when it is imperative that the world reduce use of fossil fuels. The project would likely necessitate an additional north-south pipeline which in turn encourages more fossil fuel extraction. Increased extraction of fossil fuels violates Washington clean energy goals. Increased extraction will likely soon violate national goals. It is wrong to accelerate harm to the people and species of the world by increasing fossil fuel extraction and infrastructure. It is wrong to be party to the effects from the refinery and the acceleration of storms, fires, droughts, political unrest, climate refugees, expense…

The portion of the draft second SEIS which deals with displacement of dirtier methanol production in China should be eliminated. It is far too speculative with no evidence. Also, it sets a precedent for future projects to request approval on the basis that there exists a more polluting method which could be displaced.

In its present form, the second SEIS clearly shows a significant, unmitigatable increase in global greenhouse gas emissions. It is morally wrong for Washington and the USA to be a partner in this increase. Please deny the shoreline substantial development and conditional use permit on the basis of unacceptable greenhouse gas emissions.

Kristin Edmark