Attn: Rich Doenges
NWIW SSEIS
Washington Department of Ecology
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Comments on: Draft Second Supplemental Environmental Impact Statement (draft SSEIS) on Northwest Innovation Works’ Proposed Kalama Methanol Facility

I am an environmental health scientist with more than 40 years’ experience in environmental public health in state and federal agencies and in university teaching. I am commenting on the proposal to permit this methanol facility because of my concerns about the folly of this proposal and the harms it will inflict on the public. It is my sincere belief that this project is not in the interests of the people of the State of Washington, the Northwest, the country, or the world.

Regarding the draft SSEIS for the proposed Kalama Methanol Facility, it is apparent that the Washington Department of Ecology is not taking science seriously when a spokesperson for Ecology concludes that greenhouse gas emissions would be reduced more if this plant were operating than if it were not. This conclusion depends on other less efficient plants ceasing operations if this plant were operating. There is no way to know this, so operating this plant would, in fact, increase greenhouse gas emissions!

Everything we know says we must eliminate the use of fossil fuels in order to have a livable future. The fracked gas to be converted to methanol in this plant is primarily methanol, a potent greenhouse gas. The intergovernmental agency on climate change has cautioned the world on the basis of scientific consensus that we have 10 or fewer years to make drastic changes in our way of doing things in order ward off the worst effects of the global climate disruption.[[1]](#footnote-1) We are seeing these effects manifested every day in increased storms, flooding, heat, droughts, wildfires and their devastating effects on all our life support systems: loss of clean water, increased air pollution, disrupted crops, food insecurity, destruction of species, disruption of ecosystems. The effects on human health and livelihood are devastating!

How can a public agency charged with protection of the environment of the state ignore the overwhelming evidence that we are in a crisis that demands an end to the “business-as-usual” that brought us to this point?

We are in the midst of a triple public health crisis for which we must take urgent steps to prevent continued and increased threats to health and life. Catastrophic climate disruption, a global pandemic of lung disease aggravated by air pollution, climate change induced wildfires adding to the unbreathable air and increasing susceptibility to pandemic disease, displacement of thousands of people regionally, (millions worldwide), without shelter to reduce exposure either to the polluted air or to COVID-19. These are related to continued emissions of greenhouse gases including methane.

We have had plenty of warnings! It is past time to take the warnings seriously and stop taking half measures. That is what this proposal is: a misguided plan that would increase the demand for and production through extreme extraction of fracked gas, lock us in to 40 years of fossil fuel use when we could be using our scarce resources to expand development of real sustainable (including sustaining human life) clean and renewable sources of energy.

The use of fracked gas also has adverse impacts on all the communities across the US that are suffering from the public health and safety impacts of fracking,[[2]](#footnote-2) Our understanding of the adverse health impacts on communities near fracked wells increases as this extremely damaging process continues to be used. Water and air are contaminated, aquifers are drawn down, and the wastes from this process are indiscriminately dumped. The proposed Kalama methanol project does not exist in isolation. Its upstream and downstream impacts go far beyond Washington State and these will not and cannot be mitigated by NWIW. No consideration of these true costs of this facility was given in the draft SSEIS. This is unconscionable.

Our survival on this planet will not allow us to extract, transport, process and use fossil fuels for the next 40 years, the proposed lifespan of this facility. We won’t get a chance to undo this terrible mistake.

Please deny the Shorelines permit and reject this project!

Theodora Tsongas, PhD, MS

1. IPCC. 2018. Special Report. Global Warming of 1.5 Degrees C.

 https://www.ipcc.ch/sr15/ [↑](#footnote-ref-1)
2. The Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking (Unconventional Gas and Oil Extraction) 6th Edition. 2019. Concerned Health Professionals of NY and Physicians for Social Responsibility. http://concernedhealthny.org/compendium/  [↑](#footnote-ref-2)