



Seotember 27, 2020

Richard Doenges, Regional Director
Southwest Regional Office
Department of Ecology
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Via Web & Email: <http://admin.ecology.commentinput.com/?id=kG9ji>
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In Re: Kalama Manufacturing and Marine Export Facility Draft Second
Supplemental Environment Impact Statement

Director Doenges:

Thank you for this opportunity to comment on the proposed Kalama Methanol Plant.

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment. We oppose locating any coal or other fossil fuel terminals in the State of Washington, and any expansion of such terminals elsewhere.

As we commented in our December 27th, 2018 letter, which we incorporate by reference, Washington State is a leader in clean energy and should not be approving the transport and storing of so dangerous a fossil fuel. In addition, we incorporate by reference those comments made by Grays Harbor Audubon Society, Earthjustice, Columbia Riverkeeper, Washington Environment Council, Center fo Biological Diversity, Washington Physicians for Social Responsibility, and the Sierra Club.

We find the following to be significant adverse impacts and are concerned that they were inadequately addressed in the SEPA/NEPA review process and this new Supplemental document.

1. The project proposes to create the world's largest methanol refinery, proposed on the Columbia River in Southwest Washington, would use more fracked gas than all of the Pacific Northwest cities combined and need massive new fracked-gas pipeline expansions throughout the region.
2. "Following the crude oil collapse in early March, the US methanol market was largely unchanged until later in Q2 as some domestic production issues were cleared up. Domestic product availability was widely viewed as more limited, but as production continued to run smoothly during Q2, oversupply was a top concern for much of the market. Consumption of US methanol in Q2 remained quite muted with less active than usual spot market seen for much of the quarter. Coronavirus weakened demand, particularly from China, impacted the global methanol market. Weaker demand caused US spot prices to sink to four-year lows as stricter coronavirus precautions implemented in much of the country". Source: *Independent Commodity Intelligence Services (icis.com)*. This seems to conflict with the "Markets and Trends" statement made in the Executive Summary. It is clear that proposed and planned facilities will have an effective lifespan beyond the time when all experts agree that we must abandon all fossil fuels. This means that these will be stranded assets and wasted economic investments. Are we considering another destructive white elephant for the Columbia River?

3. We reiterate, the Methanol plant would not meet Governor Inslee's package to transition to 100 percent clean electricity by 2045, as well as several other proposals to clean up electricity, buildings and transportation and a mandate for utilities to eliminate all fossil fuels, such as coal and natural gas, from the state's electricity by 2045.

4. Ocean acidification will only be increased as we continue to use and abuse fossil fuels. Our Pacific Northwest marine resource economy provides sustainable economic value to both tribal and non-tribal communities. Treaty rights and our coastal communities cannot be ignored by inappropriate development.

Sincerely,



Arthur (R.D.) Grunbaum
President

