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Submitted via online comment form

September 29, 2020

RE: Kalama Manufacturing and Marine Export Facility Second Supplemental EIS

Dear Department of Ecology,

Thank you for the opportunity to comment on the Second Supplemental EIS (SEIS) for the Kalama Manufacturing and Marine Export Facility.

This new analysis confirms that Northwest Innovation Works' (NWIW) proposed facility would become one of the largest sources of climate pollution in Washington. The refinery would produce at least 4.6 million tons of greenhouse gas pollution each year for 40 years. The project would result in new greenhouse gas emissions at all points in the process—from fracking and piping the gas, to its conversion to liquid methanol, to its downstream conversion to plastics or fuel, and then the burning of that fuel. Building out new fossil fuel export infrastructure in this manner is at odds with Washington's climate change mitigation goals and the severity of the global climate crisis.

The SEIS's conclusion that this methanol could displace future dirtier energy in other countries is speculative and flawed. Ecology should base its permitting decision on what is reasonably foreseeable about this project: the assured, significant pollution from fracking gas, producing and refining methanol, and burning or using methanol. Energy technologies are likely to change significantly in the next 40 years; Ecology speculates about the future of Chinese energy and methanol consumption but does not similarly estimate future clean energy potential. The analysis should consider whether cleaner energy technologies may dramatically displace the need to use methanol for transportation fuels. Ecology should also consider whether dumping methanol into the market could impede a transition to cleaner transportation alternatives and vehicle electrification.

We are also concerned that some portion of the methanol is likely to be used to make virgin plastics,[1] and the analysis does not adequately account for the long-term impacts of those plastics—whether it fills up landfills, ends up as ocean pollution, or becomes a fuel in China via waste-to-energy

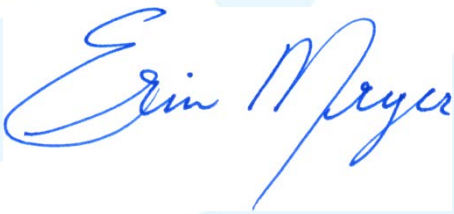
[1] One of the products that NWIW specifically mentions could be made with its methanol is polar fleece (SEIS Appendix D). The Seattle Aquarium has eliminated polar fleece uniforms because the microfibers are commonly found in ocean samples.

incineration, which has enormous carbon pollution and public health consequences. Ecology is currently taking meaningful steps to address plastic waste and pollution in Washington. Supporting a project that will directly support increased production of virgin plastics—rather than reuse, post-consumer recycled content, and a circular economy—is inconsistent with the agency's own efforts and the urgency of the plastic pollution crisis.

Mitigation projects are also not a justification for continuing to build out the fossil fuel industry. The urgency of climate change demands that mitigation should be the *last* option (after all other possible steps are taken). First and foremost, we should not construct new fossil fuel infrastructure in our state.

We urge Ecology to deny NWIW's proposal to build and operate the methanol refinery in Kalama by rejecting the Shoreline Conditional Use Permit. In doing so, you will get Washington on track to meet its climate mitigation goals, and not assume that future energy needs must be met by fossil fuels. You will help keep our air and our water clean and show that Washington is walking the talk as a true leader in climate action.

Sincerely,



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