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September 20, 2020

Rich Doenges, Director
Department of Ecology
Southwest Region
PO Box 47775
Olympia, Washington 98504-775

In Re: Kalama Manufacturing and Marine Export Draft Second Supplemental EIS

Dear Director Doenges,

The Grays Harbor Audubon Society is opposed to the NWIW methanol refinery proposed to be built on the Columbia River. At a time when we must reduce carbon pollution and the impacts of climate change, considered a major threat to our security, introducing the proposed refinery would cause millions of tons of greenhouse gas pollution. This level of pollution is inconsistent with achieving Washington's climate goals, protecting Washington's Shorelines, and charting a path to keep global temperature rise below 2 degrees C. The fact that this is a permanent installation being constructed means that methanol will continue to be exported to (probably) China for many decades to come, a strong source of greenhouse gases out of control of any U.S. regulations.

The SEIS argues that methanol could "displace" dirtier energy when in actuality it will add to the amount of dirtier energy. Ecology's analysis contemplates 40 percent of the methanol being burned, yielding 2 million tons of carbon pollution each year. Combustion of the full methanol production capacity of the plant would generate 5 million tons of pollution each year.

Over 62 bird species comprising thousands of birds were identified in the area of the Columbia River near the proposed refinery by Washington Audubon members in September 2019. Birds are seriously affected by everything, from changes in the timing of their food (insects) items to massive die-offs from huge regional fires during migration. Greenhouse gases causing global warming is upsetting many of the intricate timing regimes of natural systems, including flowering, insect emergence, wildlife food sources, migration and others not yet recognized. Life as we know it depends on lowering greenhouse gases, not allowing them to persist well into the future.

In addition, the proposed facility would negatively impact public health and negatively.

1. Fracking pollutes water systems and causes physical harm from earthquakes and the devastation of surrounding habitat.
2. The pipeline required to transport fracked gas has a high-risk potential for leakage and spills, releasing harmful chemicals into ground and surface water.
3. On-site operation of the facility would pollute the Columbia River and its tributaries with harmful runoff and contribute to reduced air quality leading to increase instance of asthma and other respiratory illness.
4. Methanol emits a wide range of hazardous air pollutants including ammonia, carbon monoxide, nitrogen dioxide.
5. Methanol is highly flammable and extremely toxic if ingested or inhaled.
6. Spills into large natural bodies of water, such as rivers and oceans, cannot be contained.
7. Increase in tanker traffic would harm endangered salmon and increase risk of ship strikes that harm or kill whales near the mouth of the Columbia River.
8. Pipelines will need to be built to supply the refinery, endangering communities along the route.

9. Accumulations of methanol vapors in confined spaces may explode if ignited, and containers filled with methanol may rupture violently if exposed to fire or excessive heat for a prolonged duration.

10. The proposed plant would be built on soil with moderate to high risk of liquefaction in a known earthquake zone.

Washington cannot contribute to the goal of keeping global warming “well below 2 degrees Celsius” by allowing major polluters to move forward. A low-carbon future demands investment in lower-emitting production processes. Ecology should not assume that future energy needs must be met by fossil fuels. All fossil fuel pathways would be massive polluters. None of them will solve our climate crisis.

Ecology also fails to consider whether cleaner energy technologies may dramatically displace the need to use methanol for transportation fuels. Industry studies show that more investment in fossil fuel industries yield much less job growth than greener energies. There is a greater job return in moving to a green economy. All of these high-carbon paths are unacceptable and inconsistent with Washington’s clean energy and climate goals, and will not bring the jobs promised.

Thank you for your careful consideration of these concerns. The risk is too great.



Janet Strong, President
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on behalf of the
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