

Comment on the Kalama Manufacturing and Marine Export Facility Second Supplemental EIS

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The Kalama Manufacturing and Marine Export Facility (KMMEF) has a planned lifetime of 40 years, and the Second Supplemental EIS (SSEIS) takes this into account when calculating its lifetime effect on the environment. While lifecycle analyses are the current standard, they are not typically relative. For example, Apple doesn't report the lifecycle impact of its iPhones compared to other popular phones. If other phones are worse that doesn't mean that Apple's phones have a *negative* effect on emissions. Apple is responsible for its own emissions, and its phones' emissions by extension. By comparing the output of the proposed KMMEF to other current or hypothetical plants based on predicted methanol markets over the next 40 years, the Department of Ecology has created a misleading, unproductive, and highly questionable report.

The state of Washington is responsible for its greenhouse gas emissions, not those of other countries around the world. However, by highlighting the relative emissions of the KMMEF over its absolute emissions, this logic is broken. The SSEIS states explicitly that "if KMMEF sells 3.6 MMT per year to China, then the emissions for 3.6 MMT of methanol produced under alternate cases would be replaced with the emissions from the KMMEF-produced methanol each year" (page 50). This idea completely dismisses the effects of supply and demand on the size of markets, while implying that Washington residents are responsible for those hypothetical emissions just as much as the emissions from the KMMEF. This relative analysis does not make economic or environmental sense, and it should be revised to highlight the expected lifetime emissions of the KMMEF, not the relative ones.

40 years is a long time. The SSEIS assumes that "global methanol demand increases over the next 40 years" (page 50). This is a reckless assumption that is based on the current state of the industry without taking into account the larger sociopolitical and environmental state of the world. No regard is made for the requirements that are already beginning to be imposed by the Paris Agreement and other efforts to limit warming to 1.5 or 2.0 degrees Celsius. As one specific example, China recently promised to be carbon neutral by 2060. Such a goal does not square with a rapidly growing methanol industry—*unless they are outsourcing their emissions to America with plants like the KMMEF*. Promises to be carbon neutral or close to it in the next 20-40 years are growing rapidly, and are likely to only increase in extremity over the next 40 years. This leaves the future of methanol highly uncertain, and makes any study (including the SSEIS) that relies primarily on strong assumptions about the methanol industry in this time period extremely unreliable at best. If a relative report is required, any EIS should make clear the large uncertainty present in the future of the industry, and integrate these uncertainties directly into their predictions. A much more factual and good faith solution to this issue would be to avoid comparison all together, and report only on the lifecycle emissions of the KMMEF.

There are glaring issues with the SSEIS. I urge the Department of Ecology to reconsider the assumptions this Environmental Impact Statement is based on, and revise its methodology and reporting to reflect that. Arguing that the KMMEF will have a net positive effect on the environment requires ignoring obvious economic and environmental realities. You can do better.