Nick's emissions analysis shows that this is a good deal because this project emits fewer outrageous numbers of tons of GHG emissions when compared to even more outrageous coal sources. To get there you have to assume the doomsday scenario that for the next 40 years there will be no global action to address climate change. On top of that if any of the following the assumptions are true then this big idea that applicant's plant will displace a coal methanol plant from being built, fails. You have to buy into applicant's claim that:

- 1. For the next 40 years there will be endless growth in demand for fossil fuel based plastics or methanol or other fossil fuels.
- 2. And for the next 40 years we can with certainty predict Chinese manufacturing, trade and environmental policy, tech development and global commodity markets.
- 3. And for the next 40 years no coal based competitors will produce methanol because they'll see the Kalama plant in operation and fold their tents knowing methanol consumption will be a fixed amount.

It's so divisive to this community for Ecology to promote this project as one that reduces greenhouse gas emissions.

The fact is the low cost methanol that applicant sells to the into global market will affect demand, will affect price and will affect supply. Actually it's gonna incentivize other methanol plant production. It won't at all displace coal but instead will displace Renewable Energy Sources!

And you're lowballing the amount of methane that will be released. The "bottom up" method of measuring methane relies wholly upon the gas industry granting permission to measure

where they want us to measure. ZERO independent verification. And we're talking 40 years of this production to distribution gas highway. Blow outs will occur, they're inevitable. Just one gas well in Belmont, Ohio blew out in 2018 and spewed more methane into the air in 20 days than most of Europe did in an entire year. Bottom up measuring, completely dependent upon the gas industry's permission to measure where it wants us to measure, is the opposite of random testing. Couple that with inevitable catastrophic discharges and you have a rock solid basis for denying this permit on the basis of untenably large greenhouse gas emissions.

Ecology's job is not to provide jobs and not to weigh the merits of plastic, its stated mission is to protect the environment for future generations.

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