Columbia Riverkeeper

Director Watson, Heather, and Rich,

I've pasted below our quick policy thoughts on the displacement theory presented in the Kalama methanol EIS. We will submit technical comments, but I wanted to distill and highlight this policy concern. We appreciated the chance to discuss this with Rich, Stu, and others. Hope everyone is staying safe.

Kalama methanol: Washington should not adopt a dangerous new climate policy

The draft SSEIS for the world's largest fracked gas-to-methanol refinery could back Washington into a dangerous new climate policy: the displacement theory.

Northwest Innovation Works suggests that building a new refinery, which will emit 4.6 million tons of carbon pollution per year, is good for our climate because gas-derived methanol will displace coal-derived methanol. Consultants hired by the Department of Ecology repeated the displacement theory in the draft SSEIS. Washington should reject the displacement theory as unreliable and contrary to the state's rational, hopeful climate policies. Here's why:

1. Fracked gas is not the answer

This goes without saying: fracked gas is not a bridge fuel. The real comparison is not coal versus gas, but fracked gas versus clean energy and fuels.

2. The displacement theory takes a bleak view of humanity

To justify the displacement theory, the SSEIS assumes that society will have no technological advances in clean energy or fuels, the Paris Climate Accords will fail, and China will do nothing to meet its pledge to be carbon neutral by 2060. In other words, the world will give up on stopping climate change. Washington should reject this bleak and dangerous outlook. We rely on Washington's audacity to tackle the climate crisis and provide hope for the future.

3. Washington has already rejected the displacement theory

Any fossil fuel developer can fabricate worse alternatives. Backers of the Millennium coal terminal in Longview claimed their coal would displace dirtier coal in Asia. Tesoro claimed its "lower-carbon Bakken crude" in Vancouver would displace dirtier oil. Washington leaders did not take the bait. Why? Displacement is speculative and unenforceable. And, most importantly, our climate cannot afford to lock in fossil fuel infrastructure for the next 50 years. If Washington adopts the displacement theory for Kalama methanol, this creates a precedent that invites new fossil fuel projects.

4. Where are the electric cars?

The SSEIS presents a false choice: is a gas-derived or coal-derived fuel better? The consultants

ignore electric vehicles and other technologies that compete with methanol. Does Washington want to lock in fossil fuels that will directly compete with clean technologies?

5. Choose a brighter future

The displacement theory is antithetical to everything our state is working to accomplish. Washington is innovating new technologies and fighting for new policies. We are creating positive change, not passively accepting a dark future. These words from Governor Inslee give us hope:

"I cannot in good conscience support continued construction of a liquefied natural gas plant in Tacoma or a methanol production facility in Kalama."

"I decided that on my final day on Earth, I want to be able to look at my three grandchildren and tell them that I did everything humanly possible to save them from this enormous cataclysm of the climate crisis."

Recommendation: Do not adopt the displacement theory in the Kalama methanol final EIS. Acknowledge in the final EIS that changes in technology, regulations, and trade policies will occur over the next 40 years so the "no changes" assumption underlying the displacement theory is unreliable and incorrect.

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