

Anonymous Anonymous

Thank you for this opportunity to comment on the proposed Kalama Manufacturing and Marine Export Facility. I am a member of the Green Team at Keystone United Church of Christ. As such, I advocate for upholding Washington's climate action commitments.

Clearly the proposed project's expected emissions of GHGs in the range of 4.6 MMT/CO₂/yr to 9.4 MMT CO₂/yr would threaten Washington's GHG emissions goals.

Less clear from the SSEIS is the likelihood of the proposed project's displacing more GHG intensive sources of methanol over a 40 year period given the difficulty of predicting such factors as technological developments, Chinese consumer behavior, and global commodity markets.

The SSEIS assumes increasing demand for methanol, failing to consider the likelihood that China will take action to address the climate crisis that would reduce demand for methanol. As analyst David Roberts writing for Vox (9/25/2020) indicates, China is under great pressure to decarbonize: "China has a lot to lose from unmitigated climate change, from catastrophic floods to worsening heat waves and sea level rise [impacting coastal cities like Shanghai by 2050]..."

A report published 11/20/2019 by The Energy Transitions Commission and the Rocky Mountain Institute, entitled "China 2050: A fully developed rich zero-carbon economy," offers a model for China's becoming carbon neutral by midcentury. The model covers decarbonizing across all sectors, most relevantly the chemical sector, including methanol for plastics through greater circularity of plastics and demand reduction. China is already taking steps in this direction with the prospect of reducing demand by 45%.

Also relevant, the model covers decarbonizing transport, including a transition to all electric passenger vehicles, which would eliminate the need for methanol as transportation fuel. Current policies are fostering this transition.

Also unclear from the SSEIS is in what way the potential for the proposed project's possible displacement of other sources of methanol balances or justifies the expected upstream and midstream emissions of the project.

The SSEIS fails to consider the proposed project's large requirement for gas that would almost certainly lead to the expansion of our gas pipeline system, which in turn would result in additional gas-based projects. that would result in more GHG emissions, significantly more in all likelihood. The mitigation plan is insufficient for not covering emissions from fracking in Canada, shipping, conversion to plastics and use as fuel in China.

I oppose the project for its threat to achieving Washington's climate action commitment.