

# Patricia Kullberg

September 23, 2020

To the Washington State Department of Ecology:

Thank you for this opportunity to testify today in opposition to the proposed methanol refinery in Kalama. My name is Patricia Kullberg. I am a retired physician and public health official, a member of Oregon Physicians for Social Responsibility and a life-long resident of the Pacific Northwest. I recently spent more than a week confined to my home in Portland because the smoke-filled air outside was too hazardous to breathe. Fires were consuming forests west of the Cascades, which in my seven decades in Oregon have never burned, because normally they are too wet. Climate change is not something off in the future. It's here and it's now. For this reason I find the draft Second Supplemental Environmental Impact Statement (SSEIS) for Kalama Manufacturing and Marine Export Facility (KMMEF) a shockingly reckless document. At a time when we should be pulling out all stops to avert climate disaster, this analysis represents nothing more than business as usual. Despite presenting a dizzying array of future scenarios, the analysis makes unsupportable claims about corporate behavior, makes highly speculative assumptions about market trends, and forecloses on the very opportunities we have to save our way of life in the Pacific NW.

After so much documentation about how Northwest Innovation Works (NWIW), the company behind KMMEF, has misled the public about its intentions for marketing the methanol it generates, it is unbelievably naive to take their current statement of intent to target the plastics industry at face value. To assume that at most 40% of the methanol will be marketed as fuel is a fantasy. NWIW will market their methanol in whatever way they please to turn a profit, even if that means 100% of their product is used as fuel. Given that the plastics industry itself is subject to increasing regulatory demands, that 40% assumption seems particularly untenable.

The SSEIS assumes that the market for methanol will continue to grow unabated for the next 40 years, once it recovers from the current pandemic-induced contraction. Underlying this assumption are many more: that we will never be faced with another pandemic, which is not what the infectious disease experts are telling us; that there will be global political and economic stability, which is difficult to imagine in an era of increasing numbers of nation-states ready to conduct trade wars and withdraw from long-standing regional economic relationships, plus the social unrest and dislocation associated with massive climate induced migration; that the regulatory environment will remain unchanged when countries all over the globe are looking for ways to reduce their carbon footprint. But most egregious of all is the total lack of consideration in the SSEIS for true alternatives to the climate-destroying fossil fuels. Coal-based production of plastics in China should not be our benchmark for comparison. Anything better than coal is not the policy that will spare the planet. We should be bench-marking against climate-saving scenarios, for example, a ban on single-use plastics, which alone would reduce the production of plastics by up to 40%. Or a ban on methanol and coal based production of plastic in favor of naphtha-based production, which method results in the lowest net greenhouse gas (GHG) emissions. Allowing the KMMEF proposal to move forward not only locks the community of Kalama into supporting an industry that is doing immeasurable harm to our planet, it will have the effect of squeezing renewable sources of energy out of the market. Additionally it risks sending Kalama into a boom-bust cycle. After a significant contraction in the market for methanol, which is hardly a rash prediction, the community would be saddled with all the costs of a stranded asset. You can be sure that NWIW will not be picking up the tab.

I, like most residents of the Pacific Northwest, am devoted to our way of life here. We should be

promoting projects that protect and preserve our natural resources like our forests, our abundant and clean water and our clean air, not projects that will only hasten their destruction.

Respectfully submitted,

Patricia Kullberg, MD MPH