

M Judith Ferguson

Director Watson, Regional Director Doenges and Department of Ecology staff –

Thank you for your issuance of a 2nd SEIS on the Northwest Innovation Works (NWIW) Methanol refinery in Kalama after finding the project's initial submissions inadequate and inaccurate. I have read the document. As a resident of Tacoma in close proximity to the original Methanol refinery siting, I am more than aware of NWIW's modus operandi and am very sorry to see that their misleading and speculative theories of operation have changed very little over the last 6 years- - while during this same time span much has been revealed regarding the negative climatic and environmental impact of fracked gas. Building the world's largest fracked gas-to-methanol plant in Washington State does not align with my personal values of stewardship and justice, nor does it support our state's commitment to reducing climate pollution. Its current siting on the Columbia River at Kalama is as inappropriate and outrageous as its original siting in the Port of Tacoma was.

My fervent hope is that your Department will reject the project and deny Shoreline permits based on your new analysis, as well as the 'climate change' summer we have experienced this year - from the wildfire devastation on the west coast to the hurricane and derecho destruction in the Gulf and Midwest. It is an unfortunate truth that NWIC is a Chinese owned company that lies to regulators and the public. They enticed the Port of Kalama and Cowlitz County to sacrifice the health, safety and long term viability of the Columbia River ecosystem for profits and promises that may never be realized. NWIW cannot be trusted to mitigate negative impacts of this fracked gas refinery. The fact that this project had to abandon its initial Tacoma siting due to outspoken community opposition and is facing equal opposition and additional reviews in Kalama is a 'red flag' indicator that there is something wrong with it at its core. I appreciate that you addressed the likelihood that methanol produced in Kalama will be used as transportation fuel, despite deliberate efforts by NWIW to mislead your agency and the public that it would be used solely for plastics manufacturing.

Your new SEIS analysis reveals what the NWIW backers have long denied - that the refinery would cause more methanol to be burned as fuel in China and result in significant methane pollution from fracking. The methanol refinery would quickly become one of Washington's most significant sources of climate-changing pollution and use more fracked gas than all of Washington's gas-fired power plants combined. If built, our state will be locked into decades of additional climate pollution, even though we know it's past time to pursue a truly low-carbon future. Speculating that this project may displace other fossil fuels is not adequate justification for the known pollution that will harm our communities and climate. As Governor Inslee stated, we cannot support such fracked gas projects in good conscience.

When I read the Public comments of so many others who are equally concerned, I feel hopeful. The pandemic has impacted systems and business practices across the board, as well as altered assumptions at many levels. Uncertainty and volatility abound in energy market dynamics, and the predictability of global fuel markets, technology development, consumer behaviors or regulations of any kind are equally uncertain. For those same reasons, one must not expect that what NWIW states they will or won't do will actually come to fruition. Talk is cheap and actions speak louder than words.

I am concerned that your SEIS provides too little detail on the actual mitigation that would be accomplished within the VMPF framework – and concerned that NWIW is the 'architect of the voluntary program.' Does this mitigation address the full impacts of NWIW's overseas emissions?. Without defined benchmarks to achieve, it can't be expected that NWIW will address issues in a forthcoming, transparent manner. Once in operation, the NWIW's working relationship with the State of Washington could abruptly change, as could the plant's operational plan. Promises to the community and State regarding mitigation, etc. could easily be dismissed and abandoned.

I do have four questions/concerns that I would like you to consider:

#1 - Have emissions from activities at the adjacent dock and wharf site been included in your analysis?

#2 - In regard to SW Washington Clean Air Agency, will they be monitoring the cumulative emissions of the methanol refinery in conjunction with the emissions of the other commercial industries in the area? It is my understanding that Puget Sound Clean Air Agency in my Port of Tacoma area monitors only individual emissions of each facility and does no monitoring of the cumulative emissions in the air. In addition, the Agency only monitors certain emissions and not all emissions. It may be that the list of monitored emissions needs to also be updated as the current list may not be capturing newer pollutants. I assume that such an update would need to be instigated by the State of Washington.

#3 - Wilma Subra spoke in Tacoma in 2016 regarding the initial proposed plant and expressed concern regarding the measuring of emissions during startups, shutdowns, testings and flarings. Will all emissions during these procedures be monitored or will some be 'self reported' or not reported at all? It's my understanding that these types of emissions do happen on a frequent basis and are most likely not reported. I would hope that their reporting would be mandated. NWIW's 10/30/2019 letter to Dr. Placido is vague to me in its 'mitigation list of emissions' on page 2.

#4 – September 2020's week of hazardous air quality throughout the region due to smoke and an inversion layer may be a precursor of events to come. What regulations will be put into place to ensure that the Methanol facility does not contribute to increased human health risks in similar situations? Will a facility shutdown be mandated in such circumstances?

Should this Refinery be completed, a local ecosystem will be forever altered - - this time by a Refinery that will be the largest in the world and whose operation will contribute millions of tons of greenhouse gas pollutants yearly for 40 years. It is profoundly inconsistent with achieving Washington's climate goals.

Thank you again for initiating a 2nd SEIS on the Methanol facility. I appreciate the opportunity to share my concerns about this Refinery yet again. I do hope that you will deny the Shoreline permit. The Methanol refinery is a project that was/is a bad fit for both the Port of Tacoma and the Port of Kalama.