Sam Kern

Dept of Ecology-

I am writing to ask your department to reject the NWIW application. I called into one of the public hearings and many of the claims made in support of the Kalama facility cited two things: that the methanol would be used in plastics production, and that NWIW would mitigate its pollution in the area

On the first claim, it appears Ecology is already skeptical that the methanol would not be burned for fuel. The list of "Preliminary Report Findings" on the WA Ecology website on the project mentions the likelihood of this happening.

On the second claim, I read the SEIS and was concerned to see that it did not include a mitigation plan for regional pollution. I am unsure all of the pollution can be mitigated – an emissions increase in the area can not be undone. Cancer-causing chemicals and air contaminants can not be negated; localized pollution is very hard to mitigate. It would not suffice for NWIW to buy offsets, because the air pollution would be happening adjacent to our communities, where it poses a health risk. This can not be mitigated, even if NWIW HAD gone so far as to release a plan in their SEIS (and it is a problem that they did not do this, while still relying on their private mitigation plan as a selling point to the public).

Additionally, I am concerned about the water usage from the Columbia River. This does not seem like the kind of project worthy of disrupting ecosystems, or laying the foundation for future pipeline expansion. NWIW is giving every indication that this is an anchor project and would likely necessitate further natural gas pipeline expansions in the state of Washington, as (it is my understanding that) the existing pipelines are operating at near-capacity.

Investing in more dangerous natural gas pipelines is not something I hope our state will do, as the Pacific Northwest region has recently experienced multiple natural gas pipeline explosions. The Kalama refinery will open the door to expansion of infrastructure that will put our communities at risk, ESPECIALLY considering that most of the Pacific Northwest region is preparing for the inevitability of a massive earthquake.

I don't think the SEIS is accurate in positing that extractive fuel sources will increase in demand at the proposed rate. This seems highly speculative – between the time the first SEIS was filed and the second SEIS was submitted, major changes have been made in the global economy that indicate a shift away from extractive fuels. For one thing, massive investing firms like Blackrock and global buyers like Google, Microsoft, and Amazon have announced transitions away from extractive fuels. China itself has announced new energy plans that indicate a desire to move away from polluting fuels. I do agree that we will not likely see plastic production slow any time soon, but considering it's highly suspect that this is what the Kalama refinery will be solely used for, I think that the SEIS relying on old market trends to justify its necessity is suspect.

As a final point, this is not the kind of investment that signals an interest in public health, public safety, or a responsible future for our state. I urge you to deny the Kalama refinery proposal.