My name is Mark Uhart and I'm a Kalama area resident. We believe Ecology will hold true to their mission and deny the shoreline permit.

Over the last two online comment sessions I've listened to both sides. I understand the need for jobs and how this project will improve the lives of the working class in Cowlitz County for the first few years of the project. But the high-paying jobs will not likely come from current Cowlitz County residents. The skills needed to run this plant will require mechanical and chemical engineers that will be recruited from out of state. Key inside jobs, like the CEO/Chairman, CFO, comptroller and COO, will be filled by foreign nationals, as proven by the three H1B visa applications submitted by Pan Pacific Energy. The only jobs that will go to local residents will be the hazardous blue collar and administration jobs. I've seen this play out in the Chinese-owned refineries in Texas and Louisiana.

It is true the project would provide additional local, county and state revenues from taxes and fees. But what are the long-term social and economic costs if the KMMEF and other fossil fuel projects are approved? We are at an environmental tipping point and a slower rate of pollution is not going to forestall global warming. The last time the earth warmed this quickly was 56 million years ago.

The US is still the most powerful country in the world, yet we are not taking responsibility for the mess we created, nor the future of mankind. We can either take the lead and say NO to these fossil fuel projects, as our Governor directed, or stand by and watch the earth heat to a point our grandchildren will be one of the last generations to survive. The United States is responsible for most of the GHGs emitted since industrialization in the US surpassed that of the UK in 1910. As of 2017 the US is responsible for 397Gt of CO2, with China emissions at 214Gt and the former USSR countries at 180 Gt.

The United States is responsible for most of the GHGs emitted since industrialization in the US surpassed that of the UK in 1910. This is illustrated in one of the many CO_2-tracking portals, such as the US Energy Information Administration (USEIA) and non-profits like CarbonBrief, which issues the status of the climate each year. As of 2017 the US is responsible for 397Gt of CO2, with China emissions at 214Gt and the former USSR countries at 180 Gt.

The IPCC projects global energy-related CO_2 emissions will grow 0.6% per year from 2018 to 2050 assuming global GDP remains around 2%. However, future growth in energy-related CO_2 emissions is not evenly distributed across the world: relatively developed economies collectively have no emissions growth, so all of the future growth in energy-related CO_2 emissions is among the group of countries outside the Organization for Economic Cooperation and Development (OECD), of which China is not a member.

There is no assurance China will retire a coal-fired methanol production plant if the KMMEF is built. On the contrary, energy sector economics and their plan for economic and social development indicate they may even build more coal-fired plants. China's 14th five-year plan (FYP), setting out its national goals for 2021-2025, will provide more insight as to the use of coal for energy. China's National Energy Administration released a risk warning notice No. 12 on coal power planning and construction in 2023. In this document the provinces were notified that they may construct additional coal power plants under certain risk conditions. This contradicts NWIWs replacement theory.

I realize the fact that the KMMEF will be owned and operated by a foreign entity is not a legal restriction under Washington State code. However, the risks associated with Chinese ownership, governance, transparency in environmental protections, and public safety oversight should be a concern.

I certainly hope Ecology will read all the written comments, and scrutinize the information in this SSEIS. I read the SSEIS and there are so many bad assumptions, omissions of relevant information, poor application of technical information, and a covert attempt to under report upstream, operational and downstream emissions. I documented my review and I am submitting multiple comments, referencing all my sources.

This project:

- Underreports GHGs because it doesn't mitigate upstream and downstream GHGs outside of Washington.
- It continues to refer to information in the FSEIS, such as the 100-year global warming potential, instead of the 20-year GWP for fugitive methane.
- It refers back to GREET_2017 emissions data in some tables. The standard now is GREET_2019.
- It cherry picks information from fugitive methane research papers such as Yu Gan (2020), Alvarez (2017 and 2019), and others.
- It presumes the use of Ultra-low Emissions (ULE) technology that has not been approved by the EPA through application of a Prevention of Significant Deterioration (PSD) Permit for GHG emissions. This technology was first used in 1994 in an Australian power plant.
- NWIW reports ULE will emit 38% less GHGs than CR Technology, but I found several articles that indicate the savings is only around 31%. The actual emissions from ULE are unknown.
- The GHG emissions reported in Section 3 are based on "net GHG emissions." The emissions this plant will be responsible for include all upstream, operations, and downstream GHGs to include at least 60% of the methanol used as a fuel.

- The Voluntary Mitigation Framework (VFM) presented is inadequate and unenforceable. The VMF Board of Directors doesn’t include stakeholders from local Kalama residents, environmental non-profits like the Columbia Riverkeeper and Sierra Club, and Native American tribes. Only a legally enforceable MOU/MOA, signed by all stakeholder representatives, is acceptable.

Thank you for giving us the opportunity to weigh in on this project. Your efforts are appreciated.

Mark Uhart
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