

Nick Engelfried

Dear Washington Department of Ecology,

After attending today's webinar on the Kalama methanol facility, I believe the logic used in the EIS to calculate the global lifecycle carbon footprint of this project to be fundamentally flawed. We cannot assume that building this plant will automatically cause China or some other country to build one fewer methanol plant of their own. Furthermore, the assumption that the volume of methanol this plant would produce will necessarily be made elsewhere if the project is not built also does not pass scrutiny. The assumption seems to be that the world will consume the same amount of methanol, regardless of how many different countries are dumping their product on the international market over the next few decades. This defies reason and basic economics.

I urge you to consider why it is that Chinese companies would buy imported methanol from the U.S. in the first place? Clearly, they would only do so if it is a cheaper option than purchasing methanol made closer to home. If U.S.-imported methanol is unavailable, using the product will become more expensive and less attractive, changing the economic calculus of whether it makes for companies to engage in activity that emits greenhouse gases. A product that is readily available on the international market is much more likely to be consumed than one which few countries are producing, and this applies to methanol. By adding to the number of new facilities dumping methanol on the market, we can expect Washington will contribute to more global methanol consumption and increased carbon emissions.

Furthermore, I question whether it is at all possible to calculate how the Kalama methanol facility will impact the decisions of governments and major corporations decades from now, during a time when the world is undergoing a transition to clean energy. Energy markets are changing so fast that assumptions made today may not hold true five years from now, let alone ten, thirty, or forty years into the future. Major oil companies like Shell and BP are planning for a post-oil future. Entire nations, including Asian countries like South Korea, are undertaking efforts to transform their economies in order to move beyond fossil fuels. It is certainly possible, and arguably likely, that China's economy will undergo a similar transformation sometime in the next few decades as renewable energy becomes cheaper and the costs from burning fossil fuels become ever clearer. Just recently, the Chinese government indicated it is considering significantly increasing its renewable energy targets for the next five years.

As countries are hit by more and more extreme weather events and other "natural" disasters linked to climate change, it can be expected that they will ramp up investments in green technology to a degree that would seem unimaginable today. Given the likelihood of this scenario, we cannot assume the demand for methanol produced at the Kalama facility will exist ten years from now or that it will be met by another project if this facility is not built. More likely, the plant will become a stranded asset making a product for a market that no longer exists.

What does seem convincing in the EIS are the numbers showing that here in Washington, carbon emissions will go up if the Kalama facility is built. While we cannot say with any degree of certainty how our actions will or will not affect market players in China, we can reduce our own carbon emissions and set a positive example for the rest of the world. In calculating the carbon

footprint of the Kalama project, I urge DOE to focus on this reality rather than making speculative assumptions that "prove" producing more fossil fuels will somehow result in fewer carbon emissions.

Thank you for considering this comment,

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