

Dr Demian

Hi:

The previous environmental analysis of Northwest Innovation Works (NWIW) Methanol refinery proposal in Kalama, Washington was inaccurate and inadequate.

The new Draft Supplemental Environmental Impact Statement has some important improvements, the methane leakage rates continue to be low estimates given the widespread underreporting of leaks.

Despite these marginal improvements, it's dangerous to presume this analysis can accurately predict global fuel markets, technology developments, consumer behavior, or regulations for the coming four decades.

Further, the SEIS provides too little detail on the actual mitigation that would be accomplished within the voluntary mitigation framework, nor does this mitigation address the full impacts of NWIWs emissions that will occur overseas.

Even with all of its flaws, this analysis confirms that NWIWs proposed facility would become one of the largest sources of climate pollution in Washington.

Ecology should dismiss the speculative basis that this project could displace even more polluting facilities. Instead, it should base its permitting decision on what is reasonably foreseeable and indeed, assured, about this project, that it would cause millions of tons of greenhouse gas pollution each year, for 40 years, and is profoundly inconsistent with achieving Washingtons climate goals.

Washington MUST DENY NWIWs proposal to build and operate this dangerous methanol refinery in Kalama.

Thank you.
Dr. Demian