

Peter Fels

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October 1, 2020

Washington Department of Ecology
(submitted via on-line comment portal)

RE: Kalama Manufacturing and Marine Export Facility -- Supplemental Comments

Dear Ecology:

I oppose the permit application of NWIW for the KMMEF. You should deny the application. These comments supplement my comments submitted earlier.

As I previously stated, I am an ordinary citizen with two children and two grandchildren and I am very concerned about the future of our earth's environment for their sake. I am also concerned for the future of all other citizens of our planet.

I am submitting this additional comment because I was only recently able to obtain a copy of the Cowlitz County Superior Court's Order Affirming in Part and Reversing in Part the Shorelines Hearings Board Order Dated September 15, 2017 ("Order"), issued and filed by Judge Warning on July 12, 2018.

The Order states that "Ecology must review the SEIS and determine whether, or not, the Permits must be modified, conditioned, or denied based on the analysis in that document." (Order, p. 5, line 23.) You required the Second SEIS because you determined the FEIS and SEIS were inadequate. Essentially, that requirement was a decision that the permits should be conditioned on completion of the additional analysis you requested in the SSEIS.

It is still your obligation, therefore, to determine whether the Shoreline Conditional Use Permit and the Shoreline Substantial Development Permit you previously approved should be modified, denied or conditioned based on the SSEIS.

As noted in the SSEIS, in 2019 you recommended statewide reduction goals for GHG emission limits including reducing overall emissions of GHGs in the state to 1990 levels by 2020, by 2035 to 45% below 1990 levels, and by 2050 to 95% below 1990 levels pursuant to RCW chapter 70.235.

It is clear from the SSEIS that emissions from KMMEF will never result in any reduction in in-state GHGs for the next 40 years. At best, even assuming KMMEF is able to mitigate all of its in-state emissions, it will do nothing to meet Ecology's emissions guidelines. To the extent KMMEF does

not mitigate all emissions with in-state mitigation measures, it will make it that much harder for the state to meet its overall emission reduction targets.

As I noted previously, KMMEF promises to mitigate all its emissions, but does not identify any existing mitigation measures. Whether it can and will actually fulfill its promises is yet to be proven.

In your order requiring the SSEIS, you asked for "evidence showing how the project would impact other sources of methanol..."

Again, as I noted in my first comments, the SSEIS continues to rely on speculation about the impact of KMMEF on other sources of methanol, speculation which is internally inconsistent because of its assumptions that KMMEF methanol will replace other sources of methanol even though those sources, produced from coal, will be cheaper, and even though producers of more expensive methanol are likely to reduce their prices to be able to stay in the market. Speculation and unfounded economic projections are not "evidence".

You have given KMMEF at least 3 bites at the apple of proving its case that the permits will not harm Washington's shoreline or air-shed. It has failed each time. It continues to offer unproven and unsubstantiated projections.

Because KMMEF has not shown and cannot show it can meet the requirements of Washington's GHG emission reduction goals, it is time to deny both permits.

Washington citizens rely on the Department of Ecology to protect us and our environment from pollution, consistent with state laws. The future livability of our state and our climate depend on every jurisdiction doing its job to reduce global GHG emissions consistent with the IPCC findings.

For the sake of everybody's children and grandchildren I hope you will deny this permit.

Thank you for your consideration,

/s/

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October 2, 2020

Washington Department of Ecology
(submitted via on-line comment portal)

RE: Kalama Manufacturing and Marine Export Facility -- Supplemental Comments

Dear Ecology:

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It is clear from the SSEIS that emissions from KMMEF will never result in any reduction in *in-state* GHGs for the next 40 years. At best, even assuming KMMEF is able to mitigate all of its in-state emissions, it will do nothing to meet Ecology's emissions guidelines. To the extent KMMEF does not mitigate all emissions with in-state mitigation measures, it will make it that much harder for the state to meet its overall emission reduction targets.

As I noted previously, KMMEF promises to mitigate all its emissions, but does not identify any existing mitigation measures. Whether it can and will actually fulfill its promises is yet to be proven.

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