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The Department of Ecology should deny the NWIW permit because GHG emissions attributable to the facility are significant and NWIW's proposed mitigation plan won't reduce GHG emissions in Washington.

The Department of Ecology has meticulously analyzed and identified the GHG emissions NWIW's facility will produce. Ecology finds GHG emissions attributable to the facility would be "significant". However, Ecology also finds the emissions are "capable of being mitigated." SSEIS ¶ 1.5.2.

Ecology's conclusion NWIW can mitigate its significant emissions relies on NWIW's proposed Mitigation Framework, SSEIS Appendix D. Ecology concludes "... the mitigation framework would establish an annual greenhouse gas emission reduction obligation equal to instate emissions as determined by Ecology's GHG reporting rule, to the extent possible." SSEIS ¶ 1.5.2.

I'm not encouraged by the vague "to the extent possible" language. The SSEIS doesn't identify what might or might not be possible. To be effective, any mitigation effort must be possible.

Even if "possible", NWIW's proposed mitigation efforts would do nothing to actually reduce overall GHG emissions. NWIW doesn't propose to actually reduce any of the GHG emissions attributable to its facility. Operation of the facility will cause millions of tons of GHG pollution every year for 40 years.

NWIW's mitigation proposal is to invest in projects that may or may not result in GHG emission reductions from other sources. Basically, NWIW will be allowed to significantly increase GHG emissions in Washington in return for a promise to voluntarily invest in projects elsewhere that are actually trying to reduce GHG emissions. When considering the increase in GHG emissions attributable to the NWIW facility, a plan to possibly offset those emissions won't ever reduce overall GHG emissions.

In contrast, not permitting the NWIW facility will assure NWIW can't pollute to the tune of millions of tons of GHGs for 40 years. If NWIW doesn't build the facility, there will be zero new GHG emissions attributable to the facility. If NWIW doesn't build its facility, other projects can still work to reduce existing GHG emissions, resulting in an overall reduction of GHG emissions.

The Mitigation Framework NWIW proposes is inadequate for other reasons. All NWIW mitigation efforts would be voluntary and the framework doesn't provide any enforcement mechanism. NWIW doesn't propose to enlighten us about the nuts and bolts of its proposal until after the environmental review is completed. SSEIS, Appx D, p. D-2.

While the framework describes involvement of a Board and environmental groups, the framework lacks an explanation of how the board would operate, how the board would be appointed, and/or how the board would compel compliance with its decisions. Any potential enforcement would occur after NWIW doesn't meet its voluntary mitigation goals, and while NWIW's significant GHG emissions continue.

I live in southwest Washington. Although the Mitigation Framework prioritizes using its voluntary investments in Southwest Washington and then Washington, there's no requirement that all or even most investment be in Southwest Washington or Washington projects.

Washington is committed to reducing GHG emissions on a specified schedule with specific benchmarks. The benchmark reductions won't be easy to meet. NWIW's facility would be responsible for "significant" new GHG emissions over its 40 year lifetime. Because the mitigation framework is only a commitment to offset other GHG emissions, and because operation of the facility will never result in any actual reduction of GHG emissions, NWIW's proposed facility would set back the state's efforts to meet the statutory benchmarks.

The effects of climate change in our state, region and country have been starkly evident these past few months. NWIW's Mitigation Framework is deficient. Even accepting that NWIW will meet its voluntary commitment to mitigate as the framework describes, the fact remains that this facility will be responsible for "significant" GHG emissions, not just in one year, but in every year over 40 years the facility remains in operation. The "significant" emissions attributable to the NWIW facility will negatively affect me and all Washington residents.

The Washington permit approval process should protect Washingtonians. The SSEIS reliance on NWIW's deficient mitigation plan doesn't protect us. The Department of Ecology should deny NWIW's permit.