Sandra Davis

The Dept of Ecology seems to be relying on speculation that this proposed methanol project in Kalama, Washington would displace existing methanol plants in China currently using coal in their production. This speculation theory could also assume other manufacturers in China would burn 100% of their methanol as fuel instead of producing olefins for plastic, if this project was built. The result would be a huge increase in GHG. There is no evidence either theory will happen. The SSEIS should not rely on speculation.

The natural gas needed for NWIW's project would exceed the limits of Williams' Northwest Pipeline and would require an expansion of an additional line to accommodate the methanol facility. Why has the expanded pipeline not been taken into consideration in this analysis? The expansion of this pipeline will have many negative impacts to the citizens of Washington state as well as the many, many landowners.

If NWIW obtains all of the needed permits, their plan could be to sell the permits. What would prevent this new owner from using 100% of the produced methanol for fuel, thereby increasing GHG substantially.

In reading the Voluntary Mitigation Program proposed by NWIW, the language leaves the reader to feel uncertain what role the Department of Ecology will play in this mitigation. I have never heard of a "voluntary" mitigation proposal for such a large industrial project. As you know, self-reporting does not always work. What recourse will the Department of Ecology have if a voluntary program fails? Why hasn't the Department of Ecology required their own Mandatory Mitigation Plan?

NWIW is proposing to distribute an Emergency Response Plan "before" the first production of methanol. Emergency Response Plans and Hazard Mitigation must be a part of the permit process. Our state and local officials have a right to review and/or change any Plan that would involve their services and impact citizens. This is totally unacceptable. The safety of the public must be foremost in permitting any industrial project which will involve hazardous materials.

Thank you for accepting my public comments.