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I'm writing to urge the Department of Ecology to deny the NWIW permits. I've made two previous comments. I'm submitting another comment because new evidence about China's future intent to reduce GHG emissions is relevant to both of my prior comments.

My first prior comment asked the Department of Ecology to deny the NWIW permits because GHG emissions attributable to the facility are significant and NWIW's proposed mitigation plan won't reduce GHG emissions in Washington. Operation of the NWIW facility will assure the state won't meet the statutorily required GHG emission reduction, even assuming every NWIW mitigation effort offsets other Washington GHG emissions. An offset does not achieve a reduction. NWIW's GHG emissions will make statutory reduction requirements much more difficult to achieve.

My second prior comment asked the Department of Ecology to deny the NWIW permits because the SSEIS conclusion relies on a speculative assumption. The SSEIS relies on the assumption the NWIW facility will "... prevent utilization of other more polluting processes, particularly in China." SSEIS 3.5.1.4.

As reported in Steven Lee Myers' Sept. 23rd New York Times article, China's Xi Jinping has recently pledged to make China carbon neutral by 2060. China's carbon neutrality goal invalidates the SSEIS assumptions that NWIW methanol will supplant China's more polluting methanol sources.

If China intends to become carbon neutral by 2060, it will be pursuing ways to reduce and/or eliminate all GHG emissions over the NWIW project life. That includes reducing or eliminating GHG emissions from methanol. China's reduction of methanol use could leave NWIW producing a significant GHG pollutant that doesn't have a market in China. If China isn't buying NWIW methanol, the NWIW facility won't "... prevent utilization of other more polluting processes, particularly in China." The SSEIS assumption is speculative at best and the Department shouldn't rely on it to grant NWIW permits that will result in significant GHG emissions.

The new information about China's intent to be carbon neutral by 2060 also calls into question NWIW's representations about its ability to mitigate its Washington emissions. If a polluter as large as China is reducing GHG emissions, there may be fewer opportunities for NWIW to mitigate its Washington GHG emissions. Although NWIW assures it will look to mitigate Washington GHG emissions first, there's no assurance it can or will do that. NWIW may have to look globally for mitigation opportunities.

The SSEIS has no specifics about any current or future available mitigation sources, in Washington or elsewhere. Although China's GHG reduction efforts could have a significant effect on NWIW's opportunities to mitigate, the SSEIS doesn't sufficiently address this issue. Instead, the SSEIS allows NWIW to make the unsupported and unspecific representation it will mitigate all of its GHG emissions.

While it's true that cynics could dismiss China's announcement as a public relations effort and argue China has no intent to be carbon neutral by 2060, the announcement makes it clear just how

unsupported the SSEIS assumption is. China's announcement makes it clear no one, certainly not NWIW or the Department of Ecology, can predict what China will do now or for the next 40 years.

It's worth repeating. The NWIW GHG emissions, if allowed, will be "significant". The Department of Ecology shouldn't rely on speculation or erroneous assumptions to support granting any permit for a facility that will produce significant GHG emissions. Our state is actively pursuing a policy that will reduce, not increase GHG emissions. The NWIW facility is inconsistent with that policy. I urge you to protect Washingtonians and deny NWIW's permits.

Thank you for considering my comments.