

# Cathryn Chudy

I have submitted a number of comments, as well as testified at the public hearings regarding the Kalama Methanol proposal, and have read many of the comments as submitted online here.

I am opposed to the Kalama Methanol proposal and believe that the SSEIS sadly and infuriatingly offers proponents a handy talking point ("good for the environment") to bolster their "red herring" argument that jobs are a valid and driving reason to unleash this obvious boondoggle of a project that will ultimately pollute Washington at the expense of all but those out-of-state investors who promise voluntary "mitigation" but whose concrete plan to do mitigate is nowhere in evidence.

I am including in this comment the following "Note to Ecology" submitted to you by Kalama resident Linda Horst. Due diligence by Ecology should include not only the analysis of greenhouse gas pollution impacts of this proposal, but also the soundness of the company proposing the refinery. We are relying on your decision-making to protect our precious shoreline and ensure a good faith "do no harm" outcome for Washington. It is impossible to conclude (after reading Linda's analysis) that NWIW LLC is a reliable and trustworthy proponent that will do right by Washington going forward.

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Note to Ecology:

Admittedly, the following comment listed below does not critique GHG emissions, displacement or mitigation issues. My comment will, however, address the bona fides, or lack thereof, for Northwest Innovation Works to reliably and fully implement during the next 40 years their commitments contained in the DSSEIS: lowering GHG emissions; displacement of other dirty fuels; and 100% mitigation of all in-state direct/indirect GHG emissions.

The saying "All hat, no cattle" comes to mind when I consider the role of Northwest Innovation Works in their high-stakes, paper shell game they are waging with Ecology in this Draft SSEIS process.

While Ecology has invested considerable time and money researching and analyzing the myriad aspects and ramifications of this proposal, alarmingly zero attention has been devoted to the qualifications of the proponent of this climate/life altering refinery!

It is unconscionable that this upstart company that has never built a methanol refinery, never operated a methanol refinery or ever produced a drop of methanol is, in fact, proposing to build, operate and produce methanol in what would be the largest fracked-gas-to-methanol refinery in the world! Too ludicrous to be true? Tragically it appears not to be too ludicrous for every governmental agency in Washington state that has been tasked with reviewing this proposal for the past 6 years!

How did this meritless company get this far?

NORTHWEST INNOVATIONS WORKS LLC:

- No employees — according to WA Secretary of State, NWIW Kalama LLC has no active license with L & I — no covered employees
- No income — since forming their LLC, zero income from methanol sales
- No assets — business office rented not owned
- No credentials — no documentary evidence
- No experience building a methanol refinery
- No experience operating a methanol refinery
- No EPA approval for the ULE technology proposed to decrease GHG emissions
- No methanol refinery has ever used both ULE and ZLD technology together

They say "The devil is in the detail". The preceding "No —" details are red flags I trust Ecology will not ignore.

There are almost as many red-flag comments submitted against this refinery proposal as red-shirted "No Methanol Refinery" opponents! All of us urge you to deny this permit.

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I add my voice in support of these observations and concerns as raised by Linda Horst in the above comment.

I believe that the only outcome "good for the environment" that serves Washington is to allow our state to move forward with the climate goals that have been initiated by Governor Inslee (who has stated he cannot support this proposal in light of those goals).

We need Ecology to do its due diligence by taking into account the shaky foundation on which NWIW LLC actually rests, a foundation that clearly appears to be cobbled together on quicksand rather than built on solid ground. Quicksand will no doubt swallow up any lip service that has thus far been offered to voluntarily "mitigate" the actual harms to Washington that Ecology clearly outlines in its SSEIS.

We ask you to keep the faith with the vast majority of Washingtonians as well as those throughout our region who have urged you to deny the Shorelines permit and ultimately reject the project.