

The proposed NWIW methanol refinery would cause millions of tons of greenhouse gas pollution each year, for 40 years. Ecology should deny the Shorelines permit for the refinery.

The SEIS relies on a flawed, speculative analysis to argue that methanol could “displace” dirtier energy.

Burning methanol as fuel would generate millions of tons of pollution each year.

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Washington cannot contribute to the goal of keeping global warming “well below 2 degrees Celsius” by allowing major polluters to move forward. A low-carbon future demands investment in lower-emitting production processes.

Ecology should not assume that future energy needs must be met by fossil fuels.

The SEIS provides little detail on the actual mitigation that would be accomplished as part of the “voluntary” mitigation framework. The mitigation framework is too vague for Ecology to conclude that the project’s impacts can and will be mitigated.

Ecology should be requiring mitigation of the full impact of the Kalama refinery.

The SEIS continues to use low estimates of methane leakage.

The SEIS continues to rely on a narrow set of “bottom-up” estimates for its methane leakage estimates. The SEIS should instead evaluate methane leakage rates based on “top-down” observations.

The SEIS makes unreasonable assumptions about the potential source of fracked gas and its impacts.

The analysis fails to NWIW spent five years attempting to mislead Washington account for the long-term impact of plastics.