VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966
www.vancouveraudubon.org

September 22, 2020

Rich Doenges re: NWIW SSEIS
Washington Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775
submitted via Department of Ecology Online Public Comment Form

RE: Draft Second Supplemental Environmental Impact Statement for the proposed Kalama Manufacturing and Marine Export Facility

Dear Mr. Doenges:

Vancouver Audubon Society, a chapter of the National Audubon Society, believes in the wisdom of nature's design and promotes this through education, involvement, stewardship, enjoyment and advocacy.

We thank you for the opportunity to comment on the draft Second Supplemental Environmental Impact Statement (SEIS) that seeks to correct previous environmental analyses of the proposed Northwest Innovation Works (NWIW) project that have been inaccurate and inadequate.

This new SEIS demonstrates some important improvements in evaluating the true climate impacts of this proposed methanol refinery, including addressing the likelihood that methanol produced will be used as transportation fuel in China, despite deliberate efforts by NWIW to mislead the Department of Ecology (DOE) and the public otherwise.

The SEIS has made some necessary adjustments in the methane leakage rates, but the rates still are low estimates given the widespread under-reporting of leaks. Even given the unreasonable assumptions regarding the single-sourcing of natural gas from British Columbia, as well as the unrealistically low leakage estimates for that source, the SEIS confirms that NWIW's proposed facility would be enormously polluting. The proposed plant would use up to 320 million cubic feet of fracked gas per day, more than all of Washington's gas-fired power plants combined. DOE concluded the methanol refinery would emit 4.6 million tons of greenhouse gasses every year for 40 years. It would become Washington's largest source of climate pollution at the same time we are trying to reduce emissions statewide.

The evaluation of potential mitigation and displacement contained in this SEIS, however, is misleading in its reliance on speculative, unproven and unenforceable assumptions. It is dangerous to presume this SEIS can accurately predict global fuel markets, technology developments, consumer behavior, or climate regulations for the coming four decades. For

example, improved technologies are creating a growing commercial market for a variety of alternatives to traditional plastics. Growth in bioplastics will be fueled by a number of factors, including consumer demand for environmentally-sustainable products, the development of bio-based feed stocks for commodity plastics and increasing restrictions on the use of non-degradable plastic products, particularly plastic bags. Further, bioplastics manufacturing usually requires lower temperatures, further bringing down production costs and energy usage.

A news report on September 18, 2020, announced a new type of plastic that's being rolled out in the United Kingdom. Xampla says it is the first company in the world to engineer plant protein into a material that acts like single-use plastic. "Single-use plastics and microplastics don't need to be made from fossil fuels, there's something very wrong about making materials from oil that lasts just for a minute or two," says Simon Hombersley, Xampla CEO.

The SEIS assumes no new climate regulations, no changes in the world economy, no new technologies and no new developments in trade policy for the next 40 years. This is not realistic; we cannot predict the future.

The SEIS provides too little detail on the actual mitigation that would be accomplished within the "voluntary" mitigation framework, and this mitigation fails to address the full impacts of NWIW's emissions that will occur both "upstream" during gas extraction in Canada and transport to Kalama and "downstream" after the methanol is manufactured and transported to China. The "upstream" impacts include the industrialization of rural landscapes, abandoned and leaking wells, cumulative impacts to aquifers, mining of groundwater, loss of agricultural land and impacts to poor and indigenous communities. The SEIS also fails to consider the impacts of the proposed new lateral pipeline to the Port of Kalama.

The "downstream" impacts not considered in the SEIS include tanker emissions and the emissions from other ships allowed to dock at the proposed new marine dock. Another "downstream" impact would be to air quality over federal lands. One of the most basic forms of air pollution - haze - degrades visibility over our public lands. Haze is caused when sunlight encounters tiny pollution particles in the air, which reduce the clarity and color of what we see, especially during humid conditions. The Clean Air Act gives special air quality and visibility protection to national parks larger than 6,000 acres and national wilderness areas larger than 5,000 acres that were in existence when it was amended in 1977. These "Class I" areas include Mount Rainier, Olympic and North Cascades National Parks and Mount Adams and Goat Rocks Wildernesses in western Washington.

All other federal areas are "Class II" allowing for a moderate amount of air quality deterioration. Because air pollution is often regional in nature, reductions in pollution to improve visibility in Class I parks and wildernesses will also improve visibility in all other parks and wildernesses in the surrounding area. Class I areas are managed by the National Park Service, U.S. Fish and Wildlife Service, U.S. Forest Service, and several Native American Tribes.

Outside of the visual consequences from polluted air, human health consequences include flare-ups of asthma and chronic obstructive pulmonary disease. When greenhouse gasses are combined with wildfire smoke, as happened recently across Washington and Oregon, that air

pollution also makes people more susceptible to complications from COVID-19, according to Clark County Public Health Officer Alan Melnick. The Centers for Disease Control and Prevention warns on its website that wildfire smoke irritates the lungs, causes inflammation, impacts the immune system and makes people more prone to lung infections such as the virus that causes COVID-19. Air pollution disproportionately affects already vulnerable people including those with chronic illness (e.g. heart or lung disease), children, older adults, low-income communities, and communities of color.

In addition to human health impacts, air pollution also affects birds. “We do know that exposure to particulate matter, which of course is of great concern for human health, can affect birds as well,” says Olivia Sanderfoot, a National Science Foundation Graduate Research Fellow at the University of Washington Seattle who studies how air pollution affects birds. For example, veterinarians and poultry scientists who study captive birds have found that smoke can damage lung tissue and leave the animals susceptible to potentially lethal respiratory infections. How that plays out in the wild is largely unknown, Sanderfoot says. Her current research aims to track changes in bird populations and diversity after exposure to smoke from large wildfires.

While wildfires are a part of natural cycles in the western United States, climate change makes every wildfire that sparks more likely to rapidly grow and spread. Like melting glaciers and rising seas, larger fires and longer fire seasons are among the predicted effects of climate change that are now coming to pass. In 2016, Columbia University scientists showed that climate change has doubled the area of the western U.S. affected by forest fires over the past three decades. “Climate is really running the show in terms of what burns,” one of that study’s authors said. “We should be getting ready for bigger fire years than those familiar to previous generations.” The SEIS should anticipate more times of hazardous air quality exacerbated by both the cumulative climate impacts of the emissions from the proposed project and the day-to-day unavoidable impacts of the proposed project’s emissions when combined with other hazardous air events like wildfire smoke.

The mitigation framework is too vague for DOE to conclude that this project’s impacts will be mitigated, and the urgency of climate change demands that mitigation should be the last option (after all other impacts are reduced) in order to address unavoidable impacts, not simply to maintain the status quo.

We find it simply unacceptable for Washington state to permit an unequivocally and enormously polluting methanol manufacturing facility based on speculative analysis and a faint hope of theoretical emission reductions.

DOE should dismiss the speculative basis that this proposed project could displace even more polluting facilities and, instead, it should base its permitting decision on what is reasonably foreseeable and indeed, assured, about this project – that it would cause millions of tons of greenhouse gas pollution each year, for 40 years, and is profoundly inconsistent with achieving Washington’s climate goals.

We urge DOE to deny permits for NWIW's proposal. We cannot allow new fossil fuel export infrastructure to be built at the same time we are trying to build a clean energy future for Washington and reduce emissions that contribute to climate change.

Please keep our communities safe and keep Washington on track to meet our goals for reducing climate pollution.

Sincerely,

Sam Neuffer
President