

David Hupp

I testify in opposition to the proposed Northwest Innovation Works (NWIW) Kalama Manufacturing and Marine Export Facility in any form. NWIW proposes a similar facility in Oregon and I oppose that as well.

I have lived in the Pacific Northwest for more than half a century, am certain of and share its strong values about the environment and democratic government. I feel these values are being threatened by the fracked gas industry in general. The Kalama Manufacturing and Marine Export Facility proposal is the latest of those threats to Washington, Oregon and our unique national treasure, the Columbia Gorge. Those threats include, but are much more than, the inevitable leaks, spills, fires and explosions. They include massive emissions of greenhouse gasses that will completely compromise the states' ability to meet their official carbon emission reduction goals and create a sustainable energy future.

The NWIW and its investors and allies represent substantial corporate wealth and possess the ability to hire skilled public relations. They will say anything to get this project approved and I don't believe anything they say. The corporate owners are not from the Pacific Northwest, do not understand our culture and environment, nor do they have our community interests at heart. The current SEIS (Draft Second Supplemental Environmental Impact Statement, Publication 20-06-011 dated September 2020) is so full of distracting analysis and turgid language as to be useless as a document for citizens. Its conclusions are highly flawed. In some respects the SEIS reads like a NWIW puff piece. In my work life I read many EISs and wrote a couple, so I know the game. I do not understand why the Washington Department of Ecology seems to be doing NWIW's work for them.

THE CARBON LOAD

The SEIS states the NWIW annual carbon emissions would be 4.6 million metric tons (mmt). The goal set in Washington law, updated in 2020, specifies "The state shall reduce ... overall emissions of greenhouse gases in the state to 1990 levels, or ninety million five hundred thousand metric tons" (<http://lawfilesexternal.wa.gov/biennium/2019-20/Pdf/Bills/SessionLaws/House/2311-S2.SL.pdf?q=20200919150040>).

Kalama's emissions are nearly 10% of the state's total emissions goal. The emissions also exceed the combined total emissions of 8 NW cities and the fracked gas used would be more than the combined total consumption of all the state's fracked-gas fueled power plants.

Washington is justly proud of their emissions goal and efforts to reach it, as expressed on both the governor's web site:

"The governor has: powered a new path to Washington's clean energy future by requesting and signing an unprecedented suite of clean energy legislation into law, ushering in aggressive timelines for decarbonizing Washington's economy and transforming the state's energy landscape."

and the Department of Ecology's:

"Washington is a national leader in cutting greenhouse gas emissions to prevent climate change. Gov. Jay Inslee and the Washington Legislature have adopted a variety

of regulations, programs, and initiatives designed to reduce greenhouse gas emissions. ... Ecology stands proud to protect, preserve, and enhance Washington's environment for current and future generations."

It appears that Kalama's emissions are as significant as any other pollution source in the state. Yet in examining the various versions of the SEIS I cannot even find a reference to the state's goals. Ecology must insist that the SEPA analysis comprehensively and honestly address the issue of how Kalama's total carbon emissions relate to the state's climate goals.

Whatever, NWIW promises vaguely to mitigate these emissions. There is no reason to trust NWIW's mitigation promises.

Your state's Shoreline Management Act, as shown on your website, says "The SMA establishes the concept of preferred shoreline uses. These uses are consistent with controlling pollution, preventing damage to the natural environment, or are unique to or dependent upon use of Washington's shorelines." Ecology must reject this boondoggle on the basis of unacceptable and unmitigatable carbon pollution.

BIGGER PLANS DRIVEN BY PROFIT

Because the Kalama proposal is but one of three, and because the fracked gas industry is desperate to export its surpluses, I suspect that NWIW has future plans that are as yet unstated in such documents as the SEIS, including plans for expanding Kalama to export liquified fracked gas (LNG). There is some evidence as well that the fracked gas volume required by Kalama will require a new transmission pipeline. In addition, the Trump Administration is allowing the shipment of LNG by rail. If such shipments occur, my state of Oregon is as threatened as the state of Washington.

Ecology must use its power to dig out all NWIW planning documents and emails showing future intent about anything beyond the refinery and a 3.1-mile feeder pipe, e.g., a new transmission pipeline and/or LNG export facility/expansion. We need the total picture of this corporation's intent to cut through the spin and promises.

EMISSION DISPLACEMENT

NWIW claims that part of its "mitigation" of carbon emissions is that their consumption of fracked gas will be more efficient than use of fracked gas elsewhere, and will displace the use of "dirtier" fuels in China (the SEIS says that the first "project objective" is "NWIW and the Port are pursuing the proposed project with the stated goal of reducing greenhouse gas (GHG) emissions globally by producing methanol from natural gas rather than coal"). These speculations about future energy decisions in foreign energy markets are so much hot air and Ecology must ignore them in their decision making.

JOBS AND TAX REVENUES

Ecology must ignore the jobs and local tax revenue claims made by NWIW. These are made-up numbers and not relevant to the department's responsibility to protect the state's air, water, and shorelines.

"PLASTICS MY BOY"

This advice may have had traction in 1967, but it advocates harm now. The idea that the Kalama

facility exports are intended to help produce plastics in China is to propose a crime against nature. Plastics in all forms are polluting every system on earth. It is time to stop this madness and send NWIW packing.

David Hupp
Hood River OR
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davidhupp@charter.net