## Columbia Riverkeeper

Hi, my name is Daniel Steris and I'm the Conservation Director with Columbia Riverkeeper. Ecology should set its sights on protecting the future we can live in rather than contributing millions of tons of carbon pollution each year [inaudible] the big justification that someone else might do something similar or worse anyway.

On this basis, recognizing that the project will produce 4.6 million tons of pollution each year or more, Ecology should deny the project. A central premise of the new EIS is that all of the factors-economic growth, technology, climate policy, trade regulations, et cetera- affecting the production and consumption of methanol will remain fundamentally unchanged for the next 40 years. This prediction about the next four decades is unfounded and almost certainly wrong. None of these factors have remained static over the last 40 years. Pretending that time will stand still for Northwest Innovation Works is illogical, and the displacement theory, which relies on that illogic, is not reliable.

In every case Ecology presents, methanol production dramatically increases from fossil fuels and pollution increases. Ecology's analysis bleakly predicts that coal-based methanol will increase regardless, and the displacement analysis that comes to paper over the pollution from the fracked gas-based methanol coming from Northwest Innovation Works by comparing it only with other fossil-based forms of methanol. The analysis fails to make comparisons for competing cleaner alternatives, such as electric vehicles, which may be displaced by fossil-based methanol being used for fuel. The SSEIS also fails to consider cleaner ways of producing methanol that may develop over the next 40 years. Cleaner forms of methanol production are technologically feasible now and may become commercially feasible during the next 40 years.

Washington must plan for something better. The analysis should involve a case that actually aims for reducing carbon emissions in absolute terms, and works toward limiting global warming in line with Washington's goals towards limiting global warming below two degrees.