

Electronic Submission to the Department of Ecology, State of Washington

September 24, 2020

Subject: Review Comments and Recommendations on the Draft SEIS for Permits/Approval of Northwest Innovation Works Proposed Kalama Gas to Methanol Refinery

Summary: As the Final EIS and Decision Documents are prepared for this project, I call on the Washington State, Department of Ecology to not approve the Shoreline Conditional Use Permit and to deny any proposed action associated with Proposed Methanol Refinery on the Columbia River in Kalama, Washington.

Response to Report's Summary Findings:

- **The project would increase greenhouse gas emissions within Washington state by almost one million metric tons of carbon dioxide equivalent a year.** The Kalama facility would be one of the 10 largest sources of greenhouse gas emissions in the state. Northwest Innovation Works has said that it will mitigate all of the facility's in-state emissions.

Response: Avoidance of adding over 1 million metric tons of CO₂ and other Greenhouse Gas (GHG) emissions to our Region will be the best action for all. The documents don't adequately address methanol leakage and impacts to the local area. Mitigation measures are susceptible to failure and inadequacy.

- **Worldwide demand for methanol is likely to increase in the decades ahead,** leading to higher greenhouse gas emissions with or without the Kalama facility

Response: We can all work together now to stop and reverse this trend before more serious impacts of Rapid Global Climate Change occur.

- **It would lead to methanol being burned as a fuel.** Northwest Innovation Works has said all of the methanol from the Kalama facility will be used in plastics production, but increasing methanol supply makes it more likely that more methanol will be used as fuel, regardless of the source.

Response: Burned as fuel, the Kalama project could add between 2 and 5 million tons of carbon pollution per year. Even China is reportedly beginning to take action to reduce pollution and GHG emissions!

- **Extracting and transporting the natural gas used to make the methanol could produce higher emissions than previous estimates.**

Response: This is a serious issue, throughout our Country, methanol pollution is increasing and has caused serious air quality including reduced poor visibility – The Methanol Haze.

- **Methanol made in Kalama could produce lower greenhouse gas emissions than many competing methanol supplies**, from coal or less efficient natural gas sources. This means that global greenhouse gas emissions would increase with the addition of the Kalama facility, but likely less than they might if that demand was met by other sources.

Response: Weak argument. See my comments herein. Let's work together and form a Green Business Center in Kalama!

Detailed Comments:

The original Environmental Impact Statement (EIS) as well as the supplemental documents (SEIS) are full of generalities, assumptions and unsupported statements. Reviewing Officials are urged to be open minded and listen to all commentors on this project. (Collectively, under law, I will refer to this as the EIS to incorporate the SEIS and SSEIS under this project, as a final decision document nears).

The air quality analysis is particularly weak and limited in its scope.

The Analysis is to address existing and estimates of project emissions and compare expected impacts against a variety of standards under various scenarios. The analysis fails to simply and adequately address the relationship of the project and the local area along with greater impacts to the regional area, and global climate change, in fact, rapid climate change should be addressed, as this proposed project is a likely component of such.

The Regional area around Kalama has just experienced over a week of unhealthy and hazardous air quality conditions. <https://www.columbian.com/news/2020/sep/15/clark-county-is-worst-in-state-as-washington-sets-record-for-hazardous-air/>

The document is incomplete in its analysis of emissions of CO2 and other GHG along with local air quality hazardous air events. Visual Quality impacts have also not been adequately addressed.

The EIS documents actually assumes that the air quality in the area will improve with future improvements in other standards, including an expectation that EPA will have new more stringent air quality standards for methanol, ships, etc. – when in fact, most recently, EPA has been relaxing standards. This is one, among a number of completely unsupported and likely inaccurate assumptions in the EIS and SEIS Documents.

Particularly disturbing is that there now appears to be little to no oversight of methanol pollution from existing and abandoned gas wells and fracking projects throughout the US. As a result, air quality conditions have deteriorated in many parts of the US, including the Southwest USA and California – where reports of methane air pollution, including a visual and visually degrading “methane haze” increase yearly. <https://www.bloomberg.com/news/features/2020-09->

[17/abandoned-gas-wells-are-left-to-spew-methane-for-eternity?utm_source=url_link&fbclid=IwAR2IZicvXTRm0jluzdnPfdE4m1iQ8b6ZXU4cArXgPekpclmnX9CNsHHEROM](https://www.cbsnews.com/news/who-are-the-biggest-us-methane-emitters/)

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The air quality analysis in the documents, including this current SEIS, do not examine the air quality for special management areas nearby, including Mt Rainer NP, Columbia River Gorge NSA, Mt St Helens or the National Wildlife Refuges nearby including many islands in the Columbia River.

Many islands of the Julia Butler Hansen Refuge for the Columbia White-tailed Deer (JBH CWTD) and the Lewis and Clark National Wildlife Refuge have been designated as Wilderness Study Areas.

<https://www.fws.gov/pacific/planning/main/docs/WA/jbh-lc/Final%20CCP%20EIS/LAC%20JBH%20Final%20CCPEIS.pdf>

The US Fish and Wildlife Service has yet to complete these studies, however, some of the important criteria in analyzing Wilderness characteristics and values includes Air Quality. There is no or limited analysis of the potential impacts of the proposed plant's operation, nor the increased ship traffic and the associated impacts to air, fish, wildlife, including Threatened and Endangered Species and other natural resources of these important areas.

I contend that proceeding with the proposed action could likely impact the potential Wilderness Designation of Islands within the nearby Lewis and Clark and JBH CWTD Columbia River National Wildlife Refuges, and possibly the management purposes and objectives for these as well as other nearby Federal Lands. Analysis of the impacts of achieving and maintaining a Class 1 Air shed should have been addressed in the EIS documents from a variety of actions associated with the project proposal.

Burning Methanol or Making Plastics - - The project's purpose should be clearly explained.

However, whether it is to ship the refined natural gas to burn and directly contribute to air pollution and GHG emission or to make Plastics, neither purpose stands out to be more significant and important as helping to stop or slow down global climate change. In fact, the most significant positive action would be for the Kalama Community and Project Proponents to come together and denounce this project and work together as a community to develop Green Businesses. International networks of such communities are starting up and the growth potential seems unlimited, as well as a very positive future.

As for the future of plastics and it's recycling – I refer you to the following, which demonstrates the myth that all plastics are being recycled, when in fact it has never been greater than 10%,

and the future of recycling will need to rely on new innovations, but primarily and avoidance and use of sustainable and reusable products.

<https://www.npr.org/2020/03/31/822597631/plastic-wars-three-takeaways-from-the-fight-over-the-future-of-plastics>

Perhaps somewhere in Washington State there is a good place to help with recycling of plastics, if China is not going to take it from the US any longer. (I don't believe it is in Kalama). Or perhaps the US should ban the sale of methanol to China until they agree to a plastics recycling program.... However, with less than 10% of the volume of plastics generated worldwide being recycled, the future of plastic use for many products is unsustainable and unacceptable – the best alternative is to reduce plastic use and in our environment. Reuse, Recycle, Invent New!

Burning Methanol from the Kalama project as a fuel would generate millions of tons of particulate pollution yearly. Simply, these types of projects can't continue worldwide, without more serious complications associated with global climate change.

It is hard to imagine that the people of the Kalama area would want to have such a facility in their community. Or to have such a facility that causes so much environmental harm, on a global scale as well as the impacts to the local area – Columbia River natural resources, scenic beauty, fish and wildlife, public recreation, small town charm, etc.

Not only is this project proposed in the wrong location for a facility like this, we all must question whether or not just a facility should be built anywhere in the Western USA – or anywhere on Planet Earth!

I suggest that all of us, including the people of Kalama and the Project Proponents - must avoid taking the road of Short Term Economic Gain for the benefit of a small group of wealthy individuals when it seems clear that a road of Long Term Economic Stability and Sustainability with the Positive Benefits for the Public Good – including public health - - for Long Term sustainability – including clean air, water and healthy natural resources, is a better choice. We need to examine more clearly for all to understand what projects are healthy for our communities that will provide long term positive benefits for everyone, not just a few. And when necessary, as is the case herein, what are the long-term impacts for everyone.

From the Intergovernmental Panel on Climate Change (IPCC) Report:

Climate change has been intensively studied and acknowledged at the global, national, and regional scales. Climate change is being fueled by the human-caused release of greenhouse gas emissions, in particular carbon dioxide and methane. The Intergovernmental Panel on Climate Change (“IPCC”) is a Nobel Prize-winning scientific body within the United Nations that reviews and assesses the most recent scientific, technical, and socio-economic information relevant to

our understanding of climate change. In a recent report to policymakers the IPCC provided a summary of our understanding of human-caused climate change. Among other things, the IPCC summarized:

- Human influence on the climate system is clear, and recent anthropogenic emissions of greenhouse gases are the highest in history. Recent climate changes have had widespread impacts on human and natural systems.
- Warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen.
- Anthropogenic greenhouse gas emissions have increased since the pre-industrial era, driven largely by economic and population growth, and are now higher than ever. This has led to atmospheric concentrations of carbon dioxide, methane, and nitrous oxide that are unprecedented in at least the last 800,000 years. Their effects, together with those of other anthropogenic drivers, have been detected throughout the climate system and are extremely likely to have been the dominant cause of the observed warming since the mid-20th century.
- In recent decades, changes in climate have caused impacts on natural and human systems on all continents and across the oceans. Impacts are due to observed climate change, irrespective of its cause, indicating the sensitivity of natural and human systems to changing climate.
- Continued emission of greenhouse gases will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of severe, pervasive, and irreversible impacts for people and ecosystems. Limiting climate change would require substantial and sustained reductions in greenhouse gas emissions which, together with adaptation, can limit climate change risks.
- Surface temperature is projected to rise over the 21st century under all assessed emission scenarios. It is very likely that heat waves will occur more often and last longer, and that extreme precipitation events will become more intense and frequent in many regions. The ocean will continue to warm and acidify, and global mean sea level will continue to rise. Carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride are recognized as the key greenhouse gases contributing to climate change. (IPCC AR5, Summary for Policymakers (March 2014))

In short, this project will add to and exacerbate the already declining quality of human health and impact the natural environment. Nationally, and globally, we all need to aggressively work to slow GHG emissions and attempt to slow and reverse the negative trends of rapid climate change. We must act locally, everywhere, to effect this change.

Closing

In closing, as the Washington State Department of Ecology completes the Final documents and reaches its Decision, based on my review of the project proposal and EIS documents, I urge rejection of the Shoreline Conditional Use Permit and non-approval of the Kalama Methanol Refinery. I encourage the businesses, Port and local government and citizens of Kalama and the

surrounding Region, and the proponents of this project to aggressively work together for climate solutions, discover local projects that will add to the beauty and charm of the community, the Columbia River Watershed, the State of Washington and the PNW. Focus on the quality environments that exist and work to help and improve water quality, air quality and the natural resources which support the great Columbia River fishery, wildlife and wilderness characteristic of the nearby and surrounding State and Federal lands. Kalama and Southwest Washington, and beyond will be better without this project.

Sincerely,

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