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With the unreasonable assumptions about the single-sourcing of gas from British Columbia, as well as the unrealistically low leakage estimates for that source, the analysis confirms that NWIWs proposed facility would be enormously polluting.

Despite marginal improvements, the evaluation of potential mitigation and displacement contained in this analysis is misleading and concerning in its reliance on speculative and unenforceable assumptions. One can simply look to the impacts of this pandemic to see evidence of incredible uncertainty and volatility in energy market dynamics. It is dangerous to presume this analysis can accurately predict global fuel markets, technology developments, consumer behavior, or regulations for the coming four decades. Furthermore, the SEIS provides too little detail on the actual mitigation that would be accomplished within the voluntary mitigation framework, nor does this mitigation address the full impacts of NWIWs emissions that will occur overseas. The mitigation framework is too vague for Ecology to conclude that this projects 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 as we continue to build out the fossil fuel industry.

This analysis confirms that NWIWs proposed facility would become one of the greatest sources of climate pollution in Washington. It is simply unacceptable for Washington to build an unequivocally and enormously polluting facility based on speculative analysis and a faint hope of theoretical emission reductions. Ecology should dismiss the speculative basis that this project could displace even more polluting facilities, and instead 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 Washingtons climate goals.

The evidence in this draft SEIS demonstrates that Washington should deny NWIWs proposal to build and operate this dangerous methanol refinery in Kalama. We cannot keep building fossil fuel export infrastructure and expect to address the dangers of climate change.

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