Jean Avery

The Kalama refinery would have a huge environmental "footprint"-- if that term can be used to refer to pipelines and ocean routes.

-- The map on page 41 shows pipeline routes that would supply fracked gas to Kalama: 600 miles from British Columbia, plus 800 miles from Wyoming -- totaling 1400 miles of pipeline. Even if NWIW mitigated for upstream emission leakage, would this be sufficient to mitigate for other damages -- such as to lands occupied by Indigenous tribes or private landowners?

-- On page 48 is a color map of the world, with a red line showing the marine route from Kalama to China. As proposed, large tankers would transit 5,000 nautical miles from Kalama to China. Product would be unloaded, and the tankers would return empty to Kalama. This 10,000-mile round trip would be completed approximately once a week. (The SSEIS estimates 36 to 72 shipments per year; see page C-4).

Although the SSEIS includes plans to mitigate emissions within Washington, it is less clear

(a) if there will be any mitigation outside of the state and

(b) if there will be mitigation for non-emissions, such as marine fuel.

In conclusion:

1, The enormous reach of this project -- across the continent and across the globe -- would be hugely impactful, even beyond the stated GHG emissions.

2. The SSEIS fails to provide a complete, multi-dimensional plan for mitigation.

3. The scope of this project seems far beyond the regulatory purview of one state's Dept. of Ecology.

The Climate Clock is ticking. Please deny this project.

(Presented as oral testimony on Tuesday morning, 9/22/2020, with this revision: Neil's slide confirms zero mitigation out of state.)