

# Behnoosh Armani

Thank you for your work to protect Washington's environment and acknowledgement that previous environmental analysis of Northwest Innovation Works (NWIW) Methanol refinery proposal in Kalama, Washington have been inaccurate and inadequate.

This new Draft Supplemental Environmental Impact Statement represents some important improvements in evaluating the true climate impacts of this facility, including addressing the likelihood that methanol produced by this facility will be used as transportation fuel, despite deliberate efforts by NWIW to mislead your agency and the public otherwise. And while the SEIS has made some necessary adjustments in the methane leakage rates, the rates continue to be low estimates given the widespread underreporting of leaks. However, even 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 NWIW's proposed facility would be enormously polluting.

Despite these 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 NWIW's emissions that will occur overseas. The mitigation framework is too vague for Ecology to conclude that this project's 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.

Even with all of its flaws, this analysis confirms that NWIW's 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 Washington's climate goals.

The evidence in this draft SEIS demonstrates that Washington should deny NWIW's 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.

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