

Peter Fels

PETER FELS
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September 25, 2020

Washington Department of Ecology
(submitted via on-line comment portal)

RE: Kalama Manufacturing and Marine Export Facility

Dear Ecology:

I oppose the permit application of NWIW for the KMMEF. You should deny the application.

I am an ordinary citizen with two children and two grandchildren and I am very concerned about the future of our earth's environment for their sake. I agree with the IPCC that it is crucial to take immediate steps to reduce GHG emissions. However, the KMMEF if built will greatly increase the total GHGs emitted in Washington (between 786,117 and 1,421,748 million tons annually, SSEIS p. 86), making it much more difficult for us to meet our state GHG reduction goals.

It is your obligation to review the proposed permit under SEPA to assure it meets state goals. The proponents claim they plan to fully mitigate their in-state GHG emissions using yet to be developed methods, but they have no existing method of doing so. Pursuant to RCW 43.21C.060, "(m)itigation measures shall be reasonable and capable of being accomplished." Even assuming the technology and availability of mitigation will exist, the overall increase in GHGs will make it more difficult for the state to meet its goals by removing potential mitigation reduction credits from the state market while still adding significantly (among the top 10 Washington emitters) to state GHG emissions and doing nothing to reduce total annual emissions.

You must evaluate a proposal under WAC 197-11-782 for how probable its outcome is Under WAC 197-11-794, an adverse effect may be considered significant even if its chance is not great but if the resulting impact would be severe. In this case, its proponents agree the likely GHG emissions from construction and continued operation of the KMMEF would be great and continue for approximately 40 years. Although the SSEIS argues on balance global GHGs would be reduced, the impact to Washington is so significant and the likelihood of full mitigation so unknown the permit should be denied.

Claims of global reduction of GHGs if KMMEF is built are speculative

The SSEIS states that all worldwide methanol demand will be met with or without KMMEF (SSEIS pp. 54 and 75). It further argues that under the most likely scenario, global emissions from methanol

production with KMMEF in place would be 55% less than without (SSEIS p. 76). However, because so many factors considered and conclusions stated by the SSEIS are either uncertain or unsupported, this conclusion fails to meet the definition of "probable" under WAC 197-11-782.

For example, the ESM assumes that methanol from Kalama will replace methanol produced by coal in China to varying degrees (SSEIS p. 52). However, the SSEIS also explains that KMMEF production will replace higher cost methanol in the market (SSEIS p. 52).

The SSEIS does not establish that coal-produced methanol is a higher cost product. It currently is the most profitable Chinese methanol (SSEIS p. 71). In fact, it seems likely that Chinese methanol produced from coal will continue to have a lower cost or be preferred by Chinese buyers due to political factors in the Chinese economy. Because the assumption that KMMEF methanol will replace methanol from Chinese coal is unsupported and contradicted by the evidence, the conclusion that KMMEF methanol will replace Chinese coal-produced methanol does not meet the probability test.

In addition, although the SSEIS states the market in 2019 was capable of producing approximately 50% more methanol than was used*, it also concludes that producers will continue to produce methanol, even at a loss, in order to benefit from expected future profits (SSEIS p. 68). If producers are willing to operate at a loss, they will sell their product at a lower price than KMMEF in order to assure future sales. In that case, KMMEF methanol will not replace other global sources.

Mitigation

KMMEF proposes to fully mitigate all in-state GHG emissions by designing a voluntary mitigation program. While its promises sound good, KMMEF cannot point to any existing method of mitigation nor does it specify exactly how it will be able to mitigate the huge negative environmental impact KMMEF will create on Washington's airshed. Whether it will actually be able to completely offset all GHGs for the full life of the plant and how it will do so remain completely speculative. KMMEF has not demonstrated its mitigation measures are capable of being accomplished as required by RCW 43.21C.060.

Furthermore, assuming mitigation measures such as carbon credits are available in the future, there may be a limited supply. The large amount of credits KMMEF will need will result in fewer credits available for other emitters, meaning there may simply not be enough mitigation measures in Washington to meet the overall need.

Finally, even assuming KMMEF is able to fully mitigate all of its annual emissions, doing so merely returns Washington to the current GHG count but does nothing to meet state goals for GHG reduction.

Conclusion

The SSEIS cites numerous other bases for uncertainty for its conclusions. See, e.g., SSEIS pp. 68, and 105. Under SEPA the outcome of an EIS must be probable. With so many uncertainties, the proponents cannot meet their burden.

Polluters often use the promise of future jobs as an excuse for their climate destroying operations. In this case, NWIW has continued to claim without credible factual support that not only will they

create jobs but they will magically reduce worldwide global GHG emissions by substituting "cleaner" methanol for "dirty" methanol. Ecology did not buy the promises made in NWIW's first and second EISes and it should not buy them now.

Washington citizens rely on the Department of Ecology to protect us and our environment from pollution, consistent with state laws. The future livability of our state and our climate depend on every jurisdiction doing its job to reduce global GHG emissions consistent with the IPCC findings.

For the sake of our children and grandchildren I hope you will deny this permit.

Thank you for your consideration,

/s/

Peter Fels

* At one place in the SSEIS global methanol production capacity is listed as 153 MMT (SSEIS p. 50) and at another place 157 MMT (SSEIS p. 68); while global use in 2019 was more than 98 MMT (SSEIS p. 50).

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September 26, 2020

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(submitted via on-line comment portal)

RE: Kalama Manufacturing and Marine Export Facility

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