

Comment: Formal Comments on Kalama Manufacturing and Marine Export Facility Draft Second Supplemental Environmental Impact Statement, September 2020

RE: Emissions and Global Warming

Date: September 15, 2020

Respectfully submitted by: Kristin Edmark, MPH RD  
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SEP 22 2020

WA State Department  
of Ecology (SWRO)

To: Washington State Department of Ecology c/o Rich Doeges

Thank you for the opportunity to comment. Thank you for requiring the SEIS be redone. Thank you for the changes made.

I am very much against the building of the Kalama methanol refinery because we are in a climate crisis and must stop our use and worldwide use of fossil fuels as soon as possible. I love hiking, kayaking and studying nature. Therefore, I am a member of the Audubon Society, Sierra Club and Columbia Riverkeepers and other outdoor groups. My daughter-in-law's family lost a beloved home this month to fire in Oregon but this is nothing compared to the devastation experienced by so many worldwide due to a warming climate.

Please revise your methane leakage rates to 1 to 3% to align with current findings and the Stockholm Environment Institute. 1% leakage is far below what should be expected. As you are familiar, the Stockholm Environmental Institute wrote (SEI-1800-db-towards-a-climate-test) "the US Department of Energy estimates that an average leakage rate for natural gas supply systems nationally is 1.6%"...However, research based on atmospheric measurement suggests that bottom up estimates...consistently under estimate methane emissions. Brand finds leakage could be 25-75% higher than inventory based estimates which would mean leakage rates of more like 1.5 to 2.6% for the US average." Rodney Mountain was found to be 2.8%; global average is accepted at 4.3% for shale gas production. SEI concludes that 1-3% leakage would be plausible for the Kalama methanol refinery.

Downstream impacts for the methanol refinery should assume that all methanol produced will be burned. We do not know the end use; China can use it in any way desired. Even if a percentage is used to produce plastics, the plastics will most likely also be burned. Similar to the purchase of insurance, it is imprudent to plan for less than the worst case scenario. 100% eventually burned is likely. There is no evidence that 40% of methanol will be burned.

Looking at the big picture, the refinery would encourage significant fracking at a time when it is imperative that the world reduce use of fossil fuels. The project would likely necessitate an additional north-south pipeline which in turn encourages more fossil fuel extraction. Increased extraction of fossil fuels violates Washington clean energy goals. Increased extraction will likely soon violate national goals. It is wrong to accelerate harm to the people and species of the world by increasing fossil fuel extraction and infrastructure. It is wrong to be party to the effects from the refinery and the acceleration of storms, fires, droughts, political unrest, climate refugees, expense...

The portion of the draft second SEIS which deals with displacement of dirtier methanol production in China should be eliminated. It is far too speculative with no evidence. Also, it sets a precedent for future projects to request approval on the basis that there exists a more polluting method which could be displaced.

In its present form, the second SEIS clearly shows a significant, unmitigatable increase in global greenhouse gas emissions. It is morally wrong for Washington and the USA to be a partner in this increase. Please deny the shoreline substantial development and conditional use permit on the basis of unacceptable greenhouse gas emissions.

*Kristin Edmark*

Comment regarding mitigation of greenhouse gas emissions

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Washington Department of Ecology  
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Thank you for the chance to comment. The section of the draft second SEIS which deals with mitigation is not workable because 1) The plan is too vague. 2) The project is too large to mitigate. 3) NWIW and Port of Kalama have repeatedly shown they cannot be trusted with monitoring.

The mitigation plan is unclear. As written, it is unlikely the components of the plan would be in place and working before any methane is produced. No methane production should be allowed without equal mitigation. Even funding for the salaries is unclear. The Department of Ecology or other state organizations should not be expected to donate time to NWIW.

I do not believe it is possible to mitigate a project of this magnitude. As the draft second SEIS clearly shows, the project has significant upstream and downstream emissions. A plan which mitigates only emission in Washington State does very little to mitigate the full effect of this project and should not be considered mitigation. Real mitigation can only be done by removal of CO<sub>2</sub>e from the atmosphere. Most assuredly, NWIW does not plan to plant enough trees to remove that enormous amount of CO<sub>2</sub>e and certainly would not wait until the trees were large enough to sequester equal CO<sub>2</sub> to the CO<sub>2</sub>e produced. Even if enough trees could be planted worldwide to mitigate the greenhouse gas produced, the warming planet is increasing the numbers of trees burning each year. Proposing to mitigate by other means like contributing to a wind farm or battery plant is not acceptable and will not prevent acceleration of warming.

Mitigation involves monitoring emissions. An outside entity must do all monitoring. Some examples of ways NWIW has shown that they cannot be trusted include:

1) The unacceptable SEIS from 2019 concluded that the methanol refinery would decrease greenhouse gas emissions worldwide based on too many unfounded unpredictable assumptions. Only data which would support their desired conclusion was used. NWIW continues to state that the refinery will decrease world greenhouse gas emissions.

- 2) The 2019 SEIS repeatedly dismissed, discounts or leaves out methane leakage from drill sites, pipelines, pump stations and transport including such statements as: 1.2.1.2 "There are no permanent sources of operational emission for the proposed pipeline with the exception of minor fugitive methane emissions".
- 3) NWIW insisted for years that the methanol would be used only for plastics until the evidence (the Powerpoint presentation to investors and statement by Mr Lebin) proved this was false.
- 4) The large amount of conflict of interest NWIW promotes is unethical. NWIW hired Richard DeBolt, a ranking member of the Washington State Capital Budget Committee. DeBolt is NWIW Director of External Relations. \$143 million in tax loopholes have been negotiated with the State of Washington; \$11.5 million for the dock and road has been in the state budget; Washington Public Employees' Retirement Funds are to be invested in NWIW through Stonespeak. NWIW has also hired Rick Desimone, a former Chief of Staff for Senator Murry for advisor, George Raiter, a former Cowlitz County Commissioner, as an outreach director. Gary Locke, a former Governor, as Chairman of an advisory board for NWIW, and two members from the Center for Urban Waters, Tom Luce and Rick Desimone.
- 5) NWIW violated Washington State public meeting laws. At the Dec 13th 2018 hearing on the draft supplemental EIS about 1000 members of the public came and almost 500 signed up to speak overwhelmingly against the refinery. Washington law requires the public free access to public hearings but on 12/13/18 we were asked to wait in a 45 minute line to provide name and address to enter the building. Since the hearing was only 3 hour long and there was a break the last 10 minutes of each hour, some members of the public missed almost the first 1/3 of the hearing before being allowed to enter. I was one of the many who prepared a comment and asked to speak but was not allowed time under the lottery system used.
- 6) NWIW/Port of Kalama sent a letter of support to the BUILD grant from the Cowlitz County Board of Commissioners. The Port of Kalama/NWIW conducted County Commission business at odd unannounced meetings. At the regular public Cowlitz County Commissioner's meeting, July 3rd, 2018, the vote on the endorsement letter for the grant application was included as "consent agenda" meaning when the agenda was approved so was the letter. Public comment was only allowed after the vote. The letter was pushed through quickly; Commissioner Axel Swanson admitted at the meeting that he had not read and did not know the contents of the letter.
- 7) In 2019, the NWIW website listed the average salary (to the penny) for employees once the refinery is operational. The average is misleading because it includes the high salaries of the executives. NWIW has applied for at least 4 visas for Chinese employees.

The mitigation plan presented in the draft second SEIS should not be accepted because it is nowhere near adequate, incomplete and does not include trustworthy monitoring. To leave it in as is makes it seem that the plan has validity; so the entire mitigation section should be rejected. Please deny the shoreline substantial development and conditional use permit on the basis of unacceptable, unmitigatable greenhouse gas emissions.

*Kristin Edmark*