

Comments on the Kalama Manufacturing and Marine Export Facility Second Supplemental EIS
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The conclusion of the SSEIS that the project would not result in significant adverse impacts to GHG emissions or climate change is deeply flawed. The conclusion is reached not because operations of the plant will not result in significant GHG emissions, but because the plant will displace other, dirtier sources of GHG in the future. The reasoning is faulty.

I speak from experience. In the 1970's, I worked for the Pacific Northwest Regional Commission which was a federal/state partnership to fund economic development in the region. At the request of the utilities, we commissioned a study by a notable team of expert economists to look at the need for electrical power in the future. They found, based on their well-reviewed economic modeling, that the region's need for power would double every 10 years. Five new nuclear power plants were planned to meet the anticipated demand. Construction began. The modeling was seriously wrong. It did not anticipate that energy conservation would be a much less expensive source of power. Growth in electrical demand was not even close to what was modeled. The project resulted in the **largest municipal bond default** in history. It cost ratepayers thousands of dollars and 75,000 bondholders lost money. This is the story of the Washington Public Power Supply System (WPPSS, pronounced Whoops!, <https://www.historylink.org/File/5482>).

This EIS finds that the project will not result in adverse impacts because it will displace dirtier sources for olefins. This is another Whoops!, a conclusion drawn from economic modeling based on assumptions that could be grossly wrong. The economic models resulting in this conclusion make projections based on today's assumptions without anticipating changes that are bound to happen as new technology is developed and new public policy is set.

We don't know enough to know what GHGs, if any, will be displaced by this project. The adverse impact of this project and its GHG emissions must be based on the project's operations alone, not on what it might hypothetically displace.

I will leave it to people with more expertise than I have to comment on whether the direct emissions from this project are fairly measured. The FEIS says that they will be substantial. We who live in the PNW, having just lived through the worst air quality in the world due to fires, which are partially due to climate change, should not build giant projects which will damage the region and the planet for the next 40 years.

I urge you to choose the No Action alternative.