

## Burt Culver

The Department of Ecology should withdraw its Mitigated Determination of Nonsignificance (MDNS) for the proposed TransAlta coal-to-gas conversion and require a comprehensive Environmental Impact Statement (EIS). Swapping one fossil fuel for another commits Washington to decades of high-emission infrastructure at the precise moment our regional climate realities demand a real transition to modern clean power.

A project of this scale cannot be evaluated in isolation, and the current environmental assessment suffers from critical structural flaws:

**Distorted Emissions Baseline via 100-Year GWP:** The SEPA analysis omits the near-term warming impact of upstream methane leakage from hydraulic fracturing, compression, and pipeline distribution. Over a critical 20-year horizon, methane is more than 80 times more potent than carbon dioxide. Using an extended 100-year metric conceals the front-loaded warming impacts of supplying fuel to this facility.

**Misclassification as a Peaker Plant:** Regulating this facility under peaker-plant rules while permitting an operational capacity factor as high as 59% exploits a loophole in Washington's emissions standards (RCW 80.80). A facility running at that duty cycle operates as mid-merit baseline power, locking in over 2 million metric tons of direct CO<sub>2</sub> annually through 2044—well past the statutory mandates established under the Clean Energy Transformation Act (CETA).

**Grid Resilience False Dilemma:** Long-term energy security will not come from tying Washington's grid to volatile, pipeline-dependent fuel inputs. System reliability is better built through distributed regional capacity, utility-scale battery storage, targeted efficiency improvements, and modernized transmission routing. Approving this facility underwrites Puget Sound Energy's reliance on dirty baseloads while consumers face substantial pending rate increases.

**Unexamined End-Use Demand:** Project disclosures indicate this generation capacity is being preserved to support intensive industrial compute and data center expansion, with potential conversion pathways extending to Unit 1. Ecology must evaluate this lifecycle footprint holistically rather than pretending this generation exists in an isolated vacuum.

Washington communities are already dealing with unprecedented wildfire seasons, stressed water resources, and prolonged drought. Adding 42 million metric tons of lifetime carbon emissions directly compounds these system vulnerabilities.

Ecology must retract the MDNS, order an exhaustive EIS that accounts for full lifecycle methane leakage and actual operational capacity, and reject this conversion permit.