

## Collected comments on DSSEIS submitted to Ecology by Keely Family in 2020.

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By SALLY KEELY

### 10/9 Covid and Particulate Matter

KMMEF will emit 62 tons of particulate matter annually. Particulate matter is known to carry Sars-Cov-2 virus (COVID-19) per <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7345938/>. Areas of high particulate matter also have high rates of coronavirus infection and death. Ecology should DENY any chemical or petrochemical plant that will increase atmospheric particulate matter so as not to increase pathogenic transmission on the PM particles. PLEASE deny Kalama methanol if for no other reason.

### 10/9 Outdated and Cherry-Picked Data

Why does the DSSEIS contain outdated stats and cherry-picked outlier rates?

The DSSEIS uses GWP values from IPCC AR-4. Why not the more recent AR-5 values? The more recent assessment with more accurate current data has been available for years. Doing so makes the 4.6 MMT CO<sub>2</sub>e that KMMEF is shown to emit far, far worse.

The DSSEIS uses a 100-year GWP for methane even though (1) the project is expected to be in operation for 40+ years, and (2) the IPCC and other scientists worldwide have proven we have just ten years to dramatically reduce GHG emissions to avoid irreversible climate catastrophe. Over the next 20 years methane has a GWP 86 times that of coal and would make the 4.6 MMT CO<sub>2</sub>e that KMMEF is shown to emit far, far worse.

The DSSEIS uses a 0.97% methane leakage rate from pipelines. Why cherry pick such a low outlier rate when more accurate rates of 2-3% have been proven again and again? Doing so makes the 4.6 MMT CO<sub>2</sub>e that KMMEF is shown to emit far, far worse.

Don't permit our climate emergency to become far, far worse. DENY the shorelines permits!

### 10/9 Bogus Displacement Theory

I've been working to stop the methanol refinery for almost 5 years. I've read EVERY word of every EIS, related document, and public comment. There are only 2 reasons ever given to build this monstrosity: the "displacement" theory and jobs, jobs, jobs.

- (1) The displacement theory in the DSSEIS is completely bogus, and everyone knows it. There is NO guarantee China is going to stop burning coal to make methanol. And if NWIW, the Port of Kalama, and Cowlitz County legislators cared one inkling about coal emissions they would have been against Millennium Coal terminal in Longview but instead supported it 100%. The entire displacement theory is completely speculative and should be disregarded.
- (2) Ecology's "displacement" argument in the DSSEIS assumes China is never going to work toward a better climate future, so why should Washington. SO INFURIATING! The people of Washington, the Governor of Washington, and I had (mistakenly?) thought the Dept. of Ecology in Washington all "got it" – that we

were going to work together toward a clean green future with massive REDUCTIONS in GHG emissions as we QUICKLY transition to sustainable carbon free energies. But the DSSEIS assumes we carry on the “status quo” of fossil fuel use for another 40 years. YIKES! Even doing so for another 10 means “game over” for humanity per the IPCC and other well documented scientific reports. Ecology – you can’t really believe spewing 4.6 million metric tons of CO<sub>2e</sub> every year for the next 40 years can be “displaced” or “mitigated” can you? Come on!

- (3) Jobs. Hmph. First off NWIW is lying. The people of Cowlitz County aren’t getting living wage jobs – not temporarily in construction (the facility is modular, built in China, assembled here), not permanent (Kalama has not a single Mandarin fluent methanol engineer). NWIW already applied for H1B Visas to bring workers over from China. The rest would come from the gulf coast. And even if we were to get 200 permanent jobs and 1000 temporary, what use is a job when you cannot breathe the air? Or your family member is dying of cancer from 59 toxic pollutants spewed into the air (cite: SEPA 2016)

DENY the shorelines permit and quickly so we can get on with the business of finding a sustainable business to build on the Port’s vacant 92 acres. Enough is enough!

### 10/9 NWIW’s Lies

I do not understand how the Department of Ecology can be so misled.

Northwest Innovation Works ([https://nomethanol360.com/images/graphic\\_who-ownsNWIW.gif](https://nomethanol360.com/images/graphic_who-ownsNWIW.gif)) is a shell company, a company on paper only, with no current employees, no active Washington State UBI number (L&I contractor search: [https://nomethanol360.com/images/graphic\\_nwiw\\_landi.gif](https://nomethanol360.com/images/graphic_nwiw_landi.gif)). NWIW is a controlled foreign entity (<https://assets.documentcloud.org/documents/6111358/2019-4-18-Letter-CFIUS-NWIW.pdf>) of the Chinese Party State (the CPC, [https://www.washingtonpost.com/world/asia\\_pacific/command-and-control-chinas-communist-party-extends-reach-into-foreign-companies/2018/01/28/cd49ffa6-fc57-11e7-9b5d-bbf0da31214d\\_story.html](https://www.washingtonpost.com/world/asia_pacific/command-and-control-chinas-communist-party-extends-reach-into-foreign-companies/2018/01/28/cd49ffa6-fc57-11e7-9b5d-bbf0da31214d_story.html)), the only company the Chinese Academy of Sciences Holdings (CASH, <http://english.holdings.cas.cn/cp/>) has spun outside China. NWIW has never build or operated a methanol refinery (despite lies in an NWIW presentation to the NWGA in 2016 about methanol on the Columbia River [https://nomethanol360.com/images/graphic\\_HistoryMethanolCR-annotated.jpg](https://nomethanol360.com/images/graphic_HistoryMethanolCR-annotated.jpg)). They propose to use a new production process (ULE <https://nomethanol360.com/docs/20160623ULERefiningProcess.pdf>) never tested on this scale.

Ecology – you are being sold a bill of goods, don’t fall for it!

President Trump wrote in an Executive Order on August 6<sup>th</sup>, 2020, “... the People’s Republic of China (China) continues to threaten the national security, foreign policy, and economy of the United States.”

Vice President Pence stated in a debate with Senator Kamala Harris on October 7<sup>th</sup>, 2020, the Chinese government “did not play straight with the American people.”

The Netflix documentary The American Factory describes how a similar Chinese communist party owned company took advantage of a small rural town, not unlike Kalama, and its people, leaving workers high and dry with low wages, no health care, no sick pay, no workers rights that we have come to expect here in the United States.

The same executives including NWIW’s Vee Godley tried to start a manufacturing plant, similar to the current proposed methanol refinery in Kalama, in Pocatello, Idaho, leaving it in shambles in 2013 (<https://www.nytimes.com/2013/11/06/us/idaho-town-struggles-after-pinning-hopes-on-failed-factory.html>).

Do we really want the Chinese communist government having computer-driven control of 72 million gallons of volatile methanol stored on dredged soil at moderate-to-high liquefaction risk? That is a huge BOMB just a couple of miles from 3 schools, a day care center, and a retirement village that the China could set off at a moment's notice if aggravated by our government and their trade wars. This proposal is a gigantic NATIONAL SECURITY RISK. Don't let the wool be pulled over your head! Save our county. Save our state. DENY the shorelines permits.

### **10/8 Lateral Pipeline**

KMMEF is a 3-part project: the lateral pipeline, the dock, and the refinery itself. They are all tied together. One is not able to operate without the other two. Either all three should be permitted or NONE should be permitted. (I favour the latter!) The pipeline aspect of the proposed Kalama project remains highly controversial. The people of Kalama and Cowlitz County do not support the use of eminent domain for exporting gas in the form of methanol. The 3.1-mile lateral pipeline is for corporate gain and serves no public purpose. This issue bridges traditional political divides in Kalama. Families have had their homes and land held hostage by the threat of eminent domain for years, and now 2 more with the recent FERC rubber-stamped extension decision. My own home is ¼ mile from the Williams north-south pipeline and I can't imagine the uncertainty they must be feeling. STOP Kalama methanol refinery. DENY the shorelines permits. Let homeowners along the lateral pipeline route get their property, and sanity, restored.

### **10/8 Dock Use Agreement**

Ecology caught the shell company Northwest Innovation Works in yet another lie. On page 13 of the DSSEIS Ecology describes how the methanol produced in the Kalama Methanol Refinery could be burned as fuel, even 100% of it burned as fuel, despite the first amendment of the dock use agreement between the Port of Kalama and NWIW. The June 2019 amendment<sup>(1)</sup> states, "*No quantity of methanol produced at the Facility shall be sold for use as fuel products.*" Frankly this is contradictory to logic, reason, and public statements made by company executives.

As Ecology noted, once a tanker leaves dock, the product on board can be sold to anyone on the global market including wholesale commodity traders who could sell the methanol to other middlemen. Sale records would be impossible to track. Port has no way to enforce what the Chinese government does with the methanol or even if its destination is China.

The amendment says that NWIW will self-report any violations. But we know that NWIW is not credible, there have been so many lies. The Port and NWIW have a very cozy relationship. We rarely hear from NWIW, the Port Commissioners seem now to be NWIW's spokespersons.

In terms of the end use of the methanol, NWIW tells one thing to potential investors and another to the public and regulatory agencies. Reporting in April 2019, Oregon Public Broadcasting, our local PBS, caught NWIW in a major lie, telling investors the methanol is to be burned as transportation fuel while telling the public that it is to be used as an olefin for plastic production<sup>(2)</sup>.

In summer 2017 NWIW sponsored an industry conference called "Sowing the Seeds of a Cleaner Future"<sup>(3)</sup> that focused on the prospects of using methanol as a liquid fuel, even going so far as calling it 'Liquid Sunshine'<sup>(4)</sup>. The conference reading materials do not even mention plastic production.

Wu Lebin, the chairman of C.A.S. Holdings, has repeatedly said the end use of the methanol is for fuel including to *Reuters* in December 2017<sup>(5)(6)</sup> admitting a goal of the company is to "drive use of methanol as a transportation fuel for cars and ships." More recently, for an International Capital Conference last November<sup>(7)</sup>, Mr. Lebin's bio says that NWIW will use the ULE process to convert North American gas to methanol to provide China with fuel.

It is avidly clear that with this amendment the Port is trying to sidestep the shorelines process, limit the scope of the cradle-to-grave GHG emissions in the FEIS, and mislead the public and state regulators. They are building this huge fracked-gas-to-methanol refinery, they've marketed the methanol as a fuel source, and now they are asking us to believe the methanol will never be burned. And note if it is burned as fuel, according to their own FSEIS (Appendix B, page 50), that would add an additional 5.44 million tons of carbon pollution annually. This dock use "promise" cannot substitute for the legal requirements of a full true SEPA analysis of GHG emissions including from burning NWIW's methanol as fuel. We are counting on Ecology for holding true to that science, not the speculation described in the DSSEIS.

Don't get me wrong. I vehemently oppose this project no matter the end use of the methanol because methane gas is too environmentally damaging, and our state should and can be a model to the nation in moving to clean renewable energies immediately. But NWIW and the Port of Kalama are trying to have it both ways, while lying to the public, state regulatory agencies, and the Dept. of Ecology.

DENY the shorelines permits.

1. [http://opb-imgserve-production.s3-website-us-west-2.amazonaws.com/original/proposed\\_dock\\_usage\\_agreement\\_amendment\\_no\\_1.pdf](http://opb-imgserve-production.s3-website-us-west-2.amazonaws.com/original/proposed_dock_usage_agreement_amendment_no_1.pdf)
2. <https://www.opb.org/news/article/methanol-plant-kalama-fossil-fuel-china/>
3. <https://nwinnovationworks.com/news/sowing-seeds-cleaner-future.html>
4. [https://ngi.stanford.edu/sites/default/files/20170731\\_Liquid\\_Sunshine\\_Pre-reading\\_material.pdf](https://ngi.stanford.edu/sites/default/files/20170731_Liquid_Sunshine_Pre-reading_material.pdf)
5. <https://www.reuters.com/article/us-china-usa-gas-methanol/chinas-cas-plans-gas-to-methanol-plant-on-u-s-west-coast-idUSKBN1DZ0BH>
6. [http://www.chinadaily.com.cn/business/2017-04/05/content\\_28793866.htm](http://www.chinadaily.com.cn/business/2017-04/05/content_28793866.htm)  
<http://www.internationalcapitalconference.com/speakers/wu-lebin>

### **10/8 GHG Equivalents**

DSSEIS Table 3.5-11 states KMMEF will emit approximately 4.6 million metric tons of CO<sub>2</sub>e per year, every year, for the 40 year planned lifetime of the Kalama Methanol Refinery. There is simply no way to mitigate this level of climate pollution. Per the U.S. government's own GHG equivalencies calculator at <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator> (screenshot below) this is comparable to burning over 5 billion pounds (that's billion with a B) of coal, per year, every year, for 40 years. Is this what Ecology wants? Is this what Gov. Inslee wants? Is this what the people of Washington state want? NO, of course not! NWIW = Now What I Want. We all need to REDUCE our GHG emissions not massively increase them. This level of emissions added to our already swollen carbon footprint would be a death sentence for our citizens, young and old. Do not permit this insanity. DENY shorelines permits.

# Greenhouse Gas Equivalencies Calculator

## Equivalency Results [How are they calculated?](#)

The sum of the greenhouse gas emissions you entered above is of Carbon Dioxide Equivalent. This is equivalent to: **4,600,000** Metric Tons

### Greenhouse gas emissions from

**993,800**



Passenger vehicles driven for one year

**11,414,392,061**



Miles driven by an average passenger vehicle

### CO<sub>2</sub> emissions from

**517,609,992**



gallons of gasoline consumed

**451,866,405**



gallons of diesel consumed

**5,068,568,923**



Pounds of coal burned

**60,895**



tanker trucks' worth of gasoline

**530,810**



homes' energy use for one year

**778,807**



homes' electricity use for one year

**25,295**



railcars' worth of coal burned

**10,649,972**



barrels of oil consumed

**188,046,666**



propane cylinders used for home barbeques

**1.2**



coal-fired power plants in one year

**586,648,221,811**



number of smartphones charged

### Greenhouse gas emissions avoided by

**1,564,626**



Tons of waste recycled instead of landfilled

**223,518**



Garbage trucks of waste recycled instead of landfilled

**195,728,023**



trash bags of waste recycled instead of landfilled

**993**



Wind turbines running for a year

**174,752,118**



Incandescent lamps switched to LEDs

### Carbon sequestered by

**76,061,974**



tree seedlings grown for 10 years

**6,007,386**



acres of U.S. forests in one year

**31,118**



acres of U.S. forests preserved from conversion to cropland in one year

**9/28 (also presented orally 9/17)**

Hello. My name is Sally Keely. I am an educator, a mother, and a longtime resident of Kalama, Washington. My husband and I own a 5-acre home outside of the city and a small lot inside the city. My family and I have been working actively to stop the fossil-gas-to-methanol refinery for 4½ years.

As a mathematician, I would normally provide you with a numerical analysis, but I will reserve those facts for written comments. Today I want to speak from my heart.

This refinery is a climate disaster. We cannot afford the 4.6 million metric tons of carbon pollution you report it will create every year for 40 years. We don't have time. We are in a climate emergency. That climate catastrophe is causing loss of life, land, and livelihoods right now. You only need to look out the window to see it in the global heating caused wildfires across the PNW. This is not a freak event. These disasters are becoming increasingly common and worsening with each year. Our homes are on fire. Our forests are on fire. Our planet is on fire.

My 18-year old daughter has come of age during this decade of climate crisis. She will have to live year after year with the dangers of wildfires, potential loss of home and belongings, damage to her lungs. All parents want a better life for their children. What happens when she wants to have a child? She would be a fantastic nurturing mother. Will she be forced into a position of going childless in order to not bring a child into a world overwhelmed by climate pollution driven tragedy and trauma? How dare we put young people in that predicament!

You have a responsibility to ease the burden of residents, local and statewide, and protect the people of Washington state, young and old. That is your mission. You have the power to say NO to new fossil-gas GHGs and infrastructure as has our Governor. I urge you to reject the shorelines permits for NWIW's massive petrochemical plant.

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**By MARK KEELY**

**10/9 >>** Referenced in the DSSEIS: 3.3.1.1 Paris Agreement, 3.3.2.1 Federal Clean Air Act, 3.3.3.1 Limiting GHG Emissions (RCW 70.235), 3.3.3.2 Washington Clean Air Act (RCW 70.94), 3.3.3.3 GHG Emissions – Baseload Electric Generation Performance Standards (RCW 80.80), 3.3.3.4 Washington State Efficiency Environmental Performance (Executive Order 18-01), 3.3.3.5 Washington's Leadership on Climate Change (Executive Order 09-05).

NWIW has not shown any just adherence to these standards or any clear mitigation for the harm and pollution through the operations of this petrochemical refinery. In fact mitigation of 4.6 million metric tons of CO<sub>2</sub>e is IMPOSSIBLE!

Ecology WA -- your mission statement states, "Ecology is Washington's environmental protection agency. Our mission is to protect, preserve, and enhance Washington's land, air, and water for current and future generations. Our innovative partnerships support environmental work throughout the state." Please abide by it! Adding new fossil fuel infrastructure, obligating us to 40+ years of fossil gas consumption, and adding 4.6 MMT of CO<sub>2</sub>e to our already overburdened atmosphere for even 10 years is a climate disaster from which we cannot overcome. Do your job. DENY the shorelines permits.

**10/9 >>** The Port of Kalama wants to marry up to the China government-backed Northwest Innovation Works, a limited liability company (whereby the owners are not personally liable for the company's debts or liabilities). Why, if they are so sure of themselves? The China government company that's backing NWIW, known as the Chinese Academy of Science Holdings (acronym CASH), along with the Port of Kalama and Northwest Innovation Works, has applied for monies that would cost the US taxpayers 2.681 Billion dollars to install the world's largest methanol refinery in Kalama so China can burn the methanol as fuel for transportation.

The Port of Kalama applied to the federal government for 11.5 million dollars for a dock & road for the refinery. The Port of Kalama applied to Washington State for another 11.5 million dollars which is “double-dipping” for the same cause and it’s against the law. Do they know what they’re doing? The Port of Kalama asked for a federal loan for 15 million dollars to build a well for NWIW that would take over 5 million gallons of water a day from a freshwater aquifer next to the Columbia River. NWIW lobbied for state tax loopholes valued at 143 million dollars. NWIW wants the US taxpayers to bear the full financial burden of 2.1 billion dollars if the methanol refinery fails. NWIW wants to use Washington public employees retirement funds to build the methanol refinery.

That’s 2.681 billion dollars total for taxpayers to be on the hook.

This is U.S. taxpayers cash and the Cash Always Stays Here. Our tax monies are ours for our own improvements on air, water, land, and the health of all the people. Taxes should certainly not be spent to emit 4.6 million metric tons of CO2e per year for 40+ years.

The DSSEIS displacement theory is based on pure speculation using cherry-picked data. All for a shell company that wants to exploit our natural resources and garner profits for a foreign country. DENY the permits. No petrochemical company in Kalama!

**10/8 >>** There is uncertainty to rely on a narrow set of bottom up estimates for methane leakage rates while leaving out top down leakage rates. It is suspect to have one and not the other. Considering the multiple locations and long distances from the wells through the pipelines to its final destination top down observations should be included in evaluating methane leakage rates because they are more comprehensive with sensors that capture the full range of operating conditions at gas extraction fields and pipelines. To leave out top down observations would be the practice of dubious legality. Regarding DSSEIS page 42, Alvarez found good agreement that a combined estimate for methane emissions to be 60% higher than US EPA emission inventory estimate.

**10/6 >>** Port of Kalama’s determination to marry the shell company NWIW to Washington State is a disastrous greenwashing disguise. This refinery proposal will never pan out for the people of Cowlitz County and POK knows it. They are just using this latest project to try to get the 3.1 mile lateral pipeline in so that they lock us into 40+ more years of fracked gas infrastructure and consumption. If they cared about jobs, they would have moved to a viable project on that 90-acres years ago. If they cared about climate, they would have moved to a viable green proposal years ago. DON’T BE FOOLED, Dept. of Ecology. You are being sold a line of BS. NWIW and the POK are throwing you red herrings that deprive the people of actual opportunities and bring to a standstill any potential sustainable businesses. DENY Kalama methanol. We must do better NOW.

**9/29 >>** WAC 173-485-010 PETROLEUM REFINERY GREENHOUSE GAS EMISSION REQUIREMENTS. The purpose of this rule is to determine reasonably available control of technology for emissions of GHG emitted by petroleum refineries located in WA state. The emissions standard for this rule were developed under the requirements of RW 70.94.154.

NWIW’s KMMEF \*is\* a refinery (Methanol is distilled in a “refining column,” which is likely why project backers of the plant originally referred to it as a refinery. Now they balk at that term and have scrubbed it from their materials probably because it sounds nasty. But it is what it is, a petrochemical REFINERY.)

I’ve read the DSSEIS carefully. NWIW has not shown reasonable available control using technology for emissions either onsite or through their vague and flimsy mitigation framework. NWIW is skirting our laws of Washington state. The laws we set in place to protect our environment – land, air, soil, water, animals, plants, and humans. Obey our WA laws. DENY the shorelines permits. Let’s move forward with NO new petroleum or petrochemical refineries in Washington State.

**9/29 >>** Ecology WA's Water Quality Program <https://ecology.wa.gov/About-us/Get-to-know-us/Our-Programs/Water-Quality> states, "The Water Quality program's goals are to prevent and reduce water pollution, to clean up polluted waters, and engage citizens in the work to protect and restore water quality in Washington."

This refinery would sit at the confluence of the Kalama River and Columbia River, a natural salmon spawning area. One gallon of methanol depletes the oxygen in 198,000 gallons of water. (Source: Univ. of Washington Urban Waters video, 2016-03-03, between minutes 34 and 39, <https://www.tacoma.uw.edu/methanol/>.) What will happen when a tanker holding 14 million gallons of methanol goes aground (as ships often do in the Columbia) and starts leaking? Potentially deoxygenate 2.7 trillion gallons of water killing every marine creature. Stand up for your own Water Quality Program goals. DENY Kalama methanol refinery shorelines permits.

**9/29 >>** NWIW says if they get the shorelines permit 60% will be used for plastics and 40% will be used for fuel. When this all started we were assured it would all be used for olefins for plastic, as if the earth needs more plastics floating around in its waters or burned and mucking up the air we breathe. Its written on the wall that the methanol will be used only as fuel. The song and dance NWIW is giving us isn't worth the value they portrayed. It will be used as fuel. This is NWIW's way to avoid FESEC oversight. If the shorelines permit gets approved then the foot gets in the door and we get screwed. Let's don't forget NWIW recently amended the dock use agreement with the POK stating that NWIW promises methanol will not EVER be used as fuel. They're flopping like a dying salmon. Reject this petrochemical disaster.

### **9/28 (also presented orally 9/17)**

Good afternoon my name is Mark Keely. I've been a Kalama resident for 24 years.

When my wife and I moved to SW WA we were fortunate enough to find a home in an area that shares our core values. We found a quiet 5-acre home on Green Mountain Road with woods and a river view. The land was there for us to develop with gardens and walking trails.

My family's quality of life includes outdoor games, meals on our deck, and river walks. Kalama offers local recreation, antique stores, and restaurants. This is a beautiful area and we were ready to work hard to make it our lifelong home.

About four and a half years ago we heard a foreign company wanted to build a petrochemical refinery here in Kalama on the Columbia River since they had been denied in Tacoma. So why Kalama? We are not an industrial area. What possibly could a massive fracked gas refinery have in common with our small town of Kalama?

So far me and thousands of other people find it completely incompatible. With 4.6 million metric tons of carbon pollution spewed out every year for 40-plus years, all I can see is the damage it will cause to the air, water, soil, and everything I hold dear about this area.

Washington State sets a standard for clean sustainable living. That's why Governor Inslee could not in good conscience support it. I urge you to reject NWIW's fossil fuel refinery. Don't let the Evergreen State become the Greenwashed State. Do the right thing for the people of Washington who you are charged with protecting.

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**By CAMBRIA KEELY**

### **10/9 Marine Life**

Over my four-and-a-half years spent researching the proposed Kalama methanol refinery, one of the statistics I felt has been widely ignored is the deoxygenation of water by methanol. One gallon of methanol can deplete 198,000

gallons of water of oxygen, the most essential resource for marine life. This means that even the tiniest of spills-- say for instance a tablespoon, which would deplete 773 gallons of water—would be devastating to the river. Take a moment to let that sink in. Spills that small are nearly impossible to avoid when filling each tanker.

Section 3.5.1.3 of the DSSEIS discusses the marine transport (MT) vessels. The low and medium emissions estimates are based upon the concept of 100,000 tankers annually, contributing to the emissions of 197,344 CO<sub>2</sub>e per year. If 100,000 tankers spill a mere tablespoon of methanol per fill, over 77-million gallons of water would be deoxygenated. Is contributing to forty years of polluting our ecosystem really the way to respect our River, our town, and our future? I find it truly disturbing that this statistic was discussed nowhere in the DSSEIS.

### **10/9 Usage**

Section 3.5.2.2 of the DSSEIS discusses China's methanol usage rate over the past couple of decades. It states that China used around 60 million metric tons of methanol in 2018, 6 times that of a decade prior. With the use of methanol growing at this rate, how could anyone believe this is truly just a "transition fuel?" The use of methanol is going up and will continue to grow as more facilities are built. Methanol is not a transition, it is the new coal— simply a regurgitation of the same fossil fuels we have been protesting for years. If we want change, we must simply change. The fossil fuel industry is dying and we must not allow this refinery to keep it alive for any longer. Please deny the KMMEF.

### **10/9 Price**

I recently took a job that involves the analysis of a decade's worth of Reuters articles. I noticed that one recurring theme of every economic recession is that oil prices drop extremely low, sometimes into the negative, leaving investors with thousands of barrels of oil that no one wants due to supply far exceeding demand.

Section 3.5.2.5 of the DSSEIS discusses the price of methanol, which made me realize that methanol could very likely follow the same trends as oil if you permit this facility to ramp up methanol production. When the price of methanol inevitably eventually drops, where will we store all the overstock? Will it simply be sitting in Kalama for months, years, decades, waiting for an earthquake or a fire to cause a disaster?

There are far too many unanswered questions and unconsidered situations that go along with this facility. After a year of the world proving to us that anything could happen at any time, the last thing Kalama needs is for this project to introduce so much uncertainty and risk. Please say NO to the KMMEF.

### **9/28 Carbon**

At the beginning of the pandemic, the shutdown of Asian factories left blue skies in Beijing, a city known in the U.S. as the epicenter of extreme air pollution. Environmentalists celebrated the idea of a world where people everywhere could breathe freely without concerns of lung diseases, and biodiversity would begin to thrive again. As industrial cities started to become pure again, and those of us that rely on their products still had access to essentials, environmentalists tried to spread the message of "Look, we can do this! This is our chance to make our Earth healthy again!" Despite the fact that factories have since reopened, we have not missed our chance to put an end to unnecessary carbon pollution.

At the very moment that I am typing these words, Earth's carbon budget is rapidly depleting. According to Carbon Brief, the IPCC report on the 1.5 degree Celsius maximum temperature rise suggests that we will hit that temperature rise mark next year, based on 2016 carbon emissions. Does that not terrify you? It terrifies me. Other sources say we have 25 years to prevent a global temperature rise of 2 degrees Celsius, which is barely the blink of an eye in terms of the Earth's history. 25 years is just over half as long as the Kalama fracked-gas-to-methanol-

refinery is expected to be in production, meaning that if this project is permitted, the methanol refinery will still be heating our planet long after the 2 degree temperature rise has been surpassed.

“We do not have the time” was one of the most emphasized phrases in the recent methanol hearings, and it is completely correct. We absolutely do not have the time to make exceptions. We must not allow any new fossil fuel industries to make our Earth sicker, and furthermore, must shut down any existing fossil fuel consumers in Washington. I beg you with utmost urgency to deny the shorelines permit for this fracked gas polluter.

### **9/28 (also presented orally 9/17)**

My name is Cambria Keely, I am 18 years old in my fourth year of my Bachelor's in ecology at Western Washington University, and I have been protesting the proposed refinery for a quarter of my life.

I was recently asked by a reporter about what moved me to get involved with the protest against this refinery. The answer is that fear, anger, and disbelief morphed into a feeling of responsibility to protect my hometown. Kalama and Cowlitz County officials have made it very clear that their priority is monetary profit, not protecting their constituents, thus it becomes our duty to protect ourselves and those around us by representing the community to decision-makers such as yourselves.

My companions and I have collectively committed thousands of precious hours, day and night, on holidays and birthdays, to defeating this calamity. One of my friends and fellow activists, Chris Turner, who spent decades fighting the climate crisis and frequented these very methanol hearings with her powerful testimonies, recently spent the last few hours of her life ensuring that her research would continue to spur the fight. I know she would be here tonight if she could, explaining the proper calculation of statistics in the DSSEIS.

I am telling you this to emphasize that we are not here for fun, we're here because we need to ensure that Washington is headed for a carbon-negative future. Climate legislature must be extensively considered and respected.

Every time I visit my 93-year-old grandfather, he asks me when I plan to start a family, and how many kids I want to raise. I tell him I'd like to have one or two kids in my 30's. What I don't tell him is that I'm terrified of what the world will look like in 20-30 years. Will the next generation know what it's like to have a snow day, and let raindrops fall on their tongue, and get a bird's-eye view of the world from the top of a tree? I can't imagine who I would be if the outdoors weren't pure enough for me to have those experiences. Will my children have to wear a mask everywhere to decrease their pollutant inhalation, and gape in disbelief at history books which show photos of a clean, healthy Columbia River?

Article 25, Section 1 of the Universal Declaration of Human Rights states “Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family.” I cannot in good conscience pass onto my children the burden of spending every day fighting for basic human rights.

We will not allow ignorance of the consequences of the construction of the world's largest methanol refinery in Kalama because if this project is permitted, the consequences are unavoidable: pollution of the biggest river in our region and vital ecosystems that rely upon it, the release of toxins into our air that is usually clean and healthy, and the exertion of powerful and plentiful greenhouse gases.

Change cannot wait. It is your mission to preserve, protect, and enhance our ecology and we are counting on you to quash this fossil fuel project. We believe that we can do better than to enforce a fossil-gas dependent economy. Once again, I am here to ask you with utmost earnestness to please deny the shorelines permits for the proposed Kalama fracked-gas-to-methanol refinery.