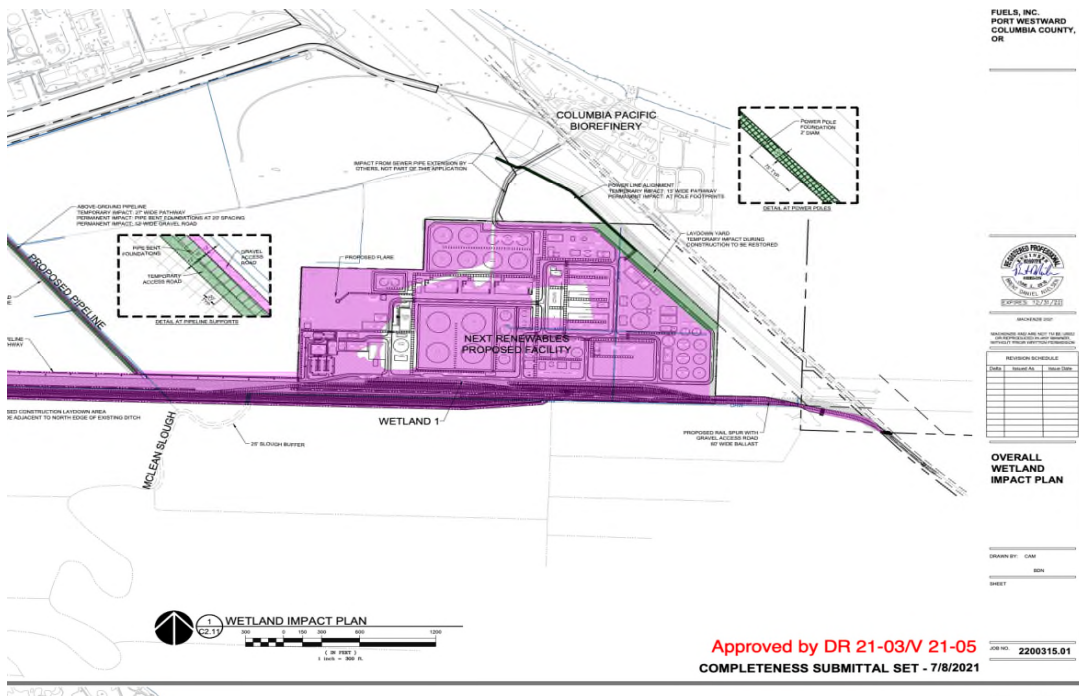


To the Columbia County Commissioners,

I believe there is an item in the NEXT proposal that has not received the scrutiny it deserves.

The topic of my concern is the tall cylindrical structure standing alone in the field in the site rendering:



Note:  
A magnifying glass  
will confirm that the  
label says:  
**PROPOSED FLARE**



Some brief information about flares (flare stacks):

Source: <https://www.exxonmobil.com.sg/company/overview/who-we-are/understanding-flares#>

- Elevated flare tip can be between 60 and 450 feet above the ground.
- Elevated flare presents itself as a flame.
- May not always be possible to achieve smokeless flaring; may be black smoke from the flare.
- Flaring may sound like thunder.
- A flare stack produces a fire as part of controlled burning: a) as part of testing to stabilize pressure, b) managing waste gas that cannot be captured or processed, c) for safety or emergency situations to release pressure. Exxon says a flare is environmentally friendly.

Source: <https://blogs.edf.org/energyexchange/2022/09/30/new-study-confirms-flaring-is-a-nationwide-problem-requiring-urgent-action/> Blog published by the Environmental Defense Fund.

- On September 30, 2022 a new study published in the journal *Science* found that current environmental standards are not adequately controlling this pollution source and underline the need for urgent regulatory action from the EPA and the BLM to limit pollution and waste from flaring.

The farming/agriculture uses of the area surrounding Port Westward are a matter of record. Another use that has not received as much attention is Residential. Apparently properties zoned residential do not share common boundaries with Port Westward. But a flare stack, inside or outside, the RIPD affects more than adjoining properties.

Has the County investigated possible negative impacts of the flare (flare stack) on residential uses?

What steps has the County taken to address the possible negative impacts of the proposed flare stack

on people who are looking out their living room windows? Sitting on their decks and porches? Enjoying their gardens? Being cared for, indoors and outdoors, at the monastery?

Which communities and neighborhoods would see or hear the flare stack activity?

- In Washington: Stella? Skamokawa? Cathlamet? Other residences with views of the Columbia River between those communities?
- In Oregon: Clatskanie? Mayger? Quincy? The homes on Ilmari Road, Co-op Road and other roads, or diking districts, where people have a view over Port Westward?

My search in the Columbia County Staff Report in DR 21-03 MOD & CU 23-11 NEXT Facility (RIPD/PA-80) for review criteria and findings **related to the proposed flare stack** has been futile. In the absence of flare stack information, the County's findings raise some red flags.

- Section 1550 Site Design Review
- Sec 1561.A. The site plan shall be drawn at a suitable scale [- -] and shall include the following:
  - Sec 1561.A.9. The location and exterior dimensions of all proposed structures [- -].
  - Sec 1562.A.15. Noise sources, with estimated hours of operation and decibel levels at the property boundaries.

**Finding 17** on pg 16 of 48 does not address the proposed flare (flare stack). The site rendering and other drawings fail to provide suitable scale and dimensions of the proposed flare stack. Furthermore, the finding states, "Noise sources for the approved facility will utilize applicable mechanisms to limit volumes to no more than 85 decibels at the property line." Not only are the scale and the dimensions of the flare stack missing, but the County has not required any details from the applicant on how the flare stack will meet noise standards.

- Section 680. Resource Industrial-Planned Development (RIPD)
- Section 681. Purpose:

The purpose of this district is to implement the policies of the Comprehensive Plan for Rural Industrial Areas. These provisions are intended to accommodate rural and natural resource related industries which:

  - Sec 681.4 complement the character and development of the surrounding rural area.

The County has failed to ascertain from NEXT Renewable Fuels how the flare stack will complement the character and development of the surrounding rural area. Addressing the flare stack separately is appropriate because it would be a landmark due to its height, flame and smoke. The County has failed to investigate whether the flare stack would interfere with the residential and tourist uses of the surrounding rural area. This Columbia River corridor has an extensive tourism component. Some residences within the vicinity of Port Westward are vacation rentals to take advantage of the incredible views of the Columbia River.

**Conclusion.** The County has failed to conduct any meaningful inquiry of its own to determine that a facility involving a flare stack in its design, such as NEXT Renewable Fuels, is an appropriate fit for Port Westward.

Sincerely, Sharon Coates, Clatskanie, OR, January 18, 2024. ■