

Columbia County
Land Development Services
St. Helens Oregon 97051

Comments submitted by Greg Pettit, Warren Or
January 10, Public Hearing
Port of Columbia County/ NXT Renewable Fuels

Submitted via email to: planning@columbiacountyor.gov

Columbia County Board of Commissioners:

Thank you for the consideration of the following comments asking you to deny NXT request to build a three-mile railyard at Port Westward for the following reasons.

Impact of increased Unit Train Traffic on Congestion and Safety in South County not assessed:

Initially, and for most of the past seven years, NXT virtually promised, and sold their project on the condition that feedstock and finished product would come and go to the Port by ship. Only recently has NXT begun proposing modifications to their original proposal that would allow them to send and receive those products by train. This is most likely because it is becoming evident that due to market conditions and competition the used cooking oil, greases, and fats they said they were going to use most likely will not be available in sufficient quantities, and they will need bring in feedstocks, and deliver renewable fuels to customers by train.

For the last several years, I have attended the annual Scappoose Town Meetings. At the last meeting attendees were asked to break into small groups and prioritize issues that needed to be addressed. My recollection is that the number one issue identified was traffic congestion. Across the river, at Ridgefield there are overpasses at most the major road train crossing. In Columbia County there is only one I know of in Columbia City. Highway 30 and the rail lines separate both Scappoose and St. Helens into two halves. Schools and residences in both cities are separated from police and fire by the railroad. Even now, train traffic can and does contribute to congestion in both cities and cause delays in the delivery of emergency services.

There has been no effort by NXT to provide technically supportable projections of what the increased long train traffic would be if they (and they will have to) ship in and out by train. This is critical information for us, the residents of south county to know in evaluating this project.

Beaver Drainage Improvement Company (BDIC) Levees create Unacceptable Risk:

The Army Corp of Engineers last conducted field inspections of the BDIC levees in 2013. They declared the system as “Previously certified but not currently certified” and further stated they required so much work to come into compliance that “future analysis at this point is fruitless”. The levees are not currently certifiable because they do not meet numerous criteria developed to ensure safety and prevent flooding. Even with a good levee system, the location of the proposed facility in a giant bowl, protected from flooding only by the levee system, would be ill advised. Knowing that the levees are not up to standards, and knowing the facility would be immediately adjacent to the upper end of the Columbia River estuarine ecosystem, which is of immeasurable value and importance, is not just irresponsible, but insane.

I worked for the DEQ for 38 years, much of that time investigating spills and environmental accidents. As the recent collision of the tug/barge with the dock illustrates, accidents, floods, dike failures, train derailments, and spills, etc. do happen far too often, and often despite the assurances of responsible parties that they cannot. Inevitably the public pays the costs of these disasters. Privatization of the profits and externalization of the risk has been proven case after case after case.

NXT Promises, not Supported by Record, Objective Market and Financial Analyses, and Should not be Trusted:

I read all the comments submitted prior to January 10th. Most of those in favor of approving NXT request for the railyard cited the same economic figures put out by NXT since day one. The number of union jobs it will create, the revenue it will bring to the county, city, and local governments. And my question is: Why would anybody believe those numbers? Has there been any independent objective analyses of the likelihood they will come true? NXT has never successfully built and ran an operation like this before. Already everything about this project has changed from its original descriptions except the promises of jobs and revenue it will create. Confirmation bias is a common ailment in America today, fed by social media. But we all are to some extent guilty of it. I would argue that the Port and the County in general regarding Port Westward and in this NXT case has been suffering from a particularly severe case of confirmation bias. That is taking a position on an issue and embracing information (factual or not) that supports that position and rejecting information that does not. Rather than being objective evaluators of proposals, pros and cons, they have far too often become the salesman. It is only because of market conditions or other externalities that we do not have coal trains and tar sands oil trains causing traffic tie-ups and deadly accidents in Columbia County. When something sounds too good to be true, it usually isn't. This wise old saying alone should lead us to ask tough questions.

Final Comment:

We need to make good decisions for Columbia County based on facts, technically sound analyses, and most importantly a vision for the kind of future we want for Columbia County. The facts are we have an unemployment rate of 3.9%, about as low as it can get, we have the third highest median family income out of the 36 counties in the state. We all want Columbia County to be a great place

to live and our greatest assets are our rural character, and natural resources. We do not need to become the NW Portland industrial zone, that already exists.

Thank you for you for dealing with these complex hard issues; your dedication, hard work, and commitment to us and our county.

Greg Pettit
Warren, Oregon