



**Hearing: Columbia County Commissioners**

**January 19, 2022**

**Subject: Next Renewable Energy**

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### **Corp of Engineers**

How can the commissioners make any decision regarding Next until the Army Corp of Engineers put forth their EIS,( Environmental Impact Study). That would be making a huge decision impacting many land holders, businesses, without all the information. That would be irresponsible.

**Nexts** failure to put into infrastructure and development, tax revenue promises in to legal terms, there is no safe guard that Next won't an environmental mess for the taxpayers to clean up if they decide to go bankrupt. They need to put an appropriate amount of dollars to cover the entire cost, into a trust for the cleanup of any potential spills, contamination from the plant. While in operation or after they have gone. The taxpayers shall not be held paying the bill.

**Next** wants to construct its facility on land that they need to mitigate in order to develop. But allowing mitigation to proceed, Next, must destroy 461 acres of usable, unique farmland. The plan is to take 3.9 acres from adjacent land parcels to every 1 acre Next consumes This is absolutely unprecedented. With Columbia County having a shortage of usable and unique Farmland, why would Columbia County consider allowing Next to proceed with its request to site on this land?

The destruction of farm land in itself is heinous, it makes latterly no sense, Columbia County destroys 461 acres of unique farm land plus about 200 acres for the plant itself, to construct a "renewable diesel facility. How is that even logical? Promoting their product as Green fuel while destroying actual Green land. At almost 4 acres destroyed for every 1 acre needed ratio. Nothing Green There. An absolute waste of land which is unique soils.

The idea of alternating and removal of soils from the Drainage district canals makes no sense, these channels were designed the way they are for a reason, for proper drainage and proper irrigation all when needed depending on the season. The Beaver Drainage District is unique in regards that they both provide flood control and later on in the season irrigation. To modify even one of these drainage canals would totally interrupt the entire function ability of in which these drainage canals were constructed. And would kill the mint farm, and Blueberry farms.

**The Beaver Drainage District**, the Beaver Slough Drainage District, with approximately 5,000 acres of low-lying land protected by a dike holding back the Columbia River. The river feeds into a series of interconnected sloughs and ditches where farmers draw their irrigation water.

(BDD) is unique as it provides flood control when needed and irrigation to the nearby farms when needed. The BDD knows more about its function ability, its purpose, its operations and its ability to make the correct decisions regarding its function as a district. The very reason it was adopted is to protect its lands under its jurisdiction.

The very reason dike lands were created by the government was to promote farming, and it has worked around Port Westward for decades, or well over a 100 years. Without the dike lands that entire area would be marshlands.

While many decision makers have no idea whatsoever in BDD working or in-depth understanding, it behooves me how novices can assume that they can make a decision that literally goes against the BDD's scope of expertise. How can uneducated people on this subject in good conscience assume that they can undo engineering, and workability

and function of a drainage district which effects adjacent farms with in this district. And in good conscience destroy people's lives.

**ODA Oregon department of Agriculture** said farms in the area have a proven track record of growing high yields of high-quality crops, including 1,000 pounds per acre of peppermint and spearmint.( Daily Astorian reported Dec. 17 2020).

**NEXT'S needs to be required to do a RETIREMENT AND FINANCIAL ASSURANCE Plan, the details are in the Addendum.**

How can Columbia County in good conscience vote to take, steal, property through mitigation or through modification of the BDD, from people who have spent their entire lives living and building the farms which they have? Do not the people living adjacent to this proposed facility have the right to enjoy the fruits of their labor? Live their life as rural farmers? Several of you county commissioners have known these folks within or around the BDD for your entire life, or for decades. Do you have any sense of loyalty or compassion to your fellow citizens?

Columbia County should be protecting the Seely Mint farm, no destroying it. The county should be proud that Seely Mints are a company which has expanded to markets across America, Canada and other markets outside America. They have put Clatskanie on the map! The opportunity is there to engage in tourism to visit the farm, weddings, walkabouts. Be forward thinking.

Their top of the line mint oils are supreme, the area is prime for growing mint. All natural components come together and you get high quality mint that is found NOWHERE ELSE in the world. Why would you wish to destroy that.

Oregon used to be the mint capitol of the world, and lower river mint that used to be farmed in West Rainier to Seelys are the top grade.

They do create jobs for local people, maybe not as many as this renewable diesel plants would, but they have a better track record, they are local, they are your neighbors, and they care about the community.

Including the Blueberry farm “The soil, it’s like peat, “Because of that, it lends itself to organic growing.”Hopville Farms finished its three-year organic certification regimen in 2020, and will begin selling certified organic blueberries in 2021. So let’s destroy this farm as well along with Polskys and other small sustainable farms. The cattle farms provide food locally as well, and are as important as the mint and blueberry farms..

It was done by determination and years of continuous hard work. And with a commissions vote it can be destroyed in an instant.

How can people be so callus to others life-long work? Put yourself in their shoes.

I understand the need for jobs in Columbia County, but to take away so many lively hoods to create another’s lively hood makes no sense.

I hope you will see the importance of preserving the unique soils, farms, and family business, and the potential of future farming. As our food sources and ability to maintain enough food sources for future populations is on the rise throughout the United States and the world, the importance of preserving these lands is a decision that is not just for now, but for the future in many regards. Put forward thinking first and how your actions today will effect lives of tomorrow, **vote NO.**

## **Addendum:**

### **RETIREMENT AND FINANCIAL ASSURANCE**

(1) The Certificate Holder shall retire the facility if the Certificate Holder permanently ceases construction or operation of the facility. The Certificate Holder shall retire the facility according to a final retirement plan approved by the the appropriate Regulatory department's designation, and BDD (Beaver Drainage District) as described in yet defined OAR's

Two years before closure of the energy facility, the Certificate Holder shall submit to the appropriate jurisdictions a proposed final retirement plan for the facility and site, pursuant to all OAR's yet to be determined by the asgined department's.

(a) A plan for retirement that provides for completion of retirement within two years of permanent cessation of operation of the renewable diesel energy facility and that protects the public health and safety and the environment;

(b) A description of actions the Certificate Holder proposes to take to restore the site to a useful, non-hazardous condition; in direct usage prior to construction,

(c) A detailed cost estimate, a comparison of that estimate with the dollar amount secured by a bond or letter of credit and any amount contained in a retirement fund, and a plan for assuring the availability of adequate funds for completion of retirement obligations set forth by agreement.

3. The Certificate Holder shall prevent the development of any conditions on the site that would preclude restoration of the site to a useful, non-hazardous condition to the extent that prevention of such site conditions is the results of operations on the site deliberate or accidental, or natural events/ disasters. It is the responsibility of the Certificate Holder on all listed events.

The Certificate Holder shall submit to the State of Oregon, through a bond or letter of credit in the dollar amount set forth by collaborating state departments and the Beaver Drainage District, naming the State of Oregon, and the BDD (Beaver Drainage District) acting by and through the State of Oregon as beneficiaries or payee's.

4. Before any construction on the proposed site, the Certificate Holder will submit a letter or bond of credit, dollar (amount to be determined) by the appropriate departments including the BDD.

5. Before any new construction expansions to the site a letter or bond of credit will be submitted to the appropriate State Depts. regulatory and so forth including the BDD before construction and during construction. All dollar amounts will be determined by State Regulatory Depts. and the BDD.

## **Availability of feed stock**

1. Analysts are having a hard time modeling out the soybean oil needs in the near term and long term as more renewable diesel projects are announced. For now, forecasts call for higher soybean prices, expanded acreage, and not enough soybean oil to go around.

1. a. If everything is built out as projected, farmers would have to add tens of millions of acres of soybeans and yield increases to keep up with the crush demand. To hit the

numbers, soybean production would have to grow by roughly 3.6 billion bushels by 2030.

1. b. USDA's Economic Research Service this week projected soybean oil will see greater demand starting in 2022, while Rabobank offered a similar outlook projecting greater crush capacity starting in 2023 as more renewable diesel facilities come online.

1 .c. The list of proposed and under-construction renewable diesel facilities around the country would spike production from 770 million gallons in 2021 to at least 3 billion gallons in 2023. EPA already forecasts 2022 production at 1.59 billion gallons. The U.S. Soybean Export Council projected total new capacity looking ahead at 5.97 billion gallons.

1. d. Oil refiners are helping drive the move to renewable diesel by modifying their refineries or building new ones. They are also increasingly partnering with agricultural companies to make that happen. And they are able to get their green box checked and get investors off their backs if you have activist investors and be able to make some money in some new industry," Nicholson said. "**But in the sense of putting this together, no one thought, 'Oh, do we have enough feedstocks to do this?' And the bottom line is we don't.**"

1.e. **To put the soybean numbers into context**, USDA pegs domestic soybean crush for 2021-22 at 2.19 billion bushels. Rabobank and other analysts project that to meet the projected need of 47.1 billion additional pounds of soybean oil, another 3.6 billion bushels of soybeans are needed -- just for the crush. If every soybean bushel now going to meet export demand -- 2.05 billion bushels -- went to domestic crush, **there would still be a shortage of more than 1.5 billion bushels.** Rabobank forecasts **soybean acreage would need to increase by nearly 12 million acres in the short term to cover expanded crush demand for renewable diesel without hurting U.S. soybean exports.** To get farmers to increase soybean acres by that much, soybean prices would also need to increase about \$5 a bushel into the \$18-per-bushel range by the 2024-25 crop year.

## Feed Stock Prices Have Increased

1. According to S&P Global Platts Analytics, renewable diesel production is expected to reach 4,081 million gallons annually by 2025, compared with the 538 million gallons produced in 2020.

1. a. However, increased transportation fuel demand for soybean oil has also increased its price, which has pulled up the costs of other renewable fuel feedstocks like beef tallow.

1. b. So far in the third quarter, CBOT soybean oil prices are averaging 65.33 cents/lb, compared with a 31.32 cents/lb average for 2020, according to S&P Global Platts. Chicago packer beef tallow prices are averaging 61.73 cents/lb so far in the third quarter, compared with a 31.56 cents/lb average in 2020.

1. c. Soybean oil supply is constrained by other factors unrelated to transportation fuels, including soybean's traditional agricultural value chain, including farming and agricultural demand.

## Forecast

1.a. Still, to meet the growing renewable diesel market, the U.S. would still have to dial back exports of raw beans and drive up exports of soybean meal. To make it work, the U.S. would have to displace soybean meal out of Argentina and push the Argentinians into exporting more whole beans, allowing the U.S. to fill a bigger role in sending out soybean meal. Domestic soybean meal, though, will also be cut in half to roughly \$150 per short ton, Rabobank projects. Higher soybean prices and lower soymeal prices "will heavily weigh on the soybean crush industry. **Soy oil would have to carry an even higher share of the margins, and high soy oil prices would significantly challenge the food sector to shift to other oils to allow more soy oil in renewable diesel.**"

1. b. Soybean oil has more than doubled in price to an average forecast of 65 cents a pound for 2021-22. That's prompted the American Bakers Association and other edible oil stakeholders to push back on EPA's proposed mandated blend volumes to make biodiesel. The bakers and others are upset over EPA expanding biodiesel and renewable diesel as advanced biofuels. **EPA noted it had underestimated the growth of renewable diesel, and higher volumes are coming from both soybean oil and corn oil from ethanol plants. Food shortages?**

## **ACREAGE QUESTION**

1. a. If all the renewable diesel capacity gets built out, within three to four years, there could be either a risk of deficit in vegetable oils or millions of new acres needed in soybeans, as well as other crops such as canola.

1. b. If you look at it all going to soybeans, **you would need upwards of 55 million to 60 million more acres of soybeans, "We just don't have that in the United States. "Soybeans would basically wipe out corn and wheat acres in the U.S. just to produce enough oil for this.** But we don't have the crushing capacity to do it."

1. c. A more likely scenario is that not all of the planned renewable diesel plants end up being built. Until both the market and policies get worked out, renewable diesel will test expansion of acres, domestic crush capacity and exports. **Calculations show it would take 40 million additional soybean acres to run these not-yet-built renewable diesel refineries at 80% capacity.**

## **China's demand for grain**

China needs to replenish their National Grain reserves, they need to import billions of bushels of grain to do so, they also are requiring more meal grains for animal feed as their hog farms are coming back after a disease wiped out their hog numbers. Their need will fuel the shortage of soybeans and grains. The prices will increase on these



futures. Possibly making renewable diesel too expensive to make or make at all with the source shortages.

## **costs**

will be of top importance into 2022, especially escalating inflation. Global shipping costs back in October reached the highest levels since 2008, and although they have fallen significantly since then, they are at 12-year highs or the date.

Relative to demand, global wheat supplies by mid-2022 are projected at all-time lows, so production rebounds for Russia, the United States and Canada will be crucial to rebuild inventory.

Dec 14 (Reuters) - Grain and oilseed markets in 2021 proved just as exciting as in 2020 with prices hitting multiyear highs on shrinking stockpiles. Whether those prices sustain or relax in 2022 will be partially guided by some of the industry mainstays.

Unforeseeable events pop up every year, but market participants over the next 12 months will likely remain focused on top importer China as well as the increasing demand for renewable fuels and the impact on agriculture. The always-crucial U.S. growing season could be a shorter-term aspect.

**Other topics** will be of top importance into 2022, especially escalating inflation. Global shipping costs back in October reached the highest levels since 2008, and although they have fallen significantly since then, they are at 12-year highs for the date. Relative to demand, global wheat supplies by mid-2022 are projected at all-time lows, so production rebounds for Russia, the United States and Canada will be crucial to rebuild inventory.

## **U.S. ACRES**

U.S. farmers' 2022 plantings will be a significant factor on prices because the range of acres currently in discussion could easily be the difference between the safe building of supplies and another year of tightness and uncertainty.

In an attempt to plumb international impact of biofuel production, IFPRI director general Joachim von Braun projected in the February 2008 report *Food Prices, Biofuels and Climate Change* that worldwide calorie consumption would fall by 2% in most regions by 2020 if the trend toward biofuels is “moderate.” But a “drastic” biofuel expansion would reduce calorie consumption by more than 8% in Latin America and sub-Saharan Africa—a devastating reduction for someone who is already hungry.

## **Hunger VS Renewable fuels**

**<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2430252/>**

Questions about biofuels highlight the complicated structure of agricultural markets: prices reflect supply and demand, farmer decisions, weather, crop diseases, distance to market, and the price of alternative crops. If demand raises the price of corn, farmers will plant more corn, raising the yield and reducing the price. But if that corn is planted on land formerly devoted to soybeans, the price of soybeans and cooking oil also may rise as the effects echo through the food markets.

According to the UN World Food Programme, 854 million people were undernourished in 2001–2003, and about 10 million people die of hunger and hunger-related diseases in an average year. However, demand for biofuel feedstocks is overwhelming a food supply system that was already overextended by surging demand. Moreover, the demand for biofuel affects even nonfeedstock crops, such as rice and wheat, as farmers plant feedstocks instead of food. The price of rice hit a record 3 April 2008, according to *Forbes.com Market Watch*, which added that “the World Bank estimated that 33 countries faced ‘social unrest’ because of soaring food and energy prices.

As food becomes scarce, Brown says, major exporters, including Vietnam, Russia, Argentina, and Kazakhstan, have imposed limits on exports. On 19 January 2008, *The New York Times* reported, “Egypt has banned rice exports to keep food at home, and China has put price controls on cooking oil, grain, meat, milk, and eggs.” The article added, “Just in the last week, protests have erupted in Pakistan over wheat shortages,

and in Indonesia over soybean shortages . . . [and] food riots have erupted in recent months in Guinea, Mauritania, Mexico, Morocco, Senegal, Uzbekistan, and Yemen.

Malaysia and Indonesia, where vast palm oil plantations are being established in cleared rainforests, biodiesel refineries have created a palm oil shortage. The 19 January 2008 New York Times reported that the price of palm oil for cooking has risen by 70%, and street vendors in Malaysia are having difficulty finding cooking oil. So we destroy entire ecosystems, rainforests for feedstock, so we claim to stop fossil fuel usage but we decimate the rainforest which is our major cleaner of the air. **NOT SO GREEN** after we research these projects.

An African Call for a Moratorium on Agrofuel Developments,” thousands of rice and maize farmers are being evicted from their lands in order for large companies to plant sugarcane and jatropha trees (whose seeds are a feedstock).

There is certainly more information to read, too much to list. Please click on the link provided above.

In our attempt to minimize the dependency on fossil fuels we will be creating food shortages, food cost increases, the increase will be too costly for poorer populations reducing their calorie intake by 8% that's quite a bit when you are already hungry. Food prices are going up with high inflation to add further price increases on lower income people is not right. How many of these renewable diesel plants can even produce. We have a food/supply shortage all over the world.

we need to be logical in our fossil fuel issue, to starve people or make food shortages for fuel makes no sense, we need to focus on other technology instead of going to extremes trying to solve one problem but create another one in its place.

## **Next Renewable diesel 5 years to Late**

1. Several former petroleum refineries plan to begin producing renewable biodiesel. Marathon Petroleum's refinery in Martinez, California, plans to start producing renewable diesel in 2022 and could reach its full production capacity of 730 million gal/y (48,000 b/d) in 2023. Phillips 66's Rodeo Renewed project in San Francisco,

**California, plans to produce 800 million gal/y (52,000 b/d) of renewable fuels when completely converted in 2024.** If realized, this project would be the world's largest facility of its kind.

1. a. **One of the primary risks to the expansion in renewable diesel production capacity is the availability of fat, oil, and grease feedstocks.** Prices for most renewable diesel feedstocks have increased as renewable diesel production has increased. Biodiesel and renewable diesel producers have been **relying on incentives** such as the biomass-based diesel tax credit and tradeable credit prices for renewable diesel in the RFS and LCFS to make a profit. If they lose any of the numerous tax credits these facilities will close. Feedstock availability and government incentives will likely continue to play a role in **the financial viability of new renewable diesel production capacity in the near term.**

**1. b. By 2025, Platts Analytics predicts** that the total renewable diesel supply will reach 5 Bgal; however, demand is expected to be less than one third of the supply. As more renewable diesel plants come online in 2022 and beyond, this can overwhelm the demand and create a surplus of renewable fuels.

### **Food Prices will Skyrocket**

1. a. Soaring demand for crops has once again raised the question of whether nations should really depend on ethanol and renewable diesel to save the planet from global warming. Corn, soybeans, palm oil and sugar, which are increasingly processed into biofuels worldwide, are part of a staggering commodities rally that's making everything from animal feed and noodles to taco shells and chocolate more expensive, putting central bankers worldwide in a tough spot between fighting inflation and seeking to stimulate battered economies.

**1.b.** Projects such as Phillips 66's conversion of its San Francisco area oil refinery into one of the globe's biggest renewable fuel plants are helping stoke the price surge at a time when farmers in key growing countries grapple with bad weather, while China gobbles up supplies because of a depleted national reserve and growing demand in animal food.. U.S. production capacity for renewable diesel will jump almost sixfold by the end of 2024, according to JPMorgan Chase & Co. Meanwhile, costlier food aggravates lingering shockwaves from the coronavirus: increased world hunger and unemployment.

**1. c.** Soybean oil, corn and palm oil have all more than doubled in a year, while sugar jumped about 50%, helping push food costs to the highest in seven years. Biofuels drive in the U.S., Brazil and Europe, helped precipitate the world into a food crisis.

Principal contributors: Sean Hill, Estella Shi, Peter Colletti, Today in Energy, Hydrocarbon processing, Goldman Sachs, Progressive Farmer, Chris Clayton, DTN Ag Policy Editor, Janet McGurty Editor Jim Levesque Commodity Agriculture, Electric Power, Oil , S&P Global Platts, Kim Chipman, Bloomberg Green,

## **Nexts**

Failure to put into infrastructure and development, tax revenue promises in to legal terms, there is no safe guard that Next might leave an environmental mess for the taxpayers to clean up if they decide to go bankrupt. They need to put an appropriate amount of dollars into a trust for the possible clean up of any potential spills, or contamination from the plant. The taxpayers shall not be held paying the bill for any clean up. Or demolition of the plant.

## **Next**

Has not proven that they have procured enough fed stock to run their plant. This is a simple request from the people of Columbia County. Many other renewable diesel plants have procured available fed stock three years in advance and beyond. Corning the market on available supply sources. With a deficit in fed stock and the high demand, in less you have these contracts now, there may not be enough or any for plants that

have not been permitted, or plants like Next that are still trying to get through basic permitting. I am afraid that ship has sailed for Next.

### **Next**

Has NOT identified any toxic waste which they would send by rail through the county from the facility's processing. How many train cars of this pass through the towns and cities of our county? This information should be made available to all appropriate over site Depts. of the State of Oregon and available to all citizens.

### **Next**

Has certainly not addressed or answered many important questions regarding their facility, finances, bonding, taxes, tax incentives.

**Nex**ts failure to put into infrastructure and development, tax revenue promises in to legal terms, there is no safe guard that Next might leave an environmental mess for the taxpayers to clean up if they decide to go bankrupt. They need to put an appropriate amount of dollars into a trust for the possible clean up of any potential spills, contamination from the plant. The taxpayers shall not be held paying the bill.

### **Next**

Needs to prove that they can be viable without federal, state and local tax incentives of any kind. Renewable diesel plants make 45% in extra profits from these taxpayer funded freebee's. Without the subsidies a high percentage of these facilities would fail because of the tight, volatile, markets of feed stock and profit margins.

### **Port Westward**

The water table around this area is very high, at some points, 5 ft and you hit the water table. Areas have boiling points of high water flows if breached. These boiling points are scattered throughout the proposed mitigation areas. There are bogs and peat, and the

soils are very easy to liquefy in an earthquake event. The area is also in the Clatskanie fault line and the Cascadia subduction zone. If an earthquake hit, the unique soils around this area would liquefy and cause complete destruction of this plant.

The amount of chemicals used in the plants process would run into the Columbia River and kill all life for decades to centuries.

### **Habitat, Columbia River**

This area is a habitat for many species of fern, fauna and aquatic life. It is a critical habitat for sturgeon, steelhead, salmon smolts, trout, and other species of fish. The unique ecosystem around this area in close proximity of the Columbia River. This area is crucial to the survival of endangered salmon. The salmon smolts live in this area for an extended period of time before they make their way downstream to the ocean. If an accident happened it would destroy this very important endangered species habitat. We cannot be poor stewards of the earth and allow a plant such as this to be sited here.

**ODA** Jim Johnson, land use and water planning coordinator for the Oregon Department of Agriculture, submitted comments on the proposal in which he said farms in the area have a proven track record of growing high yields of high-quality crops, including 1,000 pounds per acre of peppermint and spearmint.

### **Next**

1.a. has changed its proposal several times. First they were bringing all fed stock by ship/barge. Now that has changed. Next now propose they will bring in fed stock by rail. Their lease agreement with the Port does not allow Next to use unit trains/rail for their project.

1.b. Encouraging more traffic on a rail system that does not have the much needed rail safety concerns met is illogical. The rail divides all major cities, leaving most of their **emergency capabilities unusable for 15 minutes at a time blocking the entire length of the towns ingress and egress.** Next's lease agreement prohibits them from using unit trains to deliver products for use in their process.

## **Port heads study on rail safety**

1. a. The concern for rail safety has prompted the Port of Columbia County to be the led Partner on doing a study to identify rail safety concerns. The major cities toward the South end of the county where the more dense population lives, and other businesses are partners in this endeavor. **So far the county has not joined this partnership. Evidently the county feels the safety of its citizens are not important enough to be part of this partnership.**

Although there has been many areas of identified concerns, the list had to be reduced to only a few because of cost. Being part of this partnership, I personally feel that there are concerns toward the North end of the county as well. But because of the cost to do this study many important areas were left out even though they were listed in the study.

1. b. Then we come to the realization that even though we need car over passes. And two pedestrian over passes because of the schools which happen to be on both sides of the tracks in Scappoose. And because of the heavily used intersection at Gable Rd. in St Helens, with the added huge housing development on one side of the tracks and various business and the high school on the other side, throwing in the current train traffic, then adding possibly more train traffic id a disaster waiting to happen.

1. c. The possibility of adding 900 unit cars (total 1,800 round trip) or more each month is detrimental to the livability of our towns and citizens. These very life threatening concerns needs to be fully addressed and taken care of before we add more scenarios.

1. d. The Rail Safety Committee understands like most infrastructure needs will not be met. The car overpasses will never be fulfilled because of the lack of money. The pedestrian overpasses will have to be limited to one because of funding. So which one do we chose? How can we decide which child crossing the street is more important in St Helens than Scappoose or visa versa. So before permitting this project please take in consideration not only the site itself but its impact throughout the community.

**Corp of Engineers**



How can the commissioners make any decision regarding Next until the Army Corp of Engineers put forth their EIS,( Environmental Impact Study). That would be making a huge decision impacting many land holders, businesses, without all the information. That would be irresponsible.

### **Beaver Drainage District.**

1. a. The area is within the Beaver Slough Drainage District, with approximately 5,000 acres of low-lying land protected by a dike holding back the Columbia River. The river feeds into a series of interconnected sloughs and ditches where farmers draw their irrigation water.

1. b. (BDD) is unique as it provides flood control when needed and irrigation to the nearby farms when needed. Most drainage districts only provide flood control. BDD provides both.

1. c. Any disturbance within the BDD will adversely effect all the lands within the BDD, rendering them unusable, costing billions in net loss.

1. d. Land within the BDD has sold for approximately \$120,000 per acre.  $5000 \times \$120,000 = \$600,000,000$  of just land value loss, adding the loss of structures, equipment, product, mature orchards, plants, productions and all other associated categories that have not been listed. The cost has yet to be fully realized. But can be sure it is in the tens of millions.