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Columbia County Board of Commissioners
230 Strand St.
Columbia County Courthouse Annex
St. Helens, OR 97051

RE: NEXT Renewable Fuels Oregon, LLC (NEXT) Biodiesel Plant at Port Westward

Columbia County Board of Commissioners,

We are against the planned expansion at Port Westward to accommodate the NEXT Renewable Fuels Oregon, LLC biodiesel production facility. We are in a global climate crisis and another fuel energy production facility is irresponsible for a number of reasons. Although bio-based diesel (BBD) is less carbon intensive (CI) than diesel produced from fossil fuels, the GHGs emitted from transporting feedstock and supplying the heat to produce the biodiesel gains very little in GHG reductions. And when one includes the fugitive methane from the fracked natural gas production and transport, which will become apparent in the Environmental Impact Statement (EIS), it may well be more damaging to our climate. Excluding the GHG impacts, there are many other reasons this proposal is a bad idea.

As we learned from the NWIW proposed methanol plant in Kalama, air and water pollution know no boundaries. The PM 2.5, PM 10 and VOC air pollution that will enter the air at Port Westward will affect surrounding communities such as Cathlamet, WA, and those downwind to the SE. This will add to the pollution in Longview, Rainier, and as far as Kalama, although to a lesser extent. And the Army Corps of Engineers (ACoE) permit request has the same methodology error that was in the NWIW permit request, the report being challenged in court. The "action area" omitted any of the waters of the Columbia River. The NEXT ACoE permit request stated there are no salmon, steelhead or sturgeon habitats in the action area, which is true if the action area is only limited to land, but it is not. "Action area means all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action." This includes the areas upstream and/or downstream from the stormwater discharge into a stream segment that may be affected by these discharges. Any failure in the wastewater or stormwater system, the effluent not meeting NPDES permit specifications at the point of discharge, could indirectly affect the effluent entering the Port Outfall, thus affecting the action area.

Any loss of wetlands or farmland for the development for a fuel that will produce GHGs is unacceptable. I reviewed the ACoE's document and the amount of wetlands and farmland that will be excavated and disposed of off site is staggering. Total wetlands and waterway soils removal with either a temporary or

permanent impact is 241,587 cu. yds., over 6.5 million cu. ft. of earth. This affects 145.27 acres of existing wetlands. The mitigation basically takes farmland and wetland that were purchased and rezoned by Columbia County and uses it to replace destroyed wetlands. This is not mitigation. It is invasive and has received criticism by the Beaver Drainage District, neighboring residents, farmers and area land owners. There are more appropriate locations in Oregon for this biodiesel production facility, away from wetlands, away from the Columbia River, and any tributaries that feed into the Columbia River. The Port's wetlands are ecologically valuable and should be preserved.

The County Planning Commission didn't allow enough time or venues for public input on this project. Here are my primary concerns are:

- All biodiesel refineries pose a risk of fire and pollution (air, water, noise and smell.) Gas flaring, vapor stacks, PM 2.5/PM 10 and VOC air pollution, fuel and oil spills, noise pollution, and obnoxious odors are not complementary to nearby agricultural operations, ecological functions, wildlife habitat and the residents of Clatskanie and Cathlamet.
- Biodiesel refineries historically face regulatory, financial and market challenges. Examples are:
 - The Grays Harbor Imperium biodiesel plant, operational in August 2007, was hit hard by the economic downturn and the drastic changes in the cost of petroleum fuels and biodiesel feedstocks in 2007. In early 2008 Imperium cut staff from the high of 107 and again in March 2009 a further reduction brought the staff to 24. In 2015, the plant was acquired by Renewable Energy Group, at which point the plant had 39 employees.
 - The Renewable Environmental Solutions plant in Carthage, MO, was plagued with air pollution violations and the sulfur smell was so bad the Governor of Missouri shut it down in 2005. It has been resold twice and is no longer producing BBD. It used poultry tallow as a feedstock, the same feedstock proposed by NEXT.
 - The small-scale Darling Ingredients BBD plant in Butler, Kentucky was shut down in April 2021 due to "unfavorable biodiesel industry economics." "There are no plans to resume biodiesel production at this facility and two others owned by Darling Ingredients that ceased operations.
 - Renewal Energy Group's (REG) Houston plant, producing 35 million gal/yr., was closed in 2020, leaving the US Gulf Coast region with 14 plants, down from the 18 in 2019, and the US total at 74, according to Energy Information Administration data (EIA). There are currently 84 registered BBD plants in the US but most of them are blending facilities.
 - In 2018 REG proposed building a 16,308 bb/yr. biodiesel refinery in Ferndale, WA, but the plan was scrapped in Jan 2020 due to permitting delays and public resistance.
- Changes in Renewable Fuel Standard (RFS) regulations and the value of RIN credits, reliable supplies of feedstock, variable transportation costs, variable energy (primarily natural gas) costs, EPA air and water regulatory changes, market conditions (recessions, pandemics, petroleum blending facilities closings), and transportation industry electrification all increase risk. There's a long list of plants that closed, were shut down by state or Federal regulators, or reduced production due to lagging demand and insufficient feedstock supplies.

- The increased slow-moving rail traffic, and additional truck traffic, will be a disruption to area farmers, land owners and the residents of Clatskanie. The water cooling tower vapor clouds and flare tower, up to 300 ft. high, would detract from the natural beauty of the area.
- At the time the Army Corps of Engineer permit was submitted the promoters of NEXT Renewable Fuels Oregon, LLC, previously known as NEXT Energy Group, Inc., included Louis Soumas and Christopher Efird. Although Louis Soumas was removed from the Board of Directors, Christopher Efird remains as the Secretary. Both have a history of leaving communities with environmental contamination and suppliers unpaid. Such was the case with Transmessis Columbia Plateau biofuels plant in Odessa, WA. The plant was abandoned in 2014 with serious issues of chemical waste management observed inside the facility. Then in May 2016 Waterside Energy, operated by Lou Soumas, Damon Pistulka and Chris Efird, proposed a \$1.25 billion refinery and propane terminal at the Port of Longview. Pistulka also served as CEO of TransMessis. The project didn't have the support of the Port of Longview and was abandoned.

The proposed facility goes against the goals and policies of the Columbia County Comprehensive Plan which is supposed to protect and preserve agricultural lands. The Board of County Commissioners shouldn't make any further decisions on this project until the Oregon Land Use Board of Appeals has decided on this case.

I urge the County Board of Commissioners to allow time for the County Planning Commission to hold public hearings and gather more information from NEXT and all stakeholders. There are too many concerns to proceed and making a decision now could be costly for the County and its residents.

V/r

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