

## Comment on the Rezone at Port Westward for NEXT Renewables



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To: Jacyn Normine <Jacyn.Normine@columbiacountyor.gov>

Dear Ms. Normine,

Please include this comment on the rezone at Port Westward for NEXT Renewables. From: Kristin Edmark, Battle Ground, WA, a concerned citizen

### A full EIS is necessary for the NEXT Renewables project because

1. The proposed project is very large and complex. The NEXT facility is more than 7x the production of the Bp biodiesel facility at Cherry Point, WA which required an EIS.
2. The upstream effects of methane used for power and of chemicals necessary are not fully assessed.
3. Upstream impacts of feedstocks are not adequately assessed. Feedstocks are not defined so impacts of transportation, tractor use, fertilizers, etc. have not been assessed.
4. Feedstocks are not adequately identified.
5. Full air quality impact of the project in combination with other nearby facilities in the airshed.
6. Wastewater plan is inadequate. The present system cannot handle the wastewater which would be generated.
7. Spill plan is inadequate.
8. Mooring to bedrock due to dangerous chemicals on unstable soil is not defined for the facility and all fuel tanks.
9. Up-front security deposit/surety moneys to Columbia County are necessary due to company history.  
If in Odessa, WA they left \$1.9 million unpaid, Columbia County should insist on \$2 million security deposit.
10. The facility is adjacent to sensitive wetlands, wildlife areas and the Columbia River. The proposed mitigation plan does not make these sensitive environments safer.
11. The facility is adjacent to some of the most fertile farmland in Oregon with inadequate analysis of water flow toward that farmland and effect of contaminants on the site to that farmland.
12. There has been inadequate analysis of the impact on the present dike system.

The need for a full EIS will cause long delays and could cause the project to be denied permits. Once the excellent farmland has been covered/destroyed it cannot be reclaimed.

The rebuttal letter from NEXT does not address concerns and reiterates previous misconceptions.

Garrett Stephenson in his rebuttal letter, dated January 17, claims that "The Board can find that the Project is **water dependent** .... because the Project depends on marine transportation and a direct water intake from the Columbia River for its industrial processes."

If the project was truly water dependent, then other large biodiesel plants would be located near waterways which they are not. The risk at the proposed site is in appropriate because of the Columbia River. This large facility will store chemicals and diesel too close to sensitive Columbia River and wetlands habitats on unstable soil which would be expected to give way in an earthquake. My great fear is that when the projects fails that it will transition to oil export to Asia.

Garrett Stephenson states, "The **Beaver Drainage Improvement Company, Inc.**'s ("Drainage Company") comments address NEXT's wetland mitigation plan, which is not before the Board." I feel this is a foolish statement; drainage, inadequate wastewater facilities, spill prevention, water flow are all integral concerns the Board must consider in making decisions regarding the site. These are important concerns.

NEXT's has not disclosed its "**full waste treatment protocol and the specific toxicity and ingredients** that would travel via the highway 30 railway." NEXT says they will comply with all laws. That is *no plan*. Saying they will make a plan is not good enough to approve this project. Treatment of wastewater and chemicals is of paramount importance and needs to be specified before approval.

NEXT's process requires **virgin oil crops and animal fat derived from the same crops** that has agricultural practices that destroy soil and promote greenhouse gas emissions.

NEXT is mistaken. This statement is true and very important. The use of biodiesel made from virgin oils for feedstock can be worse for the environment than petro-diesel depending on transportation, farming techniques, fertilizers and the specific crop.

Thank you. Sincerely, Kristin Edmark, concerned citizen