

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

January 25, 2022



RE: Next Renewable Fuels, LLC  
Biodiesel Refinery at Port Westward  
Public Comments

Columbia County Board of Commissioners,

My name is John Flynn. I live in Kalama, Washington, just upriver from the proposed NEXT Renewable Biodiesel Refinery at Port Westward. Oregon and Washington share the river as well as the air shed. As a lifelong recreational fisherman I have personally witnessed the decline of fish populations, particularly salmonids (chinook, coho, sockeye and steelhead) not only in the Columbia River but throughout the Pacific Northwest. The siting of this proposed renewable diesel facility adjacent to the Columbia River could potentially be disastrous for these fish as well as the health of the Columbia River estuary.

The lower Columbia River is home to threatened and endangered species of fish, including salmon, steelhead, bull trout, lamprey, eulachon (smelt), green and white sturgeon. Shallow water habitats in the lower Columbia River and estuary play a critical role in the life cycles of these fish species in that they provide growth opportunities as well as protection from predators. The construction of this proposed project would put at risk the long term survivability of these species with the added green house gases, ocean warming, ocean acidification and the fallout of toxic and hazardous air pollutants into the water ecosystem.

Converting existing ecologically invaluable wetlands for a renewable diesel refinery is in direct juxtaposition to the recovery of threatened and endangered salmonids including chinook, coho, sockeye and steelhead as well as eulachon (smelt). The potential for spills, and air and water pollution from this facility cannot be ignored. DEQ is in the process of reviewing how much pollution would come from this facility. DEQ expects that the combustion of fracked gas will be the major contributor for pollution from this facility. Preliminary estimates are that this proposed facility would consume 30 million cubic feet of fracked gas per day. It is estimated that the facility would also release 70 tons of volatile organic compounds and 1 million tons of greenhouse gas per year.

The Army Corps of Engineers and NOAA Fisheries need to complete a full, comprehensive Environmental Impact (EIS) for this proposed project and not rely on a minimal Environmental Assessment. This will determine whether the

projects impacts on fish and wildlife meet the requirements for the Clean Water Act, the Endangered Species Act and National Environmental Policy Act (NEPA).

On November 5, 2021 the US Army Corps of Engineers, Portland District, released NWP-2020-383, Public Notice, Application for Permit soliciting comments on the proposed project. In the public notice the Corps of Engineers stipulated in part that "Endangered Species: Section 7 of the Endangered Species Act (ESA) (16 U.S.C. 1536) requires federal agencies to consult with the National Marine Fisheries Service (NMFS) and/or U.S. Fish and Wildlife Service (USFS) on all actions that may affect a species listed (or proposed for listing ) under the ESA as threatened or endangered or that may adversely modify designated critical habitat. The Corps' preliminary review indicates the described activity may affect an endangered or threatened species or designated critical habitat". In addition the Corps stated under the heading "Essential Fish Habitat: Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) as amended (16 U.S.C. 1855) requires federal agencies to consult with the NMFS on all actions, or proposed actions, permitted, funded, or undertaken by the agency, that may adversely affect Essential Fish Habitat (EFH). The Corps' preliminary review indicates the described activity would adversely affect EFH at the project location or in the vicinity."

These preliminary reviews alone are enough to raise concern that this proposed project should be put on hold pending more detailed, comprehensive analysis. The agencies responsible for conducting these analysis should be allowed the time to perform their mandated duties before any actions are taken in regards to permitting let alone construction of any aspects of the project.

Thank you.

John Flynn  
PO Box 1813  
Kalama, WA  
98625  
jcflynn68@gmail.com