



Cowlitz Indian Tribe

October 2, 2020

Rich Doenges
Department of Ecology
Kalama SSEIS
PO Box 47775
Olympia, WA 98504-7775

RE: Comments Regarding the Draft Second Supplemental Environmental Impact Statement for the Northwest Innovations Methanol Manufacturing and Marine Export Facility Revised Mitigation

To Mr. Doenges, SEPA Responsible Official

The Cowlitz Indian Tribe has reviewed the revised Port of Kalama Draft Second Supplemental Environmental Impact Statement (Draft SSEIS) Greenhouse Gas Report associated with the Northwest Innovations methanol manufacturing and marine export facility. We thank the Washington State Department of Ecology for the one-week comment period extension which allowed our tribal council to discuss this important matter.

The Cowlitz Indian Tribe is a Federally Acknowledged Government entity located in the Pacific Northwest. Our historic area of interest includes a large portion of the Lower Columbia River Basin that spans both sides of the Columbia River in Washington and Oregon States. The proposed Kalama Methanol Manufacturing and Marine Export facility (also identified as the 'methanol facility') lies within our homeland, which has been established through historical adjudication processes. The Cowlitz Tribe has held neutrality on the project to evaluate company statements and actions. However, the Cowlitz Tribal Council has now determined this project is inconsistent with the Tribe's stewardship ethic and we today voice our opposition to this project moving forward.

The Cowlitz Indian Tribe does not evaluate project impacts based only on narrow regulatory definitions. Project impacts are, in reality and in fact, permanent impacts to a landscape. Within the Columbia River, features such as floodplains, wetlands, aquatic habitat, and Cultural Sites are in a depressed state. Landscape features, such as dredge spoils at the project site, are temporary, manmade features. Development is a habitat restoration opportunity that is lost – once a site is developed, the site cannot and will not be restored within the Cowlitz's seven-generations world view. The landscape of the Project's proposed APE and surroundings are rich with Cowlitz Heritage and significant Cultural and Natural Resources.

The Cowlitz Indian Tribe Culture Resources Department and Natural Resources Department work together to address important project-related impacts to natural resources which are integral parts of

our heritage and traditions. Clean water, culturally significant fish, plants, and the various species and habitats that will be affected are parts of our continuing Cultural Heritage. These components of the landscape, which are interdependent on each other, are priorities for the Tribe. The Tribe holds Indigenous knowledge about surrounding Cultural Resources, i.e. archaeological sites, fishing stations, root gathering locations (and the like). Though the landscape has changed over the period since European contact, there are still important Cultural Resources that need to be protected.

The Cowlitz Indian Tribe are stewards of the land. As such, the Tribe and Northwest Innovation Works have engaged throughout the permitting process. NWIW has been respectful and conscious of the Tribal interests in land, sea, air, water, fisheries and wildlife. We have, we believe, influenced some environmentally sound changes to the project proposal. In the event Kalama Methanol Manufacturing and Marine Export Facility moves forward in permitting, it is our expectation to have an ongoing involvement in mitigation portfolio discussion and review.

Please contact our Natural Resources Department Director, Taylor Aalvik, Cultural Resources Department Director Nathan Reynolds or our Natural Resources Program Assistant, Tiffini Alexander for follow up communications and scheduling. Taylor or Nathan can be reached via email taylor.a@cowlitz.org, or NReynolds@cowlitz.org, and Tiffini can be reached at: 360-577-8140, or talAlexander@cowlitz.org.

Sincerely Yours,



Philip Harju
Chairman of the Cowlitz Indian Tribe

Cc:
Laura Watson, WA Dept. of Ecology
Craig Bill, Executive Director, Governor's Office of Indian Affairs