

## Columbia Riverkeeper

Hi, my name is Dan Serres. I'm the conservation director for Columbia Riverkeeper. I want to thank the Department of Ecology for the effort it has put in to holding these hearings and soliciting public comments. I also want to say that I'll be counting on you to protect Washington and to implement a vision for the future that involves less climate-changing pollution, less plastic pollution, and a healthy river. Ecology, the EIS correctly identifies NWIW's proposed refinery would be a massive polluter, capable of producing 4.6 million tons of greenhouse gas pollution each year or more.

Roughly one million tons of this pollution would occur in Washington State each year alone. The refinery will be one of Washington's top polluters. NWIW had suggested that it can mitigate all of its in-state pollution. We doubt this claim and we urge Ecology to find the mitigation plan incomplete and inadequate on several grounds. The plan lacks specifics. NWIW has put forward a voluntary framework, a plan for a plan that gives little substance for the public to comment on at this time. Although, we will attempt to offer more detailed comments in writing as best we can.

NWIW has not identified any mitigation projects in Washington thus far, and according to the plan, projects wouldn't be identified until far too late in the game to know if they are likely to succeed. The governance structure of the mitigation framework is suspect. NWIW states that it will set up a board of its own choosing. This is inadequate. Ecology is responsible for identifying the impacts of the project and how they will be mitigated. Ecology should protect Washington by denying this project altogether. Thank you for your time.