

Lauren Whybrew

From: cathy seitz <catseitz1@gmail.com>
Sent: Friday, January 12, 2024 12:33 PM
To: Lauren Whybrew
Subject: 23NOC1606

Jan. 12, 2023

Dear Lauren Whybrew:

This letter concerns the Notice of Construction (23NOC1606) for the proposed wood pellet plant in Hoquiam, WA. I am a fourth generation Oregonian and a fifth generation Washingtonian, currently residing in Vancouver, WA.

My grandfather was a logger. For decades, as a concerned citizen and nature lover, I have been following, and occasionally joining with groups to oppose, the decimation of the forests which once were the northwest's greatest pride. I was already deeply concerned about the rise of biomass as a supposedly renewable fuel for electricity, when I heard that a wood pellet plant was being proposed in Washington. I was told they were passing themselves off as not being a high level polluter, and not warranting the scrutiny they actually deserved. It has long been my experience with the forest products industry, that without citizen involvement they often get away with falsifying their potential impact on the environment in order to get a pass from the gatekeepers.

I have read a number of testimonials from outraged citizens of our southeastern states, regarding the horrific air pollution impact that wood pellet plants have on their communities. Once such a plant is established, it is very difficult to get it shut down. [Half-truths and sometimes no truth at all: Public debates pollution limits at Enviva's wood pellet plant in Hamlet | NC Newsline](#). I include the text of this article at the end, for ease of printing.

I have been told that some locals are being led to believe this plant would offer jobs. If this has any legitimacy, one should consider the jobs lost, if the plant is built and scares off tourists and residents with smelly air and loud noises.

The proposed pellet plant is almost certainly a major source of hazardous air pollutants, and should be required to use "Maximum Achievable Control Technology" during construction and operation.

Thank you for your service, and your time and attention.

Sincerely,

Cathy Seitz
7415 NE 94th Ave.
Vancouver, WA 98662

NC Newsline

Half-truths and sometimes no truth at all: Public debates pollution limits at Enviva's wood pellet plant in Hamlet

By: [Lisa Sorg](#) - November 9, 2018 10:01 am

Enviva is building a wood-pellet plant north of Hamlet. The company is requesting a modification to their air permit to allow them to increase production while restricting certain hazardous pollutants to less than 250 tons per year.

About a quarter-mile off NC 177 in Richmond County, just north of Hamlet, skeletons of buildings gouge the horizon, as bulldozers coerce the dirt into mounds and flats. This is the site of Enviva's new wood pellet production plant, its fourth in North Carolina. Logs timbered from area forests are chopped up, dried and made into pellets that resemble dog kibble. Those pellets then begin their long journey, far from their birthplace in North Carolina forests.

At the nearby CSX terminal, they are transported by diesel train to the port of Wilmington, then loaded on ships powered by sulfur-spewing, low-grade bunker fuel that are bound for the United Kingdom and the European Union. Upon arrival, the pellets are again transported by rail or truck to power plants, where companies, benefiting from large government subsidies, burn them instead of coal.

Every step of wood pellet production carries significant environmental and climate consequences, not only for the neighbors of the plant but also the inhabitants of this planet. The Hamlet plant — and all of Enviva's North Carolina facilities — are located in predominantly low-income communities of color that will bear the burden of its air pollution.

When trees are timbered from North Carolina forests, they exhale carbon dioxide, a greenhouse gas that contributes to climate change, into the air. Replanting cannot keep pace with the timbering in terms of the carbon dioxide balance. Once abroad, when wood pellets are burned, they produce more carbon dioxide than coal, further contributing to climate change. In turn, those changes cause extreme weather, like Hurricane Florence, which devastated eastern and southeastern North Carolina just two months ago.

At a public hearing last night in Hamlet, about 200 people heard about Enviva's request to the NC Department of Environmental Quality to modify its air permit in more than a dozen ways. But most significantly, the Maryland-based company wants to increase its production of pellets from 537,000 oven-dried tons per year to 625,000. It also wants to tinker with the softwood/hardwood mix.

These seem like relatively small adjustments, but they can result in greater amounts of pollutants, particularly volatile organic compounds (VOCs), like formaldehyde and benzene. So Enviva is proposing to install controls that the company says will cap pollution to less than 250 tons per year.

But there are legitimate questions as to the accuracy of Enviva's claims. Patrick Anderson, an attorney with the [Environmental Integrity Project](#), told DEQ that it was wrong to rely on Enviva's numbers, which are based, he said, on a single test out of Florida. "We reviewed the results," Anderson said, "and the amounts were three to four times higher. The discrepancy has not been explained."

[easy-tweet tweet="It's time to pump the brakes on this industry"]

Inside Cole Auditorium at Richmond Community College, the crowd was divided along predictable lines, with predictable arguments coming from proponents. On one side were the loggers, foresters, economic developers, the president of Richmond Community College, state lawmakers, and industry reps. Churchgoers and a representative from Habitat for Humanity — both of which received tax-deductible monetary donations from the company — vouched for Enviva's corporate citizenship. [State Sen. Tom McInnis](#), apparently emboldened by his re-election, criticized "outside groups" who were in attendance. (He did not single out the [US Industrial Pellet Association](#), based in Virginia, which had a spokeswoman there.) Many supporters promised the company would bring jobs to the economically depressed area; over the evening, 80 positions ballooned to 400, accounting for a "multiplier effect."

Yet Enviva has yet to jump-start the local economies in the counties where it has plants. The poverty rate in Hertford County, where Enviva operates a plant in Ahoskie, is 24.4 percent, according to 2016 census figures. In 2011, the year the [plant opened, the rate was 24.7 percent](#). Hertford County gave the company [\\$1.5 million in performance-based incentives](#) to come to the area.

Enviva has operated a plant in Garysburg in Northampton County since 2013. Since that time, the poverty rate has actually [increased from 26.3 percent to 28.5 percent](#).

In Sampson County, where the percentage of people living at or below the federal poverty line rose from 21 percent in 2012 to 24 percent in 2016 when the plant opened, the impact is not yet clear. Sampson County officials provided [\\$2.8 million in performance-based tax incentives](#) to lure the company. John Swope, executive director of the Sampson County Economic Development Commission, said that "there have been no disappointments. We need more companies like Enviva."

Proponents also emphasized the importance of the timber industry to the state's economy. "To save a resource you use a resource," said Euell Smith of [Carolina Loggers Association](#). "To save fish, you have to eat fish. To save a forest, you have to use it."

The pretzel logic of that argument aside, Smith also cited the 18 million acres of woodland in North Carolina as "evidence when you manage forests, you have stronger forests." However, not all acres are equal, particularly in terms of carbon dioxide. Young trees contain and absorb less carbon dioxide than older stands. In addition, many of these replanted forests are monocultures and do not provide the biological diversity and habitat as a natural forest. Newly planted forests don't provide the same level of flood control.

Jessica Marcus of the US Industrial Pellet Association said sustainable timbering provides a financial incentive for landowners to "keep forests as forests rather than develop them." Marcus also repeated the erroneous industry talking point that "customers on the other side" — that is, in the UK — "reduce their carbon emissions." Bill Schlesinger, a former EPA Science Advisory Board member and Duke University professor, [recently blogged about his experience](#) advising the agency on the wood-pellet industry and carbon emissions. Former EPA administrator Scott Pruitt decided to classify wood-pellets as "carbon-neutral," even though that is not supported by science. "I can't say there is evidence that politics were involved—such as lobbying by the forest products industry," Schlesinger wrote, "but it sure looked like it. Make America Great Again by harvesting trees."

[easy-tweet tweet="DEQ fined Enviva's Sampson plant \$5,000 earlier this year"]

The environmental groups of which Sen. McInnis spoke were allies of many of the plant's neighbors, joined by several scientists, [attorneys and other concerned citizens](#), who pleaded with DEQ to deny the permit until its terms are more closely reviewed. They want the agency to consider its decision in light of the governor's recent executive order on climate change. They also want DEQ to conduct fence line monitoring, instead of arranging

for inspections that the company will know about in advance and for officials to conduct a more thorough environmental justice analysis before granting the permit. (DEQ has issued a preliminary [environmental justice snapshot](#); it does not include Dobbins Heights, a community of color that is beyond the two-mile radius analyzed.) They want a fuller analysis of the cumulative impacts of the many major pollution sources in the area: the rail line, the Perdue chicken plant, Duke Energy's natural gas operations and the proposed connection to the Atlantic Coast Pipeline.

Adam Collette of the [Dogwood Alliance](#), which has worked with many Dobbins Heights residents, asked DEQ to deny the permit in its current form. "We're hearing the same arguments about jobs and markets," he said. "I've followed this industry for five years. We've caught them polluting air and logging wetlands. they evade the truth. It's time to pump the brakes on this industry."

"Is Enviva putting in these controls because they got caught?" asked [Debra David, a resident of nearby Dobbins Heights](#), a community of color. David was referring to the emissions violations that occurred at Enviva's Sampson plant; DEQ fined the company \$5,000 earlier this year. Bruce Ingle, regional supervisor at DEQ's Mooresville office, replied that every facility is required to conduct an emissions test. The Sampson County plant failed that test, and the agency required it to install additional controls, similar to those proposed for Hamlet.

These pollution controls are critical for the wellbeing of the residents of Richmond County. It ranks 91st among the state's 100 counties in health outcomes and 89th in life expectancy. Several of the VOCs that would be emitted, such as benzene, are known to cause cancer. "I ask you, DEQ," said Daniel Parkhurst, [policy manager for Clean Air Carolina](#), "to put the health of the families and children first."

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