

ORCAA Reference Notice #: 23NOC1606 -- Hoquiam pellet plant

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To: Lauren Whybrew <lauren.whybrew@orcaa.org>

Lauren, thank you for being at the hearing in Hoquiam. Here are my comments:

To Lauren Whybrew, regarding ORCAA Reference Notice #: 23NOC1606 -- Hoquiam pellet plant

HEAL Act

Please review how the HEAL Act applies to your permit review. Hoquiam and Grays Harbor are identified by Department of Health as having high health risks. Your permit review should consider the existing health burdens on this population.

From the World Resources Institute website, "Breathing dirty air affects more than just lungs and causes more than premature death. Air pollution affects almost every organ in the body. A **recent study** by the Forum of International Respiratory Societies shows that air pollution contributes to everything from diabetes and dementia to fertility problems and childhood leukemia."

Any increase in air pollution is unacceptable for people who are already sick or lack social support. From that **recent study** by the Forum of International Respiratory Societies, **Air Pollution and Noncommunicable Diseases**,* "Although air pollution affects people of all regions, ages and social groups...Persons are more vulnerable to air pollution if they have other illnesses or less social support. Harmful effects occur on a continuum of dosage and even at levels below air quality standards previously considered to be safe." **The safe pollution levels on your charts are not safe for people who are already sick or lack social support.**

I ask you to drive through the neighborhoods around the three schools that are about a mile or so from the proposed plant location. Many of these homes do not have filtered air ventilation. Residents will be exposed to outdoor pollution all day.

Children at the three nearby schools will be exposed to outdoor air pollution on the playground, on the ball fields and on the track, and even in the classrooms. These children are more susceptible to the health harms of air pollution than adults.

*Schraufnagel DE, Balmes JR, Cowl CT, De Matteis S, Jung SH, Mortimer K, Perez-Padilla R, Rice MB, Riojas-Rodriguez H, Sood A, Thurston GD, To T, Vanker A, Wuebbles DJ. Air Pollution and Noncommunicable Diseases: A Review by the Forum of International Respiratory Societies' Environmental Committee, Part 2: Air Pollution and Organ Systems. Chest. 2019 Feb;155(2):417-426. doi: 10.1016/j.chest.2018.10.041. Epub 2018 Nov 9. PMID: 30419237; PMCID: PMC6904854.

Grays Harbor National Wildlife Refuge

The internationally important Grays Harbor National Wildlife Refuge is located right next to the proposed pellet plant site. Air pollution from the pellet plant will fall into the water and on the mudflats where it will harm the birds and their food sources in the refuge. Any direct health harms birds experience from breathing new air pollution will be exacerbated by stress and the difficulty birds will have hearing each other and their prey, due to the noise from the nearby plant.

From the refuge website: "Grays Harbor National Wildlife Refuge...at Bowerman Basin **occupies only two percent of the intertidal habitat but hosts up to 50% of the migrating shorebirds in spring.**"

This wildlife refuge is one of only a handful of stops of its size and importance to migrating shorebirds on their long journeys up the west coast of the Americas. Finding rest and food during migration is essential to the survival of these birds. Any impact to the capacity of this refuge will result in loss of migratory birds. **It is**

impossible to overstate how rare and irreplaceable this wildlife refuge is, and how important it is to the survival of migratory birds.

From [How Air Pollution Becomes Water Pollution](https://www.pugetsoundinstitute.org/), [pugetsoundinstitute.org](https://www.pugetsoundinstitute.org/): “When thinking of air pollution, I used to think only of breathing toxic chemicals into our lungs, with uncertain health effects. That’s bad enough, but **air pollution** — which is everywhere — is also getting into our waterways and penetrating deep into our food webs...no body of water escapes toxic chemicals dropping out of the sky...(pollutants) can poison organisms and cause rapid and harmful changes in the environment. These changes may stress certain species, making them more vulnerable to decease...and may reduce their ability to respond and survive...Species’ young, sick, older and rapidly growing members all tend to be more vulnerable to the effects of pollution. Importantly, the loss of any species can have significant impact on the ecosystem by disrupting the complex relationships among all members of the food chain...There may be a loss of biodiversity...”

I understand this ORCAA permit considers pollution from the stacks if it is transported by air to human lungs and the lungs of wildlife, but the ORCAA permit does not consider pollution from the stacks if it falls on the mudflats or into the water, harming the living things that migratory birds eat. Please consider whether these arbitrary regulatory assignments to “air” or “water” pollution based on where the air pollution happens to fall are failing to capture all the real effects of the 40 plus tons of annual air pollution from the stacks. All effects of air pollution that comes from the stacks should be considered in the air pollution permit, regardless of where they fall, and regardless of whether they will be monitored during operations in the NPDES.

Please incorporate comments made by FOGH.

Thank you.

Donna Albert
Montesano, WA

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