

**PNWRE Reference Notice #: 23NOC1606**

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To: Lauren Whybrew &lt;lauren.whybrew@orca.org&gt;

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I strongly oppose the proposed Pacific Northwest Renewable Energy (PNWRE) wood-pellet-for-export production project.

The air permit application admits **PNWRE's plant would be a major source of hazardous air pollutants (HAPs)**. Yet their estimates are a severe underestimate. Smokestack tests in the southeast United States of plants similar to PNWRE's reveal PNWRE will likely emit *at least 40 tons of total HAPs per year*. DRAX recently applied for an air permit for a wood pellet plant in Longview WA – one that is comparable in scale, control technology, and feedstock to PNWRE. DRAX estimates its facility will emit *49 tons of HAPs*.

**The product is for export.** The pellets PNWRE is to manufacture are not for Washington state energy use. PNWRE is exporting them to Asian markets. Yet Washington state would be liable/responsible for the emissions associated with logging to fulfill feedstock demands. This undermines Washington state goals for carbon sequestration in our forests. Our forests are our best natural climate defense. Washington state gets the brunt end of the stick with PNWRE raping our natural resources for less than zero benefit to state residents.

**Wood pellets are not green energy.** Sam Yassa, a respected senior scientist with Natural Resources Defense Council's Climate & Clean Energy Program reports<sup>1</sup>, "wood emits more carbon dioxide than coal for every unit of electricity produced." The Partnership for Policy Integrity, a U.S.-based group that advocates for data-driven environmental policies, finds that power plants that burn biomass emit 150 percent more carbon dioxide<sup>2</sup> than those burning coal.

**We are in a climate emergency.** Human health and well-being is affected globally everyday. The PNWRE plant is going to make matters worse on multiple fronts. This proposal is wrong for Hoquiam, wrong for Washington, and I urge you to DENY the PNWRE air permit.

Sally Keely  
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1. Natural Resources Defense Council (2022). *No, Burning Wood Fuels Is Not Climate-Friendly*.

<https://www.nrdc.org/stories/no-burning-wood-fuels-not-climate-friendly>

2. Partnership for Policy Integrity (2011). *Carbon Emissions from Burning Biomass for Energy*.

[https://www.pfpi.net/wp-content/uploads/2011/04/PFPI-biomass-carbon-accounting-overview\\_April.pdf](https://www.pfpi.net/wp-content/uploads/2011/04/PFPI-biomass-carbon-accounting-overview_April.pdf)

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