

Sept. 23, 2021

Jose Valenzuela
City of Fresno
2600 Fresno St.
Fresno, CA 93721

Sent via email to Jose.Valenzuela@fresno.gov and publiccommentsplanning@fresno.gov

Re: Request to Extend Public Comment Period
West Coast Waste Co., Inc., Fresno Renewable Energy Station
Conditional Use Permit Application No. P18-03189

Dear Mr. Valenzuela:

West Coast Waste Co., Inc. is seeking to add two major public health and environmentally-damaging components to its waste recovery facility: a biomass cogeneration plant and a wood pellet mill. Both components--collectively called the Fresno Renewable Energy Station--will emit harmful air pollution such as nitrogen oxide (NOx), sulfur oxide (SOx), volatile organic compounds (VOCs), ammonia, and particulate matter (PM10), as well as climate change-worsening greenhouse gases (GHGs). In addition, the components will enable and perpetuate harmful biomass energy, which is more climate-damaging than coal.

Because approval of these components would have significant consequences for Fresno residents, air quality throughout the San Joaquin Valley, and climate change, the Central California Environmental Justice Network, the Central Valley Air Quality Coalition, and the Center for Biological Diversity request that you extend the comment period for Conditional Use Permit Application No. P18-03189 (the application) from September 27, 2021 to November 1, 2021 in order to allow the public--particularly those communities who will be directly impacted--to review the application and the associated California Environmental Quality Act (CEQA) documents, and provide meaningful comments. We are requesting this extension for several reasons.

First, the City of Fresno has not provided adequate time for the public to review the application and its associated documentation. On August 4, 2021 the City of Fresno issued a 654-page proposed mitigated negative declaration (the "MND") for the Energy Station. Understanding this massive MND is vitally important to community members now wanting to protest and/or comment on the application. It will take longer than the current deadline for the public to meaningfully grapple with the MND and provide the City of Fresno with comment. The City's Notice of Intent to Take Action was only published on September 10, meaning that the public was given only 15 business days to review the materials and comment. This is simply not enough.

Second, the proposed Fresno Renewable Energy Station will have significant public health impacts, meaning that public review and consideration of the application should not be rushed. Biomass power plants are significant sources of air pollutants, harming the vulnerable communities where they are

located and worsening environmental injustice. The MND notes that construction of the biomass cogeneration plant will occur over 12 months, and once operational, the plant will run 24 hours a day for approximately 350 days per year. Construction of this type of major facility will produce noise impacts that will impact local residents, and once up and running, the air pollution will add to the already abysmal air quality in the San Joaquin Valley and local communities, such as Malaga, which is less than one mile north of the facility. The MND relies on a 2016 MND that studied air quality, which means that the public has to cross-check that information in order to evaluate current proposed plans. This, too, will take more time and careful consideration.

Third, the communities nearest to the Fresno Renewable Energy Center, such as Malaga, are comprised primarily of people of color, including immigrants and people with a primary language other than English compared to other parts of Fresno. As of 2019, 86.3% of Malaga, CA residents were born outside of the country. By not providing adequate or translated notice, the City of Fresno risks both not including important resident input the permit review process and violating California laws.

Finally, biomass power and wood pellets will worsen the climate crisis, and the public deserves a chance to speak up about our climate future. While biomass power is often framed as a type of energy that could be helpful to combat the climate crisis, in reality, it has more in common with fossil fuels than it does wind or solar energy. Like coal and oil, biomass is a carbon-burning form of energy production that emits large amounts of GHGs. In fact, biomass power plants are California's dirtiest electricity source. The average greenhouse gas emission rate for California's current electricity portfolio is about 485 pounds carbon dioxide equivalent (CO₂e) per megawatt hour (MWh). In 2018, woody biomass power plants in California emitted more than *seven times* that amount, with smaller-scale gasification biomass power plants ranking as similarly carbon intensive. The MND does not meaningfully grapple with these realities, instead concluding by some stretch of logic that the facility will have "no impact" on climate change. This deserves a much closer look, and that will take time.

We look forward to hearing from you soon.

Thank you,

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