

## Kate Lunceford

I applaud WA State's intention to set a high standard for clean fuel. I am concerned that carbon credits could be related to support for biomass fuel and "renewable" natural gas. Biomass

Biomass projects can be sustainable, but many biomass projects are not. Projects based on "clean" construction waste, forest byproduct waste or sustainable waste such as municipal tree trimmings may include strong incentives for companies to use unsustainable or contaminated fuel if the intended supply runs short. Researchers at the Massachusetts Institute of Technology concluded wood burns dirtier than coal, and determined it takes at least 44 years for replanted trees to absorb the carbon released from burning the ones they replaced. If biomass using wood waste is included in the C-PACER program, there should be provisions to ensure it is truly from waste and to prevent cheating. See this article for more information.

<https://www.cbsnews.com/news/wood-pellets-renewable-energy-source-critics/>

### Renewable Natural Gas

It is good to contain waste methane and put it to use, particularly in a closed system such as the waste digester described in the seminar last night. Where the problem arises is that RNG is being touted as a replacement for natural gas, which is simply not possible. There are not and will never be enough RNG sources to provide that level of supply. The other major problem is that existing pipelines are leaking a lot of methane. Instead of increasing the use of pipelines, they need to be safely removed. See this article for more information.

<https://www.sightline.org/2021/03/09/the-four-fatal-flaws-of-renewable-natural-gas/#:~:text=RNG has four fatal flaws,natural gas—not even close.>