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BEFORE THE STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2006-01 ENERGY NORTHWEST PACIFIC MOUNTAIN ENERGY CENTER POWER PROJECT	DECLARATION OF JOAN CROOKS IN SUPPORT OF PETITION TO INTERVENE

I, Joan Crooks, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am the Executive Director of Washington Environmental Council (WEC). I have held this position since 1995, and I have been employed by WEC since 1992. I am very familiar with the history and mission of the organization.

2. WEC is a non-profit corporation registered in the state of Washington. Formed in 1967, WEC is a statewide, nonpartisan organization dedicated to the protection, preservation and enhancement of the natural resources, ecological values, and environment of Washington through public education, political action, legislation, and support for citizens and citizen groups working toward the same ends. WEC has been instrumental in the adoption of many of the state's major environmental laws, including the State Environmental Policy Act, the Shoreline Management Act, the Model Toxics Control Act, and the Growth Management Act. These laws help to set the standards for keeping Washington's rivers, lakes, streams, and saltwater ecosystems healthy, ensuring better protection of our shorelines, and promoting responsible development. WEC has consistently supported and defended such laws and has an interest in ensuring that all power plants sited in Washington State comply with all relevant legal mandates.

3. WEC has over 3,500 individual members and over 50 affiliated organizations. WEC maintains a website at www.wecprotects.org, and communicates with our membership through a quarterly newsletter and "E-news" bulletin. We also maintain a grassroots activist network through our "Greentree" alert system. WEC is one of the primary organizers of the environmental "Lobby Day" that brings thousands of citizens to the state capitol to communicate directly to legislators.

4. WEC has a longstanding history of involvement in energy issues, and we are a

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current member of the NW Energy Coalition. In the early 1990s WEC was one of the founding members – and provided a staff project coordinator to – the Regional Renewable Energy Project, an eighteen-month program of education and communication among energy planners, environmentalists, utilities, consumer advocates and renewable resource developers that was funded in part by the Bonneville Power Administration and the U.S. Department of Energy. WEC has twice appeared as an intervenor in EFSEC adjudicatory proceedings in the last decade, first regarding the 230-mile Cross-Cascade Gas Pipeline and later challenging the Sumas Energy 2 power plant planned for Whatcom County. Over its history, WEC also worked to reduce emissions of air pollutants and greenhouse gases at the Centralia coal plant.

5. In 2005, WEC helped lead the effort to pass Clean Cars and Green Building legislation. Together, those laws should help reduce Washington's carbon footprint from its transportation sector and from new public buildings. In 2006 and 2007 we had similar success with new biofuels laws, intended to increase the state's energy security as well as reduce greenhouse gas emissions. WEC supported the passage of Initiative 937 in 2006, requiring major utilities to have 15% renewable resources in their electricity portfolio by 2020. In 2006, WEC also participated as an amicus before the state Supreme Court in support of Seattle City Light's efforts to mitigate for its greenhouse gas contributions. When the Supreme Court issued an adverse decision, we supported successful legislation to grant City Light and other municipalities the authority they needed to mitigate greenhouse gas emissions by purchasing emissions offsets.

6. We advocated for the passage of ESSB 6001 in the 2007 legislative session. The legislation established greenhouse gas reduction goals for the state and, especially relevant to these proceedings, it set an emissions performance standard for new power plants. WEC

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currently participates on Governor Gregoire's Climate Action Team that will propose policies to meet the overarching goals set by the legislation. As an outgrowth of these efforts, WEC recently adopted a Climate Change Campaign to push state decision-makers to take the critical next steps in fighting climate change. WEC seeks to intervene in this adjudication to ensure that our efforts to reduce greenhouse gas emissions in Washington State are not frustrated by the siting of the Pacific Mountain Energy Center (PMEC), which could emit well over five million tons of carbon dioxide annually.

7. The PMEC, if built, will contribute to atmospheric greenhouse gas concentrations and cause increases in average temperatures, changes in surface water conditions, reduced mountain snowpack, and longer and more intense forest fire seasons. WEC's organizational members, including the NW Energy Coalition, Washington Native Plant Society, Washington Ski Touring Club, and many other organizations have institutional and economic interests in the natural resources of Washington State that will be injured by such emissions. WEC seeks to protect its members' interests by opposing Energy Northwest's application for site certification.

8. I routinely come into contact with WEC's individual members and members of WEC affiliate organizations. Generally, our membership is an active group that engages in activities such as hiking, rafting, sea kayaking, fishing, and nature study in and around Washington's coasts, rivers, mountains, and forests. Our individual members' ability to use and enjoy the coasts, rivers, mountains, and forests of Washington State will be adversely affected by the release of carbon dioxide and other greenhouse gases associated with this project, and WEC members have frequently noted to me their concerns about the impacts of climate change on the state.

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Signed this 12 day of September, 2007 at Seattle, Washington.

JOAN CROOKS

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