Materials Submitted

At Meeting

The following public comments
(up to and including
the petition opposing biomass)
were submitted at the October 24, 2019,
RCEA Board of Directors meeting.

Public comment on agenda item 5.1-Comprehensive Action Plan for Energy

To: Redwood Coast Energy Authority Board of Directors

Estelle Fennell, RCEA Board Member Humboldt County
Dwight Miller, RCEA Board Member City of Trinidad
Michael Winkler, RCEA Board Chair, City of Arcata
Summer Daugherty, RCEA Board Member, City of Blue Lake
Austin Allison RCEA Vice Chair), City of Eureka
Robin Smith, RCEA Board Member, City of Ferndale
Dean Glaser, RCEA Board Member, City of Fortuna
Frank Wilson, RCEA Board Member, City of Rio Dell
Sheri Woo, RCEA Board Member, Humboldt Municipal Water District

Cc: Matthew Marshall, Executive Director RCEA

Testimony by Daniel Chandler, Ph.D¹. Spoken testimony is in boldface.

As someone who has done research for forty years to test, evaluate or predict good policy—but someone new to the field of biomass—I believe there is an opportunity for RCEA to get out ahead of difficult decisions on biomass that will need to be taken when wind power makes local electricity available with much lower emissions.

I want to make two quick points, and then hope you will follow me in drawing from them two implications. Both points are made many places in the literature. I am quoting this source in particular because it was published in 2019 with authors from multiple countries. It is from the peer-reviewed journal called <u>Global Change Biology (GCB) Bioenergy</u>. The article is called, Serious mismatches continue between science and policy in forest bioenergy. [It is free online at: https://onlinelibrary.wiley.com/doi/full/10.1111/gcbb.12643]

Two facts:

Woody biomass contains less energy than coal (bio-mass pellets $9.6-12.2 \text{ GJ/m}^3$; coal $18.4-23.8 \text{ GJ/m}^3$; IEABioenergy, 2017), so that CO_2 emissions for the same energy output are higher [in biomass than in coal] (110 kg CO_2/GJ for solid biomass, 94.6-96 kg CO_2/GJ for coals in IPCC, 2006).

Second fact:

When climate mitigation policies were being developed, the delay in achieving net reductions in emissions was left out of the regulations. However, the Paris Agreement now commits 'to pursue efforts to limit the temperature increase even further to 1.5°C' (https:// unfccc.int/process-and-meetings/the-paris-agreement/ the-paris-agreement—accessed May 10, 2019). Given that the Intergovernmental Panel on

¹ Ph.D. in sociology from UC Berkeley, 1972. Since then Dr. Chandler has done policy-oriented research for the Assembly Office of Research, the County of Sacramento, and in conjunction with Lewin Associates, and the California Institute for Behavioral Health Solutions.

Climate Change (IPCC, 2018) projects that average surface temperatures are likely to exceed 1.5°C between 2030 and 2052 on current trends, payback periods of decades increase the risk of overshooting Paris Agreement targets. Even the shortest payback periods [for biomass] compare unfavourably with those of solar and wind which offer net CO₂ emission savings within months to a few years (Marimuthu & Kirubakaran, 2013).

The first implication is that the CAPE plan should build in flexibility about biomass. Biomass is obviously needed now. How much will it be needed in five years or ten years if the Terra Gen wind farm is implemented? We don't know. So please don't overcommit.

The second implication, is that while burning is the worst use of mill waste because the greenhouse gas emissions go directly into the atmosphere, there will need to be a transition to a better way of using mill waste in which carbon is sequestered for long periods of time.

So my suggestion is that the Board instruct the RCEA staff to use the next three to five years to obtain a Life Cycle Assessment of the greenhouse gas emissions of alternative uses of mill waste. These should include burning for electricity, composting, recycling into new products, and gasification and biochar. We are lucky to have Schatz Energy Research Center in our community. Using existing RCEA consultant funds they could do a preliminary study that includes developing the kind of detail that would be necessary to put into an RFP for a full-fledged study.

Both these actions have minimal costs but a big potential for reducing large amounts of greenhouse gases in the critical next thirty years.

Thank you for considering these suggestions

From: <u>EnergyPlan2019@RedwoodEnergy.org</u>

To: <u>Lori Taketa</u>

Subject: FW: Addendum to comments submitted to RCEA Board of Directors October 24, 2019

Date:Tuesday, October 29, 2019 12:05:45 PMAttachments:Addendum to RCEA Board testimony.docx

From: Daniel Chandler

Sent: Monday, October 28, 2019 9:17 PM **To:** EnergyPlan2019@RedwoodEnergy.org

Subject: Addendum to comments submitted to RCEA Board of Directors October 24, 2019

Please accept this addendum to the short presentation I made to the Board on the 24th. It includes other points that were not possible to fit into the oral comment format. There is also tangential overlap with comments made to the RCEA Community Advisory Board. All comments pertain to biomass energy.

Again, thank you very much for your very open planning process.

Dan Chandler

Daniel Chandler, Ph.D. Research and Evaluation Consultant

Addendum to statement on biomass submitted October 24, 2019 to RCEA Board of Directors

Submitted by Daniel Chandler, Ph.D.

Context

- 1. The RCEA Board has committed itself to 100% clean and renewable energy by 2025. Biomass energy from burning mill wastes is not "clean" or, in a scientific sense, renewable (carbon neutral).
 - a. Humboldt County's biomass plants are among the county's top stationary sources of air pollution. Data from 2014 through 2017 (the latest) are shown in below, as is comparable data from the PG&E Humboldt Bay Generating Station. The maximum metric tons of greenhouse gases emitted in any of these four years for each stationary source was:

DG Fairhaven: 230,000 Humboldt Sawmill: 235,500 PG&E Humboldt Bay: 199,500

However, due to plant closures at both sites, it has been highly variable by year over these four years.

b. The power plants in Humboldt are classed by the state as providing "renewable" energy. The Scotia plant also provides steam to an adjacent sawmill. Although mill wastes and other "feedstock" used in biomass power come from forestry many scientists argue that the emissions and sequestration of GHG must be calculated separately for the biomass generation of energy, not incorporated into the overall equations of sustainable forest management. This would mean the emissions from biomass energy are not carbon neutral and not renewable. The mills have no independent way of sequestering carbon, and trees planted as part of sustainable forestry do not offset mill wastes.¹

¹ This is a fraught issue and elements continue to be controversial. While fossil fuels by definition are not renewable, the EPA under Trump has announced that by definition biomass is carbon neutral. The policy seems designed to further the biomass industry as do California biomass policies. But the fact that European energy plants that burn wood pellets are also officially considered carbon neutral has become something of a scandal. (Booth, Mary. 2018. Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy. Environmental Research Letters; Millward-Hopkins, J., & Purnell, P. 2019. Circulating blame in the circular economy: The case of woodwaste biofuels and coal ash. Energy Policy, 129, 168 - 172. doi:https://doi.org/10.1016/j.enpol.2019.02.019) Locally, the Humboldt Climate Action Plan does not classify emissions from biomass power as emissions because the state has the official position that biomass is carbon neutral. (email from Conor McGuigan of the Humboldt County Planning Department). The preferred method of studying emissions and sequestration is Life Cycle Assessment. In general, it proceeds from the basis that if a secondary use (in this case burning mill wastes) provides more than 1% of the total market value it should be analyzed separately. In this case, that means the mill waste cannot ride the coat tails of forest management. (Millward-Hopkins, ibid.). This is not academic because the method of accounting for carbon, that is whether it is deemed neutral, in biomass analyses has a large effect on the GHC impact of alternatives. (Morris, J. 2017, Recycle, Bury, or Burn Wood Waste Biomass?: LCA Answer Depends on Carbon Accounting, Emissions Controls, Displaced Fuels, and Impact Costs. Journal of Industrial Ecology, 21: 844-856. doi:10.1111/jiec.12469) See the first figure in Appendix 2 of this document to understand how much difference the assumption makes. While burning of some waste, e.g. construction debris of clean milled wood, has been studied mill wastes such as used in Humboldt has not yet received a Life Cycle Assessment. (One torrefaction option was

As a consequence, the desirability of biomass power with regard to greenhouse gas emissions becomes one of how much greenhouse gases would be released if the waste were *not* being burned for electrical energy.² There is no perfect solution, but the diagram below shows the equation we have to solve. We could replace biomass power (with natural gas) tomorrow but the emissions from mill waste do not just disappear. Unfortunately there are not now Life Cycle Assessments that would allow us to fill in these boxes reliably.

Biomass power emissions

Emissions if natural gas replaces biomass

Emissions from alternative uses of mill waste e.g. recycling or trucking to Anderson

Conservation and controlled peak use would reduce emissions used to generate electricity, but don't change the equation: mill waste emissions still go somewhere.

studied in 2014 in a HSU Master's Thesis: http://humboldt-dspace.calstate.edu/handle/10211.3/123998. The preliminary finding was that "timber harvest waste" emitted less GHG if torrified and then used as an alternative to coal in coal-burning power plants.)

² The main existing options are putting the waste in landfills to the extent this is compatible with the law (and perhaps capturing some of the methane released), composting, several types of gasification (which can be captured while producing residues, like charcoal, which can be used for fuel or soil amendment), or reuse/recycle such as in particle board or pet bedding. At one plant, the steam used to generate electricity is also used to dry wood. So loss of a market for the electricity could conceivably not result in reduced emissions if the plant is still run for wood drying. All of these options have a net impact on GHG emissions. In 2017, John Anderson, director of forest policy at Mendocino Redwood Co/Humboldt Redwood Company said that HRC would sell most waste as a soil amendment, animal bedding, or similar use if not burning it to create electricity. See the white paper by Katy Gurin, Colin Fiske and Greg Gaiera, 'Biomass Energy in Humboldt County, available at https://world.350.org/humboldt/campaigns/local-clean-energy/

Proposed Recommendation³

Since a scientific answer regarding the environmental impact of alternative uses of mill waste is not yet clear, 350 Humboldt urges RCEA to contract with an energy analysis firm for a life cycle assessment of the use of mill wastes and other raw biomass for electricity generation in Humboldt County. Ideally, RCEA would seek supplementary funding so that the analysis would cover all 34 powerplants in California that burn biomass for electricity.

Note that if RCEA decides biomass power can be replaced by 2025 with clean and renewable power from another energy source this study is not needed. An example of the kind of study that would be useful is in Appendix 1, although it focused on construction waste rather than mill waste.

To be clear, since we need a study to fill in the values for GHG emissions in the chart above, it is not possible to <u>scientifically</u> advocate for either supporting biomass electricity or opposing it at this point. However, there are a number of proposals that might increase our knowledge or move us toward clean and renewable electricity that stop short of advocacy either direction. For convenience some of these are listed below. These, and perhaps others, would all be compatible with the primary recommendation that RCEA have an LCA study completed.

Related Recommendations

• Wendy Ring has pointed out that the source or amount of local peak energy need not be assumed to be fixed. The overall equation might be modified by writing into the CAPE plan that RCEA will investigate reducing the need for local peak power in ways similar to other communities using strategies that include reducing peak demand (peak shaving) with battery storage at large customers, shifting the time of electricity use by large customers by means of financial incentives, remote control of smart devices like electric water heaters and EV chargers to turn reduce power demand and even feed power into the grid at peak times, and planned increase of peak power conservation through energy efficiency. In the same vein, a Humboldt-only *Ohm Connect* could help conserve energy at peak hours. (The 150,000 Ohm Connect participants reduced power this

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³ This is not a new recommendation. The 2017 position paper by Gurin, Fiske and Gaiera mentioned earlier states: "RCEA should support ongoing research into the full life-cycle carbon impacts of local biomass power production and fund its own research if necessary. If other feasible modes of mill waste management show substantial greenhouse gas emissions savings over raw biomass incineration, or if research reveals other significant GHG impacts of local biomass power production, RCEA should phase out biomass from the CCE grid mix."

⁴ A preliminary step could be contracting with Schatz Energy to do a literature review in order to clarify what is known and what needs additional data collection. This could be done by use of a non-competitive consultant contract: https://redwoodenergy.org/wp-content/uploads/2019/08/RFQ_19_601_Energy-Assessment Professional-Services.pdf

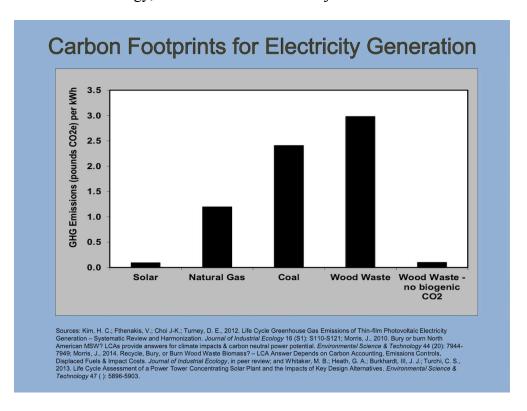
⁵ http://www.calbiomass.org/facilities-map/

- *summer* equivalent to shutting down four dirty power plants or planting 1.5 million trees.)
- EPIC has suggested removing any fixed megawatt target tied to local biomass. While the
 powerplant operators need some information to plan on, removing the fixed target
 would provide RCEA the flexibility it may need if an LCA study shows feasible lower GHG
 alternatives.

APPENDIX I

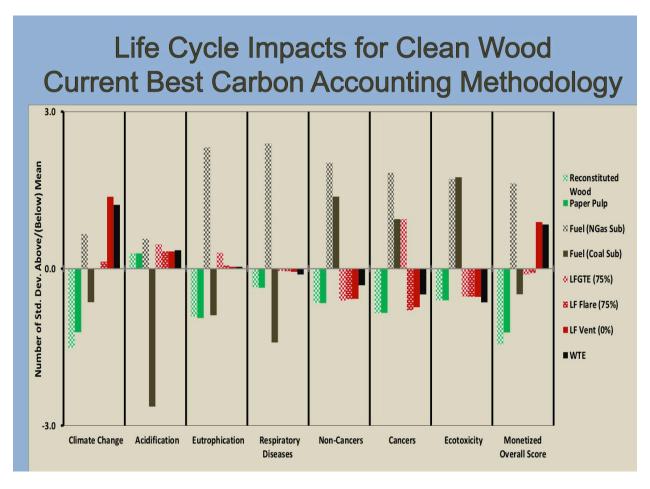
AN EXAMPLE LCA STUDY

Two graphs from Morris, J. 2017, Recycle, Bury, or Burn Wood Waste Biomass?: LCA Answer Depends on Carbon Accounting, Emissions Controls, Displaced Fuels, and Impact Costs. Journal of Industrial Ecology, 21: 844-856. doi:10.1111/jiec.12469



NOTE: Results in this study are shown to depend greatly on the carbon accounting method used. The "best" method shown below includes the assumption of biogenic CO². That is, emissions of CO² are attributed to the method of using waste wood rather than assuming CO² is neutral (just because it is not a fossil fuel). Morris gives several technical reasons for this assumption, but the most basic is that the environment is affected by the CO² emissions in the same way whether it is from fossil fuels or wood products.

The calculations in this article are for clean wood from construction or demolition sites, so the conclusions cannot be assumed to be true for mill waste (according to the author in conversation with Wendy Ring). The graphs are shown as an illustration of what a well-done LCA that is based on mill wastes would look like. In the table below WTE stands for Waste to Energy (e.g. burning trash for energy) is included for comparison purposes.] [In the graph below being over the mean (above the midline) is a negative outcome. Recycling, which includes the first two methods, demonstrated a positive finding for all outcomes and substituting biomass power for natural gas demonstrated a negative finding for all outcomes.]



Eight management options are assessed: recycling into reconstituted wood products or papermaking pulp; combustion for heat energy displacing natural gas or coal; landfilling with 75% methane capture for electricity generation or flaring, or with zero methane capture; and waste-to-energy (WTE) facility combustion for electricity generation.

Author's conclusion: "Recycling (the first two or green options) ranks better than burying (land fill) or burning in the base case under two of the seven environmental burdens analyzed in this LCA, as well as for monetized overall score. Substitution of wood for coal in industrial boilers ranks first for the climate, third overall, and ahead of high CH4 capture rate landfill options. Substitution of wood for natural gas in industrial boilers ranks at the bottom overall and for five of the seven environmental impacts. For monetized score, WTE and landfilling without CH4 capture rank sixth and seventh, respectively, out of eight."

**As shown in the first graph of Appendix 1, results in this study are very sensitive to whether the biogenic CO² produced is attributed to the method or discounted, assuming that biogenic CO² is not possible.

For a copy of the Morris paper please ask Dan Chandler

Thank you for the opportunity to express my opposition to biomass as an energy source. I urge the RCEA Board not to renew the current biomass contracts and not enter into any additional biomass contracts.

Biomass energy costs more than solar and wind energy as shown by the California Energy Commission diagrams and graphs comparing costs. Operation and maintenance of our biomass plants, which will be over 40 years old by 2030, costs more than operation and maintenance of solar and wind infrastructure. Solar and wind don't have fuel costs; biomass does. Biomass fuel cost can vary with unforeseen problems. Conflict in the Middle East can raise the price of diesel for biomass fuel transport. Economic recession can reduce the demand for lumber and the associated waste.

The timber industry already benefits from subsidies in the form of lower property tax rates and schedule T tax write offs for timber harvested. RCEA ratepayers should not have to provide an additional subsidy by paying the timber industry to get rid of the waste it generates. The Institute of Political Economics at Utah State University in the report *Reliability of Renewable Energy: Biomass*, states: "biomass subsidies increase the cost of electricity for tax payers [and rate payers] and redistribute wealth to biomass producers."

Regulation defines the level of damage allowed; it does not require no damage. Cleaner is not clean.

The judge who ruled on the consent decree EPA vs Blue Lake Power stated: "the reduction in carbon monoxide and nitrous oxides will provide pollution reduction benefits to the surrounding community." If/when the Blue Lake biomass plant starts up, the community will experience the "allowed amount of pollution". The Intergovernmental Panel on Climate Change discussion on atmospheric CO2 has no special category for biomass CO2. Carbon dioxide molecules have the same capacity to capture long wave radiation regardless of whether California labels them as biogenic or non-biogenic. The time required for carbon sequestration according to the IPPC is 50 to 500 years. A study that I submitted in Oct., 2016 from Oregon State University showed that, for a variety of timber thinning scenarios, more than 50 years were needed to sequester the equivalent amount of carbon that existed in the timber before harvest. A timber rotation time of less than 50 years contributes to atmospheric carbon totals.

10/24/2019 Walt Parish

MAY 2019 Estimated COST of NEW Utilities

power plants. In addition, the availability of incentives such as federal tax credits can also affect the cost of a particular technology and lower project financing costs.

Levelized Cost of Generation Estimates

Figure ES-1 shows the mid case levelized cost estimates for a selection of technologies studies in this report; biomass, combined cycle, geothermal flash, solar tower, wind, and solar PV (single axis). The mid case is as assessment of the cost that is most likely to occur. It is bounded by a high case and a low case, which use simultaneous highest cost and lowest cost factors.

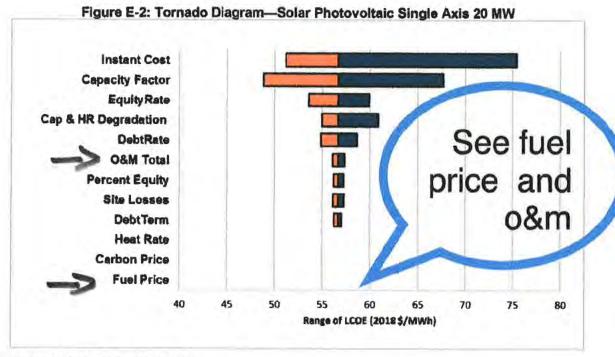
Source: California Energy Commission

Figure ES-1: Levelized Cost of Generation Estimates by Technology (Real 2016 \$/MWh)

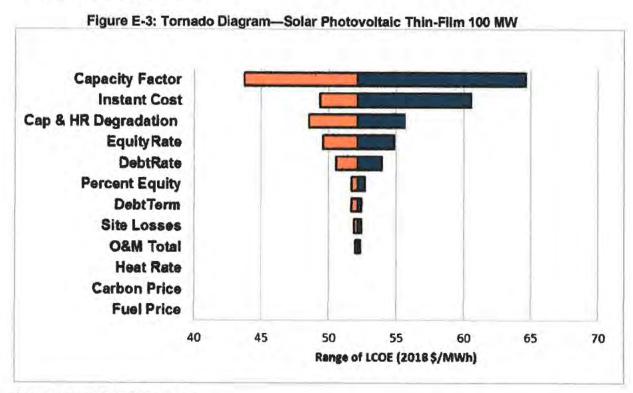
Levelized cost estimates are lowest for solar PV, with the lowest of those being the 100 MW single axis type using crystal silicon technology, at \$49 per MWh in 2018. Wind technology is most competitive before the expiration of the production tax credit, with an estimated levelized cost in 2018 of \$54 per MWh. A traditional combined-cycle plant is estimated to have a levelized cost of \$114 per MWh, while geothermal flash technology is \$132 per MWh, solar power tower is \$153 per MWh, and biomass is \$159 per MWh.

Levelized Cost Trends and Implications

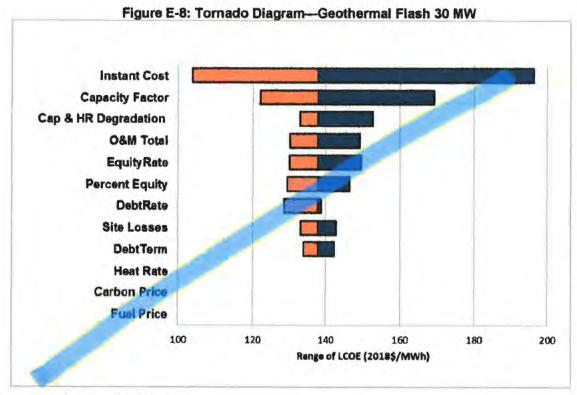
Solar PV has experienced dramatic price declines in recent years, exceeding previous estimates. While declining module costs have exhibited the largest cost decrease, inverters, other hardware, labor, overhead, and financing costs have all contributed to the cost decline. Tax credits were important in making solar PV more costs competitive and were a significant driver of development. The phaseout of this credit is expected to have only a temporary cost increase on solar PV projects as their levelized cost is anticipated to continue to decline. Solar PV is the least costly and most likely technology to be developed in California. The generation profile of solar resources poses challenges



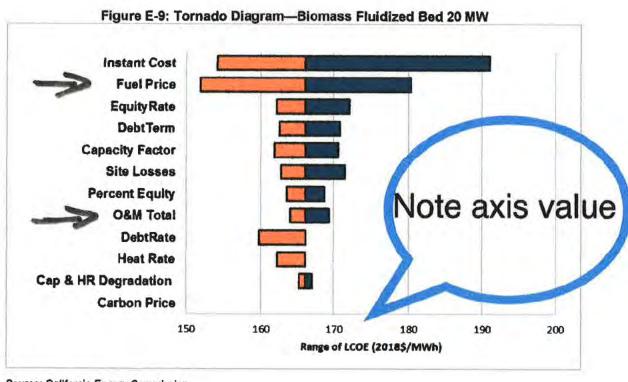
Source: California Energy Commission



Source: California Energy Commission



Source: California Energy Commission





Oct 24, 2019

Redwood Coast Energy Authority (RCEA) Board 633 3rd St Eureka CA 95501

RE: Agenda 5.2, Wiyot Tribal Opposition to Terra Gen Wind Project and RCEA Support

He'bla'lo (Greetings) RCEA Board,

Thank you for giving the Wiyot Tribe the opportunity to speak regarding the fate of one of its most high prayer sites, at Tsakiyuwit, or what we call today, Bear River Ridge and the Cape Mendocino ecological transect. We live in one of the most diverse landscapes in North America, in part because it was shaped and tended by Indigenous peoples, making Humboldt County and other parts of California a rich mosaic of vegetation types, which drives diversity and ecological stability. The proposed Terra Gen wind project, which RCEA appears to have blindly endorsed, is the aerial equivalent of damming up the Smith River, and will forever impact not just the spiritual connection of the Wiyot and other individuals, but the biology of this ecological transect. For example, survey efforts for the project found not just an array of artifacts, including Tuluwat barbed projectiles and plant processing tools, but verified the diversity of the area, identifying 81 different vegetation communities, with 38, or roughly 50% being rare or sensitive and even some newly described communities that may likely have ethnobotanical origin. The prairie system on Tsakiyuwit can be seen from outer space as one of the most intact coastal prairies in northwest California, rivaling Bald Hills in Redwood National Park. I would hope that RCEA wouldn't suggest putting a wind farm on Bald Hills, sacred land to the Yurok, so it's ok to put one on Tsakiyuwit, out of site and mind from Eureka and Arcata, in a more rural part of the County with less resources to resist? We could go on and on about the biological and cultural impacts, and inadequate mitigations, not to mention the tons GHG's that it would be emitted during construction and maintenance and the 10,000 heavy truck trips in geologically unstable soils? And, as Wiyot elder Leona Wilkinson has said to the Terra Gen reps, "This is not your wind to take! This is the birds, the bats, the Earths, the the redwood tree's wind!" A recent study by Harvard revealed the truth that wind turbines really do affect the local mircro-climate and humidity, which may be devastating here, where complex interactions along our edge of the fog belt are critical to summer fog, our local biodiversity, and persistence of the redwoods.

Of equal impact to the wind turbines themselves, is the near 30 mile-long new transmission line corridor, continuing a swath of destruction, over 900 acres of forest to be cleared, along the ecological transect from coastal prairie through redwood, grand fir, Doug fir, and tanoak

forests, and finally to the oak woodlands and glades of Bridgeville. What will RCEA rate payers say when this new transmission line, in very remote timberlands, causes a wildfire that rips either into Pamplin Grove, Grizzly Creek, or Humboldt Redwoods State Park? How much carbon will be at increased risk of release through wildfire? Who will make the decision to deenergize these new lines when catastrophic wildlife conditions exist? RCEA, Terra Gen, Humboldt County? How can we make educated decisions on such maters when we haven't even seen the Final EIR? As a public trust agency, it is premature to give input or support for such a impactful project prior to release of the FEIR and the Tribe urges RCEA to reconsider its PPA with Terra Gen and abandon this project which would only contributes to vulnerable centralized grid-based power and more energy consumption. RCEA should be working toward investing in community solar micro-grids, like its project at the Arcata Airport, rather than giving money to a few wealthy corporate elites from out of the area.

Finally, given both the Wiyot Tribe's endorsement and RCEA's commitment to developing offshore wind by 2025-2030 with a similar MW project, it is nothing less than criminal and ludicrous to develop *Tsakiyuwit*, a premier cultural and biodiversity hot spot, and ignore the requests and wisdom of the Wiyot Tribe, who have been here since time immemorial. Impacts from off-shore wind are a fraction of the long lasting impacts we would see from developing *Tsakiyuwit* and the surrounding area. We ask the board to please reconsider and revoke its support and backing of the Terra Gen wind project and respect the Tribe's concerns and suggestions of working toward more truly resilient energy independence for Humboldt County. Thank you for your time and consideration.

Rra'dutwas (with kindness)

Adam N. Canter,

Tribal Botanist, GIS, and THPO Cultural Assistant

Table Bluff Reservation

1000 Wiyot Dr.

Loleta, CA 95551

adam@wiyot.us

707-733-5055



TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Dea Gikaver		93549		EACTH
Chris Moos		95519		Ryad Ryad
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Mana Williams		95562		RICOGUE TARM
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Petition

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Chris Hall		95521					
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Susan Roching		195521					
JODITH STONER		95521					
Emilie Canning		95503					
Jaylor Yarbroug		95521			V		
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Sovanna Alves		95521			10		
Lucas Campbell		95521					
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Lorenzo Fassi			
VALOND ANGE			N.
GEOFFREY ROBINSON		95525	
SARAH PETERS JAMES PECK		95561	
JAMES PECK	d	95507	
oliviaBrock		95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Galorelle Smith		94403		
Andrew Khechp		95524		
Will Diath		95521		
Kyrstie Obiso		95521		
Kennedy Fox		95524		
Justin Salazar		92082		
Jake Knolle		95521		
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ISAAC WEGS		95521		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Innie Brown	95570		
ADRIENNE OUT	95501		
Carlotta Clark	-95525		
Mi chelle Fuller	95521		
AMYLENNOX	95501		
Sharon Hafne	95503	-	
Denny Dorsell	9552/	_	
Patricia Bender	95521	_	
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print wane	Sign	Zip	Email		Phone
			341	in a	
Jenny Finc	h	95503	4		
Claire Perric		93301			
StraRShar		95521	1		
Grik Ringer					
Nathanier mcs.		95521	1		
Moras Va Fish		95501	-		
Jeremy Hara		95519			
Hayley Country		95524			
Charles Shan	(pe	1-221			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
NARMI MCCUMR	95521	
Jonathan Mansfield	95521	
Asox Givens	92652	i de la companya de
Jule Coultyn	22891	
Courtine Lactraine	95521	
Kevin vanderady	95521	
Eric Southard	95521	
Oliova ni Taylor	95567	
Judi Rose	95524	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print wane	Sign	Zip	Email	Phone
		95501		
Tayler Mar	TIM	ACC 11		
Sean Rowe		95501	/	
HOR KOLLEN		25028		
Kancy Thara		955.21	2	
JOHN MCGIBBOI	U	95501	5	
Brandi Solomo		95501	6	
Brandonformen		95503		
Koxannetartna	an	95501		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT S	IGN	ZIP	EMAIL	PHONE
Forest Juraso		95525		
An qui contos.		95821		
Alex Galeone		95303		
Grace Jerra		95519		7.00
sonia w.		95519		
Slan Specke		95521		
Graciano Ortega		95501		
mhetto,		95521		
Daniel Erb		95521		
Melanie Bryd		95570		
Krudal Masker		95521		
5.00.00	,			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP EMAIL PHONE	NAME OF
Emily Potter	95521	
ridian Cascue 84	95503	
ALEXANDRACU FON	95521	
Amanda Beeman	95501	
Alexandra Gonzalez	95521	
Patricia Bloget	9552	
Samplas	95800	
Eresa McGinnis	95503	
Sabrina Ott	95521	
Mark Konkler	95501	
Tray Morgan	95519	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP ON THE STATE OF	EMAIL PHONE
Kris Diamond	95521	
Paul Cylorich ; C.	95576	
Kyler Conrige	9552	
Masha Gulale	95521	
Nora hendoza	93521	
Prejandra V.	75521	
Alyssa P.	95518	
O Emily Will	95521	
Paulo Matin	95521	
Carlo Bascer	95521	
Sam Remplan-Hair	95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL PHONE	
KylieBrown		95521		
Isabella Norton		95521		
Trent Johns		95521		
Skyler Mingo		95521		
Taylor Res		95321		
LILY worthing	/	95521		
Fiona Flores		95521	$m{m{m{F}}}$	
Carlos Varquez		95521		
Vausaria Penanza		95521		
Rosmary Torres		95521		
John Chernott		95721		



TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SI	CR ZIP	EMAIL PHONE
Melanie Johnson	93342	
MARA Freedman	-95570	
Catherine Reacook	95501	
Starton Wood	95503	
Breany Burgess	95519	
Annika young	95521	
RICHAR BENG	85521	
Sophia Escudero	- 95521	
Harmony Tryon	95519	
LOSE Alber	95524/974077	
Portia Herger	95571	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT S	SIGN	ZIP	EMAIL -	PHONE
WW Ian MITCHELL		masr2		
Yannet Plaseria		95521		
Kaila Gilbert		95521		
Alaxahan Sanchez		95521		
Scarlett Tripping		95521		
Timstry Wolfs		95521		
David Alvare		9352)		
Stephanie Ferking		05521		
Judith Escobar =		9552		
Abby Daviel		95521		
Eve Ashbrook		95521		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
Shirley was	the 95519	
Fhyre Phoenix	95519	
NATHAN DAVIS-FLOYD	95521	
JOSE CASTLLO	1525	コ
JasperGir	95521	
Levin Lennox	95501	
Lonce Notes	95503	C
Genthia Noel	95563	
Jane RIGGA	95521	ra de la companya de
Sei Corsic	95501	
Gwen Snernock	95503	
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL PHONE
Tahyah Pleasant		72553	
Monica Avtegga		92553	
Angelica Arnuzo		15521	
Kit Albaliale		95503	
Erica Davis		95521	
Taylor Harrington		95519	
John David		95501	
Babparen		95521	
Stuphen		95521	
Samantha Nichles		95521	
Rebecca Wood		95871	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

		1	067	ional
Name	Signature	Zip Code /	E-mil Address	Phone
Calle Pettier-o	Ison	Fortuna		
ROSEMANUS STU	ルキ	FEERING		
Kelsen Reed	y	95502		
Zoë Reiss		95524		
Jade Trylor	1	95521		
Melissa Horne	2	95519		
Alex Riggs		95501		
Daniel Noel		95521		
Lily Price		95521		
Ives Morale	05	95521		
Jenna Franguelin		95503		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	IGN ZIP	EMAIL PHONE
mes Morgies	95821	
Cal Lierheimer	-95521	
Moreey O'Brown	95503	
Stophen Kepics	95501	
Sandra Hanner	95501	
Tim RICE	95501	
Alice Pitt (95540	
KON HARPER	95503	
Celene Molina	9550	
20 Ny town swo	9501	
Cysel dnerl	95551	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL	PHONE	
SHARON HUNTER	95570			
Mina Jakanga	95519			
Daryl Bolling	95523			
Laurene Hirsola	95519			
liftenglere	95521			
Turner Love!	99521			
Jan Olson	95524			
Taylor Day	95521			
kayla baw	95525			
Elizabet (+ krrs	95501			
MIKE WACKNEA	95519			
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
THE RICHARDS	95519	
LIZKimura	95501	
Hannah Sosano	95521	
John Peterson	95521	
Carolynhalka	95519	
Jeremy c. Shellhasi	75521	
Kelsey Rancorotta	95521	
Katie Reid	95521	
Keowand	25521	
Stella Jons.	95521	
Kerima Furniss a	95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL	PHONE
SHERRY HULL	95501		
FED KAESHAN	ii.	/	
Janice Coates	95521		
Jan ¿Andrews	-75525		
KTYZ+a 6 junti	955-21		
Indi Ginn-thin	95525		
Dans Boss	9250		
Ingela Johnston	95503	4-	
Elizabeth Barro	95503		
Melissa Mamas	95501		
ag M	95501		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL PHONE
Lee Lesanie		95570	
Jada LeJanie		95570	
Lindy Elliott		95562	
TREOT H:11		95521	
penge rinchart		95521	
Ton Peters		95562	
Viotoria		95544	
Abigail Hoshing-		95524	
Isabel Diplanter		95521	
Jack Miklik		95571	
ALEX TEX AR		95521	





TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
michael Tega	95251	
Mario Fernandez	95501	
Christopher Large	95501	
Patricia Malada	95501	
Dan Butto	y 95521	
Fernando Paz	95521	
RETEN LONEY	91521	
Eliza Rutlider	03	
Emanuel Everheurt	95501	
-Xandra Manns	95501	
CAROLSAUCIER	95561	
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL	PHONE
MARTHA DEVINE	95521		
Theresam. Dev. ne	95519		
Lathie Sugar	85521		
Braden Boss	學 95521		
melance Herrera 1	95521		
Mobeo Flores	95571		
Rup Guyter 1	95521		
Phillip & Ayes -	95521		
Ryan Studdert.	95521		
Michelle (Stoppish 1	95521		
LORNA BRYANTC	95521		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name	Signature	Zip	E-mail	Phone
Swafawwlak		95521		
Shan Lingeauth		95521		
Evan Grande		95525		
CLAPISSA OPTEGA		95521		
KARIHE BRATTON		95371		
Chandra Muna		95321		
Carer Weeks		95519		
Konnawiels		95519		
July Wy		1552		
Steph loker		95521		
Zachalia		95501		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP EMAIL PHONE
DIQUE RYERSON	953.4
Joanne McGarry	95518
Cena Marino	95501
Jennischking	95519 =
Ginn Collins	94903
Ed Smelsff	95570
Martha Hunkins	95521
Shana Katz	95503 V
Jerab Pino	95503
Hora Cox	9.5503
tax Kanzkee	95003 8

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GOTTING & XX. OF CHOSE

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
Aleida Solis	95521	
Mike Golightly	95521	
Judy Gallayly	95519	
Kashy Sobilo	95501	
Many Ground	9556	
Carl Saucier	955017656	
Eva Ruttedge	95503	
Einda Richie	95303	
Avery Arbaigh	95521	
Alex Farral	95503	
TAMMy Mahin	95501	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name -	Signature	- 7	ip -	E-MAIL	~	Phone	1.74
Aucheres Edución		9	15503			with the second	,
Martica Waxatis		9	5521				
Elee Ballings		95	1521	d		II.	
Oliver Seaver			503			Management of the	
Formam Gue		9	5521			7.60	
Sorshlabs		192	5521				
danielle Season		92	554				
Juan Mikolos		D 1	15540				
Savana Thamer		921	131			-	
Clarissa Candaa		953	521				
Omega Gaskill		955	524				
J		J.	Si .				

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name - Signature	- Zip - E-mail	- phone
The same of the sa		
Arice Centini	90019	
Bellin Bly	95570	
Augus Merita	95541	
Nicholas Bag	9557	
Jett Hagery	a5521	
Joely Camacho	95521	
Christy Marks	95521	
Plaire Brown	A5521	
Reet Serve	95501	
Aldry barres	ass2)	
Manuel Sanche	95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name -	Signature	- Zip -	E-mail	- Phone
	trade and the			
Mackenzue Rodgins		95507		
Amwens		95501		
tutumn Wight		95521	(140
Shalom Flercher		95515		
Joseph Aguilar.		75521		10 10
5058 B		95521		
VictorCardina		95521		
Kim Willard-Mace		9 5521		
· Akx Girms		94421		
Late Cultur		Witte		
Mariner Stem		95521		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name -	Signature.	2:1	_	E-mail		Phone
					· 为 ()	
Luis Gonzalez		95521				
RILEYGONA	N	9552				
20e Powell		95521				
Hannah Comme	P. T. C.	95519				
Gabby Garza		95521				
Kaylin Jubail		05521				
Jaura Jundgraf		95003				
Lilli Levan						
Chris Ceni		95521				
Ruchel Ostrander		95521				
Banjama Ferre		91702				
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Marka Ronk		95521			
Eiteen Jennis Sau	p,	95501			
Jordan Lange		95501			
LINDA O'HA	₹A	95503			
DON Swall		95501			
Tara Spence	er	83704			
Stephan Vandia		95521			
CAIL SLAUGHTER		95521			
Lyn Scott		95503			
Hollie Klin	2	195501			
Carly Russell		95501			
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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94.4		A April 1	
Groline Ismacs	9595/		
Jaqueline Mayray	95501		
Derry Martien	9550	3.	
8 Grange	95540		
Emryn Grove & Dana Laurens	95503		
Karen Rice	95549		
Cat MS Adams	98503		
RUSSELL, SCOTT	95501		
Landy Mayer			
OLLIE WINTER	95501		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name -	Signature	- Zil	~	E-mail	- Phone
SAR AH CAMPBEL		95573			
Madeline Marrott		93004			
VANESSA ARGONZ		95524			
Roser Corner		95526			
Larry Glass		95503			
Gary Falxa		95503			
Joan T. ppets		95501			
Chris Berestord		95534			
Richard Preis		95561			
Dan Saly		95507			
Alicia Hamann		95524			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Mary Charles Colored	if the state of th			为一种的	
Hannah McCarthy		95519			
Aviel Perez		91731			
Ray Triana		95521			7
Raven Gialen		95576			06
Della Paytos		95590			
Celeste Joyner		95521			
Brand Lagre		35519			
Hobella Pena-Martin		95521			
AraGuillen		95521			
Wendy Carranta		95521			
Sophia Maga		95521			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

We the undersigned residents of Humboldt County believe biomass from burning mill waste is not clean. It pollutes our air and emits far more greenhouse gases than replanted trees can absorb in the crucial next decade. Continuing to rely on biomass violates Redwood Coast Energy Authority's commitment to provide 100% clean renewable energy by 2025. We call on RCEA to create a Comprehensive Energy Plan that will focus our resources on developing clean energy.

Print wane	Sign	Zip	Email	Phone
			1.45	
21 + Z	Ø Ø	9556	-	
Robert Bier		95560		
LYNDA MCDEU		95570		
Stephanie Bernet		95503		
Hannah Waje		95573		
5, Jay Taumant	<i>ا</i> ند	- 95503		
Voghua Adels		95503		
Ryller Avila		95503		
Michelle Glod		95503		
July Heather	via	95501		

Jessell a

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name -	Signature	-	2:1	-	E-mail	-	Phone
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Dorivelen			9550)				10
Aida Kessel			9552	1			
BRIAN FAGURDES			955Z	1			
Ensin Brown			a5501			ĵ	
(Noopron Anson			9554				
Bonnie Anthony			95521				
Andrea & gelotter 5			95521				11
Vanessa Vando			95570				
Cayon			95564				
Oliver Jones			95521				
Kaylin Jebaili			95521				
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL PHONE
Audrey Dermy		95503	
Midraiel Barkowitz		95903	
Ampbeckoutz		95563	
Claire Josephie		95503	
Laura Cooskey		95558	
Rachel Grossman		95521	
Ellise Mather		95521	
Jesse Noell		95502	
Kyle Barny		95521	
Naney Ilyan		9552	
Leu Mille		95519	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL PHONE
Kathleen A. Marshall	95521	
Miana Gilkerson (95549	
Maureen Hart /	95521	
an King Smith	95521	
Ann Workance	95521	
ALEXANDRA STIC	95321	
cascandra castruita c	95521	
Tania Mejia	95521	
Katherine Polik	95521	
Shasta Werthman	95521	
Elsa Baise	95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name	Signature	2:0	E-mail	Phone
	化成一生物质量			
Megan Gardner Ryon Walnut		95521		
Ryon walnut		95570		
Michael Mossinter		195521		
polarel Sey n		95527		
Many Createll		95518		
MaeveFlynn		95521		
Donna Simat		95521		
West Model Peri		95521		
Anne Holcomb		95525		3
JON FORSYTH		95521		
Krsty Demmun		95379		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	IAIL PHONE
Megan Briston	95524	
Hannah LeWiter	955ZH	
Molly Houston	295521	
Julianne Blandford	95521	
Maran Mdamas	95507 +	
Apigail McComas	95501	
Lucić Valentine	95521	
Jane Micallinery	95521	
LucasCampbell	95521	
GRANT JOHNSON	93442	
Keary Kenedy	7552	
		THE POPUL

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP EMAIL	PHONE
Anikasun	95521	
RadMELIN	95570	
Joshua Frye	95519	
Sin Lennon	95521	
Stephan Brinkley	95521	
Patricia End	75501	
LauraMiller	95521	
Jackne Sendel	95521	
Ana O-Care	95531	
Klara Hemander	95501	
REGINE FAMILA	SES.	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIPL	EMAIL PHONE
Shavon Hyssman	95519	
FRANK TEPPER	95519	F
PAT Mª Cut chea	95521	m
SHAWNON ROCKETS	95521	
Kavaev Blaxxom	95521	
Melissa Salter	9552)	
Sean Belmont	95571	
Sylvia De Kon	93503	
Lara Ashbaya	95521	A contract of the contract of
RUBIN M. DONAL	95546	
Laurie Thater	95521	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL PHONE
Daniel London		95501	
Byrd Lochto		95503	
Peg Gardnar		95503	
ANNE PIERSON		95503	
Angelica Taggar		1 95503	
Marion Cate		95540	
C.nd Knox		95501	
Kathryn Dunning		95501	
Rudulph C Kosits		95503	
Sandra Litter		95303	
Cleo Carvino		95501	

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL	PHONE	
WENDY PING		95524			
Steve DJRA		95521			
Thea Rowan		955 21			
Michaelcianciola		95521			
nina Klehr		95521			
Should a Gompa		95521			
Antrew Schwartz		95521			
LOHANNA RMERA		95521			
Charity Freitac		95521			
Alyssa Hugh		95521			
preana Covre		95521			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print Name - Signature	e - Zip -	E-mail	- Phone	
			74	
Audrey Garcia	95521			
Forrest Estes	95521			
Christopher Good	9552			
Luke Aronie	95521			27
JanessaShaffer	95521			
Jewel Duplante	95521			
Lia Espinoza	95521			9
Mia Sunderlan	95824			
April Steed	95521			
Jos T Albott	95521			
Maere Flynn	19521			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT SIGN	ZIP	EMAIL	PHONE
Ramona Bar B	95525		
Athina laza	9/2/19		
Janice Bear	9/2/19		
Adrian Dobson	95501		
Sar M Hobson	955\$1		
JOHN SCHAEFER	95521		
Sylvia Shaw	95521		
AnnKilby	95549		
	95570		
Anhir Mossman	95570		
Marianne Pennekan	95503		
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME: PRINT	SIGN , /	ZIP	EMAIL 2	PHONE
DEBRAR HARRIS		955 18		4
100	\$			39
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP (TIE)	EMAIL	PHONE
Makenna Kelly Mux 1cm		95521		
Mux lan		95521		

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

Print wane	Sign	Zip	Email	Phone
May 17		at-11=		
Andy Coffing	_(9554Z		
alt km		My Jol		
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		-		7

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZIP	EMAIL	PHONE
Gerry Tollefa	γl .	95501		
Annette Hall	X	95519		
	11	95570		
Carolyn Be CAROL Ryde	n.	95621		
Moira Casey		95521		
JANER 18 GO	40	95521		
	1			

TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

NAME PRINT	SIGN	ZiP	EMAIL	PHONE
Mary A Made	e!	95571		
SHIRLEY BROWN	J.	95519		
CLARE GREEN	JE I	. 95519	. (
Raedelle Milly		9557	o l	
	150	x 9550		
J. Bacon-Ogdo		95501		
bebore hole	DI 10	9551	7	
Carolyn PRESCO	011	95519		
Kathryn Johnso		95519		
Jon Reisdor	f	95521		
Jean Munse		95519	12.5	
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TELL REDWOOD COAST ENERGY AUTHORITY THAT BIOMASS IS NOT CLEAN ENERGY

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Ash Ramirez		95521		
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Luis Martinez		95501		

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Supreet Bhuillar	95503			
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Katherin Buzanski		95503	
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Billian Acymon		95521	
Elizabeth Thorne		95521	
Anna Samson		95521	
Hayley Hudson		95521	

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Kitty Kwan		95521	
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Carolina		9552	
Hannah		95521	
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Jose Moreno	95521	
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Christian Trajitro	95221	
Deema Hindawi	95521	
Alexandro Ochoa	95521	
Anayeli Auza	95521	
Lesly Vasquer	95521	
Karina Coronada	15521	
Casee Albarran	95521	
Bernard Brun	93521	
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ROBBIE SAMCHER	9554	
Daniel Krake	95521	
Nich Schuler	95521	
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Madeline Hobart	95521	
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Esteban L.	95527
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Daniel L. Sanchez

Cooperative Extension Specialist Department of Environmental Science, Policy, and Management 160 Mulford Hall Berkeley, CA 94720 215 593-4493 phone sanchezd@berkeley.edu https://ourenvironment.berkeley.ed u/people/daniel-sanchez



To: Board of Redwood Coast Energy Authority (RCEA)

Date: October 14th, 2019

From:

Daniel L. Sanchez, PhD., Cooperative Extension Specialist; Department of Environmental Science, Policy, and Management, University of California Berkeley

Yana Valachovic, University of California Cooperative Extension County Director and Forest Advisor; Humboldt and Del Norte Counties

Dear RCEA Board,

Sincerely,

As Specialists and Advisors with University of California Cooperative Extension, we wish to highlight the importance of continued use of local biomass as an energy source for Redwood Coast Energy Authority's (RCEA) renewable portfolio. Biomass power produces benefits for our local community, economy, *and* the environment.

Our support for bioenergy production in Humboldt County arises from its numerous benefits: <u>clean energy, improved forest health, ambitious climate change mitigation, and rural job creation</u>. We recognize that no energy source is perfect, but on the balance, locally produced and utilized biomass provides numerous public trust, environmental, and economic benefits. More information about the benefits of woody biomass and bioenergy is included in an appendix to this letter.

In the future, we expect innovation to create new wood utilization opportunities with the potential for enhanced economic and environmental benefits. However, focusing on new technologies ignores the role that current biomass power plants play in creating benefits at scale. Existing biomass power plants provide a backbone to accommodate the diversity of feedstocks that are available as California develops and deploys emerging technologies.

We urge RCEA to sustain their commitments to bioenergy produced electricity and to Humboldt County for both the near-term and long-term benefits.

Daniel Sarchery	Your Valahar
Daniel L Sanchez, Ph.D.	Yana Valachovic, RPF #2740

The following was submitted to the RCEA Board by Yana Valachovic, UC Cooperative Extension County Director and Forest Advisor, Humboldt and Del Norte Counties, on October 14, 2019.

FAQs about Forest Biomass Energy in Humboldt

What are the benefits of energy made from forest biomass?

Forest-based biomass for this set of FAQs is defined as organic matter (materials from fuels reduction projects or the chips and bark from sawmill operations) that can be utilized to produce heat and power in emissions-controlled power plants that can provide <u>clean energy</u>, <u>improved forest health</u>, <u>ambitious climate change</u> <u>mitigation</u>, <u>and rural job creation</u>. No energy source is perfect, but on the balance, locally produced and utilized biomass energy provides numerous public trust, environmental, and economic benefits such as:

- ✓ Delivers distributed, flexible baseload generation. Biomass energy production provides a continuous 24-hour and reliable power source, unlike solar or wind that have a variation in daily and seasonal power production. Additionally, biomass power plants can be ramped up and down to meet the needs of the grid.
- ✓ An essential tool in the promotion of healthy forests and defensible communities through fuel reduction strategies for diseased and over-crowded forests that contribute to large and high intensity wildfires.
- ✓ Reduces emissions from wildfires or burn piles. Biomass power plants include effective air quality emissions technologies. Biomass emissions are substantially lower than wood stoves, wildfires, or burn piles¹.
- ✓ Reduces greenhouse gas emissions. Bioenergy production using materials from sustainably managed forests reduces long-term climate impacts by replacing fossil fuel energy sources.
- ✓ Utilizes a local product. The ability for forest landowners to sell logs to local sawmills provides an economic incentive to steward and sustainably manage local forests. Furthermore, farmers use the ash produced as an organic soil amendment.
- ✓ It's renewable. Unlike coal, oil and natural gas, which are fossil fuels that bring "new" carbon into the earth's atmosphere, biomass is an abundant and renewable source of fuel. The burning of biomass and the growth of trees creates a closed-loop system and does not contribute additional long-term atmospheric carbon. In Humboldt County biomass operations turn wood waste into electricity without compromising the essential cultural and habitat values that forests provide.

Is biomass clean energy?

There is no universally accepted definition of clean energy. Definitions can incorporate life cycle analysis, social justice, and other externalities. Nevertheless, the vast majority of scientists and governments classify biomass as both a clean energy and renewable (i.e. non-fossil fuel) source. The State of California defines biomass as a renewable energy resource along with solar, wind, geothermal, small hydro, renewable methane, ocean wave, ocean thermal, or fuel cells².

When bioenergy is made from locally grown small diameter trees and shrubs or the byproducts of sawmill operations it is a clean energy source. Not only do trees convert solar energy into fixed carbon, they store energy organically with far lower environmental impact than fossil fuels or batteries. This naturally fixed carbon and energy may then be managed as habitat in the forest, harvested for use as a building material, or

¹ Springsteen B, Christofk T, York R, Mason T, Baker S, Lincoln E, Hartsough B, Yoshioka T. 2015. Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions. Calif Agr 69(3):142-149. https://doi.org/10.3733/ca.v069n03p142.

² https://focus.senate.ca.gov/sb100/faqs

utilized as energy in a biomass power plant. Burning biomass for bioenergy production is importantly distinguished from burning fossil fuels in that biomass is part of the actively cycled carbon in the atmosphere and was sequestered within the past 40-100 years, while fossil fuels reintroduce carbon into the atmosphere that were sequestered 60-200 million years ago and now are being reintroduced into the atmospheric carbon cycle.

<u>All</u> clean energy sources have an important role to play in fighting climate change and producing renewable energy. In this regard, biomass energy provides many advantages beyond its renewable electrons, especially when fuel is sourced from the local area. From producing long-lived building materials that sequester carbon, to generating renewable heating, cooling, and power in local communities, strategic biomass utilization can support the interrelated goals of forest health, forest carbon sequestration, water and air quality, creating and maintaining local jobs, as well as keeping forests healthy for everyone's enjoyment and recreation.

How does biomass support forest health?

The fire seasons of 2017 and 2018 in California³ have been a reality check for many, forcing a collective understanding that forest management plays a key role in wildfire risk reduction. In California alone, at least 129 million trees have died since 2010, due to a combination of fire suppression leading to overstocked and dense forests⁴, drought, and pests. Managing the large number of dead trees is a difficult challenge, particularly within the context of protecting rural California residents. In January 2019 the Governor charged CAL FIRE and the Natural Resources Agency with the task of reducing fuels to protect our most vulnerable communities. CAL FIRE estimates that 15 million acres need forest restoration⁵ and recognizes that "while it is not possible to eliminate wildfire risks in California; focused and deliberate action can protect communities and improve forest and fuels conditions to enable a more moderate and healthier wildfire cycle that can coexist with Californians". These challenges are not limited to the Sierra Nevada and are common throughout California including the North Coast.

The North Coast is blessed and burdened with highly productive forest and plant growth. However, all living vegetation is part of the natural carbon cycle and its fate is eventual carbon release either through decomposition or wildfire. The question is when and how? Management of this growth in the form of forest fuels reduction and the reduction of stand densities are important steps to creating more fire resilient forests and reducing uncontrolled emissions of greenhouse gasses and Short-Lived Climate Pollutants, including black carbon, during wildfires. Over the coming decade California will see an enhanced level of fuel reduction through mechanical and prescribed fire techniques and a broader level of incentives to manage fuel backlogs and improve forest health. Bioenergy utilization with emission-control technologies is an important part of the solution and provides an alternative to open-pile burning⁶ of forest fuels and prescribed fire.

³ Governor's Executive Order N-05-19 https://www.gov.ca.gov/wp-content/uploads/2019/01/1.8.19-EO-N-05-19.pdf and the state emergency declaration https://www.fire.ca.gov/general/downloads/45-DayReportPlans/3.22.19-Wildfire-State-of-Emergency.pdf

⁴ Parsons and DeBenittie (1979) Impact of fire suppression on a mixed-conifer forest. Forest Ecology and Management 21: 21–33.

⁵ CAL FIRE 45 Day Report. http://www.fire.ca.gov/downloads/45-Day%20Report-FINAL.pdf

⁶ Springsteen B, Christofk T, York R, Mason T, Baker S, Lincoln E, Hartsough B, Yoshioka T. 2015. Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions. Calif Agr 69(3):142-149. https://doi.org/10.3733/ca.v069n03p142. http://calag.ucanr.edu/Archive/?article=ca.v069n03p142

How does forest biomass utilization support climate change mitigation?

Biomass utilization produces important climate change mitigation benefits, both by sequestering carbon and displacing carbon-intensive products. Executive Order B-55-18 'To Achieve Carbon Neutrality', issued by Governor Brown on September 10, 2018, places California on a path to net-neutral economywide emissions by 2045⁷. Carbon sequestration from forest biomass will be essential to achieving this goal, as carbon stored in living trees or wood-based lumber products can help with long-term sequestration and to offset emissions from hard-to-decarbonize sectors such as aviation, long-distance trucking, and agriculture. Further, biomass power plants support removal of hazardous forest fuels that are otherwise placing these carbon stores at risk.

Furthermore, forest biomass has an important role to play in carbon sequestration. In the near-term, maintenance of bioenergy markets will help to make reducing forest fuels economically feasible thereby helping California's forests become more resilient to wildfire or other disturbances. In the future, RCEA and other energy consumers may be able to procure net carbon-negative electricity from biomass, which permanently removes CO₂ from the atmosphere. For instance, numerous scientists and policymakers recognize that biomass utilization combined with carbon sequestration (commonly referred to as BECCS—Bio-Energy with Carbon Capture and Storage) will be necessary if we are to keep global warming significantly below 2 degrees Celsius. Supporting biomass energy through power purchase agreements and other procurement mechanisms can help drive the deployment of BECCS technologies in California as they become commercially viable.

Finally, many recognize that a "portfolio" approach to fighting climate change produces large economic benefits in comparison to those that rely solely on a limited number of energy sources^{8,9}. Biomass, alongside other complimentary renewable energy sources, can play an important role in achieving cost-effective climate change mitigation.

How does the State of California view biomass and forest carbon?

California's Forest Carbon Plan, released in 2018, embraces biomass utilization as a key driver of sustainable forest management¹⁰. Key findings include:

- Reducing carbon losses from forests, particularly the extensive carbon losses that occur during and after
 extreme wildfires in forests and through uncharacteristic tree mortality, is essential to meeting the state's
 long-term climate goals. Fuel reduction in forests can increase the stability of the remaining and future
 stored carbon.
- The limited infrastructure capacity for forest management, wood processing, and biomass utilization, and the limited appropriately trained or licensed supporting workforce, are major impediments to forest restoration and ongoing forest management.

Near-term actions proposed by the State include:

⁷ https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

⁸ D.L. Sanchez, J.H. Nelson, J. Johnston, A. Mileva, D. Kammen. "Biomass enables the transition to a carbon-negative power system across western North America." *Nature Climate Change*, 5, 230–234 (2015).

⁹ S.J. Davis *et al.* (with over 30 authors) "Net-zero emissions energy systems" *Science* (2018). http://science.sciencemag.org/node/711939.full

¹⁰ Forest Climate Action Team. 2018. California Forest Carbon Plan: Managing Our Forest Landscapes in a Changing Climate. Sacramento, CA.

- Expand wood products manufacturing in California and take actions to support market growth scaled to the longer-term projections of forest productivity and resource management needs.
- Continue public investment to build out the 50 megawatt (MW) of small scale (5MW or less sized facilities), wood-fired bioenergy facilities mandated through SB 1122 (Rubio, 2012).
- Maintain existing bioenergy capacity at a level necessary to utilize materials removed as part of forest restoration and to support long-lived storage of carbon in building materials.

What role does biomass have in rural job creation?

Biomass utilization creates economic opportunities locally¹¹. Forest management and restoration activities cannot be outsourced and produce many living wage jobs in our local communities. These jobs include forest management, forest operations, trucking, processing, and other value-added operations. The many steps involved in bioenergy production require that workers be employed to operate each link of the supply chain. By having an integrated infrastructure rural development persists providing both near- and long-term economic benefits.

Does biomass utilization emit greenhouse gasses?

Yes, combustion of woody materials emits CO₂, however, these gases are already in the atmospheric carbon pool as opposed to releasing stored carbon from the fossil fuel pool (e.g. utilizing coal or natural gas for energy production). In short, utilization of organic sources of carbon for building materials or sources of energy is a part of a closed loop carbon cycle. When trees emit carbon from decomposition or through combustion in a wildfire, carbon is made available as CO₂ and can be sequestered from the atmosphere through photosynthesis into new organic forms.

Is biomass power the best means of handling the waste stream generated by our local forest products industry?

Yes, at present, power produced from the utilization of feedstocks from sawmill operations is the best means to utilize this material because:

- The utilization of chips, bark, sawdust, and other smaller pieces of wood to produce heat and power in emission-controlled power plants allows for utilization of a **diversely-sized feedstock** with a range of moisture contents. Other utilization options are not as flexible in their size or moisture variation.
- This material is abundant in our **local** region and does not require the importation of other feedstocks.
- Biomass energy complements other higher value markets, including using chips to produce pulp and paper, using bark and chips for landscape mulch, using sawdust for compost manufacturing, and using shavings for animal bedding. Bioenergy is part of a broad solution for the sustainable and renewable use of locally available woody materials. When no other higher value markets exist, the remaining residuals are used for energy production.

¹¹ Henderson, James E.; Standiford, Richard B.; Evans, Samuel G. 2017. Economic contribution of timber harvesting and manufacturing to north coast redwood region counties. In: Standiford, Richard B.; Valachovic, Yana, tech cords. Coast redwood science symposium—2016: Past successes and future direction. Proceedings of a workshop. Gen. Tech. Rep. PSW-GTR-258. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station: 371-381.

— Looking for new and creative technologies and markets is encouraged and over time, these markets may include composting, gasification, or other uses (see discussion below). However, at present these markets do not exist at scale in Humboldt or within reasonable transportation distances.

In the medium- to long-term, new, innovative wood products could provide enhanced climate benefits and enhanced revenues from forest products. To this end, California has founded the Joint Institute on Wood Products Innovation¹² to serve as a center for analysis, testing, and outreach to support industry retention and development in California for new wood products. The work of the Institute will support long-term ecological and economic sustainability, increase forest resilience, long-term carbon storage, and local economies.

Should we be looking to emerging technologies such as gasification to keep using biomass as a power source?

Gasification is a process that converts organic materials into carbon monoxide, hydrogen and carbon dioxide. This is achieved by reacting the material at high temperatures (typically >700 °C), without combustion, with a controlled amount of oxygen and/or steam. Wood gas is a syngas fuel which can be used as a fuel for furnaces, stoves and vehicles in place of gasoline, diesel or other fuels. Biochar is a coproduct.

It is always valuable to look for higher value options and to test emerging technologies. However, gasification technology has not been deployed at scale yet to process the amount of available sawmill residues and requires a uniform feedstock free of soil and rocks. Moisture management of the feedstock is also critical. Some of the sawmill residue could be diverted to a gasification plant, but it would require a significant capital investment and tight controls on the feedstock quality.

An additional question is what is the lifespan of a biomass power plant and what modifications and improvements can be reasonably expected or are feasible? Furthermore, do these plants really age out or can they be upgraded when new emission control technologies become available? At present both DG Fairhaven and Scotia have invested significant capital into emission control technology upgrades and are operating within their existing air quality permits requirements.

Should we be continuing with the existing centralized power plant approach or looking to more decentralized emerging technologies?

Yes, we should explore emerging technologies and yes, we should recognize the value that the existing power plants provide as a backbone to accommodate the diversity of feedstocks that are available. There are challenges to financing and permitting new facilities that also need to be evaluated and it is important to recognize that innovation takes time. A recent example was the proposed development of a BioRAM eligible 5 MW biomass plant in Arcata that was derailed when PG&E required the developer to fund an additional \$6 million upgrade of the PG&E substation. It could be viewed from a "bird in the hand is worth two in the bush" perspective where we are certain in what we have and there is no guarantee that future technologies will perform adequately or at scale. Permitting and capital investments for building new

¹² https://bof.fire.ca.gov/board-committees/joint-institute-for-wood-products-innovation/

infrastructure will likely continue to be a large barrier to deployment of emerging bioenergy technologies across the State and in the North Coast.

What can be expected if the existing power plants close?

- An immediate logistical challenge to divert the ~100-120 truckloads a day to Wheelabrator Shasta (in Anderson, CA), the closest biomass facility, and assuming they would take the material. This is a 300+ mile round trip haul. There are not enough trucks available to move this material.
- In the longer term, forest landowners, managers, and product manufacturers would be affected as these sectors shrink. Specific Humboldt groups include:
 - Manufacturing: Humboldt Redwood Company, Green Diamond, Mad River Lumber, North Fork Lumber, Schmidbauer Eureka, Pacific Clears, CW Wood, Arcata Lumber Products
 - Landowners of all sizes, including all small forested landowners, Bureau of Land
 Management, State and National Parks, USDA Forest Service, conservation organizations, etc.
 - Municipal compost facilities such as Arcata, Humboldt Waste Management Authority, Recology, etc.
 - Many licensed timber operators and trucking companies
 - And any further development of the forest products manufacturing sector. It is reasonable to assume there would be a contraction of this sector if the biomass power plants closed.

Could the sawmill residues be utilized for compost?

While compost is a promising option for wood waste, the industry faces a number of barriers to reaching scale. As a result, only smaller amounts of biomass can be utilized for compost. With the county's daily production of ~100-120 truckloads of biomass a day, there is no existing option available at scale. HRC alone produces 70-100 chip vans per day (5 days/week) of this material. It would take 2.65 days to fill a football field (120 x 53 x 5 yards) to a height of 15 feet with the volume of material that HRC generates. Storing large amount of chips present fire hazards because the decomposition process releases heat and fires are common. An additional challenge is that the local compost industry is currently experiencing a contraction. Finally, some portion of the compost will decompose and emit CO_2 and methane over time and the carbon will not be permanently sequestered.

Is biomass energy more expensive than other renewables?

Community-scale biomass facilities in California are currently receiving 12.7 to 19.7 cents per kilowatt (kWh) hour of power; RCEA is currently paying 6.5 cents per kWh for power from DG Fairhaven and Scotia. In contrast, distributed solar is typically 6 to 7 cents and large scale solar is 3-4 cents per kWh¹³. Biomass provides 24-hour base-load generation unlike wind and solar. If power needs were calculated on a 24-hour framework, wind and solar need other complementary sources to meet daily power demands. This is why biomass is an important Resource Adequacy tool for load serving entities. Right now, half of California's electricity comes from natural gas - so storage is not a problem because the gas provides both storage (gas can be stored) and generation- but as we phase out fossil fuels, solar and wind will increasingly require energy storage to meet demand.

¹³ Julia Levin Per. Comm., Bioenergy Association of California

The energy storage needed to fill in around solar costs 25 to 50 cents per kWh. When the cost of battery storage is added to the costs of solar, then biomass has a competitive advantage. Furthermore, battery technology is still in development and their longevity and life cycle needs to be included in our analyses. As California fully decarbonizes its economy and phases out fossil fuels, bioenergy will become increasingly cost competitive. This is due to both its flexibility, and its ability to sequester carbon from the atmosphere.

Is RCEA providing a "subsidy" to the timber industry by purchasing power from biomass from the two power plants?

It could be viewed from that perspective; however, biomass produces numerous local benefits to offset its perceived higher cost. Biomass is the primary locally available and renewable power source, a key consideration for RCEA and meets Resource Adequacy standards. Minimal trucking and processing is required to utilize this source and new infrastructure does not need to be built. Biomass utilization is providing many community benefits including: an ability to steward and improve the resiliency of our forestlands, job creation; tightly controlled emissions of low-value forest residues; disposal of urban organic wastes; and a reliable source of 24-hour power that meets local energy demands.

Public Comment

The following public comments were submitted for the October 24, 2019, RCEA Board of Directors meeting on agenda item 5.2 - Long Term Renewable Energy Solicitation Update



Rio Dell, CA 95562



Redwood Coust to

October 22, 2019

Redwood Coast Energy Association (RCEA)

633 Third Street

Eureka, CA 95501

Dear secretary to the Board of RCEA:

I am unable to attend the very important board meeting scheduled for October 24, 2019 at 1530 hours. It is my hope that you will be able to include this letter in the board's packet for the meeting and read the content to those attending.

There are many reasons that installing up to 60 over 500 ft structures (54 stories high) on Bear River and Monument Ridges an undesirable project in its current form. Anticipated impact to rare and endangered species, impact to historical native American sacred grounds, dayscapes and nightscapes (red/or white lights to be seen 20 miles for aircraft), increased fire hazard with over 26 miles of high voltage overhead transmission lines, timber removal for roads and transmission lines, and forever changing the ambiance of our community with the resulting impact to tourism to name only a few.

It is my hope that RCEA realizes that green power from the grid can be purchased from existing infrastructure. Until all solar and wind sources are fully utilized I see no reason to litter our community with these structures. Potential power generated from the Terra-Gen project would not necessarily stay in our community and from a previous RCEA meeting that I was able to attend I learned that there would not be a cost savings to RCEA.

I read an article dated June 25, 2019 authored by Peter Maloney, "Calif. Sets record for solar, renewable curtailments". The content of this article led me to believe that California is generating more renewable energy than our current grid system can fully utilize. In other words energy sources are growing faster than the infrastructure necessary to process/store it.

Please consider this view in your decision to support or not support this project with our Planning Commission. I think it more prudent for the project to move forward or not on its own merit.

It should be noted that if the Terra-Gen project moves forward on its own merit, I would fully support RCEA's purchase of power from this source as long as the power contract was equal in cost to other renewable energy sources. Fortunately there is plenty of time for this to play out before a commitment needs to be made.

Respectfully,

Beverly Chang



RECEIVED

OCT 2 3 2019

Redwood Coast Energy Authority

Carol Hoopes 2330 Monument Rd. Rio Dell, CA 95562

RCEA Board 633 3rd St. Eureka, CA 95501

October 23, 2019

Dear Chairman and Redwood Coast Energy Board:

These comments are to address Item # 5.2 on your October 24th agenda regarding "Long-Term Renewable Energy Solicitation Update". This is in reference to your "Discuss and provide guidance/authorization for potential RCEA input to the County Planning Commission on the Terra-Gen/Humboldt Wine Energy project".

As officially elected representatives of our communities in Humboldt County, your potential input letter of support for the Humboldt Wind Project without the release of a Final EIR/approval is a premature action by the Redwood Coast Energy Authority. It is also a waste of staff time. As an official and influential entity of Humboldt, it is imperative to refrain from support until a project is approved. It is inappropriate to make site specific support of projects such as Terra-Gen's Conditional Use Permit application prior to approval.

Terra-Gen has offered this RCEA Board in a public meeting last Fall 2018 a scholarship to be used at the RCEA Board's discretion in exchange for your support of this project. Could this be a conflict of interest?

Since the RCEA Board has also gone on record to initiate a Power Purchase Agreement (PPA) with the Humboldt Wind Project, the RCEA Board has already given potential support of an unapproved conditional use project that will have detrimental effects to TPZ zones and Ag areas of Humboldt County. The purpose of the Final EIR is to mitigate adverse effects to the environment.

Please be fair to the CEQA process in place and refrain from submitting a letter for this site specific project until the Final EIR has been released and the project has been approved.

Regards,

Carol Hoopes



 From:
 David Simpson

 To:
 Lori Taketa

 Subject:
 Windmills

Date: Wednesday, October 23, 2019 4:27:05 PM

Dear Ms. Itaketa,

I was just informed that if I get this letter to you it would be read at the 4:30 RCES Board meeting. Jane Lapiner and I have attended nee of the past 10 UNFCCC climate conferences and play to be in attendance in Chile in December for the next.

One element of climate change discussed in each event has been what is generally lumped under the heading of Geo Engineering. I have been forewarned by many astute observers of climate change worldwide that these projects are exceptionally dangerous and misleading. First, they are all huge projects on a sale that requires enormous output of machines and personnel. Second, they are each extremely capital-intensive requiring cash investments on a level of the largest constructions humans have undertaken. Fourth, they re all very high-tech requiring construction and measuring devices largely incomprehensible to most people. Fourth, they require complex intervention systems for when they malfunction which is often. Fifth, they are very difficult to operate successfully for long consecutive periods of time. Sixth, are well-known to do damage to the natural world around their construction. Seventh, they require regular replacement if they are expected to maintain peak capacity Eighth, their unintended consequences are almost impossible to predict but are usually extensive.

These are a couple of other common denominators but they're a good start at identifying projects we should avoid. Tera Gen's project fits most if not all of these criteria.

Thank you,

David Simpson

From: Ellen E Taylor
To: Lori Taketa

Subject: Email comment letter:

Date: Wednesday, October 23, 2019 1:54:35 PM

Dear RCEA Board,

Thank you for the opportunity to comment on the Terra Gen wind generator project.

I live in the Mattole Valley, one ridge over from where the wind project is to materialize.

We residents therefore share the same ecosystem, and we have been trying to assist its

recovery for the past 40 years.

I am Chairperson for the Lost Coast League, which unanimously opposes this project. The sacrifice is

just too great. It heavily impacts habitat due to the nature and industrial scale of the construction.

Habitat in the region has already dwindled due to human activities, such that threatened and endangered species, even those supposedly protected by the ESA, are on the verge of extinction. Even a tiny incremental cumulative impact at this point abuses the public trust.

In the context of climate breakdown: over 900 acres of forest will be destroyed in the development of this

project. This is a naturally forested area, and could grow very large trees. As you may know, the doug firs and redwoods of the northern temperate rain forests can sequester carbon at 2.5 times the rate of the tropical rain forests. Except for the few giant trees which are protected, our forests have never been allowed to grow back to a size where they can achieve their full carbon-sequestering potential. They are harvested at 60 years or so although they can live well over a thousand years.

If our motive in developing alternative energy is to assure our children's and grandchildren's safety,

to destroy these live generators of healthy air quality is seriously misguided. They do not have a short lifespan, as do the planned structures.

We are a natural-resource-rich county. If we take pride in that, it will help us not to panic and become just another example of the shock doctrine.

Very Truly Yours,

Ellen Taylor, Chairperson, Lost Coast League PO Box 60, Petrolia California 95558 629 3500 From:

Sent: Wednesday, October 23, 2019 11:52 AM

To: Lori Taketa

Subject: Public Comment Hum Wind

Follow Up Flag: Follow up Flag Status: Flagged

Dear RCEA Board:

Please accept my public comment electronically.

I am a retired University professor and author of the book "Frogs, Inside their Remarkable World" from Firefly Press. I wrote a natural history column for twenty years. I retired to Humboldt County particularly to live in an area which is relatively undisturbed by corporate enterprise and full of natural beauty. I have spent a lifetime advocating for nature, with my students, colleagues, in person and in writing.

I have many reasons for not supporting the proposed Bear River Ridge/Monument Ridge TerraGen Humboldt Wind Energy project. I recommend that RCEA also consider not supporting it for the following major reasons.

In the TerraGen DEIR, there were 26 places where they had no way to mitigate for significant impacts. They did not mention the permanent disruption to areas adjacent to Redwood Parks. They did point out their planned lack of compliance with current Habitat Conservation Plans and Timber Harvest Plans, the Headwaters Forest Agreement, the Williamson Act and other documents created by joint efforts of stakeholders and the government over a long period of time. There were an additional 34 plans and documents required by the CEQA process which were omitted from the DEIR.

At no place in the document did they specify the exact equipment to be installed, but stated it could be up to 600 feet tall - the height of the Golden Gate Bridge. This would put the exact center of the rotational energy and air disturbance at the height of the tallest redwoods - 300 feet. There are images of turbines in fog https://physics.stackexchange.com/questions/13387/what-does-the-quantification-of-causes-and-effect-look-like-for-clouds-in-offsh which clearly show the turbulance. This wind whipping happens all the time - we can only visually see it with fog. Radar can see it all the time. NOAA requests that turbine farms be situated more than 30 miles away from Doppler facilities (https://www.weather.gov/mkx/windfarm). This project is within 30-miles of the Ferndale Doppler facility.

Relatively undisturbed grasslands and timber sequester more carbon than any industrial project ever will. Bugs, birds and bats will all be negatively affected by this project. Redwood tops will be dried out by the turbulence created by the aptly named turbines. Fields Landing will be disrupted for up to six months. The route 101 corridor

will be affected for about a year initially, and again any time anything needs to be replaced. Hundreds of man trips and truck trips will occur on ridges which now may be visited a few times a year. This is serious disturbance, and should not be decided upon lightly.

Having recognized these problems, disruptions and disturbances, I was cheered to read that RCEA is aware of the difference in disturbance between onshore and offshore wind.

I would like to read into this record what Matthew Marshall, the executive director of RCEA, was quoted by the Mad River Union as saying at a Eureka meeting recently "The offshore turbines are very big - unlike on land, you don't have the constraint of moving things around by truck... So the scale of these is much larger, and with fewer turbines there is more efficiency and reduced costs." He added that the tip of the blades would reach about the height of the Golden Gate Bridge being at the 600-foot-tall range.

Since we as a county are actively working with RCEA and our elected officials for offshore wind, and since the executive director of RCEA states unequivocally that offshore turbines are more efficient and produce power at reduced costs, I feel that there is no reason to approve the TerraGen terrestrial project with its associated disruptions since the offshore project will produce the same or more power than the onshore project. There is only so much transmission electron flow availability in Humboldt. One project could preclude the other due to grid saturation. It would be wise to "take the path of least resistance," utter a great and mighty "Ohm," and let the folks who live here get back on with their lives.

Thank you.
Sincerely,
Ellin Beltz

From:
To:
Lori Taketa

Subject: Terra Gen industrial wind energy

Date: Wednesday, October 23, 2019 4:47:33 PM

The proposed plan is a waste of time and energy. Literally. The carbon footprint to build and transmit makes this a losing proposition because by the time it delivers power, offshore instillations will vastly overcompensate for renewable power. This without fragmenting the rare biodiversity found on Monument Ridge. Solar powered micro grids are a far better source and far more resilient supply of power at this time. Thanks, Howard Russell Eureka.

Sent from my iPad

Siskiyou Land Conservancy

RCEA Board 633 3rd St Eureka CA 95501

Oct 23, 2019

RE: Agenda 5.2 and 6.1 of your agenda

Dear Ms. Taketa,

I.

Sec 5.2: Based on the arguments below, the fact that a CUP has not been approved, and your conflict of interest based both on your premature PPA with TerraGen as well as a proffered scholarship offered from TerraGen to RCEA, I suggest there be no further premature and potentially illegal advocacy of this project before TerraGen's proposed permit has been finalized.

If anything, RCEA would do justice to our community by objecting to the un-mitigable fragmentation and hydro-meteorological impacts to a biodiversity hotspot, and adding insult to injury to the Wiyot Tribe, which has suffered unspeakable horrors, as powerfully articulated in the Wiyot submission to the TerraGen DEIR: "Should this development and desecration of *Tsakiyuwit* proceed, it would seem to reinforce the colonial domination and genocide associated with these persons and their atrocities, and serve as a constant reminder to Wiyots of how their lands were violently taken for the sake of profits by powerful, privileged, and elite euro Americans."

II.

Sec 6.1 of the RCEA agenda relies on "islanding" Humboldt's electricity production and supply, which does not ensure resilience.

Resilient energy production and supply are critical in these times of grid vulnerability, wildfires, and the ever-present threat of disasters and emergencies that cut us off from centralized electricity supplies, and each other.

However, this sole reliance on central utility electricity supply relegates distributed electricity generation to the status of a poor stepchild dependent upon expensive individual projects that lack the economy of scale and the diversity of innovative technological and financial opportunities available.

If RCEA put out the welcome mat to solar entrepreneurs and financiers to solarize our county, and promoted widespread distributed onsite solar minigrids with V2G capability, we could start having secure resilience and owning the systems that generate our power by the time TerraGen would come on-line in 2023, but without the immediate massive GHG emissions associated with TerraGen's construction. These emissions will nullify any advantage before offshore electricity starts in 2025-2030.

Equity ownership is ignored when these solar systems' costs include only cost per kwh; so is the priceless value of secure resilience.

Despite the added renewables to the grid in the US since the Rio Agreement over 30 years ago, electricity usage has outpaced the benefits of these renewables. Utility electricity is therefore not only increasingly expensive over time by comparison, but it's unlimited supply increases electricity use and our carbon footprint, and does nothing to incentivize electric vehicle acquisition.

Distributed solar does both: reduced PGE electricity usage is inherent in local solar systems roughly equal to that produced, and ownership of an electric vehicle and the fuel it requires accelerates the payback time for the solar system. Since transportation accounts for 60% of our local GHG emissions, electrifying our transportation is urgently necessary.

During the recent grid shutdown, the vice-chair of your CAC posted this to FB:

"Redwood Larry Goldberg Zuleika Del Pardo - Do you own or rent? If you're a homeowner, I can help you get financing that would bring monthly payments equal to or just slightly more than what you're paying to PG&E now. Message me and we can talk offline."

And Matthew Marshall's brother at Schatz installed a "nano-grid" at his home to utilize his EV battery to supply electricity to his home.

These are the sorts of services that RCEA could provide and promote, instead of blind devotion to utility scale onshore wind electricity production, a policy that divides our communities and concentrates our energy wealth in the hands of very few, leaving the rest of us captive and powerless. A solarization policy would have wide general support because it can benefit everyone in many ways, as we, not TerraGen, do our part.

Finally, it is a most arrogant and alarming position to defile these sacred Wiyot sites, which are not just confined to a small area on Bear River Ridge, as documented throughout the Wiyot's comments to TerraGen's DEIR, especially with respect to the prairie grasslands, described as "native perennial grasslands in California are among the most endangered ecosystems in the United States," and "[T]he proposed development of the coastal Prairie complex on *Bear River and Monument Ridges* would severely impact these premier and fleeting examples of this critically endangered habitat, whose origins most likely lie within the cultural burning practices of Wiyot ancestors."

A critical element of the 1992 Rio agreement was to "not to carry out any activities on the lands of indigenous peoples that would cause environmental degradation or that would be culturally inappropriate".

Now is our time to remedy our critical need for resilient energy, and honor and stand with the Wiyot People.

Ken Miller SLC

From: <u>Michael Evenson</u>
To: <u>Lori Taketa</u>

Subject: Terra-Gen is not what we need

Date: Wednesday, October 23, 2019 1:43:04 PM

Dear RCEA,

Thank you for accepting email comments. I cannot be with you today.

Terra-Gen proposal will NOT (by their own EIR) result in reduced GHGs. Do not embrace this project.

If we learned one thing from the Blackout, it's this: Humboldt County needs to use what power it can generate here and not depend on the grid.

But we knew that one. With a history of a rugged embrace of living close to the ground, within our means and independent of the over-developed south, Humboldt pioneered the "off the grid" life decades ago. (Some may say centuries ago).

Let's not fear the next step, and, following in the path laid down by the Blue Lake Rancheria, truly be responsible for our electrical needs. Roof top solar must be organized into decentralized local power grids. PG&E's one-grid-fits-all model is unreliable, vulnerable and requires hugely expensive upgrades and maintenance. Now is the time to transition out of that failing grid into something that reflects our strengths and values.

It is fitting that both Blue Lake and Wiyot people are leading the way. The Mega Wind Farm around Scotia would be a step backward: tearing up the countryside, use herbicides over the clearcut 1000 acres for transmission lines, exporting power and dollars and, with increasing frequency, leaving us powerless.

Michael Evenson

Petrolia, CA 95558

Michael Evenson

Lost Coast Ranch® Petrolia, California
 From:
 Sean DeVries

 To:
 Lori Taketa

 Subject:
 RE: Terragen Wind

Date: Wednesday, October 23, 2019 6:44:38 PM

Please add the following to public comment: [Thank you]

If we build the Terragen Wind project, there will be: decreased property values; county tax increases to pay for upgrades to roads; increases to PG&E rates for substation upgrades to handle the increased loads; and all with no incentives for the community that is being most affected.

The electricity will be going for sale on the grid -- out of the region -- which means that we will not see any benefit to ruining our environment.

The jobs will be temporary construction, most likely governed by outside experts. The 15 jobs boasted to be ongoing are all going to be specialists brought in from other areas, unless they are including janitorial.

The county is being paid \$2 million dollars per year for this intrusion, for the 30 year life of the project.

They are selling out our health, environment, and peace of mind on the cheap.

Thank you,

Sean DeVries

Public Comment

The following public comments
were submitted for the October 24, 2019,
RCEA Board of Directors meeting
on agenda item 6.1 PG&E Public Safety Power Shutoff Event

Public comment submitted on agenda item 6.1 PG&E Public Safety Power Shutoff

Dear RCEA Board

If you were discomforted without PG&E electricity for 24 hours, you should be delighted to know that you have proven, lower cost, choices to avoid such discomfort in the future.

The Blue Lake Rancheria's solar rooftop system clearly demonstrated that achieving energy independence is possible with preparation, allocation of resources, and political commitment. Solar is prudent, available, reliable, cost effective and a good investment.



Rather than prioritizing implementation of widespread solar, Redwood Coast Energy Agency has focused on expensive utility scale onshore wind with dangerous transmission lines through fire prone forests. Only local distributed solar can eliminate the need for incendiary transmission lines thru forests.

Our policy makers need to proactively deploy a variety of appropriate distributed energy strategies including installing translucent solar panel arrays on County buildings, infrastructure, equipment yards & parking lots to realize the resilience so critical to our County during emergencies.



Instead our policy makers and Supervisors are surrendering obscene profits at our expense to TerraGen rather than developing energy independence for us constituents This is not doing our part to alleviate the climate emergency, rather it is conceding to a colonizing global powerhouse whose mission is to increase, not reduce, energy use.

Electricity from biomass and TerraGen costs \$65-50 per Mwatt or over 5 times as much as my rooftop solar, and we would own nothing after decades of payments; yet RCEA has deployed far less than 8 Mwatts of solar in RCEA's 30 Mwatt goal. My solar rooftop generates at a 25 year project cost of less than \$9 per MWatt. Because solar is so cost effective and low impact and because Humboldt County must convert to electric vehicles for transportation to reduce fossil fuel emissions, RCEA's priority goal should be 300 MWatts of solar by 2025--- rather than 30MWatts by who knows when. RCEA, by contracting for unaffordable high cost biomass and wind power, is encouraging grid abandonment.

To the extent that RCEA focuses its resources on Humboldt Wind and biomas RCEA ignores its opportunity to support agriculture by placing bifacial solar panels over fields in Rohnerville, Loleta, Kneeland, and Arcata flats while conducting agriculture beneath.



As we commemorate Indigenous Peoples, and look back in horror at the genocide and ecocide committed by our local founding fathers, we can finally honor the wisdom of the Wiyot Tribe, which opposes TerraGen's industrial wind factory---and **solarize not cannibalize our precious resources.**

Jesse Noell farms in Elk River

Graduating From Blackout School

It's hard to read the PGE blackout story without appreciating this opportunity to learn to solarize our County. The day of the "blackout" was plenty sunny to keep the fridge going with a few solar panels, overnighting to the next day.

Those few with solar panels and batteries were fine, often powering one or two critical circuits. We realized that minisolar grids could serve multiple dwellings and neighborhoods, sharing energy. At least one techie with an electric vehicle lit his home with his car battery.

Social media flooded us with advice, with one solar expert offering to finance rooftop solar for the cost of a PGE bill.

We learned the crucial distinction between centralized and distributed power generation, the former coming from the grid, the latter originating close to where it is used. And we learned that over-reliance on the grid and its incendiary transmission lines, even if our local production were "islanded," leaves us vulnerable, especially in real emergencies that cut us off from services and each other. TerraGen's wind factory would not have helped.

Mad River Hospital's diesel generators consumed 10 gal/hr pumping 220 lbs CO2 per hr into our climate emergency. Multiply that by the 100 generators sold out in one day at one store, and 100x that around the county, add in all the greenhouse gasses (GHGs) from drilling, refining and barging those fossil fuels, and you have a recipe for climate suicide.

With distributed solar, we can reduce our energy consumption and GHG emissions, have secure resilience during emergencies, fuel electric vehicles affordably, and own our mini-solar systems over time. It's the best way *for us* to do our part for the climate emergency. Now that we are smarter, do we have the political will?

Ken Miller

McK 95519