

# Public Comment

September 13, 2022

Community Advisory Committee  
Regular Meeting

## Agenda Item 7 - Biomass Discussion

As a medical and public health professional who has dedicated over 20 years to improving the health of Humboldt's most vulnerable residents, I call on RCEA's Community Advisory Committee to pressure RCEA to make good on its commitment in the RePower Plan to end biomass combustion. Biomass combustion is NOT in the public interest and it is the CAC's job to represent that interest. RCEA had years to establish its promised Biomass Technical Advisory Committee and had no interest in doing so until now, when they are being pressed to stop burning biomass. A Technical Advisory Committee is not a bad thing but it is not a substitute for a committee whose mission is to represent the community's interests. The CAC should keep advocating for what is best for the community with regards to biomass even if a new technical committee is constituted.

While biomass is renewable, it is neither clean, nor carbon free. Biomass plants are federally designated major sources of air pollution with emission standards based, not on public safety, but on the EPA's finding that the best available controls can't make them any cleaner than coal.

Biomass pollution doesn't just harm people living nearby. Fine particulates can stay in the air for many days and travel hundreds of miles. The science is clear that even low levels of exposure cause heart attacks, lung disease, hospitalizations, and premature death. Requiring each community with a power plant to have its own study proving harm, aka the "show me the bodies", before taking action is a shameful delaying tactic that runs counter to the basic tenets of epidemiology and public health. No one would expect every coal fired power plant to undergo this kind of study before being shut down. Biomass is as dirty as coal.

Humboldt Redwoods' biomass plant burns mill waste, not slash, so it doesn't prevent forest fires. In fact, it increases the risk of fire by emitting tons of greenhouse gas that will not be reabsorbed from the atmosphere fast enough to avoid climate catastrophe. Wildfires and drought are also decreasing air quality in our county. The American Lung Association's State of the Air Report for 2022 gave Humboldt County a C for 24 hour fine particulate pollution and indicated that our annual average fine particulate exposure is increasing and is only a few decimal points away from violating the new air quality standard recommended to the EPA by its expert panel. The American Lung Association counts over 50,000 Humboldt residents who are particularly vulnerable to health harms from fine particulates. The best way to protect these residents is to decrease fine particulate emissions from the sources we can control.

The American Academy of Pediatrics, the American Lung Association, and the American Public Health Association have declared that biomass combustion plants are harmful to human health and should not be supported with public dollars.

RCEA's practice of prioritizing local renewable energy, regardless of pollutant and carbon emissions, does not serve our county well. We ask that you place a higher value on protecting the health of current residents and future generations by putting public health and climate first and prioritizing clean carbon-free power over dirty local energy.

With only 8 years remaining until the current biomass contract ends, another timber company talking about building a new biomass plant, and a draft climate action plan that could easily lead to increased biomass combustion as local electricity demand increases, the CAC must take a stand now that polluting and carbon emitting power plants should not be a part of RCEA's "clean energy" portfolio. Please ask the RCEA board to commit now to:

- 1) No increases in biomass energy between now and 2030

- 2) No biomass combustion energy after 2030.
- 3) Only contracting with new non-combustion biomass plants which have pollution controls that reduce emissions to at least the level of a natural gas fired power plant and capture of at least 90% of carbon emissions.
- 4) Passing a resolution that reorders its priorities to put public health and climate first, above local, when making energy procurement decisions

There are a couple of other points I want to address: Whose responsibility is it to end biomass combustion? Won't someone else just buy the electricity if we don't? Is biomass really comparable in cost to other sources of clean energy?

We have learned from the plastic waste debacle that companies trying to foist the responsibility for their waste onto the public by claiming that users should recycle just doesn't work. This has failed so badly that countries and states like CA have adopted a policy of extended producer responsibility which requires producers of products packaged in plastic to take financial responsibility for recycling the plastic. If that cuts into their profits, so be it. The same concept should apply to the timber industry. It is not the responsibility of RCEA or our community to pay for recycling mill waste with our utility bills or our health. Investing in alternatives for mill waste is a cost of doing business that the industry should have to shoulder.

The CCA should ask for numbers to back up RCEA staff's assertion that power purchase agreements for truly clean energy are more expensive than PPAs for biomass. I've looked at reports of PPA pricing and haven't found this to be true. Even if the PPA cost is equal, those prices do not include the social cost of carbon or particulates. If you add those into the equation, biomass costs us many millions more each year. By financially supporting biomass combustion, RCEA is participating in the industry's practice of externalizing these costs onto the public.

If HRC could sell their power so easily to others, they would not care if RCEA didn't buy it, but instead we've seen them repeatedly pressure the RCEA board to continue. Most of CA electricity is purchased by community choice aggregation entities and at least one large CCA has dropped biomass from their definition of clean energy. When a group of CCAs recently got together to purchase clean firm power, the other CCAs influenced the group's decision to choose batteries over biomass.

Even if others did buy HRC's power output, RCEA joining the movement to buy only truly clean energy will help HRC see that the writing is on the wall and that being a socially responsible company means investing in other alternatives.

Alternatives do exist. Biomass is valuable feedstock for carbon sequestration, hydrogen production, jet fuel, and bio-plastic. All of this is happening now commercially in the US. By helping to end biomass combustion we can be part of turning a climate problem into a climate solution. Please help give the RCEA board a push to do the right thing.

Sincerely, Wendy Ring MD, MPH