

Public Comment

6. Humboldt's Electric Future Community Engagement Draft Final Report

From: [Martha Walden](#)
To: [Public Comment](#)
Subject: CAC meeting item 6
Date: Tuesday, July 11, 2023 4:55:29 PM

As others have pointed out, we need more time and more information before decisions are made about the IRP because more information is on the way about the biomass element and the sawmill's violations of air quality standards. I know that RCEA's job is complicated. The Electric Future workshop gave a little taste of how complicated it is—the different priorities, sometimes conflicting, the regulatory mandates about resource adequacy and other criteria. So looking at the big picture you can say biomass electricity is a fairly small part of it, but it's the most contentious because of its outsized carbon emissions and air pollution.

However, the reason it's so important to me goes beyond our local situation. Incinerating biomass to make electricity is becoming more and more common—ironically, as a greener substitute for fossil fuels. And of course that's a big step in the wrong direction for the climate. So we're talking about more than one sawmill burning, primarily, its own waste and getting some baseload electricity out of it, which is helpful for balancing the grid even though it's a small amount of electricity, considering all those emissions. The larger issue is a situation that is getting worse and worse as word gets around that you can burn wood as an energy source and not even count the carbon emissions, plus you can get a ticket from the CPUC that allows you more air pollution than other electricity producers get. More and more people are getting into that business.

Another factor is the proliferation of fuel load reduction projects and the drastic need to do something with huge amounts of forest residues. We're in a lot of trouble if burning it is the main way to deal with all that stuff. CO2 emissions are going up, not down. We have to reverse that. There are other things to do with biomass that are much better for the environment, and we must prioritize those. I don't know how to get through to Humboldt Sawmill Company. It's a private corporation that is mainly concerned with its bottom line, but I'm hoping that if RCEA can hear these concerns from the public and stop supporting biomass incineration, HSC will get the message.

Thank you,

Martha Walden

Sent from [Mail](#) for Windows



TO THE RCEA COMMUNITY ADVISORY COMMITTEE

We were appointed by RCEA to the Technical Advisory Group. This is a brief summary of the information we submitted as members of the Technical Advisory Group. Our comments on biomass power in Humboldt County are also endorsed by our organizations. We request that the CAC endorse each of the recommendations below.

Caroline Griffith
Executive Director, Northcoast Environmental Center
[REDACTED]

Tom Wheeler
Executive Director, Environmental Protection Information Center
[REDACTED]

Daniel Chandler
Steering Committee, 350 Humboldt
[REDACTED]

BIOMASS FACTS

1. The ten-year contract for biomass power was not in 2021 and is not now required by the state. According to the RCEA staff report in 2021, the state requirement for long-term renewable power could have been met with solar power. Biomass is replacing truly green power.
2. The HSC emitted 295,000 metric tons of greenhouse gases in 2020. That is equivalent to 75% of all passenger vehicles in the county.
3. The carbon dioxide will not be sequestered as part of the carbon cycle before net zero is required in 2050 and probably not for one hundred years or more, contributing to the climate crisis.
4. UC Berkeley's new calculations for the damage caused by emission of each metric ton of CO₂ is \$185 per ton. Each year that HSC operates causes \$555 million in damages in the future – \$5.5 billion over the ten-year contract.
5. The Humboldt Sawmill biopower plant emits many times more air pollutants than does the gas fired Humboldt Bay Generating Station.
6. In 2017 before the contract between RCEA and Humboldt Sawmill was signed, Humboldt Sawmill reported to RCEA five violations of air quality over the previous several years. A month after RCEA signed the contract the North Coast Unified Air Quality Management District reported a total of 1,044 violations in just the two previous years. (See our report.)

7. Wendy Ring, MD, MPH has discovered a large number of recent violations at Humboldt Sawmill. These are currently being investigated by the North Coast Unified Air Quality Management District.

PROPOSED RECOMMENDATIONS FOR THE CAC TO SUBMIT TO THE RCEA BOARD

AIR QUALITY:

The RCEA Board shall not consider biomass as a potential part of the Integrated Resource Plan until a) an independent air quality and public health expert of national stature has been consulted and reported to the Board¹ and b) the North Coast Unified Air Quality Management District reports to the Board that there are no pending investigations or unaddressed violations of the Humboldt Sawmill power plant.

TECHNICAL ADVISORY GROUP REQUESTS FOR INFORMATION:

The Humboldt Sawmill submissions regarding the MOU in 2023, as presented by staff to the technical advisory group and the CAC, shall be considered unresponsive until HSC/HRC presents information regarding alternatives they have considered in the past year and the proportions of forest residues vs. mill waste, as requested by four members of the technical advisory group.

CONTRACTING FOR BIOMASS

Recommendation 1: No other biomass power shall be contracted for beyond the HSC contract.

Recommendation 2: The HSC contract shall not be extended.

Recommendation 3: Due to the numerous air quality violations of HSC, the HSC contract should be cancelled as soon as the long-term renewable energy that it provides in the RCEA portfolio can be replaced by additive solar or wind.

If this is not legally possible, the RCEA Board should modify the contract to require the HSC equipment be upgraded to Best Available Control Technology, which would significantly reduce both greenhouse gas and air pollution.

¹ We have suggested two names to RCEA.