

# Public Comment

March 12, 2024  
Community Advisory  
Committee  
Regular Meeting

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**From:** [diane ryerson](#)  
**To:** [Public Comment](#)  
**Cc:** [diane ryerson](#)  
**Subject:** CAC Agenda Item 5: HSC Biomass Discussion  
**Date:** Wednesday, March 6, 2024 9:40:08 PM

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March 6, 2024

Public Comment by email for March 12, 2024 CAC Meeting

Agenda Item 5: Humboldt Sawmill Biomass Discussion

Dear RCEA Citizens Advisory Committee Members,

RCEA can contribute to reducing global warming emissions by using the violations committed by the HSC biomass plant to end the contract now and using money saved to purchase more energy storage, solar and wind energy. Although solar and wind purchase rates are higher now, the investment helps stabilize corporations producing these clean energy sources. The public record of the hundreds of HSC air pollution violations will reduce HSC's potential income and may incentivize them to take action and reduce air pollution violations.

To do our part to slow down global warming, RCEA needs to invest in cool, clean, and just energy sources. Biomass combustion is: **1)** not cool – it releases 5,233 lbs CO<sub>2</sub>/kwh and this is more than burning methane; **2)** not clean – it emits particulates of various sizes (10 microns lodge in the trachea, 2.5 microns lodge in the lungs, 1 micron gets into blood, 0.1 micron gets into all the organs in our bodies) and because of incomplete combustion it emits air toxics (benzene, formaldehyde, acrolein, dioxin, polycyclic aromatic hydrocarbons) [commercial air monitors can't detect the smallest particles, 1 and 0.1 microns sizes. The smaller the particle the more surface area it has and the air toxics and viruses like COVID can stick to these particles.]; **3)** not just – Scotia residents have to breathe the particulates and air toxics 24/7 and have more hospitalizations than residents not living next to a biomass plant grandfathered in with old and poorly maintained equipment [from 2020 to 2022 the smoke stack electrostatic precipitator stopped working so all the particulates and air toxics were escaping into the air].

RCEA does not have to stay in the contract with HSC. Ending the contract now will make RCEA energy sources cooler, cleaner and more just. As a RCEA ratepayer, I urge CAC members to vote to end the biomass contract with HSC.

Thank you.

Diane Ryerson  
[REDACTED]  
Arcata, CA 95521

**From:** [Sue Parsons](#)  
**To:** [Public Comment](#)  
**Subject:** End RCEA's contract with Scotia biomass plant  
**Date:** Wednesday, March 6, 2024 8:13:31 AM

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Hello,

For current and future generations' sake, I urge RCEA to use a provision in the contract that allows you to end the biomass plant's current contract early due to environmental noncompliance.

Here are the reasons:

First, Scotia's biomass plant emits over 300,000 tons of carbon dioxide equivalent a year. California's Renewable Portfolio Standard was established to cut carbon emissions. Using biomass to meet the standard subverts its purpose, diverting our dollars from real climate change prevention.

Second, the Scotia plant emits twice as much greenhouse gas per kilowatt hour as a coal powered plant, and as much per year as 70% of the county's passenger vehicles.

Third, we are currently on track to exceed 1.5C and reach 5 planetary tipping points in the next decade.

Finally, Plant operators lied about their environmental performance to get the RCEA contract. Over the past decade, the plant has committed over 1000 violations of the Clean Air and Clean Water Acts, including several hundred while under contract with RCEA. It is currently operating illegally without a Title V permit.

For all these reasons, it is clear that the county should end its contract with the biomass burner.

Respectfully,

Susan B Parsons, Bayside

<https://www.humboldtcleanenergy.org/>

"A book, too, can be a star, explosive material capable of stirring up fresh life endlessly, a living fire to brighten the darkness, leading out into the expanding universe." - Madeleine L'Engle

To: Community Advisory Committee members

Regrettably I will be out of town for the Community Advisory Committee's March 12th meeting and will not be able to address the committee in person.

My opposition to RCEA's procurement of biomass energy from the Humboldt Redwood Sawmill has been largely based on my concern about our climate crisis and the fact that the biomass plant emits approximately 300,000 metric tons of greenhouse gas annually. This represents over 75% of the amount emitted by Humboldt County's largest greenhouse gas source, transportation. (More recent calculations have estimated the percentage to be even larger.) Our climate emergency is real. It is urgent that we do what we can to make the impacts less devastating.

Increasingly, however, I have become as concerned about the health consequences of biomass combustion.

At one of your meetings, Candy Stockton, Humboldt County's Public Health Officer, reported that the biomass plant, on average, would be responsible for 7 to 8 emergency hospital visits for asthma attacks by people living within the vicinity of the biomass facility. This estimate was based on research conducted on the east coast looking at the impact of numerous similar biomass plants. And in a letter to the United States Congress eight health organizations ( Allergy and Asthma Network, American Academy of Pediatrics, American Lung Association, American Public Health Association, the Asthma and Allergy Foundation of America, the National Association of County and City Health Officials, National Environmental Health Association and Physicians for Social Responsibility) identified numerous other health impacts, stating that "burning biomass creates air pollution that causes a sweeping array of health harms, from asthma attacks to cancer to heart attacks, resulting in emergency room visits, hospitalizations and premature deaths." I have included the letter at the end of my comments.

On its website the mission of RCEA is said to be to "advance the use of clean, efficient and renewable resources available in the region for the benefit of the member agencies and their constituents." Biomass energy is not clean as the position of numerous health professionals makes clear. It can also be considered not a benefit, - especially for those living in Rio Dell and Scotia. RCEA should do what it can NOT to be complicit in harming the health of others.

An argument I've heard from RCEA staff supporting its purchase of biomass energy is that this energy provides state mandated "resource adequacy", that it is available when solar and wind energy is not. I have a question regarding this. Would not procuring energy from a battery storage facility, powered by renewable sources such as solar and wind, do this as well?

Another argument is that were RCEA not to contract with HRS, the sawmill would still produce biomass energy and would simply sell it to someone else. This may be true. A lot of studies have been done, however, that have identified less impactful uses of mill waste. I have included below, as well as the letter from the health organizations, an article about one

alternative, the use of mill waste to make biochar. The article features a biomass company that transitioned from producing energy to producing biochar.

My understanding is that HRS is not a struggling company and that the majority owners of the company have amazing financial resources. RCEA is a community based organization with representatives from entities throughout the county. The RCEA and these entities need to be doing what they can to promote a healthy and climate friendly environment for the people of Humboldt. They should be encouraging HRS to change the ways that they deal with their mill waste.

Nancy R. Ihara

### **Letter from health organizations to the United States Congress:**

September 13, 2016

Dear Senator/Representative:

The undersigned public health, medical and nursing organizations urge you to oppose policies that would encourage or expand the use of biomass for electricity production. Biomass is far from “clean” – burning biomass creates air pollution that causes a sweeping array of health harms, from asthma attacks to cancer to heart attacks, resulting in emergency room visits, hospitalizations, and premature deaths. Biomass uses fuel sources, or feedstocks, whose combustion harms human health, including wood products, agricultural residues or forest wastes, and highly toxic construction and demolition waste. Burning biomass from any source generates immediate dangerous air pollution that puts health at risk. Among the most dangerous of these emissions is particulate matter, also known as soot. These particles are so small that they can enter and lodge deep in the lungs, triggering asthma attacks, cardiovascular disease, and even death.<sup>i</sup> Particulate matter can also cause lung cancer.<sup>ii</sup> Biomass combustion also creates nitrogen oxide emissions, which are harmful in their own right and also contribute

to the formation of ozone smog and particulate matter downwind.<sup>iii</sup> Ground-level ozone pollution can trigger asthma attacks and cause premature death, and newer research shows possible links to reproductive and central nervous system harm.<sup>iv</sup> Burning biomass also creates carbon monoxide, which leads to headaches, nausea, dizziness, and in high concentrations, premature death;<sup>v</sup> and carcinogens, including benzene and formaldehyde.<sup>vi</sup> The dangerous air pollution from burning biomass endangers some people more than others. Millions of infants and children, older adults, individuals with respiratory or cardiovascular disease or diabetes, and individuals with lower incomes face a higher risk of suffering serious health effects from these pollutants.<sup>vii</sup> In addition to emitting harmful conventional pollutants, some biomass processes also increase carbon emissions that contribute to climate change. The U.S. Environmental Protection Agency's Science Advisory Board is currently evaluating available research to answer questions about the net carbon emissions that result from burning biomass. In their 2012 letter to EPA from an earlier review, the Science Advisory Board noted that "[c]arbon neutrality cannot be assumed for all biomass energy a priori" and described the processes that can make biomass increase carbon emissions.<sup>viii</sup> Scientists must be allowed to continue to review these impacts. The United States is already experiencing health harms as a result of climate change. Increased temperatures lead to heat-related illnesses and deaths and help make the formation of ground-level ozone more likely. More droughts lead to elevated particulate matter levels. More frequent and severe extreme weather events harm both physical and mental health. These trends are projected to continue, along with increased health threats from vector-borne diseases; food insecurity; food- and water-borne diseases; worsened allergy seasons; and many more.<sup>ix</sup> Burning biomass creates proven harm to human health through direct air pollution impacts, as well as the potential for increasing climate change. Because of those threats, the undersigned public health, medical and nursing organizations ask that you oppose policies that would encourage or expand the use of biomass for electricity production. We urge you to protect human health by supporting the development of truly clean, carbon-free sources of energy such as solar energy and wind power. Sincerely, Allergy & Asthma Network

American Academy of Pediatrics American Lung Association American Public Health  
Association Asthma and Allergy Foundation of America National Association of County & City  
Health Officials National Environmental Health Association Physicians for Social Responsibility

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**Article regarding the Clean Maine Carbon Company transition from the use of mill waste for biomass energy to the production of biochar:**

*In the quest for climate solutions, Pat Jones, the president of Clean Maine Carbon, is among the Maine entrepreneurs banking on this charcoal-like substance. They say it can bind up carbon for decades, and improve agricultural soils at the same time. The end product has high carbon density, and is very stable, so less of the carbon will be released into the atmosphere than if it were left to decompose.*

In a former biomass plant in Greenville, wood chips are flowing from hoppers into long tubes about three feet in diameter.

Pat Jones is the president of Clean Maine Carbon, which burns wood in high-temperature, low-oxygen conditions known as pyrolysis.

“It starts out as wood” he said. “And as you can see when we come over here what comes out the other end is biochar.”

In the quest for climate solutions, Jones is among the Maine entrepreneurs banking on this charcoal-like substance. They say it can bind up carbon for decades, and improve agricultural soils at the same time.

The end product has high carbon density, and is very stable, so less of the carbon will be released into the atmosphere than if it were left to decompose. So while Jones is making biochar, his business plan is focused on selling carbon credits to corporations.

“So somebody will say, ‘Would you like to sell credits to XYZ company?’ And we’ll say, ‘Yeah, what’s the price?’ They will pay on a per-ton basis, whatever the agreed value, based on carbon content and everything else,” Jones said. “And that’s the end of it, they never get the biochar and they don’t do anything. They get to use those credits to help reduce their footprint, their carbon footprint.”



Most of the biochar Jones has sold from the Greenville plant has been for agricultural applications. And he's not yet certified to sell carbon credits, but pending the completion of an audit, he said he'll be able to sell credits even on the biochar he's already shipped.

Scientists and advocates debate the true value of carbon sequestration as a response to climate change. Jonathan Foley is executive director of Project Drawdown, a nonprofit that focuses on science-based climate solutions.

Foley says 95% of climate solutions should focus on reducing emissions by driving more efficient cars, for example, or insulating houses. But he said there's also value in removing carbon from the atmosphere. And while there's no silver bullet, biochar could be seen as a piece of silver buckshot.

"And we can put that in farm fields, we can bury it in old mines, we can bury it in the ground, and it should last for hundreds, if not thousand of years under the right circumstances," Foley said. "So it's a pretty clever kind of hybrid of nature and some engineering that might be a pretty good little piece of silver buckshot."

And researchers are looking for ways to put biochar to use. As a soil additive, for example. University of Maine associate professor YongJiang "John" Zhang said the physical structure of biochar allows it to hold water like a sponge during periods of heavy precipitation, and release it slowly. It can also hold nutrients, and Zhang said these qualities can be beneficial when applied to the sandy soils of blueberry barrens.

“But if you have the biochar, it can hold more water, and hold the nutrients to increase the water use efficiency, and nutrient use efficiency,” he said.

Zhang said other research is looking at biochar’s benefits to potato crops, and its ability to lock up particles of PFAS in contaminated fields and prevent them from being taken up by plants.

Jones said he plans to produce about 1,200 tons of biochar annually with the current setup. But he’d like to scale up, using more and bigger equipment, to create more biochar and also put the excess heat from the process to work.

“So that it becomes more economical and practical to extract hot air and hot gasses for lumber drying for power generation, any number of things that could be done with this very clean, high-temperature gas,” he said.

Meanwhile, a second biochar facility, Standard Biocarbon in Enfield, hopes to start production in the next few months, and aims to produce about 1,200 tons annually.

<https://cleanmainecarbon.com/>

**From:** [Emily Siegel LCSW](#)  
**To:** [Public Comment](#)  
**Subject:** no to Scotia biomass plant  
**Date:** Sunday, March 10, 2024 8:48:00 PM

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I do not want my rate payer money going to any form of biomass because it is not clean energy. The Scotia biomass plant emits more carbon and pollution than even the average biomass plant in California. It makes no sense to use energy from the Scotia biomass plant, which produces much more pollution than the PG&E gas plant and only a third as much electricity as a gas plant. How is RCEA going to live up to its promise of 100% clean energy by 2025 when using the Scotia biomass plant? Research shows that there is no safe level of health harms from biomass plant emissions. Claiming that energy from biomass plants is clean energy is a hoax. Although the current contract goes until 2031, there have been many environmental violations documented and reported to the EPA, which can give RCEA a reason to end the contract before 2031. Stop spending my rate payer money on energy from the Scotia biomass plant. -- Emily Siegel LCSW

**From:** [Garden of the Heart](#)  
**To:** [Public Comment](#)  
**Subject:** Get out of the biomass contract!  
**Date:** Monday, March 11, 2024 3:56:30 PM  
**Importance:** High

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As an RCEA customer and member of this community, I heartily support terminating the contract to burn biomass. Use the money on clean fuel—burning waste is not a solution anymore.

Carolyn Hawkins, REHS  
Eureka, CA

March 7, 2024

To: Redwood Coast Energy Authority (RCEA) Board of Directors  
RCEA Community Advisory Committee

Dear Advisory Committee and Board Members,

We, the undersigned environmental, public health, and community organizations, are writing to urge you to end Redwood Coast Energy Authority's use of biomass combustion for electricity. The current biomass power plant is a health hazard, it produces large amounts of CO<sub>2</sub> at exactly the time we need drastic reductions, and there are more environmentally friendly ways of using woody biomass.

In 2019 the Arcata City Council, the Eureka City Council, the Humboldt County Board of Supervisors, and the Redwood Coast Energy Authority Board each passed a resolution committing to "100% clean, renewable" energy starting in 2025. (RCEA, 2019). When RCEA extended its biomass contract with Humboldt Sawmill Company to 2031, it broke that promise, violating the trust of its customers and Humboldt County voters.

*"Clean" Energy and Public Health*

Biomass plants produce air pollutants linked to multiple adverse health effects, including heart attacks, asthma attacks, cancers, neuro-developmental deficits, adverse birth outcomes, emergency room visits, hospitalizations, and premature deaths (NACCHO, 2016). HSC emits 8 times the NO<sub>x</sub>, 7 times the particulate matter, 6 times the formaldehyde and 15 times the benzene of the gas fired Humboldt Bay Generating Station while producing a quarter of the electricity. (CARB, 2023; CEC, 2024). The biomass plant is less than 1 block from residences and 3 blocks from an elementary school where > 30% of students are non-white and >70% are economically disadvantaged.

The Humboldt Del Norte County Medical Society has called on RCEA to drop biomass from its energy mix (HDNCMS, 2022). The American Academy of Pediatrics, the American Lung Association, the American Public Health Association, the National Association of County & City Health Officials, and the National Environmental Health Association called on Congress to oppose policies promoting or expanding use of biomass for electricity (NACCHO, 2016).

EPA standards allow biomass plants like HSC to emit more particulates and air toxics than coal (CFR, 2022). Humboldt Sawmill Company frequently fails to meet even these minimal standards and its low efficiency and high emissions make it an outlier among its peers.

In its 2016 bid for an RCEA contract, HRC misrepresented its environmental compliance, reporting only one air quality violation while withholding monitoring records from the air district which subsequently revealed over 700 violations, and signing a PPA stating it was in good standing with regulators (HRC, 2016; NCUAQMD, 2017). While under contract with RCEA, Humboldt Sawmill has violated the Clean Water Act every year, and committed more than one thousand violations of the Clean Air Act including hundreds for emitting excessive pollution and thousands for a multi-year failure to do quality checks on pollution monitors (NCUAQMD, 2023; CARB, 2023).

### *Greenhouse Gas Emissions*

In 2022 HSC emitted 312,559 metric tons of greenhouse gas, an amount equivalent to 88% of all passenger vehicles in Humboldt county. (CARB, 2024). 2023 was the first year that global warming reached 1.5 C. On our present emissions trajectory, 6 global tipping points could be reached in the next decade. (McKay, 2022). Biomass carbon emissions add to global warming during this critical period and resulting impacts to the ocean and cryosphere extend for centuries to millennia after it has been reabsorbed (Kemper, 2021). Continued reliance on biomass between 2025 and 2035 would divert over one hundred million ratepayer dollars from clean energy.

As a public agency RCEA must look beyond the purchase price of biomass and take into account the externalized societal costs, which fall disproportionately on the most vulnerable. At the EPA's proposed updated social cost of carbon, Another decade of biomass will cost society around \$5.5 billion (IPCC, 2023; Rennart, 2022).

### *Alternative Uses for Woody Biomass*

Open burning and landfilling of commercial wood waste have long been illegal in California. There are alternative uses for Humboldt Sawmill's wood waste that are healthier than burning it for electricity. Elsewhere in CA plants are being built to produce hydrogen, biofuel and biochar from wood waste with construction heavily incentivized by the Inflation Reduction Act, the California Low Carbon Fuel Standard and other state funds (Voegelé, 2023; CDC 2023). An analysis exploring these options for Mendocino Redwood Company found them technically and economically feasible (ICF, 2022).

Commercial operations around the country are also using mill waste to make compost, hydromulch, and insulation. California's updated AB 32 Scoping Plan includes compost application and organic conversion of over 100,000 acres of cropland, creating a need for compost among local farmers and ranchers that cannot be met without additional feedstock (CARB, 2022).

## *Recommendation*

The power purchase agreement with HSC allows RCEA to terminate the contract if “any representation or warranty made by such Party is false or misleading” and for “failure to operate the Project in compliance with all applicable Laws” (RCEA, 2017). Both criteria have been abundantly met. We call on the RCEA Board to terminate its current contract with HSC and commit to no new contracts for biomass combustion.

Sincerely,

350 Humboldt  
Humboldt Unitarian Climate Action Campaign  
EPIC  
Northcoast Environmental Center  
Women's Intl League for Peace and Freedom-Humboldt  
Humboldt Health Care for All  
Buddhist Peace Fellowship  
HOPE Coalition  
Redwood Alliance  
Lost Coast League  
Sierra Club Redwoods North Group  
Friends of the Eel River  
Humboldt Green Party  
Humboldt Democratic Central Committee  
Humboldt Progressive Democrats  
Climate Health Now  
CA Alliance for Retired Americans-North State  
CA Nurses for Environmental Health and Justice

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**From:** [Jennie Brown](#)  
**To:** [Public Comment](#)  
**Subject:** Dump Biomass  
**Date:** Monday, March 11, 2024 3:16:12 PM

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RCEA Community Advisory Committee,

As a member of the community I would like to urge you to end the biomass contract with the Humboldt Sawmill Co. My understanding is that you currently have a contract with them until 2031 which is a direct contradiction with the pledge you made in 2019 to have 100% clean energy.

The biomass plant is dirtier than a coal plant, why on earth would our area continue to utilize such dirty energy when there are cleaner options? Due to the many violations of the Clean Air and Clean Water Act it is possible to break the contract and I urge you to do so.

Continuing to burn biomass is the wrong thing to do given the escalation of climate change we are seeing. Humboldt Co deserves to have clean air and biomass is not the way to go, there are cleaner options!

Jennie Brown



Trinidad

**From:** [Petra Bingham](#)  
**To:** [Public Comment](#)  
**Subject:** We don't want RCEA to spend our renewable energy dollars on dirty biomass  
**Date:** Monday, March 11, 2024 4:42:19 PM

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Dear RCEA Community Advisory Committee

We are community members and paying customers and are subscribing to 100% renewables with the expectation that the energy generated is (going to be) clean and does not contribute to climate change nor add to local air pollution levels.

Dump biomass by 2025 and keep your promise for 100% clean energy.

In 2019 RCEA promised us 100% clean energy by 2025 and then broke that promise by extending Humboldt Sawmill Co's biomass contract to 2031. This plant emits twice as much carbon per megawatt hour as a coal plant. There are now several commercially viable alternative uses for mill waste that are climate beneficial. There is no need to burn it. The biomass plant's thousands of violations of the Clean Air and Clean Water Acts make it possible for RCEA to legally terminate its contract by 2025. That would free up >\$100 million over the next decade to invest in clean energy.

Thank you for listening to the needs of our community!

Petra Bingham

[REDACTED] Arcata, CA 95521  
[REDACTED]

**From:** [COLLEEN KANDUS](#)  
**To:** [Public Comment](#)  
**Subject:** Dump biomass  
**Date:** Monday, March 11, 2024 9:13:20 PM

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Please dump biomass by 2025, and keep your promise for 100% clean energy. Thank you.

Colleen Kandus  
McKinleyville  
Sent from my iPhone

**From:** [Andrew Greer](#)  
**To:** [Public Comment](#)  
**Subject:** No more biomass  
**Date:** Monday, March 11, 2024 6:44:41 PM

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As a customer who gets energy RECA , I am appalled, that you continue to use biomass and claim that it is saving me money and helping the environment. I will vote with my wallet and encourage you as strong as I can, to cease, purchasing biomass generated, electricity. if necessary, I will fire you and buy my power directly from PG&E although I would hate to do so. There is no reason to continue to support a biomass plant that has had so many violations of climate control, and pollution,

Andrew Greer

[REDACTED]

Eureka, CA 95503

**From:** [Barbara Brimlow](#)  
**To:** [Public Comment](#)  
**Subject:** CAC agenda item 5  
**Date:** Monday, March 11, 2024 7:09:11 PM

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We are RCEA customers and want you to know we are more than a little disappointed that you have chosen to continue biomass for the next decade rather than keep your promise of clean energy. We are firmly requesting that you dump biomass by 2025 and keep your promise for 100% clean energy.

We signed on to RCEA because of the renewable promise and we expect you to live up to that.

Thank you.

Barbara and John Brimlow

**From:** [Karpani Burns](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 6:16:08 PM

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I am writing to demand that RCEA's Community Advisory Committee vote that RCEA stop buying energy from a plant that emits as much carbon as **88% of Humboldt's cars and twice as much per megawatt hour as coal**. RCEA could shift over \$100,000,000 ratepayer dollars from dirty biomass to clean energy over the next decade.

I demand that RCEA dump dirty biomass by 2025 and keep their promise for 100% clean energy.

Barbara Burns

Arcata

*from Goudi'ni (Arcata, California) unceded ancestral lands of the Wiyot People*

**From:** [craig knox](#)  
**To:** [Public Comment](#)  
**Subject:** Stop Biomass generating= Too much Carbon released  
**Date:** Monday, March 11, 2024 5:26:15 PM

---

Dear RCEA:

CAC item 5- Biomass electrical generating is NOT helping to cool down the planet. It releases massive amounts of CO2. It is NOT clean energy. End this type of electrical generating.

Craig Knox  
Arcata



**From:** [dkh](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 11:56:18 PM

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Dear Committee Members,

I am an RCEA electricity customer and have been since the choice was made available to me. I became a customer because RCEA is local and as such has a vested interest in our community. That should mean they want clean air as much as I do. This being the case, there is only one choice here:

Cancel the biomass contract with Humboldt Sawmill Co effective 2025, thereby keeping your promise to this community to go 100% clean energy by that time.

Sincerely,  
Dorre Kidd Howard  
Fortuna

**From:** [GCCA](#)  
**To:** [Public Comment](#)  
**Subject:** Biomass  
**Date:** Monday, March 11, 2024 5:42:39 PM

---

Dear Community Advisory Committee,

Our community doesn't want RCEA spending renewable energy dollars on biomass. I know I don't. I trusted RCEA and agreed to pay the extra amount on my bill so that it was clean energy I would be receiving.

In 2019 RCEA promised us 100% clean energy by 2025 and then broke that promise by extending Humboldt Sawmill Co's biomass contract to 2031. This plant emits twice as much carbon per megawatt hour as a coal plant. There are now several commercially viable alternative uses for mill waste that are climate beneficial. There is no need to burn it. The biomass plant's thousands of violations of the Clean Air and Clean Water Acts make it possible for RCEA to legally terminate its contract by 2025. That would free up >\$100 million over the next decade to invest in clean energy.

Thank you,

Gisele Albertine  
[REDACTED]  
Arcata, CA 95521

**From:** [Jessica](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 8:21:31 PM

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End biomass by 2025. The goal is 100% clean energy.

Thank you,  
Jessica  
Eureka, CA

**From:** [Kathryn Donahue](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda item #5.  
**Date:** Monday, March 11, 2024 8:58:46 PM

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**In 2019 RCEA promised us 100% clean energy by 2025 and then broke that promise by extending Humboldt Sawmill Co's biomass contract to 2031. This plant emits twice as much carbon per megawatt hour as a coal plant. There are now several commercially viable alternative uses for mill waste that are climate beneficial. There is no need to burn it. The biomass plant's thousands of violations of the Clean Air and Clean Water Acts make it possible for RCEA to legally terminate its contract by 2025. That would free up >\$100 million over the next decade to invest in clean energy.**

**I would like the Community Advisory Committee to know that our community doesn't want RCEA spending renewable energy dollars on biomass. Please help stop the production of yet more carbon emissions in the air we breathe. Thank you.**

**Kathryn Donahue, R.N. and resident of Humboldt County**

**From:** [Lee Dedini](#)  
**To:** [Public Comment](#)  
**Subject:** Note: CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 5:00:16 PM

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Dear RCEA Community Advisory Board,  
Keep the 2019 promise of dropping biomass by 2025 to keep 100% clean energy.  
Drop the Humboldt Sawmills contract. This plant emits twice as much carbon per megawatt hour as a coal plant.  
Instead, use other viable alternatives uses for mill waste that are climate beneficial.  
Stop using the biomass plant.

Lee Dedini  
Bayside

**From:** [Richard Salzman](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 6:09:27 PM

---

Back in 2019 you promised us 100% clean energy.  
Bio mass is not that.  
Please stop!

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Richard Salzman

[REDACTED]

Arcata CA 95521

[REDACTED]

[REDACTED]

RichardSalzman.com

**From:** [Stacy Becker](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Monday, March 11, 2024 5:19:23 PM

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Please "stop buying (biomass) energy from a plant that emits as much carbon as 88% of Humboldt's cars and twice as much per megawatt hour as coal." ([Wendy Ring, EcoNews](#))

Thank you for pursuing better energy sources.

Stacy Becker - McKinleyville, CA

**From:** [Steve Salzman](#)  
**To:** [Public Comment](#)  
**Subject:** Dump biomass from RCEA's energy portfolio  
**Date:** Monday, March 11, 2024 8:08:03 PM

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Biomass energy may be cheap but it is not carbon neutral or clean. Why not do the right thing and invest our money in clean renewables?

Steve Salzman



**From:** [REDACTED]  
**To:** [Public Comment](#)  
**Subject:** Re CAC Agenda Item 5 : Dump biomass by 2025 and keep your promise for 100% clean energy  
**Date:** Monday, March 11, 2024 9:00:40 PM

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Re: CAC Agenda Item 5

In 2019 RCEA promised us 100% clean energy by 2025 and then broke that promise by extending Humboldt Sawmill Co's biomass contract to 2031. This plant emits twice as much carbon per megawatt hour as a coal plant. There are now several commercially viable alternative uses for mill waste that are climate beneficial. **There is no need to burn it.** The biomass plant's **thousands** of violations of the Clean Air and Clean Water Acts make it possible for RCEA to legally terminate its contract by 2025. That would free up more than \$100 million over the next decade to invest in clean energy. I urge RCEA to end the contract with Humboldt Sawmill for the sake of our children and the planet.

More details:

Forty percent of RCEA's renewable energy and one of every 5 megawatt hours provided to customers comes from an aging biomass plant in Scotia which is the county's largest stationary emitter of air pollution and greenhouse gas. RCEA's power content label claims 49 pounds of CO<sub>2</sub> per megawatt hour for its default energy mix. This does not include the more than 5000 pounds of CO<sub>2e</sub> per megawatt hour generated at the biomass plant since biomass carbon is counted in the forestry, not the energy, sector. If all the greenhouse gas emissions that warm the planet over the next few decades were included in RCEA's label, customers would see a carbon intensity 20 times higher than currently reported and significantly higher than the power provided by PG&E. Switching to RCEA's biomass free Repower Plus plan doesn't change this because the amount of biomass energy RCEA buys is fixed by a contract that runs until mid-2031. Ordinarily, we'd be stuck heating the planet for the next seven years, but the biomass plant's multiple Clean Air and Water Act violations and a provision in RCEA's contract allowing termination for that reason presents a chance for RCEA to clean up its dirty renewable portfolio. The biomass plant has a pollution problem. Even though the EPA allows biomass plants to emit more pollution than coal plants, the Scotia plant has not been able to keep within those liberal limits. In its seven years under contract with RCEA, Humboldt Sawmill has been cited with nearly 300 violations of the Clean Air Act. Humboldt's other power plant, the PGE gas plant has zero violations for the same period, and none of the six biomass plants in Shasta County have anywhere near the number of violations as the plant in Scotia.

We cannot keep polluting the air at this rate. Cancel the Humboldt Sawmill contract.

Sincerely,  
Suzanne Cook

[REDACTED]  
McKinleyville, CA 95519

**From:** [Wendy Ring](#)  
**To:** [Public Comment](#)  
**Subject:** Fwd: The Scotia Biomass Plant is Operating Without A Permit  
**Date:** Monday, March 11, 2024 5:25:11 PM  
**Attachments:** [Biomass Plant Letter No Permit.pdf](#)  
[NCUAQMD letter granting app shield 7-28-2023.pdf](#)

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Please include this letter as part of public comment for CAC agenda item 5.

Wendy Ring

*Stories of climate action from the bottom up  
with [Cool Solutions Podcast](#)*



Sent via email to [support@ncuaqmd.org](mailto:support@ncuaqmd.org)  
March 11, 2024

North Coast Unified Air Quality Management District Governing Board  
Attn: Clerk of the Boards  
707 L Street  
Eureka, CA 95501

Re: Scotia Biomass Plant is Operating Without A Permit

- I. The North Coast Unified Air Quality Management District Erroneously Informed Humboldt Sawmill Company and the Public that the Sawmill Company's Biomass Plant Can Operate Without A Permit. The District Must Therefore Immediately Notify the Plant that Operation Before the Permit is Renewed is in Violation of District and Federal Regulations and Issue a Press Release Correcting Previous Public Statements.

All major sources of air pollutants must operate with a Title V permit under the Clean Air Act and its regulations.<sup>1</sup> Once a permit expires, a major source no longer has a legal right to operate.<sup>2</sup> The only exception occurs when a facility submits a "timely and complete" permit renewal application and is granted an application shield, allowing it to continue to operate while the District considers their renewal application.<sup>3</sup> Operating without a Title V permit or application shield is a violation of federal law and NCUAQMD regulations.<sup>4</sup>

On May 12 2023, the Humboldt Sawmill Company (HSC), located in Scotia, California, submitted a request to the North Coast Air Quality Management District ("the District") to renew the Title V Permit (NCU 060-12) for their biomass plant. The fifth term of that Title V permit expired on July 19, 2023.<sup>5</sup> On July 28, 2023 the District had not yet renewed the permit and

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<sup>1</sup> 40 C.F.R. §70.3

<sup>2</sup>40 C.F.R §70.7(c)(1)(ii) "Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with paragraph (b) of this section and § 70.5(a)(1)(iii) of this part."

<sup>3</sup> 40 C.F.R. §70.7(b)

<sup>4</sup> 42 U.S.C. 7413(c)(1) [42 U.S.C. 7661(1)-(2), 42 U.S.C. 7661a(a)]

<sup>5</sup>Press Release from the North Coast Unified Air Quality Management District, January 25, 2024, available at <https://www.ncuaqmd.org/files/ca7579a9c/NCUAQMD+Press+Release+HSC+Title+V+Permit+Update+1-25-2024+final.pdf>



notified HSC by letter that the plant could continue to operate under an “application shield”.<sup>6</sup> This same letter noted that the plant’s renewal application was submitted late and that several sections of the District’s application form were incomplete.<sup>7</sup>

Granting an application shield was done in error and in violation of both federal law and the District’s own rules because the application for renewal was not “timely” or “complete”. Federal Clean Air Act regulations define a timely application for permit renewal as “at least 6 months prior to the date of permit expiration.”<sup>7</sup> and a complete application as including the “statement and description of all applicable requirements.”<sup>9</sup> The district’s own Regulation V, Rule 502 likewise requires a renewal application to be submitted “no later than 6 months before the expiration date of the permit” and states that permit renewal applications must be “timely and complete” for a facility to qualify for an application shield, referencing the federal definition of timely constituting 6 months prior to expiration.<sup>10</sup>

In this case, HSC submitted their application on May 12, 2023 only 2 months prior to their permit expiration on July 19, 2023 and failed to complete Section V of the District’s Permit Application Form 1313 with a list of applicable requirements.<sup>7</sup> Because the application was incomplete and was not submitted on time, an application shield cannot have been granted. The plant has been operating without an application shield or permit since July 19, 2023.

The District has argued in a press release that HSC submitting the application 4 months late was merely a procedural violation and that the application shield has taken effect.<sup>8</sup> However, a plain reading of both 40 C.F.R. 70.7(c)(ii) and District Rule 502(a)(2) and the district’s July 28 letter to Humboldt Sawmill Company indicates that the District could not have granted an application shield to HSC because their permit renewal application was both late and incomplete. Even if the Air District wanted to grant an application shield to an applicant that

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<sup>6</sup> Letter from Jason Davis, Deputy Air Pollution Control Officer to Chris Verdeber, Director Scotia Operation, Humboldt Sawmill Company (July 28, 2023) (Attached to this letter)

<sup>7</sup> 40 C.F.R. § 70.5(a)(1)(iii) “For purposes of permit renewal, a timely application is one that is submitted at least 6 months prior to the date of permit expiration, or such other longer time as may be approved by the Administrator that ensures that the term of the permit will not expire before the permit is renewed. In no event shall this time be greater than 18 months.”

<sup>9</sup> 40 CFR 70.5 (a)(2) and 70.5(c)(4)(I)

<sup>10</sup> North Coast Unified Air Quality Management District, Regulation V, Rule 502

<sup>8</sup> <sup>11</sup> North Coast Unified Air Quality Management District, Press Release from the North Coast Unified Air Quality Management District, January 25, 2024, available at <https://www.ncuaqmd.org/files/ca7579a9c/NCUAQMD+Press+Release+HSC+Title+V+Permit+Update+1-25-2024+final.pdf>



applied less than 6 months prior to their permit expiration, they could not do so because the federal regulations define the minimum standards for State permit programs.<sup>9</sup>

This letter serves as notice to the District that you extended an invalid application shield, encouraged HSC to operate its biomass plant without a permit in violation of federal law, and misinformed the public about the plant's permit status. We urge you to inform Humboldt Sawmill Company that the plant currently does not have a legal basis to operate and to issue a new press release correcting previous statements to the media and the public.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Simmons', with a long horizontal flourish extending to the right.

Matthew Simmons  
Climate Attorney  
Environmental Protection Information Center

CC: Humboldt County Board of Supervisors  
Richard Engel, RCEA  
Matthew Marshall, RCEA  
Jeff Lindberg, CARB

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<sup>9</sup> 40 C.F.R. 70.3(a) "These regulations define the minimum elements required by the Act for State operating permit programs and the corresponding standards and procedures by which the Administrator will approve, oversee, and withdraw approval of State operating permit programs."

**North Coast Unified  
Air Quality Management District**

707 L Street, Eureka, CA 95501

(707) 443-3093

[www.ncuaqmd.org](http://www.ncuaqmd.org)



July 28, 2023

Chris Verderber  
Director, Scotia Operations  
Humboldt Sawmill Company  
PO Box 37  
169 Main Street  
Scotia, CA 95565

**Re: Title V Renewal Application: Status and Request for Additional Information**

Dear Mr. Verderber:

On May 12, 2023, Humboldt Sawmill Company (HSC) submitted a request to renew Title V Permit NCU 060-12. The request was conveyed using District Forms 1300 and 1313 and was executed by the Responsible Official, Dean Kerstetter. Consistent with District Rule 502, the District has determined the application content to be sufficient to support a preliminary completeness determination, and as such, the equipment authorized for use under the permit may continue to be operated. This *permit shield* shall remain in effect until such time as the Air Pollution Control Officer (APCO) takes final action on the application, or the expiration of the next permit term, July 19, 2028. Failure to submit a complete application for the next permit term in the interval between January 19, 2027 and January 19, 2028 may result in the issuance of a Notice of Violation.

A determination of completeness for an application does not prevent the District from requesting additional information to supplement the materials under review [District Rule 502(E)(2)]. In addition, pursuant to California Health and Safety Code (CH&SC) Section 42303, the APCO may at any time require from the applicant information, analyses, plans, or specifications which disclose the nature, extent, quantity, or degree of air contaminants which may be discharged by the source into the atmosphere. The District has previously invoked its authority in this regard and HSC has complied by providing refined emission inventory data in a timely fashion.

A preliminary draft of the proposed Title V Permit is nearly complete. At issue are the remaining gaps in the application data discussed hereafter. The District hereby requests HSC to address Staff's questions, supply the data and report of regulatory analyses listed below prior to September 30, 2023. Failure to do so may result in the issuance of notices of violation and may jeopardize the permit shield status.

**Federal Regulatory Applicability Analysis**

Section VII of Form 1313 is incomplete.

- a. Please identify all federal Clean Air Act requirements which are applicable to the source. For example, the three main woodfired boiler units are subject to 40 CFR 63 Subpart DDDDD, also known as the Boiler NESHAP for major sources.
- b. When a federal regulation is applicable and compliance options exist, please specify which option is preferred. For example, HSC previously declared its intent to comply with the Boiler NESHAP for major sources as described in the attached letter from Howard Hughes dated January 5, 2017. Please confirm this pathway remains the preferred option.

**Establish Criteria Pollutant Emission Limits**

All stationary and portable source permits issued by the District contain mass emission limits for the six criteria pollutants: carbon monoxide, oxides of nitrogen, volatile organic compounds, particulate matter 2.5 microns in size and smaller, particulate matter 10 microns in size and smaller, and oxides of sulfur. As part of the application process, it is incumbent upon the applicant to identify the hourly and annual potential to emit of each pollutant at each emission point. District Form 1300 B is generally utilized for this purpose, however, the District will entertain alternative proposals for transmittal of the information.

**Identify Insignificant Sources**

Section VIII of Form 1313 is incomplete. Please identify all equipment and devices which are exempt from federal permitting requirements pursuant to District Rule 501 (D)(2). Provide a description of each device and the regulatory basis for the exemption. For guidance, you may wish to refer to the 1995 EPA "White Paper for Streamlined Development of Part 70 Permit Applications".

Should you have questions or require additional information, please contact Ms. Cameron Purchio, Air Quality Engineer at (707) 443-3093 x 119.

Sincerely,



Jason Davis  
Deputy Air Pollution Control Officer

January 5, 2017

Delivered by email

Winslow Condon  
North Coast Unified Air Quality Management District (NCUAQMD)  
707 L Street  
Eureka, California 95501  
wcondon@ncuaqmd.org

Re: December 2, 2016 Request to Amend Letter

Mr. Condon:

This letter is in response to your letter, sent on December 2, 2016, that requested an amendment to the submitted Title V renewal application already deemed complete by the NCUAQMD. The NCUAQMD requested that the amendment provide information concerning how Humboldt Redwood Company (HRC) will demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, also known as Boiler MACT. This letter provides a summary of the compliance alternatives HRC has chosen, where applicable.

Boilers A, B, and C are all existing stoker boilers designed to burn “wet biomass” as defined in 40 CFR 63.7575, and are, according to 40 CFR 63.7500, subject to the applicable emission limits in Table 2 to the Subpart, the applicable work practice standards in Table 3 to the Subpart, and the applicable operating limits in Table 4 to the Subpart. From the options available in Table 2, Boilers A, B, and C will comply with the following limits:

- Hydrogen chloride (HCl) – 0.022 pounds of per million British thermal unit (lb/MMBtu) of heat input,
- Mercury (Hg) – 0.0000057 lb/MMBtu of heat input,
- Carbon monoxide (CO) – 720 parts per million by volume on a dry basis corrected to 3 percent oxygen (ppmvd @ 3% O<sub>2</sub>), based on a 30-day rolling average monitored by a continuous emissions monitoring system (CEMS); and
- Filterable particulate matter (PM) – 0.037 lb/MMBtu of heat input.

Except for the CO limit, for which continuous compliance will be demonstrated using a continuous emissions monitoring system (CEMS) that is installed, operated, certified, and maintained according to Boiler MACT requirements, HRC proposes to demonstrate compliance with the HCl, Hg, and filterable PM emission limits through performance testing which would be conducted in accordance with 40 CFR 63.7520 and Table 5 to the Subpart.

The work practice standards that the boilers must comply with include the requirement to conduct an annual tune-up that conforms to the specification in §63.7540(a)(10). Each boiler is also required to have a one-time energy assessment performed by a qualified energy assessor that conforms to the requirements in Table 3 to the Subpart. HRC has completed the one-time energy assessment as required.





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Because the boilers employ dry electrostatic precipitators (ESPs) to control PM, and do not use a particulate matter continuous parameter monitoring system (PM CPMS) to monitor in-stack PM concentrations, opacity must be less than or equal to 10 percent opacity, or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation, as a daily block average. Also, the 30-day rolling average operating load of each boiler must be maintained such that it does not exceed 110 percent of the highest hourly average operating load recorded during the PM performance test.

Annual tune-ups will be completed no more than 13 months after the previous tune-up. Performance tests will be repeated annually, no more than 13 months after the previous performance test. However, if 2 consecutive performance tests for a given pollutant are less than 75 percent of the emission limit, and there are no changes to the boiler that would increase emissions of that pollutant, subsequent performance tests for that pollutant can be conducted every third year, and no more than 37 months after the previous performance test. Testing would return to an annual basis if a performance shows emissions greater than 75 percent of the emission limit.

Continuous compliance with the emission limits, operating limits, and work practices required by the Subpart will be demonstrated by maintaining records of the type and amount of all fuels burned in each boiler, as well as collecting and processing data associated with operating limits. Opacity data will be collected every 15 minutes during the entire period of the PM performance tests. The average hourly opacity reading will be determined for each performance test run by computing the hourly averages using all of the 15-minute readings taken during each performance test run, and the highest hourly average opacity reading measured during the test run demonstrating compliance with the PM emission limitation will be determined. Similarly, the operating load or steam generation data will be collected every 15 minutes during the PM performance test, the hourly averages will be calculated, and the highest hourly average of the three test run averages will be determined and multiplied by 1.1 (i.e., 110 percent) as the operating limit.

To demonstrate compliance during start-up and shutdown, emissions from firing solid biomass fuel must be vented to the main stack, and all applicable control devices must be engaged. The CO CEMS will be operating, monitoring data collected, records kept, and reports provided during and concerning periods of start-up and shutdown. The boiler will be started using one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, and liquefied petroleum gas.

A Notification of Intent to conduct a performance test will be submitted at least 30 days before the performance test is scheduled to begin. A Notification of Compliance Status, which must include all performance test results, will be submitted before the close of business on the 60th day following the completion of all performance tests and/or other initial compliance demonstrations.

Compliance reports will be submitted semi-annually, covering the period from January 1 through June 30 or July 1 through December 31, and be postmarked or submitted no later than July 31 or January 31,



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whichever the first date is following the reported semi-annual period. The contents of the annual report are described in § 63.7550.

The NCUAQMD has indicated that it is amenable to a 30 day extension of the permit renewal timeframe and HRC is similarly amenable to this. We will provide additional comments on the draft Title V Operating permit by the close of business on Friday, January 13, 2017.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Howard Hughes". The signature is fluid and cursive, with the first and last names clearly legible.

Howard Hughes  
EHS Compliance Specialist  
(707) 764-4237  
HHughes@mendoco.com

**From:** [Carolyn Ayres](#)  
**To:** [Public Comment](#)  
**Subject:** Re:CAC Agenda Item 5  
**Date:** Tuesday, March 12, 2024 1:09:38 PM

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**To Whom It May Concern:**

I was just informed that RCEA is using biomass from a saw mill and calling it clean energy. I am urging RCEA to legally terminate its contract by 2025. This would free up what I hear is millions of dollars over the next decade to invest in clean energy.

I have gone solar recently and was so excited to contribute to your clean energy initiative! I am disappointed that you are still depending on biomass.

I hope you listen to the voice of the people and those of us who have taken the leap to solar!

Sincerely,  
Carolyn Ayres

--

Open an enormous welcome in your heart for the messy, unpredictable sweetness of life exactly as it is.

- Rob Brezsny

**From:** [Eric Grantz](#)  
**To:** [Public Comment](#)  
**Subject:** Bio mass  
**Date:** Tuesday, March 12, 2024 1:17:54 PM

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Please help save our delicate planet by stopping the biomass energy source currently in use. Please work towards clean energy solutions.

Thank you  
Sent from my iPhone

**From:** [Gail Coonen](#)  
**To:** [Public Comment](#)  
**Subject:** Agenda item 5  
**Date:** Tuesday, March 12, 2024 1:34:25 PM

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Dear RCEA staff,

I am a client of RCEA at the cleanest level. But, there's a big issue. You include bio waste which is not a clean source of energy. With all the violations from Humboldt Sawmill and other issues regarding health concerns, it's time to stop contracting with them. I can't support you signing on again. You need to end your contract by 2025 and find clean energy which is what you advertise.

Thank you,

Gail Coonen of Arcata

**From:** [Gary Falxa](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5: Please terminate the biomass plant's contract  
**Date:** Tuesday, March 12, 2024 12:10:49 PM

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Dear RCEA,

Please use your authority to terminate the local biomass plant's contract for electricity generation as soon as possible, and by 2025 at the latest. In the past, biomass seemed to be a good use for wood waste from the local timber industry. Today, we know better---the biomass plant is very dirty source of electricity, worse than coal, and has no place as a source of electricity given the ongoing climate change crisis, and the negative impacts of the biomass on atmospheric CO2 as well as air quality.

Do not confuse "sustainable/renewable" with "clean" energy. While one might argue that the biomass plant is sustainable and renewable, it is not clean, by any measure, and has no place in our energy portfolio. The data are clear on this. Our energy future needs to be both sustainable AND clean. Please pursue other renewable energy sources that are much cleaner than the biomass plant.

As a ratepayer who wants an RCEA portfolio that is good for the planet, I urge you to do the right thing for Humboldt County and for our planet, and terminate the biomass contract as soon as possible.

Thank you.

Sincerely,  
Gary Falxa  
Eureka, CA

Please continue to keep the Scotia power plant contract in place. This is a very viable alternative power source right here in our county.

Kris Payne

Name

Eureka

City

**From:** [Pat Kanzler](#)  
**To:** [Public Comment](#)  
**Subject:** Dirty power  
**Date:** Tuesday, March 12, 2024 12:35:24 AM

---

Last year I canceled my membership with RCEA because, actually, what I wanted was clean energy, but PG&E is cleaner than the biomass burned from the plant in Scotia! I am sure many more customers will want to cancel, which is sad considering that RCEA is supposed to be Humboldt's "clean " energy.....RCEA could easily cancel the contract with this dirty biomass burner because of their many violations.

Please listen to the people and not the billionaires who own this place, let them use their money in the pursuit of clean, TRUE clean energy.  
PAT Kanzler, RN



**From:** [Rena Kaminsky](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Tuesday, March 12, 2024 12:22:59 PM

---

Hello,

I am writing to urge RCEA to terminate its contract with Humboldt Sawmill Co. and invest that money instead in clean energy.

Thank you.

Respectfully,

Rena Kaminsky

Arcata



Since 1946

Corporate Office • 5901 Ericson Way • Arcata, CA 95521 • (707) 822-8800  
CA Central Valley (530) 458-8850 • Nevada (775) 971-3000 • WA/Idaho (208) 659-4370 • Oregon (541) 772-4606

Redwood Coast Energy Authority  
633 3<sup>rd</sup> Street  
Eureka, CA  
95501

Attn: Redwood Coast Energy Authority

**RE: RCEA Power Purchase Agreement**

I am writing in support of continuing the RCEA power purchase agreement with Humboldt Redwood.

I know that HRC has substantial upgrades in the works for particulate reduction. I also feel that support for local power generation is an important part of our power inventory. Additionally, there is the local economic benefit by supporting waste to power projects.

Please continue to keep this viable power producer as part of your inventory.

Thank You,

Rob McBeth

Eureka, CA

Industrial Construction • Food Grade and Process Piping • Structural Steel • Millwrighting • Rigging • Blowpipe  
Fabrication and Installation • Structural and Miscellaneous Metal • Heating, Ventilation, Air Conditioning  
• Industrial & General Sheet Metal

**From:** [Sue Y. Lee](#)  
**To:** [Public Comment](#)  
**Subject:** Comments for Agenda #5 re: Biomass energy  
**Date:** Tuesday, March 12, 2024 11:03:56 AM

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We are in a climate emergency, and I commend RCEA's recognition that "it's never been a more important time to significantly reduce greenhouse gas emissions." <https://redwoodenergy.org/wp-content/uploads/2020/06/RePower-2019-Update-FINAL-.pdf>

RCEA can do this by removing biomass energy from its RE Power portfolio as soon as possible. The production of biomass energy from the Humboldt Sawmill Co. (HSC) produces huge amounts of carbon and other pollutants that impact climate and the health of the residents who live, work, and attend school near HSC.

Even though the state regards HSC's greenhouse gas (GHG) emissions as being compliant with internationally accepted GHG accounting standards, according to RCEA's website, "The state's GHG emissions rules for biomass power plants count only the "non-biogenic" emissions from fossil fuels such as natural gas that are used at these plants to start up equipment."

As for HSC's biogenic emissions, 300,000 metric tons of carbon were emitted in 2022 <https://ww2.arb.ca.gov/mrr-data> According to RCEA's website, these biogenic emissions "are accounted for by the state separately in the forestry sector, per internationally accepted GHG accounting standards." There are no real standards for biomass GHG emissions. The Greenhouse Gas Protocol's [Corporate Accounting and Reporting Standard](#) (CARS) only provides requirements and guidance for companies and other organizations preparing a GHG emissions inventory. These were developed by a coalition of environmental groups (such as WWF, Pew Center on Global Climate Change, The Energy Research Institute) AND from industry (such as Norsk Hydro, Tokyo Electric, Shell) with input from a report called "[Safe Climate, Sound Business](#)." This report was created by representatives from British Petroleum, General Motors, and by NGOs such as the World Resources Institute to guide the above multi-stakeholders in the process of developing the internationally accepted GHG accounting standards agreed upon in the late 1990s. See <https://www.wbcsd.org/Programs/Climate-and-Energy/Climate/GHG-Management> and <https://ghgprotocol.org/about-us>

<https://www.wri.org/insights/ghg-accounting-corporate-climate-disclosures-explained>

With no actual figures for biomass GHG emissions standards, and with accounting of such not included in the energy sector (but in the forestry sector), there are no regulations or laws to limit or control carbon emissions by the HSC. Forests take multiple decades to recapture carbon. Meanwhile, it warms the planet, and emissions are increased in the same way that credit card debt adds compounding interest. Many changes produced by these compounding emissions, like melting ice sheets and sea level rise, are irreversible on a human time scale. Other sawmills in the state and across the US are finding better uses for mill waste that are climate beneficial. HSC would still operate, jobs would be preserved if HSC invested in one of these solutions, but they won't until we stop paying them to pollute.

Biomass energy production is also very costly. A statement from the Sierra Club's Biomass Fact Sheet (BFS) is that "In prepared testimony for the California Public Utilities Commission, California's major investor owned utilities stated that the price per megawatt hour purchased from a bioMAT (3 to 5 MW) facility is \$199.72. See [https://www.sierraclub.org/sites/default/files/sce/sierra-club-california/PDFs/Biomass\\_Fact\\_Sheet.pdf](https://www.sierraclub.org/sites/default/files/sce/sierra-club-california/PDFs/Biomass_Fact_Sheet.pdf) The BFS further reports that California utilities pay an average of \$40 per megawatt for "clean renewable energy" which means that biomass energy can cost us ratepayers "as much as five times the average."

I'm pleased that RCEA's goals "call for minimizing greenhouse gas emissions and maximizing renewable energy content of the CCE program.....". However, given the huge climate and health impacts of biomass energy and the huge expense of it, instead of minimizing GHG emissions, I ask that you eliminate GHG emissions from the renewable energy content of the CCE program by cancelling your contract for biomass energy from HSC immediately.

Sincerely,

sue y. lee mossman



Arcata, CA 95518

I'm in favor of continuing your contract with HRC Power Plant.



Treasure Hunt \_\_\_\_\_

Fortuna \_\_\_\_\_

Name

City

**From:** [Andrea Armin](#)  
**To:** [Public Comment](#)  
**Subject:** Regarding CAC agenda item 5-biomass  
**Date:** Tuesday, March 12, 2024 11:00:15 AM

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To RCEA board.

I continue to have a concern about the biomass plant in Scotia. I respect the forest people who want to clean up the forest to prevent mass wildfires. However, alternatives to using biomass DO exist, and so that is not a reason for continuing the biomass plant, which is not clean energy and which has a massive carbon footprint.

Please do not continue that plan past this year.

Thank you for your work .

Andrea Armin

Arcata, CA

**From:** [Martinique, Kristin](#)  
**To:** [Public Comment](#)  
**Subject:** Energy mix  
**Date:** Tuesday, March 12, 2024 8:26:58 AM  
**Attachments:** [image003.png](#)

---

I know it's all very complicated and no matter what you do someone will still be unhappy. Yet, the purpose of this letter is to add weight to the cleanest-energy-possible option. Please take every step you can away from biomass and toward clean energy.

Thank you,

*Kristin Martinique*



Administrative Analyst  
County of Humboldt  
Department of Planning & Building  
Direct: (707) 267-9402





Backing the Humboldt Redwood Power Plant is a sound investment in bolstering our local power generation, and I endorse the contract.

Charity Marcelli

Name

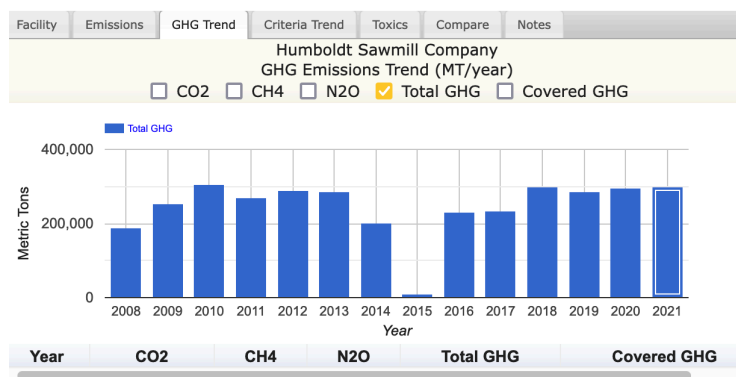
Eureka, Ca

City



## HSC and Global Warming for CAC

- A. Why do state agencies call biomass combustion renewable and carbon neutral? The basic reason is that trees emit carbon when they die and absorb it as they grow. It would be relevant if we were in a steady state, rather than warming quickly, but it does not mean HSC emissions do not create warming. There are numerous scientific and climate groups trying to get the renewable designation removed or modified – as it is with the Low Carbon Fuel Standard where biomass uses are all assigned a carbon intensity score not assumed to be neutral.
- B. The essential reason that biomass power causes warming is that there is a 30 to 100 year gap between when trees are burned and when they grow back. What happens during that time means the regrowth of the forest does not prevent warming or reverse it.
  1. HSC emits about 300,000 metric tons of carbon a year.<sup>1</sup>



2. For perspective, this is equivalent to the emissions of 88% of our passenger cars in a year. Over the period from 2017 when the HSC contract started through 2035, the time RCEA has told the state it will no longer be using HSC, it will emit approximately 5 million, 400 thousand metric tons of CO<sub>2</sub>e. That is equivalent to adding 1,286,000 passenger cars to the road for a year.<sup>2</sup>
3. All of that CO<sub>2</sub> goes into the atmosphere and causes warming because of the greenhouse effect. However, only 10% of the warming stays in the atmosphere; 90% is absorbed by the oceans where it will continue to warm for very long periods.<sup>3</sup> That 90% of warming transferred to the oceans is not going to reverse with the carbon cycle like turning a thermostat up and down.

<sup>1</sup> <https://www.arb.ca.gov/carbapps/pollution-map/>? Greenhouse gas total for 2021, the most recent year, is 297,987 metric tons.

<sup>2</sup> <https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references>

<sup>3</sup> <https://climate.nasa.gov/vital-signs/ocean-warming/#:~:text=Covering%20more%20than%2070%25%20of,heat%20as%20Earth%27s%20entire%20atmosphere.>

4. The CO<sub>2</sub> that is emitted also doesn't all stay in the atmosphere – it is absorbed by the oceans and causes ocean acidification. "The growing amount of carbon dioxide in the ocean could have a bigger effect on life on Earth than carbon dioxide in the atmosphere," according to NASA.<sup>4</sup>

So the absorption of heat and CO<sub>2</sub> by the oceans before the trees regrow makes the carbon cycle basically irrelevant: HSC emissions cause global warming.

- C. What else will happen before the trees regrow in 30 to 100 years? There are many consequences of warming that will happen over the time of the HSC contract and far more before we actually attain net zero. These are all impacts that the HSC emissions contribute to but are irreversible and would not be affected by replacement biomass in 30 to 100 years.
  1. Coral bleaching. "The Great Barrier Reef is in the midst of its fifth mass coral bleaching event in the past eight years." Reefs will not be able to recover until temperatures actually decline.
  2. Extinctions: [O]ver two-thirds of North American birds are moderately or highly vulnerable to climate change under a 3.0°C scenario.<sup>5</sup> The Audubon Society estimates that at 3°C, 40 species of Humboldt County birds would be highly vulnerable to extinction in summer, 48 species moderately vulnerable; only 45 species would be stable.<sup>6</sup>
  3. Tipping points that we have either passed or likely will in the next two decades include changes to the boreal forests and the AMOC, the current that brings warm waters past Europe and Great Britain.<sup>7</sup> Much of the Amazon has already turned into an emissions source rather than a sink.<sup>8</sup>
  4. Many of these processes create feedback loops that accelerate change. For example, melting ice means less reflection of sunlight back into space by the ice.<sup>9</sup>
- D. Finally, while scientists used to believe that warming would go on for decades after we reach net-zero, scientists now predict the temperature will simply stabilize at the level it is when net zero is reached.<sup>10</sup> It will take hundreds of thousands of years for temperatures to be brought down by natural carbon sinks like trees because of the on-going warming effect of the increase in ocean temperatures.
- E. In conclusion, HSC's emissions may be carbon neutral over a long period of time but they are not climate neutral.

Thank you for considering these points.



Daniel Chandler, Ph.D  
350 Humboldt Steering Committee

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<sup>4</sup> <https://climate.nasa.gov/news/13/climate-change-seeps-into-the-sea/>

<sup>5</sup> Bateman, Brooke L., Chad Wilsey, Lotem Taylor, Joanna Wu, Geoffrey S. LeBaron, and Gary Langham. "North American birds require mitigation and adaptation to reduce vulnerability to climate change." *Conservation Science and Practice* 2, no. 8 (2020): e242.

<sup>6</sup> <https://www.audubon.org/climate/survivalbydegrees/state/us/ca>

<sup>7</sup> <https://www.science.org/doi/10.1126/sciadv.adk1189>

<sup>8</sup> <https://www.nature.com/articles/d41586-021-01871-6>

<sup>9</sup> <https://cires.colorado.edu/ceee/sites/default/files/2020-07/Teacher%20Guide%20-%20Ice-Albedo%20Feedback.pdf>

<sup>10</sup> Summarized by Zeke Hausfather, climate scientist, at: <https://www.eco-business.com/news/explainer-will-global-warming-stop-as-soon-as-net-zero-emissions-are-reached/>

**From:** [Geoffrey Robinson](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda item 5  
**Date:** Tuesday, March 12, 2024 5:04:00 PM

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Dear RCEA Administrator People,

I would like you to drop the Scotia Biomass Plant from your green energy offerings.

I am aware that there needs to be a 24 hour source of energy for the Community Choice Aggregation program. I do not need to downplay the impact of this, but to include the MOST polluting power source in the county as renewable will damage the reputation of the RCEA.

I am also aware that the timber company is making the case that the only way for them to stay in business is by burning mill waste. They say that the ONLY al is to truck the mill waste ridiculously long distances. First of all, burning does not mean that they got rid of their waste. What they do is take truckloads of ash and dump it in a giant pile on a log landing, where it leaches out heavy metals into the local creeks and groundwater. I have seen this pile. It is immense. They could more easily compost or find other uses for the mill waste, which is much less toxic than the ash they produce. Also with the added benefit of not polluting the air by a school. We need to get past giving industry a lead role in our energy planning. They have their own agenda that goes against the environmental agenda.

Please uphold your principles and your integrity by canceling the contract with the Scotia biomass plant.

Sincerely,

Geoffrey Robinson  
B.S., Environmental Resources Engineering  
Humboldt State University 2001.



Sent from my iPhone

**From:** [Joan Dixon](#)  
**To:** [Public Comment](#)  
**Subject:** Dump biomass by 2025 and keep your promise for 100% clean energy  
**Date:** Tuesday, March 12, 2024 3:26:54 PM

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Hello,

I have followed some of this process and had hope that the County would really make progress on sustainable and renewable energy. As I understand it, we had the opportunity to go with a local (Sonoma County) company that was not a huge mega company which as we know really focuses on capital gains to reward investors, but the board chose a huge company based in Hong Kong and choose to continue with biomass processing which obviously creates toxicity.

So now we have a chance to really make progress, so please keep your eyes on the Future of Life on Earth and the Future our lovely and wonderful paradise of Humboldt County and use your position to make a difference. Please stand up and go on record as ones who stood up to take this opportunity to effectively move toward 100% clean energy and to help Humboldt actually make a real difference with climate and sustainability. The Earth is a closed system and we cannot keep on polluting and polluting to just keep living the lifestyle we are familiar with because it seems natural to us, BUT in fact it is NOT natural because it is unsustainable and the Earth, like our bodies, can only take so much poison before it has dramatic consequences like ferocious weather, toxic water and air, earthquakes, hurricanes and floods, for instance.

We are the ones who must take responsibility and act now. Thank-you for your consciousness and courage to dump biomass by 2025 and keep your promise for 100% clean energy!!

Thank-you

Joan Dixon, mother, grandmother, retired RN

**Light and Love Prevail!!!**

*"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has." ~ Margaret Mead*

**From:** [Joyce King](#)  
**To:** [Public Comment](#)  
**Subject:** Biomass  
**Date:** Tuesday, March 12, 2024 5:53:50 PM

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Please count me against biomass energy. It's not clean, and not really renewable if you count the wildlife, their habitats, and ecosystems that are damaged by the questionable forest practices involved.

Thank you.  
Joyce King  
McKinleyville  


**From:** [Juliet O'Barr](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5  
**Date:** Tuesday, March 12, 2024 2:03:02 PM

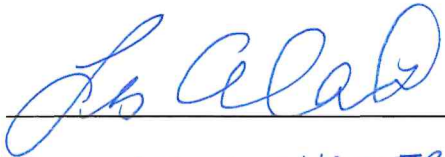
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To whom it may concern:

I would like to express my support of ending any use of Biomass for energy production. The statistics about its carbon footprint are alarming. As the mother of 2 small children, there is nothing more important to me than a sustainable future. Our use of biomass for energy production does not align with the sustainable future that all life on this planet deserves. Please do what is right for us all and keep the promise of 100% clean energy by 2025. Thank you,

Juliet O'Barr

Support for the Humboldt Redwood Power Plant is a good investment in our local power production, and I support the contract.

  
Name LES A. CHARTER

SAMOA, CA  
City



**From:** [Lynda McDevitt](#)  
**To:** [Public Comment](#)  
**Subject:** Agenda item #5  
**Date:** Tuesday, March 12, 2024 5:28:51 PM

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Dear CAC,

I am writing on behalf of the Buddhist Peace Fellowship, Humboldt Chapter. Our group realizes that a major foundation for peace is a healthy and secure community and that is why we are concerned about the pollution and degree of CO2 emissions that the Scotia Biomass Plant of Humboldt Sawmills is producing.

The proponents of biomass energy claim that biomass is carbon neutral, that the amount of CO2 produced during burning wood products for energy is equal to the CO2 produced by replacement forests to act as carbon sinks.

But this is a false equivalency because of the issue of timing.

As a March 2018 Scientific American article states, " Burning biomass for energy releases large amounts of carbon into the atmosphere all at once. But depending on the type of tree, replacement forests may take decades or even a century to draw the same amount of carbon back out of the air. Also wood waste left to decompose can take anywhere from 57 to 127 years to biodegrade slowly releasing CO2.

One could argue that the process has the potential to be carbon neutral over very long time scales but not in the short term. And that means it not a useful strategy when world leaders are working to reduce global carbon emissions immediately. "

As we all know we are running out of time to address climate change. The land surrounding Humboldt Bay is at known risk due to sea level rise. We are all aware of and affected by the devastating wildfires in our area. Knowingly using a source of energy that exacerbates CO2 emissions and pollution is not considering the community's short and long term health and security.

Therefore we are requesting the Community Advisory Committee make the recommendation to the RCEA Board that the right thing to do is keep their promise to the community of 100% clean energy by 2025 and legally terminate their contract with Humboldt Sawmills.

Thank you for your attention.

Sincerely,

Lynda McDevitt


**From:** [o.b](#)  
**To:** [Public Comment](#)  
**Subject:** CAC agenda item 5  
**Date:** Tuesday, March 12, 2024 4:09:48 PM

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Hello, I am a resident of Humboldt county and I do not support the use of biomass as an energy source. I believe we are well within our rights to end the contract with the polluting sawmill and instead spend that money elsewhere on a cleaner renewable. I am well aware that there is not such thing as a perfectly clean source of energy however there are better sources than biomass and I would be very interested to see how much better that money could be spent. I am an environmental science and management ecological restoration major and an indigenous peoples, natural resource use, and the environment minor at Cal Poly Humboldt in my third year. I was previously a wildlife major in my third year. I feel that even without the climate impacts of biomass, the health impacts alone on both people and wildlife of Humboldt county is enough to cancel this contract with the sawmill and invest elsewhere wisely.

Olivia Brock  
Arcata

Please ensure the continuation of the Scotia power plant contract, as it represents a valuable and sustainable local power source for our county.

 - Teresa Davis

Eureka, CA

Name

City

**From:** [REDACTED]  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5 STOP buying energy from a plant that emits 88% more carbon than Humboldt cars and trucks.  
**Date:** Tuesday, March 12, 2024 8:56:24 PM

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**Dump biomass by 2025 and keep your promise for 100% clean energy.  
Our community doesn't want RCEA spending renewable energy dollars on biomass.**

Sincerely, Catherine Hart  
Registered Democrat who votes

**From:** [jen knight](#)  
**To:** [Public Comment](#)  
**Subject:** No to renewing contract  
**Date:** Tuesday, March 12, 2024 9:03:21 PM

---

I'd like to address the BioMass issue. I attended online, but did not get a chance to speak. Please end the contract.

Thank you,  
jennifer knight

**From:** [Patty Harvey](#)  
**To:** [Lori Taketa](#)  
**Subject:** Re: biomass burning mtg  
**Date:** Thursday, March 14, 2024 2:12:13 PM

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Sure! Here goes:

My name is Patty Harvey, I am a senior citizen living in Humboldt Co. I am seriously concerned about the environmental damage from burning biomass. Large studies of the US Medicare population have shown that even low-level particulate pollution is especially hazardous for seniors, increasing hospitalizations and premature deaths, even when air meets air quality standards. This is especially true for low income elders, people of color, and seniors with chronic disease. Fine particulates can stay in the air for days and travel hundreds of miles, so it's not just a problem for Scotia but for the rest of Humboldt County and beyond.

I heard the forest service woman talking about how burning biomass is essential for fire suppression efforts. The CO2 that is emitted contributes to global warming that EXACERBATES the danger of fires.

It's past time to put efforts forward to find alternative energy sources. The local biomass plant emits as much carbon as 88% of all of Humboldt's cars. It has repeatedly failed to keep its pollution monitors and pollution controls in good working order to ensure public safety.

Finally, As a public agency, RCEA should not just consider the price it pays for biomass but the price we all pay and its disproportionate impact on our community's most vulnerable citizens. Please tell RCEA to drop biomass by 2025 and invest in clean energy.

On Thu, Mar 14, 2024 at 1:16 PM Lori Taketa [REDACTED] wrote:

Hello Ms. Harvey,

My apologies, I am unable to open the attachment to your email. Are you able to copy the content into the body of your email and resend it?

Thank you for your assistance with this.

Best Regards,

**Lori Taketa**

Executive Support Specialist & Clerk of the Board | Redwood Coast Energy Authority

(707) 269-1700 | [REDACTED] | [www.RedwoodEnergy.org](http://www.RedwoodEnergy.org)

*Pronouns: she, her, hers*

*CONFIDENTIALITY NOTICE: We respect your privacy. Please review our privacy policy for more information. <http://redwoodenergy.org/privacy/> The information in this e-mail may be confidential, subject to legal privilege, or otherwise protected from disclosure. No confidentiality or privilege is waived or lost by mis-transmission. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination, or copying of this e-mail and its attachments, if any, or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and delete this e-mail from your computer system.*

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**From:** Patty Harvey [REDACTED]  
**Sent:** Tuesday, March 12, 2024 7:39 PM  
**To:** Public Comment <[publiccomment@redwoodenergy.org](mailto:publiccomment@redwoodenergy.org)>  
**Subject:** biomass burning mtg

please see attached:

--

Make a Small Loan, Make a Big Difference - Check out Kiva.org to Learn How!

--

Make a Small Loan, Make a Big Difference - Check out Kiva.org to Learn How!

Thank you for the opportunity to speak in opposition to biomass power.

1. Burning wood on purpose just to make a buck is madness considering where we stand in the climate crisis.
2. Cost: Over the years RCEA rate payers have paid substantially more than the average market price for the biomass power component . The EIA forecasts the Average Wholesale price for power in-the CAISO region at \$43.00 per MW for 2024

The CPUC “Padilla Report 2023” forecast solar and wind prices trending downward over the next few years while our biomass price increases significantly. The HSC contract is based on \$63.00 MW (in 2021) plus yearly California CPI changes +1%. My estimate of the contracted amount after 3 years of CPI adjustments is \$75.25 for HSC today and out to \$92.60 for 2031 using 2%+1% for succeeding years and \$99 using 3%+1%. What is the opportunity cost lost? Whereas many solar and solar with grid storage and wind contracts are flat rate and cost secure because the fuel is free and maintenance cost is low and truly carbon neutral, price competitive and hedged against market fluctuations.

Let’s pretend that you were spending your own money and not rate payers' money, would you invest in decades old technology, that is costly, inefficient, and unhealthy?





+ Sources & Uses

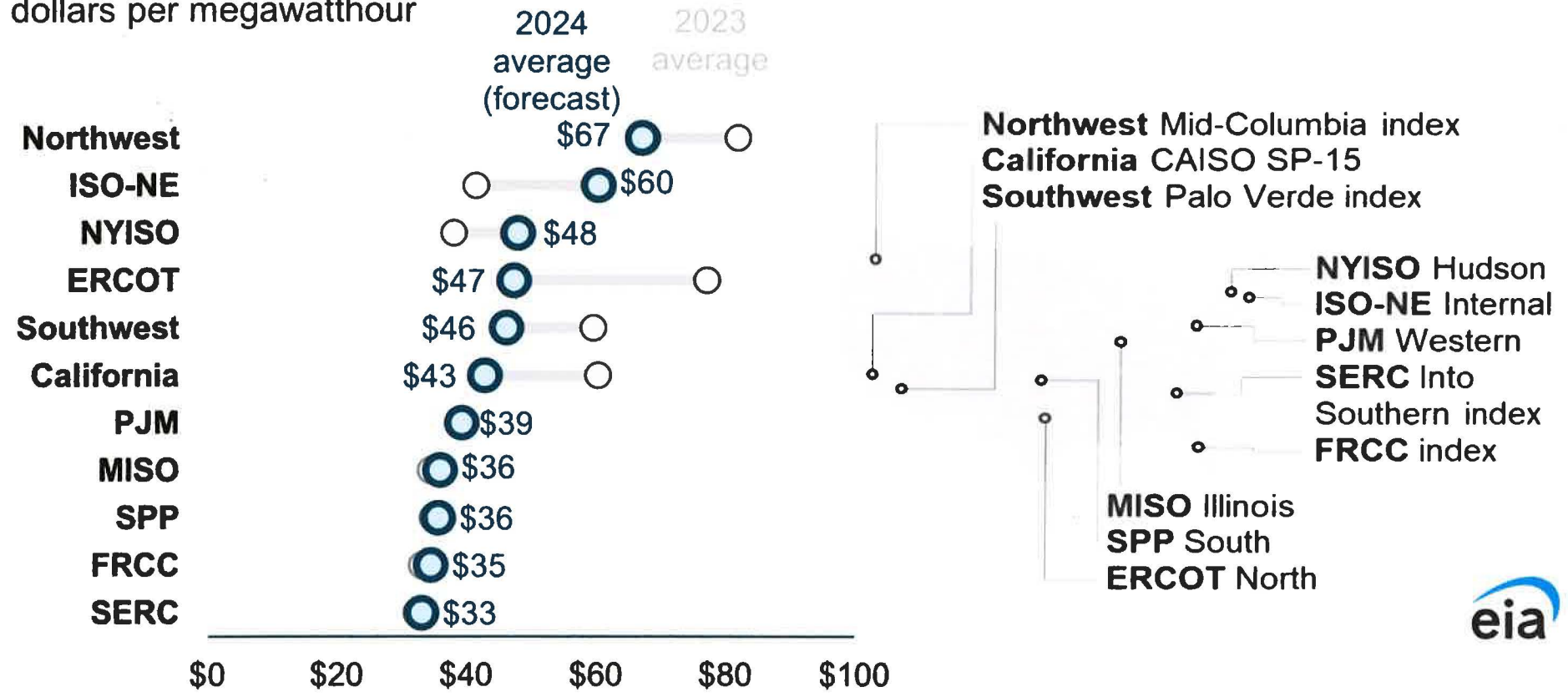
+ Topics

+ Geography

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### Annual average wholesale electricity prices at selected price hubs (2023–2024)

dollars per megawatthour



Data source: U.S. Energy Information Administration, *Short-Term Energy Outlook*, January 2024



**From:** [Melodie Meyer](#)  
**To:** [Public Comment](#)  
**Subject:** March 12 - Agenda Item 5  
**Date:** Wednesday, March 13, 2024 9:49:40 AM  
**Attachments:** [Biomass Plant Letter No Permit.pdf](#)  
[NCUAQMD letter granting app shield 7-28-2023.pdf](#)

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Good morning,

Please see the attached letter (with referenced letter from NCUAQMD) as a comment from EPIC, thank you.

--

Melodie Meyer (Pueblo of Laguna) | (she/her)  
Conservation Attorney  
Environmental Protection Information Center  
145 G. St., Suite A  
Arcata, CA 95521  
[wildcalifornia.org](http://wildcalifornia.org)



Sent via email to [support@ncuaqmd.org](mailto:support@ncuaqmd.org)  
March 11, 2024

North Coast Unified Air Quality Management District Governing Board  
Attn: Clerk of the Boards  
707 L Street  
Eureka, CA 95501

Re: Scotia Biomass Plant is Operating Without A Permit

- I. The North Coast Unified Air Quality Management District Erroneously Informed Humboldt Sawmill Company and the Public that the Sawmill Company's Biomass Plant Can Operate Without A Permit. The District Must Therefore Immediately Notify the Plant that Operation Before the Permit is Renewed is in Violation of District and Federal Regulations and Issue a Press Release Correcting Previous Public Statements.

All major sources of air pollutants must operate with a Title V permit under the Clean Air Act and its regulations.<sup>1</sup> Once a permit expires, a major source no longer has a legal right to operate.<sup>2</sup> The only exception occurs when a facility submits a "timely and complete" permit renewal application and is granted an application shield, allowing it to continue to operate while the District considers their renewal application.<sup>3</sup> Operating without a Title V permit or application shield is a violation of federal law and NCUAQMD regulations.<sup>4</sup>

On May 12 2023, the Humboldt Sawmill Company (HSC), located in Scotia, California, submitted a request to the North Coast Air Quality Management District ("the District") to renew the Title V Permit (NCU 060-12) for their biomass plant. The fifth term of that Title V permit expired on July 19, 2023.<sup>5</sup> On July 28, 2023 the District had not yet renewed the permit and

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<sup>1</sup> 40 C.F.R. §70.3

<sup>2</sup>40 C.F.R §70.7(c)(1)(ii) "Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with paragraph (b) of this section and § 70.5(a)(1)(iii) of this part."

<sup>3</sup> 40 C.F.R. §70.7(b)

<sup>4</sup> 42 U.S.C. 7413(c)(1) [42 U.S.C. 7661(1)-(2), 42 U.S.C. 7661a(a)]

<sup>5</sup>Press Release from the North Coast Unified Air Quality Management District, January 25, 2024, available at

<https://www.ncuaqmd.org/files/ca7579a9c/NCUAQMD+Press+Release+HSC+Title+V+Permit+Update+1-25-2024+final.pdf>



notified HSC by letter that the plant could continue to operate under an “application shield”.<sup>6</sup> This same letter noted that the plant’s renewal application was submitted late and that several sections of the District’s application form were incomplete.<sup>7</sup>

Granting an application shield was done in error and in violation of both federal law and the District’s own rules because the application for renewal was not “timely” or “complete”. Federal Clean Air Act regulations define a timely application for permit renewal as “at least 6 months prior to the date of permit expiration.”<sup>7</sup> and a complete application as including the “statement and description of all applicable requirements.”<sup>9</sup> The district’s own Regulation V, Rule 502 likewise requires a renewal application to be submitted “no later than 6 months before the expiration date of the permit” and states that permit renewal applications must be “timely and complete” for a facility to qualify for an application shield, referencing the federal definition of timely constituting 6 months prior to expiration.<sup>10</sup>

In this case, HSC submitted their application on May 12, 2023 only 2 months prior to their permit expiration on July 19, 2023 and failed to complete Section V of the District’s Permit Application Form 1313 with a list of applicable requirements.<sup>7</sup> Because the application was incomplete and was not submitted on time, an application shield cannot have been granted. The plant has been operating without an application shield or permit since July 19, 2023.

The District has argued in a press release that HSC submitting the application 4 months late was merely a procedural violation and that the application shield has taken effect.<sup>8</sup> However, a plain reading of both 40 C.F.R. 70.7(c)(ii) and District Rule 502(a)(2) and the district’s July 28 letter to Humboldt Sawmill Company indicates that the District could not have granted an application shield to HSC because their permit renewal application was both late and incomplete. Even if the Air District wanted to grant an application shield to an applicant that

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<sup>6</sup> Letter from Jason Davis, Deputy Air Pollution Control Officer to Chris Verdeber, Director Scotia Operation, Humboldt Sawmill Company (July 28, 2023) (Attached to this letter)

<sup>7</sup> 40 C.F.R. § 70.5(a)(1)(iii) “For purposes of permit renewal, a timely application is one that is submitted at least 6 months prior to the date of permit expiration, or such other longer time as may be approved by the Administrator that ensures that the term of the permit will not expire before the permit is renewed. In no event shall this time be greater than 18 months.”

<sup>9</sup> 40 CFR 70.5 (a)(2) and 70.5(c)(4)(I)

<sup>10</sup> North Coast Unified Air Quality Management District, Regulation V, Rule 502

<sup>8 11</sup> North Coast Unified Air Quality Management District, Press Release from the North Coast Unified Air Quality Management District, January 25, 2024, available at <https://www.ncuaqmd.org/files/ca7579a9c/NCUAQMD+Press+Release+HSC+Title+V+Permit+Update+1-25-2024+final.pdf>



applied less than 6 months prior to their permit expiration, they could not do so because the federal regulations define the minimum standards for State permit programs.<sup>9</sup>

This letter serves as notice to the District that you extended an invalid application shield, encouraged HSC to operate its biomass plant without a permit in violation of federal law, and misinformed the public about the plant's permit status. We urge you to inform Humboldt Sawmill Company that the plant currently does not have a legal basis to operate and to issue a new press release correcting previous statements to the media and the public.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Simmons', with a long horizontal flourish extending to the right.

Matthew Simmons  
Climate Attorney  
Environmental Protection Information Center

CC: Humboldt County Board of Supervisors  
Richard Engel, RCEA  
Matthew Marshall, RCEA  
Jeff Lindberg, CARB

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<sup>9</sup> 40 C.F.R. 70.3(a) "These regulations define the minimum elements required by the Act for State operating permit programs and the corresponding standards and procedures by which the Administrator will approve, oversee, and withdraw approval of State operating permit programs."

**North Coast Unified  
Air Quality Management District**

707 L Street, Eureka, CA 95501  
(707) 443-3093  
[www.ncuaqmd.org](http://www.ncuaqmd.org)



July 28, 2023

Chris Verderber  
Director, Scotia Operations  
Humboldt Sawmill Company  
PO Box 37  
169 Main Street  
Scotia, CA 95565

**Re: Title V Renewal Application: Status and Request for Additional Information**

Dear Mr. Verderber:

On May 12, 2023, Humboldt Sawmill Company (HSC) submitted a request to renew Title V Permit NCU 060-12. The request was conveyed using District Forms 1300 and 1313 and was executed by the Responsible Official, Dean Kerstetter. Consistent with District Rule 502, the District has determined the application content to be sufficient to support a preliminary completeness determination, and as such, the equipment authorized for use under the permit may continue to be operated. This *permit shield* shall remain in effect until such time as the Air Pollution Control Officer (APCO) takes final action on the application, or the expiration of the next permit term, July 19, 2028. Failure to submit a complete application for the next permit term in the interval between January 19, 2027 and January 19, 2028 may result in the issuance of a Notice of Violation.

A determination of completeness for an application does not prevent the District from requesting additional information to supplement the materials under review [District Rule 502(E)(2)]. In addition, pursuant to California Health and Safety Code (CH&SC) Section 42303, the APCO may at any time require from the applicant information, analyses, plans, or specifications which disclose the nature, extent, quantity, or degree of air contaminants which may be discharged by the source into the atmosphere. The District has previously invoked its authority in this regard and HSC has complied by providing refined emission inventory data in a timely fashion.

A preliminary draft of the proposed Title V Permit is nearly complete. At issue are the remaining gaps in the application data discussed hereafter. The District hereby requests HSC to address Staff's questions, supply the data and report of regulatory analyses listed below prior to September 30, 2023. Failure to do so may result in the issuance of notices of violation and may jeopardize the permit shield status.

### **Federal Regulatory Applicability Analysis**

Section VII of Form 1313 is incomplete.

- a. Please identify all federal Clean Air Act requirements which are applicable to the source. For example, the three main woodfired boiler units are subject to 40 CFR 63 Subpart DDDDD, also known as the Boiler NESHAP for major sources.
- b. When a federal regulation is applicable and compliance options exist, please specify which option is preferred. For example, HSC previously declared its intent to comply with the Boiler NESHAP for major sources as described in the attached letter from Howard Hughes dated January 5, 2017. Please confirm this pathway remains the preferred option.

### **Establish Criteria Pollutant Emission Limits**

All stationary and portable source permits issued by the District contain mass emission limits for the six criteria pollutants: carbon monoxide, oxides of nitrogen, volatile organic compounds, particulate matter 2.5 microns in size and smaller, particulate matter 10 microns in size and smaller, and oxides of sulfur. As part of the application process, it is incumbent upon the applicant to identify the hourly and annual potential to emit of each pollutant at each emission point. District Form 1300 B is generally utilized for this purpose, however, the District will entertain alternative proposals for transmittal of the information.

### **Identify Insignificant Sources**

Section VIII of Form 1313 is incomplete. Please identify all equipment and devices which are exempt from federal permitting requirements pursuant to District Rule 501 (D)(2). Provide a description of each device and the regulatory basis for the exemption. For guidance, you may wish to refer to the 1995 EPA "White Paper for Streamlined Development of Part 70 Permit Applications".

Should you have questions or require additional information, please contact Ms. Cameron Purchio, Air Quality Engineer at (707) 443-3093 x 119.

Sincerely,



Jason Davis  
Deputy Air Pollution Control Officer

January 5, 2017

Delivered by email

Winslow Condon  
North Coast Unified Air Quality Management District (NCUAQMD)  
707 L Street  
Eureka, California 95501  
wcondon@ncuaqmd.org

Re: December 2, 2016 Request to Amend Letter

Mr. Condon:

This letter is in response to your letter, sent on December 2, 2016, that requested an amendment to the submitted Title V renewal application already deemed complete by the NCUAQMD. The NCUAQMD requested that the amendment provide information concerning how Humboldt Redwood Company (HRC) will demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, also known as Boiler MACT. This letter provides a summary of the compliance alternatives HRC has chosen, where applicable.

Boilers A, B, and C are all existing stoker boilers designed to burn “wet biomass” as defined in 40 CFR 63.7575, and are, according to 40 CFR 63.7500, subject to the applicable emission limits in Table 2 to the Subpart, the applicable work practice standards in Table 3 to the Subpart, and the applicable operating limits in Table 4 to the Subpart. From the options available in Table 2, Boilers A, B, and C will comply with the following limits:

- Hydrogen chloride (HCl) – 0.022 pounds of per million British thermal unit (lb/MMBtu) of heat input,
- Mercury (Hg) – 0.0000057 lb/MMBtu of heat input,
- Carbon monoxide (CO) – 720 parts per million by volume on a dry basis corrected to 3 percent oxygen (ppmvd @ 3% O<sub>2</sub>), based on a 30-day rolling average monitored by a continuous emissions monitoring system (CEMS); and
- Filterable particulate matter (PM) – 0.037 lb/MMBtu of heat input.

Except for the CO limit, for which continuous compliance will be demonstrated using a continuous emissions monitoring system (CEMS) that is installed, operated, certified, and maintained according to Boiler MACT requirements, HRC proposes to demonstrate compliance with the HCl, Hg, and filterable PM emission limits through performance testing which would be conducted in accordance with 40 CFR 63.7520 and Table 5 to the Subpart.

The work practice standards that the boilers must comply with include the requirement to conduct an annual tune-up that conforms to the specification in §63.7540(a)(10). Each boiler is also required to have a one-time energy assessment performed by a qualified energy assessor that conforms to the requirements in Table 3 to the Subpart. HRC has completed the one-time energy assessment as required.





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Because the boilers employ dry electrostatic precipitators (ESPs) to control PM, and do not use a particulate matter continuous parameter monitoring system (PM CPMS) to monitor in-stack PM concentrations, opacity must be less than or equal to 10 percent opacity, or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation, as a daily block average. Also, the 30-day rolling average operating load of each boiler must be maintained such that it does not exceed 110 percent of the highest hourly average operating load recorded during the PM performance test.

Annual tune-ups will be completed no more than 13 months after the previous tune-up. Performance tests will be repeated annually, no more than 13 months after the previous performance test. However, if 2 consecutive performance tests for a given pollutant are less than 75 percent of the emission limit, and there are no changes to the boiler that would increase emissions of that pollutant, subsequent performance tests for that pollutant can be conducted every third year, and no more than 37 months after the previous performance test. Testing would return to an annual basis if a performance shows emissions greater than 75 percent of the emission limit.

Continuous compliance with the emission limits, operating limits, and work practices required by the Subpart will be demonstrated by maintaining records of the type and amount of all fuels burned in each boiler, as well as collecting and processing data associated with operating limits. Opacity data will be collected every 15 minutes during the entire period of the PM performance tests. The average hourly opacity reading will be determined for each performance test run by computing the hourly averages using all of the 15-minute readings taken during each performance test run, and the highest hourly average opacity reading measured during the test run demonstrating compliance with the PM emission limitation will be determined. Similarly, the operating load or steam generation data will be collected every 15 minutes during the PM performance test, the hourly averages will be calculated, and the highest hourly average of the three test run averages will be determined and multiplied by 1.1 (i.e., 110 percent) as the operating limit.

To demonstrate compliance during start-up and shutdown, emissions from firing solid biomass fuel must be vented to the main stack, and all applicable control devices must be engaged. The CO CEMS will be operating, monitoring data collected, records kept, and reports provided during and concerning periods of start-up and shutdown. The boiler will be started using one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, and liquefied petroleum gas.

A Notification of Intent to conduct a performance test will be submitted at least 30 days before the performance test is scheduled to begin. A Notification of Compliance Status, which must include all performance test results, will be submitted before the close of business on the 60th day following the completion of all performance tests and/or other initial compliance demonstrations.

Compliance reports will be submitted semi-annually, covering the period from January 1 through June 30 or July 1 through December 31, and be postmarked or submitted no later than July 31 or January 31,



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whichever the first date is following the reported semi-annual period. The contents of the annual report are described in § 63.7550.

The NCUAQMD has indicated that it is amenable to a 30 day extension of the permit renewal timeframe and HRC is similarly amenable to this. We will provide additional comments on the draft Title V Operating permit by the close of business on Friday, January 13, 2017.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Howard Hughes  
EHS Compliance Specialist  
(707) 764-4237  
HHughes@mendoco.com

**From:** [Gary Rees](#)  
**To:** [Public Comment](#)  
**Subject:** Dirty Biomass Plant  
**Date:** Wednesday, March 13, 2024 4:11:36 PM

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Dear Friends at RCEA, Community Advisory Committee,

Re CAC Agenda Item #5

I write in support of ending your bio-mass contract by 2025, thereby keeping your promise to achieve 100% clean energy by 2025. What the world needs more of is less and less dirty generation. I and my RCEA consumer friends urge you to do the right thing. I hope our input doesn't come too late.

Gerald C. Rees Jr.

**From:** [Marc Delany](#)  
**To:** [Public Comment](#)  
**Subject:** comment Item 5  
**Date:** Wednesday, March 13, 2024 1:19:19 PM

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On Mar 13, 2024, at 12:51 PM, Marc Delany [REDACTED] wrote:

Missed the opportunity to comment.

I would have pointed out:

Since we are now going to be composting CA garbage entirely, the sawdust and fiber should be used entirely in the composting process, rather than burned. This material is necessary for composting to be successful. Compost is a higher value product when all costs are considered for all alternative uses. Higher and better use. Disposal of ash and toxic residues from burning sawdust and scraps is beyond stupid. Stop protecting entrenched interests and harmful practices now.... Starting with the least efficient.

Reducing petroleum based fertilizer, using all electric devices, producing solar, and better conservation should have begun 100 years ago.

So start today even if it is way too late.

Marc Delany

**From:** [Michael Furniss](#)  
**To:** [Lori Taketa](#)  
**Cc:** [Larry Goldberg](#); [Matthew Marshall](#); [rengle](#) [REDACTED]  
**Subject:** Re: RCEA Community Advisory Committee March 12 meeting  
**Date:** Friday, March 8, 2024 1:18:59 PM

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Thanks Lori,

Materials for review in this are all from an advocacy perspective, and these include many inaccurate assertions.

The committee should have this link: [Biomass Humboldt-RCEA-Revised\\_December\\_2021\\_final.docx \(redwoodenergy.org\)](#). (RCEA paid for this work but it seems to be considered expired or no longer relevant by some -- this is unfortunate).

Also, we have had these discussions in public fora. Not that they need not be revisited, and certainly will be, but previous discussions are not irrelevant, and we need to consider that we are having the same discussions over and over as if they are each new. Lately, they are dominated by advocates who have zero forestry qualifications or experience. If there are new issues, that's important, tho I don't see any at this point.

See: <https://vimeo.com/368199665> (paid for by RCEA).

Some of us are not in favor of promoting fracked natural gas to provide local electricity, and that is the inevitable result of the initiative to shut down the Scotia plant.

Michael J Furniss  
[REDACTED]

On Fri, Mar 8, 2024 at 12:39 PM Your Redwood Coast Energy Authority Board Clerk <[ltaketa@redwoodenergy.org](mailto:ltaketa@redwoodenergy.org)> wrote:





**RCEA Community Advisory Committee  
Tuesday, March 12**



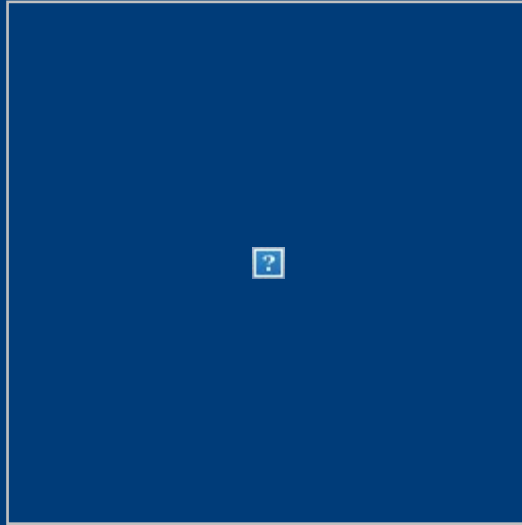
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<https://us02web.zoom.us/j/82223381610>

822 2338 1610 #

**Raise your hand in the online Zoom webinar during the public comment periods or press star (\*) 9 on your phone to raise your hand. Speaking time may be limited to 3 minutes, subject to the Chair's discretion.**

**To comment in writing,  
email [PublicComment@RedwoodEnergy.org](mailto:PublicComment@RedwoodEnergy.org) or write to the  
CAC at 633 Third Street, Eureka, CA 95501. Please indicate  
the agenda item in the subject line.**



707-269-1700

[RedwoodEnergy.org](http://RedwoodEnergy.org)  
[info@redwoodenergy.org](mailto:info@redwoodenergy.org)

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**From:** [Tina Garsen](#)  
**To:** [Public Comment](#)  
**Subject:** Biomass  
**Date:** Monday, March 11, 2024 7:50:00 PM

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Please consider moving away from biomass to a cleaner form of energy.

Respectfully,

Tina Garsen

Eureka

Sent from my iPhone

**From:** [Important Update!](#)  
**To:** [Public Comment](#)  
**Subject:** Clean power  
**Date:** Monday, March 11, 2024 8:54:41 PM

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We need to stop using biofuels and use renewable energy sources now! No more money for polluters! Disengage from sawmills. We need fewer sources of pollution and should never spend renewable dollars on dirty sources. Kathleenkelcey [REDACTED] McKinleyville ca

[Sent from AT&T Yahoo Mail on Android](#)

**From:** [Helen Azevedo-Gale](#)  
**To:** [Public Comment](#)  
**Subject:** CAC Agenda Item 5. CLEAN ENERGY  
**Date:** Tuesday, March 12, 2024 10:21:36 AM

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Regarding CAC Item #5. I'm out of town and cannot attend tonight's meeting but I wanted to make my thoughts known and heard. I originally came to Humboldt more than three decades ago because I believed that the future of the area was to be environmentally clean. Clean water, clean air, clean energy!

**PLEASE! Honor your 2019 promise to deliver 100% clean energy by 2025!**

**PLEASE! Terminate all agreements with Humboldt Sawmill Co's biomass. This plant emits twice as much carbon per megawatt hour as a coal plant. There are now several commercially viable alternative uses for mill waste that are climate beneficial. There is no need to burn it. The biomass plant's thousands of violations of the Clean Air and Clean Water Acts make it possible for RCEA to legally terminate its contract by 2025.**

**Thank you in advance for your attention to this matter that is so important to our health and quality of life.**

Sincerely,

**Helen Renée Gale**



**From:** [Maria Mehegan](#)  
**To:** [Public Comment](#)  
**Subject:** Dear RCEA:  
**Date:** Tuesday, March 12, 2024 4:40:13 PM

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It is imperative that you drop the dirty biomass plant contract by 2025. They should pay fines for all of the air quality violations and stop polluting our air and emitting greenhouse gases. We need to be 100% clean energy!

Thank you.  
Sincerely,  
Maria Mehegan