Public Comment

October 8, 2024
Community Advisory
Committee Special
Meeting

From:	Lee, Christopher@CALFIRE
To:	Public Comment
Subject:	CA Forest Pest Council to RCEA re Biomass power in Humboldt County
Date:	Monday, July 22, 2024 9:24:24 AM
Attachments:	Outlook-fxaidb0u.png Outlook-b00kifd4.png Outlook-a1x4ehoz.png Outlook-4awepral.png Outlook-s00fmfy3.png CFPC to RCEA 07222024.pdf

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To Whom it May Concern:

Please see the attached letter from the California Forest Pest Council and share with your Community Advisory Committee as appropriate. I have also sent hard copies to the Interim Executive Director and Board Chair.

Thanks for your time and attention.

Best regards,

Chris Lee
Forest Pathologist
118 S. Fortuna Blvd, Fortuna, CA 95540
[redacted]

California Forest Pest Council

Dedicated to protecting California's forests since 1951

July 11, 2024

Eileen Verbeck, Interim Executive Director
Sarah Schaefer, Chair, Board of Directors
Redwood Coast Energy Authority

Dear Ms. Verbeck and Ms. Schaefer:

The California Forest Pest Council (CFPC) is writing to express support for maintaining biomass energy generation as an active and valued part of RCEA's energy acquisition portfolio.

The CFPC is an advisory body to the California Board of Forestry, founded in 1951 and tasked with providing information to the Board and other groups about forest health, forest management, and forest ecology issues, especially those related to native and non-native forest pest organisms, forest weed management, and abiotic forest stresses such as drought, heat, and wind. With interest, we have observed RCEA conducting a periodic process of public consultation concerning the inclusion of biomass energy production in its mix of energy sources. We are interested in this case because forest management to foster forest resilience in California depends on the continued existence (and growth) of wood processing infrastructure, including biomass power, throughout the state.

Our group is not qualified to assess biomass energy production's impacts on human health and air quality, so we have no comments on those aspects of this energy production infrastructure. However, we have noticed during comment sessions that public health experts don't always observe the same boundaries. Doctors, nurses, and public health officials freely air skepticism about the necessity of biomass energy production facilities for forest health and resilience, and their uninformed skepticism in turn negatively affects public perceptions. Therefore, we are writing as a group of professional forest scientists and forest managers to provide you with some information that underscores the close ties between biomass and healthy forests in California.

During the extended severe drought of 2010-2017, California lost ~129 million trees (Fettig et al. 2019), mostly because attacking organisms such as bark beetles took advantage of severe water stress on the trees. It is now commonly accepted by scientists that this water stress has been greatly exacerbated in California by increased density of forest cover, especially an increase in small-diameter trees, in California as a result of lack of management and fire suppression policies during the 20th century (Dolanc et al. 2014; Stephens et al. 2018). In the initial severe drought, most tree mortality was concentrated in the Sierra Nevada, but during the next drought episode (2021-2022) heavy mortality began to appear in Lake, Napa, Sonoma Counties and counties to the north. These mortality events have led to the creation of several initiatives to address the multiple hazards they cause, including a Governor's Tree Mortality Task Force that has since morphed into the Wildfire and Forest Resilience Task Force and several local projects to reduce hazardous fuels and tackle the hazards of dead and

dying trees—a very active project in Lake County comes to mind (Wildfire and Forest Resilience Task Force 2024).

It is intuitive that removal of small woody fuels in strategic locations across the landscape reduces wildfire hazard. What may not be as obvious is that reducing major outbreaks of bark beetles and other pests in California forestlands also requires targeted tree removal (commonly called "thinning") to open up growing space and water resources for the remaining trees (Ristaino et al. 2019; Bernal et al. 2023; Looney et al. 2024; Loverin et al. 2024). One way of doing this is by implementing prescribed burning at various scales. Unfortunately, this solution is often impeded by uncooperative weather, public resistance, over dense stands not safe to burn without initial treatments and the need to avoid wildland-urban interface areas because of potential threats to life and property. Another approach is by manual tree removal. Mechanical density reduction is more expensive and time-consuming than removal through fire. In most unsubsidized situations in California, it can only be implemented where the landowner or land manager can find revenues to offset project costs. Typically, in the case of management for forest health and resilience, it is smaller trees and shrubs that need to be removed rather than large ones, so timber sales to the forest products market are often off the table.

The need to find such alternative revenue streams—again, not for profit but to pay for the management projects—is spurring Californians to search for innovative ways to use small and low-grade woody forest residues (e.g., the Joint Institute for Wood Products Innovation, https://bof.fire.ca.gov/board-committees/joint-institute-for-wood-products-innovation/.) Hopefully, efforts such as this will bear fruit in future years, increasing California's capacity for woody residue utilization.

Meanwhile, it is necessary to acknowledge the extent to which California's wood processing infrastructure has deteriorated. Galik et al. (2021) mention that a significant loss of this infrastructure occurred within the decade prior to their paper. This was while the unprecedented bark beetle-caused tree mortality episode was happening in California, a situation that could have been improved if processing capacity had been increasing rather than decreasing in the state. Seeing this, we think that it is critical to call attention to this atrophy of forest management capacity. Legislative policies enacted within the past decade in California mandating the removal of millions of tons of forest fuels will instead require a major augmentation of capacity (Joint Institute 2021).

Forest health management in California depends largely on geography: projects don't happen in places far from wood processing infrastructure because it costs too much to transport the woody material from forest to facility. We need more, not fewer, wood processing facilities of every kind if we want to maintain forest and landscape health in the state; furthermore, these facilities and the markets they supply depend on each other in a web of interaction and information. Every time a biomass cogeneration facility, a sawmill, or other similar facility

goes out of business in California, this dims the outlook for other facilities and diminishes the public's awareness of the need for them.

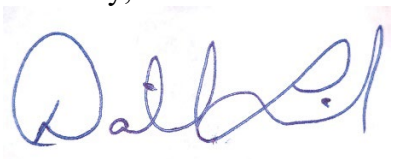
Besides these large-scale, structural reasons for encouraging the use of biofuels for energy production, biomass power generation facilities are sometimes directly related to forest health management more directly and at a more local scale. As one example, a sudden oak death management project in Humboldt County had to cease prematurely because of the closure of biomass facilities in Blue Lake and, eventually, Fairhaven, since no alternative cost-effective means of infected tree disposal could be found.

Of course, while encouraging the RCEA to continue to retain biomass power generation in its portfolio of renewable energy sources, the CFPC underlines the importance of sustainable and forest-resilient harvest practices as emphasized in RCEA's own document entitled "Biomass Power in Humboldt County" (Furniss 2020). An important part of these practices involves leaving sufficient coarse woody material on the forest floor to provide ongoing sources of nutrients for soil microbiota and as habitat for macrobiota.

The urgency of California's forest health challenges require that we not discard any management tools we have. CFPC believes that stigmatizing biomass power generation in one part of California could jeopardize its use as a forest health tool throughout the entire state. Accordingly, we urge you not only to continue to retain biomass power generation in RCEA's portfolio, but also to take the following actions: (1) do everything you can to encourage the development of further woody material processing infrastructure, including more biomass energy generating facilities, in smaller and more remote parts of Humboldt County, as mentioned in Furniss (2020); and (2) remove the stigma that currently exists in your promotion of a "Re-power +" community choice program, which promotes a biomass-free energy mix as being superior to one that sources energy partly from biomass sources. Biomass power is renewable and is an important part of the solution to California's current landscape-scale forest health problems.

Thank you for your time and attention.

Sincerely,



Danielle Lindler, RPF, Chair
California Forest Pest Council
CFPC2024@gmail.com

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2. Non-Agenda Item Public Comment

From:	Ken Miller
To:	Lori Taketa
Subject:	Distributed Solar artcle
Date:	Wednesday, August 14, 2024 3:45:44 PM
Attachments:	Joshua Frank on Distributed solar.docx Screenshot-2023-01-20-at-6.54.47-PM.png

Dear Ms. Taketa,

Please share with RCEA Board, Staff, and CAC. Thank you, Ken

https://tomdispatch.com/

Joshua Frank, What (Not) to Do in a Tinder-Box World

POSTED ON AUGUST 13, 2024

What a planet we're now on. Whether it's days (the **two hottest** ever recorded, back to back), months (the **13 hottest in a row**), or years (2023, the hottest ever **by far**), we're now eternally setting new heat records. Oh, and in case that isn't enough, we seem unable to ensure that ever more grim records won't follow by cutting back radically on the flow of greenhouse gasses from fossil fuels we're sending into the atmosphere in a distinctly overheated fashion. The latest example: emissions from methane (**responsible for** "half of the global heating already experienced") which are still rising remarkably rapidly across the planet.

And whether it's floods or fires, the result of such emissions and a significantly hotter planet is weather that's all too literally from hell. If, in fact, you happen to be living in certain parts of California, for years now you've been experiencing both **devastating fires** (2021, typically, was **the driest** in that state in at least a century) and **devastating atmospheric rivers** in a record fashion. The latest of that state's horrific blazes, which are getting worse thanks to climate change, is the Park Fire. While I was writing this, it had already **burned through 389,791 acres** (609 square miles) and was still only 18% contained, which already made it the **fifth-largest fire** in the state's history and, mind you, it was just one of 100

fires burning across the West.

The governor of California, Gavin Newsom (unlike governors in states like **Florida** and **Louisiana** who have functionally denied the very existence of climate change), has **gained a reputation** for working to rein in global warming and transition to a 100% clean energy grid, including a state ban on the sales of fossil-fuel powered cars by 2035. And yet it tells us something about the all-American world we now live in that even Newsom, as ***TomDispatch*regular** Joshua Frank reports today, is all too ready to take his eye off the prize when local politics makes such an approach seem useful, if not enticing, to him. How truly sad! *Tom*

"Where California Goes, There Goes the Nation"

Gavin Newsom's War on Rooftop Solar Is a Bad Omen for the Country

BY **JOSHUA FRANK**

California Governor Gavin Newsom appears to be taking climate change seriously, at least when he's in front of a microphone and flashing cameras. His talk then is direct and tough. He repeatedly points out that the planet is in danger and appears ready to act. He's been called a "**climate-change crusader**" and a leader of America's clean energy revolution.

"[California is] meeting the moment head-on as the hots get hotter, the dries get drier, the wets get wetter, simultaneous droughts and rain bombs," Newsom typically asserted in April 2024 during an event at Central Valley Farm, which is powered by **solar panels and batteries**. "We have to address these issues with a ferocity that is required of us."

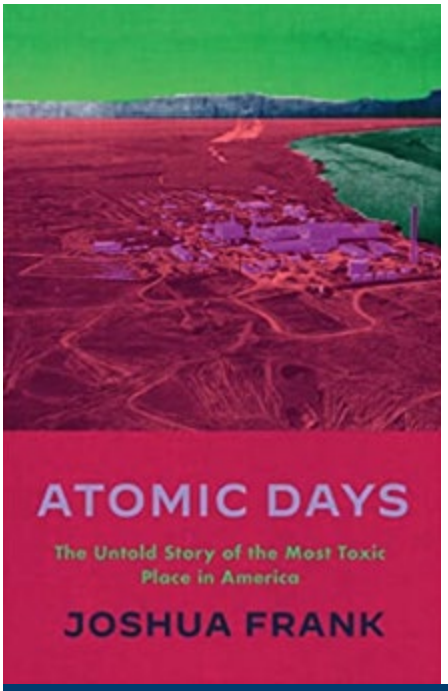
These are exactly the types of remarks many of us wish we had heard from so many other elected officials addressing the climate disaster this planet's becoming, the culprits behind it, and how we might begin to fix it. True, Big Oil long **covered up**internal research about how devastating climate change would be while lying through its teeth as its officials and lobbyists **worked** fiercely against any kind of global-warming-directed fossil-fuel legislation. It's also correct that the issue must be addressed immediately and forcefully. Yet, whatever Governor Newsom might say, he's also played a role in launching a war on rooftop solar power and so kneecapping California just when it was making remarkable strides in that very area of development.

Consider California's residential solar program (its "**net-metering**"), which the governor has all but dismantled. Believe it or not, in December 2022, the California Public Utilities Commission (CPUC) **voted 5-0** to slash incentives for residents to place more solar power on their homes. Part of the boilerplate justification offered by the CPUC, Newsom, and the state's utility companies was that payments to individuals whose houses produce such power were simply too

high and badly impacted poor communities that had to deal with those rate increases. They've called this alleged problem a "**cost-shift**" from the wealthy to the poor. It matters not at all that the CPUC, which **oversees** consumer electric rates, has continually **approved** rate increases over the years. Solar was now to blame.

It's true that property owners do place those solar power panels on their roofs. What is *not* true is that solar only benefits the well-to-do. A 2022 study by Lawrence Berkeley Labs **showed** that 60% of all solar users in California then were actually low- to middle-income residents. In addition, claiming that residential solar power is significantly responsible for driving the state's electricity rates up just isn't true either. Those rates have largely risen because of the eternal desire of California's utility companies to turn a profit.

Here's an example of how those rates work and why they've gone up. Pacific Gas & Electric Company (PG&E), whose downed power lines have been responsible for an estimated **30 major wildfires** in California over the past six overheating years, was forced to pay $13.9 billion in settlement money for the damage done. The company has also been found guilty of **84 felony** counts of involuntary manslaughter for deaths in the devastating 2018 Camp Fire in Butte County. In response to those horrific blazes and the damages they inflicted, the company claims it must now spend more than **$5.9 billion** to bury its aging infrastructure to avoid future wildfires in our tinder-box of a world. Watchdog groups suggest that it's those investments that are raising electric bills across the state, not newly installed solar power.



Buy the Book

In short, large utilities **make their money** by repairing and expanding the energy grid. Residential solar directly threatens that revenue stream because it doesn't rely on an ever-expanding network of power stations and transmission lines. The electricity that residential solar power produces typically remains at the community level or, better yet, in the home itself, especially if coupled with local battery storage. Not surprisingly then, by 2018, 20 transmission lines had been canceled in California, mainly because so many homes were already producing solar power on their own rooftops, saving **$2.6 billion** in total consumer energy costs.

A recent Colorado-based Vibrant Clean Energy **analysis** confirmed the savings rooftop solar

provides to ratepayers. Their report estimated that, by 2050, rooftop panels would save California ratepayers $120 billion. That would also save energy companies from spending far more money on the grid (but, of course, that's the only way they turn a profit).

"What our model finds is that when you account for the costs associated with distribution grid infrastructure, distributed energy resources can produce a pathway that is lower cost for all ratepayers and emits fewer greenhouse gas emissions," **said** Dr. Christopher Clack of Vibrant Clean Energy. "Our study shows this is true even as California looks to electrify other energy sectors like transportation."

However, such lower costs also mean less profits for utility companies, so they have found an ingenious workaround. They could appease climate concerns while making a bundle of money by building large solar farms in the desert. In the process, nothing about how they generated revenue would change, energy costs would continue to rise, and little would stand in their way, not even a vulnerable forest of Joshua trees.

Solar Panels vs. the Joshua Tree

"Why Razing Joshua Trees for Solar Farms Isn't Always Crazy," a troubling *Los Angeles Times* **headline** read. Sammy Roth, an intrepid environmental reporter who has written insightfully and cogently on the way humanity is altering the climate, was nonetheless all in on uprooting **thousands** of Joshua trees in California's Kern County to make space for that giant solar farm. The "**Aratina Solar Project**," a sprawling 2,300-acre installation in the heart of the Mojave Desert, would transfer electricity to wealthy coastal areas, powering more than 180,000 homes. As Roth reported, "There are places to build solar projects besides pristine ecosystems. But there's no get-out-of-climate-change-free card… Hence the need to accept killing some Joshua trees in the name of saving more Joshua trees. I feel kind of terrible saying that."

He *should* feel terrible. Roth believes that tearing up Joshua trees, already in **great jeopardy** due to our warming climate, is the price that must be paid to save ourselves from ourselves. But is sacrificing wild spaces — and, in this case, also **threatening the habitat** of the desert tortoise — truly worth it? Is this really the best solution we can come up with in our overheating world? There do appear to be better options, but they would also upend the status quo and put far less money in the pockets of utility shareholders.

Here's how Californians could think outside the box or, in this case, on top of it. A single Walmart roof averages **180,000 square feet**. In California, there are **309**Walmarts. That's 55,620,000 square feet or 1,276 acres of rooftop. Home Depots? There are **247** of them in California and each of their roofs averages **104,000 square feet**, totaling 25,668,000 square feet, or around 589 acres. Throw in **318** Target stores, averaging **125,000** square feet, and you have over 39,750,000 square feet or another 912 acres. Add all of those up and you have 2,777 acres of rooftops that could be turned into mini-solar farms.

In other words, just three big box stores in California cities ripe for solar power would provide more acreage than the 2,300-acre Joshua-tree-destroying solar installation in Kern County. And that doesn't even include all the Costcos (**129**), Lowes (**111**), Amazon warehouses (**100+**), Ikeas (**8**), strip malls, schools, municipal buildings, parking lots, and so much more that would provide far better options.

You get the picture. The potential for solar in our built environment is indeed enormous. Throw in the more than **5.6 million** single-family homes in California with no solar panels, and there's

just so much rooftop real estate that could generate electricity without wrecking entire ecosystems already facing a frighteningly hot future.

In 2014, it was estimated that solar power from California homes produced **2.2 gigawatts** of energy. Ten years later, that potential is so much greater. As of summer 2024, the state has **1.9 million residential rooftop** solar installations capable of churning out **16.7 gigawatts** of power. It's estimated that 1 gigawatt can conservatively power **750,000 homes**. This means that the solar generation now installed on California's roofs could theoretically, if stored, power 12,525,000 homes in a state with only **7.5** million of them. Already, in 2022, it's believed that the state **wasted** nearly 2.3 million megawatt-hours worth of solar-produced electricity.

And mind you, this isn't just back-of-the-napkin math. A 2021 geospatial analysis of rooftop solar conducted by researchers at Ireland's University of Cork and published in **Nature** confirmed what many experts have long believed: that the U.S. has enough usable rooftop space to supply the entire country's energy demands and, with proper community-based storage, would be all we would need to fulfill our energy production demands — and then some! If properly deployed, the U.S. could produce 4.2 petawatt-hours per year of rooftop solar electricity, more than the country **consumes**today. (A **petawatt-hour** is a unit of energy equal to one trillion kilowatt-hours.) The report also noted that there are enough rooftops worldwide to potentially fully feed the world's energy appetite.

If residential solar has succeeded exceptionally well and has so much possibility, why are we intent on destroying desert ecology with massive, industrial-scale solar farms? The answer in Gavin Newsom's California has much more to do with politics and corporate avarice than with mitigating climate change.

Profit-Driven Utilities

Despite what Governor Newsom and the California Public Utilities Commission have claimed, electric rates have increased not because of solar power's massive success but because of old-school capitalist greed.

"Rooftop solar has value in avoiding costs that utilities would have to pay to deliver that same kilowatt-hour of energy, such as investments in transmission lines and other grid infrastructure," **reports** the solar-advocacy group, Solar Rights Alliance. "Rooftop solar also reduces the public health costs of fossil-fuel power plants and the costs to ratepayers of utility-caused wildfires and power shut-offs. Rooftop solar also provides quantifiable benefits through local economic development and jobs. It preserves land that would otherwise be used for large-scale solar development. When paired with batteries, rooftop solar helps build community resilience."

Nonetheless, blaming rooftop solar for California's increased electricity rates has been a painfully effective argument. So, here's a question to consider: Why does it seem like Newsom is working on behalf of the utilities to limit small-scale rooftop solar? Could it be related to the **$10 million** Pacific Gas & Electric donated to his campaigns since he first ran for office in San Francisco in the late 1990s? Or could it be because key members of his cabinet are **tight** with PG&E executives? (**Dana Williamson**, his current chief of staff, was a former director of public affairs at PG&E.)

Then, consider the **potential conflict of interest** when the law firm O'Melveny & Myers, which previously worked for PG&E, was tasked by Newsom with **drafting wildfire legislation** to save

the company from bankruptcy. PG&E would, in fact, end up hammering out a deal with CPUC to pass on the costs of the bailout, a staggering **$11 billion**, to ratepayers over a 30-year period.

It all worked out well for the company. In 2023, PG&E, which serves **16 million**people, raked in **$2.2 billion** in profits, nearly a 25% jump from 2022.

"The coziness between Gavin Newsom and [PG&E] is unlike anything we've seen in California politics… Their motive is profit, which is driven by Wall Street," says Bernadette Del Chiaro, executive director of California Solar & Storage Association, who has over a decade of experience monitoring the industry. "[The utility companies] have to keep posting record profits, quarter after quarter. It's a perversity that nobody is really thinking about."

It's pretty simple really. Growth means more money for California's utilities, so they've gone all in on expansive and destructive solar farms. Ultimately, this means higher bills for consumers to cover the costs of a grid they are forced to rely on as home solar systems become increasingly expensive.

(More) Bad News for the Climate

Newsom's war on rooftop solar has had another detrimental impact: it's threatened the state's clean energy goals. And the governor hasn't said a word about that. The California Energy Commission **estimates** that, to meet its climate benchmarks, the state must add 20,000 megawatts of rooftop solar electricity by 2030. At **this pace**, they'll be lucky to install 10,000 megawatts. With such a precipitous decline in home solar installations, the 20,000 megawatts goal will never be reached by that year, even when you include all large-scale solar developments now in the works.

The Coalition for Community Solar Access **estimates** that 81% of solar companies in the state fear they'll have to close up shop. Bad news for the solar industry also means bad news not just for California, the **nation's leader** in solar energy production, but for the climate more generally.

A rapid decline in new solar installations also means massive job losses, possibly 22% of the state's solar gigs, or up to **17,000 workers**. In addition to such bleak projections, disincentivizing rooftop solar will also hurt the Californians most impacted by warming temperatures and in need of relief — those who can't afford to live along the state's more temperate coast.

"Rooftop solar is not just the wealthy homeowners anymore," State Senator Josh Becker, a San Mateo Democrat, recently **told** CalMatters. "Central Valley people are suffering from extreme heat. The industry has been making great strides in low-income communities. This [utilities commission decision] makes it harder."

The slow death of new residential solar installations is likely to mean that most of **California's electricity** will continue to be made by burning natural gas and sending more fossil fuel emissions into the atmosphere. All of this may also be a sign that rooftop solar across the country is in peril. Utility companies and those hoping to gut residential solar programs in Arkansas, Florida, Georgia, Nevada, and North Carolina are already **humming** Newsom's "cost-shift" tune.

"They [the big utilities] know it's a pivotal time," Bernadette Del Chiaro tells me, with a sense of urgency and deep concern for what lies ahead. "They are fighting really hard, and they are fighting hardest in California because where California goes, there goes the nation."

Ken Miller
[redacted]
Mckinleyville, Ca 95519
[redacted]

7. HSC Biomass Use Annual Report

From: Wendy Ring
To: Public Comment
Subject: Comment for upcoming CAC meeting
Date: Monday, September 30, 2024 6:54:27 PM

I was very happy to join the Biomass Technical Advisory Committee. I was not invited by RCEA as a health professional but came onto the committee as the designated representative of 350 Humboldt. The three important things I gained from the information provided by HSC were:

1) **HSC cheated on toxic emissions tests** by burning wood with a moisture content less than half the moisture content of their usual fuel. The wetter the fuel, the higher the emissions, so results with dry fuel are not representative of what workers and the community are breathing and, if the air district accepts them, may let the company get away without doing a health risk assessment.

(When I went to look back at the fuel moisture content during tests for compliance with the Clean Air Act, I found HSC had done the same thing and the air district accepted the results).

2) **The biomass plant burned only mill waste** over the past year. Some was from other local mills and some was trucked up from Mendocino Redwood's mill in Mendocino.

3) HSC knows that **the new multiclones** it is installing will not decrease pollution emissions, as the CAC was told. Their purpose is to decrease shutdowns for maintenance and allow all the boilers to operate more hours, which **will increase pollution**. The air district's draft permit to install the multiclones states that running all 3 boilers simultaneously 24 hours a day, 365 days a year would **nearly double VOCs, triple NOx and SOx, and increase pm2.5 and CO emissions fivefold**. The EPA is currently reviewing this.

The Notices of Violation which HSC provided to RCEA are not all the NOVs for that time period. The air district is delaying the issuance of a large number of NOVs saying that they will be issued along with HSC's Full Compliance Evaluation. The FCE is a federal requirement and it is past due. The air district has been working on it for 3 years now. If there were no significant compliance issues, it would probably not take that long.

The Humboldt Coalition for Clean Energy submitted a comment protesting the air district's approval of any emissions increase from HSC, and suggesting either limits to keep operating time the same or installation of best available pollution controls.

The EPA has been investigating the air district's permitting practices with regard to HSC for the past 7 months. EPA staff told me they plan to issue their conclusion in a few weeks as to whether or not the plant has been operating without a permit.

Wendy Ring

Stories of climate action from the bottom up
*with **Cool Solutions Podcast***

6. Diablo Canyon Nuclear Allocation

From: Richard Engel
To: Lori Taketa
Subject: community member comment on nuclear allocation
Date: Monday, October 7, 2024 12:19:32 PM

Hi Lori,

Louis asked me to speak to a community member about the nuclear allocation. I called her back – Deborah Lynn Gregory Fisher of Rio Dell. She told me she is opposed to RCEA taking the nuclear allocation. I offered to pass that on to our CAC and Board and she said yes, please. She does not plan to attend the CAC meeting but may attend the Board meeting.

Can you please include her opposition in the public comment to both bodies as being received by staff via telephone?

Thanks,
Richard

Richard Engel
Director of Power Resources | Redwood Coast Energy Authority
Office (707) 269-1700 x 354 | [redacted] | www.RedwoodEnergy.org
Pronoun: he