

Public Comment

September 25, 2025

RCEA Board of Directors

Regular Meeting

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From: [Sue Y. Lee](#)
To: [Public Comment](#)
Subject: Agenda Item 9.1
Date: Thursday, September 25, 2025 3:23:41 AM

With regards to RCEA's request for and review of "Offers for Long-Term Renewables Portfolio Standard Resources", please keep in mind that in response to RCEA's request for the community's preference for a renewable power mix, the majority of the community preferred not to include biomass combustion.

We commend RCEA for your strategic plan to move away from biomass combustion as a renewable power source, and that RCEA has expressed a preference for projects "that provide additional community or environmental benefits beyond the climate benefits of renewables."

Biomass combustion would certainly not meet your preference for projects that provide "additional community or environmental benefits....." because burning biomass has potentially significant health hazards for the families in Scotia who live near the Humboldt Sawmill Co.

Hence, we ask RCEA to not include biomass in your request for and review of "Offers for Long-Term Renewables Portfolio Standard Resources."

Thank you for taking our comments.

Sincerely,
sue y. lee mossman, Co-chair
Climate Action Campaign at Humboldt UU Fellowship

From: [Andrea Armin](#)
To: [Public Comment](#)
Subject: agenda item 9.1
Date: Thursday, September 25, 2025 10:55:45 AM

RCEA board members:

Please do not allow biomass construction in any new contracts. Previously, RCEA's strategic plan included moving away from biomass combustibles, with the agreement of most of the community members who have responded. It has shown by climate experts that biomass combustion is not an climate solution. Any short-term benefits or "forest management' claims on behalf of biomss are clearly not supported--except for those who profit. Please pay attention to this critical matter.

Thank you.

Andrea Armin
Arcata, CA

From: [Wendy Ring](#)
To: [Public Comment](#)
Subject: Comment on Board Agenda item 9.1
Date: Thursday, September 25, 2025 1:33:41 PM
Attachments: [Approval of Humboldt Sawmill Company's AB 2588 Emission Inventory Plan.pdf](#)

I am extremely disappointed that RCEA staff's proposed criteria for longterm RPS contracts do not exclude biomass. RCEA made a commitment in its 2019 strategic plan to move away from biomass. When RCEA gave the public a choice of future renewable portfolios the most popular choice had no biomass. When staff asked the Community Advisory Committee recently what they wanted to see in RCEA's renewable portfolio, members responded: "No biomass".

I'm especially worried that RCEA would consider increasing or extending its contract with Humboldt Sawmill Company, which has repeatedly tried to underreport its toxic emissions by as much as a millionfold. The air district approved these underestimates and is only revising them now due to CARB's intervention at my instigation. I know that RCEA board members prefer to believe the air district's verbal assurances instead of taking time to look at documentation to the contrary. To encourage some healthy skepticism about those assurances I've attached the air district's approval of the emissions factors which CARB is making them revise. One year later **that revision is still not complete, delaying state mandated assessment of the community health risk posed by HSC's toxic emissions. Due to the air district's failure to enforce the state air toxics law until CARB got involved, this health risk assessment is more than 20 years overdue. Regardless of the board's position on biomass energy, no contract with HSC should be considered until this long overdue toxic risk assessment is completed and approved by the Office of Environmental Health Hazard Assessment, and then only if it shows no significant impacts.**

[Project Drawdown](#) is an independent highly reputable nonprofit organization which applies rigorous science to focus the world's resources on real climate solutions. Drawdown used to support woody biomass energy but its scientists have concluded in recent years that burning wood waste is not a climate solution, even when it comes from thinning or milling timber from sustainably managed forests. They do not consider it renewable energy, which Drawdown defines from a climate perspective as energy coming from sources that are replenished at the same rate as they are consumed.

Price and location within the county are criteria which should not take priority over community health and the public's clearly expressed desire that RCEA not procure more biomass. Biomass emits more carbon, particulates, and nitrogen oxides per kwh than coal. If coal power was available, I doubt RCEA would buy it, even if it was the cheapest power on offer. Why should biomass be different? The 300,000 tons of CO2 emitted annually by the Scotia biomass plant are harming, not helping, the planet. The public knows it. Scientists know it. Please exclude woody biomass energy from your RPS solicitation.

Wendy Ring MD, MPH



Cameron Purchio <cpurchio@ncuaqmd.org>

Approval of Humboldt Sawmill Company's AB 2588 Emission Inventory Plan

1 message

Jason Davis

Wed, Sep 18, 2024 at 1:38 PM

To: Timothy Burke

Cc: Skyland Flansburg

, Cameron Purchio

Eric Albright

>, Aimi Tanada

Tim,

The District has completed its review of the Emission Inventory Plan (EIP) for the Scotia Mill and Biomass Power Plant and determined that it meets or exceeds the standards established in H&SC Section 44340(c). Now that the EIP is approved, expeditious implementation is required. As indicated in the attached correspondence, the District requests that an Emission Inventory Report prepared according to the EIP be transmitted to the District within 15 business days, prior to the close of business October 9, 2024. Electronic transmission of written materials and the HARP transaction file is preferred.

If you have questions or require additional assistance, please do not hesitate to contact me directly.

Regards,

Jason

Jason L. Davis*Deputy Air Pollution Control Officer**Permitting & Planning Division Manager**North Coast Unified AQMD**707 L Street, Eureka CA 95501**Office (707) 443-3093**www.ncuaqmd.org*

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**Approval of HSC Emission Inventory Plan, 9-18-2024.pdf**

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