

August 8, 2022

Low Carbon Fuels Standard Program

California Air Resources Board

Sacramento, CA 95814

**Re: Yosemite Clean Comments on LCFS Program Staff Presentation on July 7, 2022**

To the LCFS Program:

The LCFS plays a critical role in the transition to a zero emission transportation sector in California, and biofuels from forest waste play a critical role in the LCFS. CARB has an opportunity to either assist the state and federal governments in their effort to reduce wildfire risk, or to hinder them, based on the LCFS policies they adopt or abstain from adopting as relates to forest biomass.

**The Problem**

While it goes without saying, California is in the midst of a crisis of catastrophic proportions. As stated by the U.S. Forest Service (“USFS”), “Wildfires have been growing in size, duration, and destructivity over the past 20 years. Growing wildfire risk is due to accumulating fuels, a warming climate, and expanding development in the wildland-urban interface. The risk has reached crisis proportions in the West, calling for decisive action to protect people and communities and improve forest health and resilience. It will take a paradigm shift in land management across jurisdictional boundaries to reduce risk and restore fire-adapted landscapes.”[[1]](#footnote-1)

In response to the crisis, USFS set a goal to treat 50 million acres over the next 10 years. CARB recently came out in its draft scoping plan stating that the 1 million acre goal set by the Newsom administration and the Forest Service is too small, and California needs to be treating over 2 million acres per year. By conservative estimates, this treatment will generate over 20 million tons of waste biomass per year, which as of now, California has no market for.

**The Solution**

This waste, which is a biproduct of work essential to saving our forests, could be transformed into carbon negative transportation fuels, including hydrogen, if policy allows for it. This biofuels pathway allows for significant Carbon Capture and Sequestration, and is sited by Lawrence Livermore National Laboratories as a critical component to getting California to carbon neutral.[[2]](#footnote-2) Yosemite Clean Energy (“Yosemite”) and companies like us have the technology and business development solutions to turn California’s forest wood waste into carbon negative biofuels while reducing the risk of wildfire.

Yosemite is a bioenergy development company that specializes in transforming farm and forest wood waste into carbon negative green hydrogen and renewable natural gas, providing renewable solutions to California’s transportation and broader energy sectors while reducing risk of wildfire, raising air quality, and creating jobs and economic stimulus in minority, tribal, and other underserved communities. Yosemite is developing a network of biofuels plants that are locally owned by the agricultural and forest communities they serve. The company is at various stages of development planning on biofuels plants across the state of California, with operations at Yosemite’s first plant scheduled for Quarter 1 of 2025. Yosemite’s standard plants will utilize 90,000 bone dry tons of wood waste per year to produce an estimated 13 metric tons of green hydrogen and 31 metric tons of RNG per day.

**Our Request to CARB**

In its initial comments to CARB, Yosemite has two recommendations, included below, followed by description of each and why each was included. Yosemite foresees engaging with CARB on numerous topics throughout the process, but wanted to get on the record today to bring up these two key issues.

Yosemite recommends that:

1. **Avoided emissions for Forest Residuals.** CARB should develop a robust model within the LCFS to consider avoided emissions for fuels derived from forest wood waste that would otherwise be burned or decompose. Emissions from catastrophic wildfire single-handedly displace all particulate and GHG emissions reductions the state is achieved to date. Capturing avoided emissions in the LCFS will promote private sector contribution to wildfire risk reduction and accurately reflect true CI score of fuels from forest waste.
2. **Sustainability criteria for Forest Residuals.** CARB should abstain from implementing sustainability criteria for biofuels produced from forest wood waste, just as it has done to date. Adopting sustainability criteria such as that included in AB1122 would significantly complicate woody biomass-to-biofuels projects, and hinder their development.[[3]](#footnote-3) All biomass removed from federal and state managed forests have obtained permits and authorities under Cal Fire and USFS to remove the biomass in question, and each additional government program utilized implaments a unique set of requirements. CARB setting additional standards within the LCFS will add one more layer of complexity.

We look forward to additional engagement with CARB on this topics, as well as others.

Sincerely,

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1. U.S. Forest Service, “Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America’s Forests”, January 2022, accessible at: https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf [↑](#footnote-ref-1)
2. Lawrence Livermore National Laboratory, “Getting to Neutral: Options for Negative Carbon Emissions in California,” August 2020, available at https://gs.llnl.gov/sites/gs/files/2021-08/getting\_to\_neutral.pdf. [↑](#footnote-ref-2)
3. Public Utilities Code section 399.20(f)(2)(A)(iii). [↑](#footnote-ref-3)