



October 16, 2015

The Honorable Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the 2030 Target Scoping Plan

Dear Mr. Corey:

The Bioenergy Association of California strongly supports the Governor's greenhouse gas reduction goals for 2030 and appreciates the opportunity for early input on the 2030 Scoping Plan. Focusing on the 5 Pillars is an excellent framework for emissions reduction, but BAC also urges the Administration to pay special attention to strategies that provide benefits across the 5 Pillars, such as bioenergy, which can help meet all five Pillars.

The Bioenergy Association of California (BAC) represents about 60 public agencies, private companies and local governments working to convert organic waste to energy. BAC's public sector members include air quality, environmental, wastewater, solid waste and other local agencies. Its private sector members include energy and waste companies, technology and service providers, investors and others.

BAC's specific recommendations for the draft Scoping Plan are below.

1. Need to Identify Important Research Needs and Gaps

Each of the 5 Pillars and each of the major strategies under those Pillars has important research needs to ensure that the strategies maximize greenhouse gas reductions and other benefits, to accurately quantify those reductions and benefits, and to meet other important state policies. For instance, in the Natural and Working Lands Pillar, there are many urgent research needs related to accurate carbon accounting and lifecycle emissions of various strategies to reduce wildfire and restore carbon in agricultural land. Identifying the most important research gaps – and potential funding sources to carry out that research – is critical to ensure that California meets the 2030 climate change

goals and provides as many other benefits as possible.

2. Need to Quantify Expected GHG/SLCP Reductions for Each Measure

The first AB 32 Scoping Plan provided very specific greenhouse gas reduction targets for each of the measures in the Scoping Plan. Specific, quantifiable targets for each measure are critical for the 2030 Scoping Plan as well, to ensure that it will meet its overall goals and to make course corrections if those measures are not on track to meet the specific targets. Identifying reduction targets for each measure or Pillar is also important to help prioritize funding and other resources.

3. Need to Be Performance Based and Technology Neutral

Meeting our climate change goals is going to require every tool in the toolkit. It is also going to require agencies to set clear performance goals rather than picking technology winners and losers. Agencies will also have to re-assess technologies, fuels and strategies from time to time as they develop (or fail to develop) to ensure that they are meeting objective performance criteria and maximizing greenhouse gas reductions and other benefits.

Unfortunately, several GGRF funding programs identified specific technologies rather than setting performance criteria that could have resulted in much greater emissions reductions and other benefits. For example, both CalRecycle and the California Department of Food and Agriculture limited their GGRF programs to anaerobic digestion of diverted organic waste and dairy waste, respectively. Yet other technologies are available in both sectors and, in the solid waste sector, are critical to meet the goal of diverting virtually all organic waste since much of the waste that is currently landfilled is not suitable for anaerobic digestion. Rather than setting technology specific goals or funding guidelines, state agencies should set performance criteria and let the market compete.

We also urge the Air Board to set performance standards, rather than choosing technology winners and losers, for the Low Carbon Transportation Fund. It is not appropriate to limit that funding to electric and fuel cell vehicles when the lowest carbon transportation is provided by natural gas vehicles running on biogas. In fact, AB 32 requires the Air Board to use cap and trade revenues to provide maximum greenhouse gas reductions, which only biogas can do. AB 32 and subsequent laws also require GGRF funding to reduce impacts in disadvantaged communities and biogas used to replace the heaviest diesel powered vehicles can provide the greatest and most immediate pollution reductions in disadvantaged communities.

4. Need to Quantify Funding Needs and Align Public Funding with Priority Strategies.

As much as possible, the Scoping Plan should identify the funding needed for various measures and opportunities for public funding. The Draft Strategy to

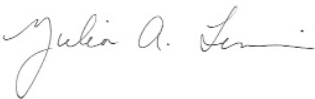
Reduce Short-Lived Climate Pollutants does this in two important areas: the number of facilities and public investment needed for both organic waste diversion and for dairy waste. Other areas of the SLCP Strategy and the Scoping Plan, such as the need to reduce black carbon emissions, should provide a similar level of detail about public investment needs and should identify possible sources of investment for important measures.

5. Need to Identify Responsible Agencies and Timelines to Remove Obstacles

The Scoping Plan should wherever possible identify the agency responsible for specific measures. It is particularly important to identify barriers and obstacles to achieving important measures and to identify the lead agency responsible for removing those barriers. For instance, the Draft Strategy to Reduce Short-Lived Climate Pollutants identifies pipeline and transmission line access as a barrier to increased bioenergy development, but does not make clear that the California Public Utilities Commission must take steps to remove those barriers. In order to provide an effective plan for emissions reduction, the Scoping Plan needs to be more specific about which agency needs to do what to meet the Plan's goals.

We urge the Air Board to include these important components of an effective 2030 Scoping Plan. We look forward to the first full draft and to working with the Air Board and other agencies to meet California's climate goals for 2030 and beyond.

Sincerely,



Julia A. Levin
Executive Director