



June 12, 2015

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California Air Resources Board  
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**Comments: Short-Lived Climate Pollutant Reduction Strategy**

Dear Mr. Tollstrup:

I am writing on behalf of the California Biomass Energy Alliance to express our support for the Short-Lived Climate Pollutant Reduction Strategy Concept Paper ("Concept Paper") and recommend how to preserve existing solutions for both California's short-term and long-term climate goals.

California's existing woody biomass power industry is playing a role today in reducing California's short-lived climate pollutants. One part of the active global carbon cycle involves the cycling of carbon from biomass to the atmosphere. Biogenic carbon can be cycled from biomass to the atmosphere in one of two forms, oxidized (CO<sub>2</sub>, CO), or reduced (CH<sub>4</sub>, HCs). One of the ways in which biomass energy production can affect global warming is by substituting CO<sub>2</sub> emissions from the power plant for CH<sub>4</sub> emissions that would have occurred in alternative disposal of the biomass that is used as fuel. The impact of this substitution is dramatically lower greenhouse warming potential from the biogenic carbon emitted to the atmosphere at the time of the emissions, with the residual benefit declining for approximately 50 years before it is gone.

In California there are 25 biomass electric generating plants, distributed across 20 counties. The biomass plants combined produce more than 565 megawatts of baseload renewable energy. That is enough to power more than 420,000 homes, nearly all of Sacramento County's residences. California's current plants use more than 8 million tons of wood waste as fuel annually that would otherwise clog the landfills, left to decay and serve as a fire hazard in the forest, or open burned. About 3.7 million tons of wood waste is urban wood waste diverted from landfills thereby helping local governments meet landfill diversion mandates. The remaining tons come directly out of the fields and forests. Biomass plants promote healthier forests by reducing the amount of overgrowth materials in the forests as well as open burns by the agricultural community.

Despite the benefits of biomass power, the industry is in jeopardy. In the past year, five plants have closed due to antiquated contracts that do not cover all of the plants' costs. Half of the

remaining plants are facing expiring contracts. Without new contracts and revenue streams that reward biomass plants for all of their attributes, half the industry will cease to exist. That means more than 300 megawatts of baseload renewable energy will no longer be available. Millions of tons of wood waste will once again be open burned or sent to landfills. In fact, there is a direct correlation to the increase in burn permits in The Central Valley and the recent closure of biomass power plants. Most importantly, more than 1,000 people will be out of work. In many instances, the biomass plants at risk are some of the largest private employers in their community.

Preserving California's existing facilities is an obvious near-term solution to black carbon emission from open burning (controlled and uncontrolled) of agriculture and forestry residues and the consequence of letting these facilities close are unacceptable. The closure of one 50 MW plant in the Central Valley would result in the displacement of an estimated 350,000 bone dry tons of agriculture residues. It is a realistic goal for the state to ensure we don't lose any more MWs and even reopen currently idle facilities.

CBEA supports the California's Short-Lived Climate Pollutant Reduction Strategy concept paper and the finding that we need to make significant changes to the utility processes and incentives to better align with SLC reductions. CBEA urges the Air Resources Board to acknowledge the work already being done by this existing industry, make a policy statement that it should be preserved and add the following specific strategies.

- Appropriating greenhouse gas reduction funds (GGRF) to cost-share the environmental and economic benefit the State derives from biomass power generation. GGRF funds are an appropriate use of funds because using waste and residue forms of biomass – agricultural residues, urban and forest wood waste – in the production of electricity reduces GHG emissions. In the absence of this energy conversation, the bulk of these materials would otherwise be open burned, buried in landfills, or allowed to remain in the forest as overgrowth material that diminishes forest health, and poses increased risks of devastating wild fires and insect and disease outbreaks.
- In addition to the State's commitment to increase its renewable energy procurement goal to 50%, we should be updating the State's Renewable Portfolio Standard program at the CPUC and CEC in a manner that provides a more level playing field for all renewables and a more balanced portfolio.
- The Public Utilities Commission, in cooperation with the California Energy Commission, should conduct the research necessary this year to allow contracting utilities to fully value both the electrical (reliable, schedulable, and voltage support to the grid) and environmental (reduction of open burning, landfill diversion and forest health) benefits of biomass energy.
- The Air Resources Board should develop biomass-fuels offset protocols. Currently, the ARB has a greenhouse gas offset protocol for reducing the emissions from livestock

waste, but not for other greenhouse gas reductions associated with bioenergy. Adoption of additional offset protocols under AB 32 could help to monetize the greenhouse gas emissions benefits associated with bioenergy.

We look forward to working with the Air Resources Board to develop and implement a successful strategy to reduce SLCP. The Concept Paper is a great start.

Sincerely,

A handwritten signature in black ink, reading "Julee Malinowski Ball". The signature is written in a cursive, flowing style.

Julee Malinowski Ball, Executive Director

JMB/kmg