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Submitted Electronically

Ms. Rajinder Sahota
Deputy Executive Officer - Climate Change & Research
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Golden State Power Cooperative Comments on 2022 Scoping Plan Update; Initial Modeling Results Workshop

Dear Ms. Sahota Randolph:

The Golden State Power Cooperative (GSPC) appreciates the opportunity to provide these comments to the California Air Resources Board (CARB) on the March 15, *2022 Scoping Plan Update Initial Modeling Results Workshop*.[1] GSPC is the statewide trade association representing California's three Electrical Cooperatives, as well as one rural public utility district: Anza Electric Cooperative, Plumas-Sierra Rural Electric Cooperative (PSREC), Surprise Valley Electric, and Trinity Public Utility District. GSPC utilities are committed to ensuring that they are able to provide their member-customers with reliable, safe, and affordable electricity throughout the state's transition to zero-net carbon electricity. GSPC utilities serve approximately 400 gigawatt-hours (GWh) of electricity in California, accounting for approximately 0.1% of the state's total electricity sales. The vast majority of their service territories are in remote or rural parts of the state, making them especially vulnerable to wildfire threats. As such, GSPC is particularly interested in ensuring that the Scoping Plan Update adequately and appropriately addresses the interaction between the natural and working lands (NWL) and the state's broader electrification and clean-energy objectives, and offers these comments in furtherance of that objective.

The Scoping Plan Update Should Focus Concurrently on Forest Restoration and Wildfire Reduction.

GSPC understands that the NWL modeling is challenging, and appreciates the work that has been done to conduct the comprehensive assessment. As this work continues, CARB should prioritize the NWL scenarios on a combination of what are currently Scenario 3 and Scenario 4; prioritize restoration and climate resilient carbon stocks,

[1] GSPC is also a signatory to the Joint Utility Group Comments (JUG) comments on the Initial Modeling Workshop, and urges the Board to address the concerns raised therein.

while concurrently prioritizing wildfire reduction and other fuel reduction efforts. As electric utilities in rural areas, we know first-hand how important it is to reduce the threat of wildfires to protect public health and ensure the reliable supply of electricity. Wildfires can impact the provision of electricity beyond just their footprint, just as the harmful effects of the particulates that can be felt hundreds of miles from the source of combustion. CARB has stated that treatment of the NWL in the 2022 Scoping Plan Update is to "focus on what is needed for forests and other natural and working lands to be more resilient and healthy, and to continue to provide water, air and biodiversity benefits to California, in addition to supporting carbon neutrality for the State."[2] Without concurrently prioritizing forest restoration and wildfire reduction (including reducing forest fuels), California's forests cannot resume their role as a carbon sink.

CARB Must Fully Assess all Aspects of Biomass Burning.

GSPC utilities believe that the utilization of woody biomass for the generation of biomass energy would help prevent catastrophic loss of rural communities and their livelihoods. The controlled combustion of biomass for the production of energy is an essential tool that should be included in the Scoping Plan Update as part of a holistic strategy to address climate change and wildfire risks. The use of woody biomass for generation of energy serves multiple purposes and can help the state meet a myriad of climate, sustainability, and safety objectives.[3] "In the case of forest biomass energy, excess material from forest management treatments, such as dead and damaged trees not suitable for wildlife habitat or low-value small-diameter trees and brush left over from thinning or other forest health activities, are combusted in a controlled facility to reduce emissions and create electricity."[4] Targeted biomass facilities enhance local communities, reduce wildfire risk, improve forest resiliency, create jobs, and provide a source of renewable electricity.[5] While there are emissions associated with biomass combustion, those emissions must be netted against the emissions from catastrophic wildfires, and reflect the renewable energy being generated. Biomass combustion provides a cleaner and safer alternative to uncontrolled wildfires. As reflected in the

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[2] CARB; Frequently Asked Questions: Wildfire Emissions;
[3] GSPC Comments on 2022 Scoping Plan Update; Scenarios Concepts Workshop; September 3, 2021, pp. 6-7.
[4] *See* Biomass in the Sierra Nevada; a Case for Health Forests and Rural Economies; Sierra Business Council, November 2019 (SBC Paper).
[5] *See*: California Energy Commission; Renewables Portfolio Standard Eligibility Guidebook, Ninth Edition (Revised); January 2017 (CEC-300-2016-006-ED9-CMF-REV).

Initial Modeling Results, Alt. 1 would result in carbon neutrality by 2035, with a nearly complete phaseout of combustion, including restricted applications for biomass derived fuels.[6] There is no carbon neutrality or zero combustion, however, as long as the state's forests and grasslands continue to be vulnerable to heightened wildfire risks. CARB has recognized, through its work directly with the California Natural Resources Agency (CNRA), that enhanced forest management strategies are necessary to improve forest health, lead to long-term carbon sequestration, and reduce the risk of wildfire. No one option will provide the solution; rather, mitigating the adverse impacts from wildfires will require a combination of improved forest restoration and aggressive wildfire risk reduction. Working with CNRA, CARB has participated in projects that look at various practices to do this, including fuels reduction, prescribed fire, advanced technology biomass utilization, and support for alternative wood products from forest residue.

Advanced technology forest biomass utilization must be more fully assessed. The Scoping Plan Update should address the multi-faceted aspects of this important tool, as there are many benefits that must be considered in the total assessment. GSPC understands that biomass burning will not be as advantageous in some communities as it could be in others, and as the SBC Paper notes, "Biomass is not a one-size-fits-all solution; it must be considered in the unique context of the place in which it may be utilized." However, until it has been considered and fully assessed in the context of each unique situation, CARB should not preclude its utilization. Leaders from across the state's environmental agencies have noted, the modeling has shown that it is necessary to consider all renewable energy sources to meet the aggressive climate targets, and no options should be taken off the table.

Cap-and-Trade Program Allowance Value Should be Immediatley Available for Wildfire Mitigation.

The Cooperatives are not-for-profit, and are required by law to provide electricity to their customers-members at cost.[7] The rural and woodland location of the GSPC member utilities, coupled with the ongoing drought and years of forest biomass accumulation has led to increasing costs for wildfire mitigation and management throughout their service territories. As GSPC noted in the September 3, 2021 Comments on the SPU Workshop, reducing risks to the electric transmission and

[6] Staff Presentation, p. 10
[7] PUC section 2776.

distribution system that spans thousands of miles, is one the biggest challenges the utilities currently face, with wildfires presenting one of the most significant threats.[8] The Cooperatives use the value of their cap-and-trade allowances for programs and measures that benefit their electricity customers and reduce greenhouse gas (GHG) emissions. The use of funds generated from the cap-and-trade program for direct wildfire mitigation efforts is authorized by the regulation, but not yet an option due to the lack of a recognized quantification methodology. It is an indisputable fact that wildfires are destructive to the landscape, cause immediate and long-term health impacts, destroy homes and livelihoods. While it is important that CARB be able to verify that allowance value is being used to reduce emissions and benefit electricity ratepayers, GSPC urges a reassessment of the need for a complex valuation methodology before allowing the utilities to utilize those funds for wildfire mitigation.

The NWL Scenarios Must Reflect Increased Fire Suppression and Prescribed Burning and Wildfire Mitigation Tools.

In CARB's *Wildfire Emissions FAQ,* the agency recognizes the that fire is a critical ecological function for maintaining healthy and resilient forests, and controlled burns can support native plants, boost soil health and increase ecosystem function. It is also used by California's indigenous people as an essential land management tool. The Wildfire Emissions FAQ states that CARB "supports the use of prescribed fire, and anticipates its use will expand to help achieve the State's goal of treating 1,000,000 acres of forest and rangelands,"[9] which is consistent with the objectives set forth in the Agreement for Shared Stewardship of California's Forests and Rangelands between the state and U.S. Forest Service.[10] Despite this recognition, however, none of the NWL scenarios appear to reflect the increased fire suppression and prevention efforts that would result, but rather hold fire suppression constant in all circumstances.

Conclusion

GSPC has advocated for the modeling that informs the 2022 Scoping Plan Update to reflect three key elements, and believes that these elements must also be reflected in any final recommendations set forth in the Scoping Plan Update:

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[8] GSPC Comments on 2022 Scoping Plan Update; Scenarios Concepts Workshop; September 3, 2021, p. 3.
[9] CARB; Frequently Asked Questions: Wildfire Emissions;
[10] https://www.gov.ca.gov/wp-content/uploads/2020/08/8.12.20-CA-Shared-Stewardship-MOU.pdf

- **reliability** of the electric grid;
- impacts on the accessibility and **affordability** of electricity; and
- **consequences of wildfires** and impacts of increased **wildfire mitigation** costs.

The costs of wildfire mitigation efforts are great, but the costs of not taking action are greater. How CARB treats the NWL, and in particular the forests and grasslands, will have a direct impact on statewide wildfires electricity reliability, and rate affordability, with resulting high costs to public health. In order to mitigate adverse impacts to the greatest extent possible, GSPC urges CARB to include in the Scoping Plan Update a careful and deliberate assessment of the value of practices and policies that can reduce the harmful consequences of California's wildfires. GSPC looks forward to continuing to work with CARB and stakeholders on this important issue, as well as those raised in the JUG Comments.

Respectfully submitted,

Jessica Nelson
General Manager