DOCKETED	
Docket Number:	22-ERDD-02
Project Title:	Climate Innovation Program
TN #:	253798
Document Title:	Calforests Comments - Forest waste disposal and utilization - Biomass
Description:	N/A
Filer:	System
Organization:	Calforests
Submitter Role:	Public
Submission Date:	1/4/2024 12:47:38 PM
Docketed Date:	1/4/2024

Comment Received From: Matt Dias
Submitted On: 1/4/2024
Docket Number: 22-ERDD-02

Forest waste disposal and utilization - Biomass

Please see attached PDF. Thank you.

Additional submitted attachment is included below.

calforests
California Forestry Association

1215 K Street, Suite 1830
Sacramento, CA 95814
916.444.6592

January 4, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 22-ERDD-02
715 P Street
Sacramento, California 95814

RE: Docket number 22-ERDD-02 and "Climate Innovation Program Update Workshop" (submitted electronically via: https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-ERDD-02)

California Energy Commission Staff:

The California Forestry Association (Calforests) is the preeminent trade association for the state's forestry sector. Our members are committed to ensuring California has an adequate and sustainable supply of affordable forest products, while maintaining and enhancing wildlife habitat, water resources, air quality and rural economies.

Managing our forests has never been more critical in California's than now. A changing climate has resulted in new and extended stressors on forested landscapes across the state, resulting in unparalleled tree mortality from drought, insect infestation, extended heat waves, and generally reduced fuel moisture levels throughout much of the year. As a result, forested conditions are extraordinarily vulnerable and receptive to dramatic impacts from high intensity wildfire. Wildfire is one of the most pressing issues in the state, with literally millions of acres burned over the last 5 years along.

In response, California has invested over 2 billion dollars into wildfire prevention over the last several fiscal years, and all partners, federal, state, private, NGO and tribal entities, are working diligently to treat a minimum of 1 million acres annually to combat the wildfire crisis. As we work cooperatively to achieve the million-acre strategy, while also working on the recovery of a myriad of fire scars across the state, the generation of forest waste is accumulating at alarming rates. In response , a short term strategy that represent large scale disposal and utilization should be supported by the Climate Innovation Program, while also supporting innovative technologies that may, in time, companion traditional technologies in terms of building or maintaining outlets for disposal and utilization of forest waste in the decades to come.

Traditional technology, that being the combustion of wood waste to generate electricity, represents an opportunity, that represents desperately needed outlets for forest waste at scale, while also addressing grid reliability. "Traditional technology" should not be considered static, and well contemplated support from the Climate Innovation Program could help to support the existing fleet of biomass facilities that would have a meaningful impact of wildfire prevention, forest resiliency and post fire recovery efforts that are happening across the state. Specific support could be provided, but not limited to, advances or investments in boiler efficiency, clean air technologies, steam trap systems, feed stock quality and quality determination, efficiencies in feedstock transportation, facility output capacity technologies, or support for interconnection.

Forests are not only vital ecosystems but also crucial sources of renewable resources. With this we must recognize the value of responsible forest biomass utilization as a necessary management tool in the face of wildfire. Harnessing the power of forest biomass presents an opportunity to strike a balance between wildfire prevention, post fire recovery and environmental conservation.

Biomass energy, in the form of electricity, derived from low value wood waste or other forest residues, plays a pivotal role in mitigating climate change by providing an alternative to energy derived from fossil fuels, replacing other carbon intensive fuels. This should be considered as a priority technology given that the process represents a climate adaptation strategy that is desperately needed as we face larger and more destructive wildfires. This renewable energy solution can also help California meet our emission reduction targets as well as provide a more reliable grid.

Utilizing biomass generated from sustainably managed forests ensures that forest ecosystems remain healthy and productive. Maintenance of the biodiversity and integrity of forest ecosystems through active management focused on fire prevention management strategies in necessary to meet our resource needs and to reduce fire impacts, but we have to have outlets that provide scale of disposal and utilization to remove accumulated and treatment generated fuels from the landscape. Forest biomass utilization provides an economic incentive for forest owners and managers to engage in desperately needed management activities, while also fostering a long-term commitment to conservation.

Support for forest biomass utilization, with the co-benefit of electricity, also offers equity to rural communities through substantial economic opportunities provided by private companies that are operating or attempting to reopen existing facilities.

Jobs are created though investment in traditional biomass processing facilities and infrastructure, all the while protecting the remaining unburned forestland from destructive wildfire and making forest-based communities more resilient.

As with other facilities associated with the forest products sector, the multiplier of employment opportunities permeates throughout the communities and produces opportunities that go well beyond simply the facility itself. Additionally, the utilization of forest biomass can reduce dependence on other energy sources, enhancing energy security and self-sufficiency for rural regions of California. Traditional biomass facilities not only represent a disposal option of scale, but also a circular economy being a driver in forest and community resilience in California.

Forest biomass utilization, with a co-benefit of electricity, holds immense value in our quest for a sustainable and greener future. It is also a foundational piece of the puzzle when considering forest health and resiliency. By recognizing the numerous advantages this technology offers, we can strike a balance between economic development and environmental benefit. The state needs the attention and support of the Climate Innovation Program to assist in expanding all existing biomass facilities in the state, while also supporting new and burgeoning new technologies to support removal of hazardous fuels from forests, or the consequences will continue to be dire.

I appreciate the consideration of these comments, and please do not hesitate to reach out if questions or concerns arise upon review of these comments.

Respectfully,

Matt Dias
President and CEO
Calforests
mattd@calforests.org
C: 916.2174221