

DOCKETED

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Comment Received From: Shannon Harroun, Placer County Air Pollution Control District

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Comments on the 2017 IEPR-Renewable Gas

This is a resubmittal of comments on the 2017 IEPR, which I submitted by the deadline on 7/14/17 at 4:38 pm. The comments were later rejected as they were not in searchable pdf format. Attached comments are in searchable pdf format.

Additional submitted attachment is included below.



July 14, 2017

The Honorable Robert Weisenmiller, Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Comments on the 2017 Integrated Energy Policy Report (IEPR) – Renewable Gas

Dear Chair Weisenmiller:

On behalf of the Placer County Air Pollution Control District, I am submitting comments that request your support for the Commission to continue with its plan to develop recommendations for the production and use of renewable gas, and more specifically gas produced from biomass waste. Current efforts to implement SB 1383 should be in combination with the subsequently approved legislation stating that “state agencies shall consider and, as appropriate, adopt policies and incentives to significantly increase the sustainable production and use of renewable gas, including biomethane and biogas” (H&S Code 39730.8(c), emphasis added). In particular, the reduction of non-anthropogenic black carbon that is mentioned in the current Short Lived Climate Pollutant plan, and emphasized in the soon to be formally released Carbon Forest Plan, should be taken into consideration in the IEPR.

The District is keenly aware of significant contributions to air pollution caused by the disposal of agricultural and woody biomass waste within the state of California. We urge you to remember the intense impacts of the burning of woody debris while you deliberate on how to include new short lived climate pollutant concepts into the Integrated Energy Policy Report. Whether the burning is associated with open pile burning, forest fires that are exacerbated by lack of forest restoration work, or wood smoke from woodstoves or fireplaces, the State has a vested interest in reducing black carbon emissions, which the IPCC has recognized as a climate forcing agent that can cause warming hundreds of times faster than CO₂.

The District supports that treating and utilizing organic wastes can significantly reduce black carbon emissions from agricultural, working lands or forest lands open pile burns, and wildfires. Much of California’s forested landscape is at risk for catastrophic wildfire. Research has conclusively demonstrated the effectiveness of strategically placed forest fuel hazard reduction thinning treatments on reducing wildfire size and severity. The reduced severity and size of wildfires will significantly reduce black (and brown) carbon, as well as methane emissions. The District is currently coordinating an ongoing privately and publicly funded research effort to develop a greenhouse gas offset protocol to quantify the carbon dioxide and methane benefits of forest fuels treatments, which result in reduced size and severity of wildfire. The protocol also considers the production of wood products, renewable electricity from forest wastes, and enhanced forest growth from more available light and water resources. This effort is building off

previous research demonstrating forest fuel treatment potential to reduce carbon dioxide emissions.

Open pile burning of forest and ag residuals is a common practice, and frequently the only economically viable disposal option, throughout California. The use of pile burning is increasing as a result of the shutdown of biomass energy facilities, and as the pace and scale of forest fuel treatments increases. Forest land managers are publicly acknowledging the critical need for forest fuel reduction treatment projects. The District urges the Commission to consider the importance of development of biogas industries, to support the reduction of open pile burning, reduce the general open air combustion of wood, and reduce catastrophic wildfire, which is the largest source of black carbon emissions in California.

The District also supports the Commission in planning for more research and development on the use of renewable gas, including its use as liquid transportation fuel, which could help the state maintain a balanced energy portfolio, as well as investigate further the true benefits of the reduction of black carbon. Our District would be happy to partner with you on such efforts.

Finally, the District would like to mention that it supports the Bioenergy of California's (BAC) request for you to consider the recent paper by the National Academy of Sciences which discusses the important grid stability benefits of baseload power, such as gasification of woody biomass, as we increase the use of intermittent renewables, such as wind and solar. There is a significant urgency to consider how we can reduce short-lived climate pollutants associated with wildfire reduction to rate-payers and the public, and we hope the Commission will keep close watch on the success of the BioMat program (SB 1122) and support that program's overall success, as a supporting agency to the CPUC and its other programs.

Thank you for your consideration of these comments.

Sincerely,

Christiana Darlington
CLERE, Inc.
Placer County Air Pollution Control District Counsel