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Comments:

We are glad to see you are the contact person to receive comments for CEC initiative on Forestry waste to intermediates (such as syngas).

We fully support this initiative. It opens pathway for win-win solution to Forestry waste which is a prime source for the fires. It is also a wasted/stranded resource. Thank you and CEC for this very timely initiative.

Technology Pathways: Please include other proven pathways for biomass to RNG- thermal as well as anaerobic digestion (AD). There are recent development in AD technology that offer lower cost and environmentally more friendly solution for biomass to RNG. T2M Global is working with a technology company to demonstrate in CA- Woody biomass waste to biogas using advance digester technology that has much higher yield of methane without combustion. It has the lowest GHG footprint. The biogas (CH_4 + CO_2) can be upgraded to RNG. This technology has unique feature of digesting lingo-cellulosic biomass to co-produce biogas plus high quality fertilizer. Room temperature process leads to lower capital cost and maintenance costs.

There are several technology companies engaged in biomass to syn-gas conversion with different TRL levels. It will be highly advisable to benefit from their lessons learned. We recommend to include higher TRL level technologies for rapid commercialization.

Economy of Scale: Our experience show larger size systems are needed for commercial viability. Studies by DOE and others show >50 ton biomass/day size is needed for commercial viability. Allowing at least 50 % other biomass waste allows larger plant size needed for economic viability.