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## State policy on refrigerants and biomass are holding up local progress

Participating in Humboldt County's Climate Action Planning process I have encountered two areas where state guidelines are misleading and prevent local agencies from doing their job. 1. CAP guidelines said not to count refrigerants covered under the Montreal Protocol. Since almost all refrigerants are R22, which is covered, virtually no refrigerant emissions are listed. This is very short sighted. After 2020 R22 cannot be manufactured or imported and will be replaced with refrigerants with even higher greenhouse gas potential. Action: Instruct Climate Action Plan guidelines to report refrigerants regardless of coverage under Montreal or other international protocols. A carbon atom is a carbon atom regardless of treaty. 2. CAP guidelines do not permit counting greenhouse gas emissions from biomass power plants. In Humboldt County these equal the emissions of all passenger vehicles. While under some circumstances burned biomass may be carbon neutral, today we are faced with having to enormously reduce greenhouse gases in the next thirty years. The payback period for the biomass power plants is likely to extend from 45 to 100 years. So these extensive emissions are not counted during this critical period. Again, a carbon atom released today or in the next few years is going to contribute to exceeding the 1.5C or 2.0C threshold regardless of whether it is "paid back" in the distant future. A double whammy is that these plants produce large amounts of particulates less than 2.5 microns, so are a public health hazard. There are alternative uses for mill waste; they don't need to be burned.