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## You can't make Clean Hydrogen from dirty energy

While biomass and biogas are considered renewable, both emit considerable amounts of pollution and produce significant health and environmental impacts. The EPA Boiler MACT allows biomass plants to emit >2x more pm2.5 and 5x more carbon monoxide (NESHAP's proxy for air toxics) than coal fired power plants. The economic production of biogas from manure digesters requires CAFOs which have adverse impacts on air and water quality, while biogas combustion emits as much pollution as burning fossil gas.

Given the CEC's recent adoption of policy to consider health and environmental impacts of energy decisions, biomass and biogas should not be included as electricity sources for the production of clean hydrogen. Approving the use of dirty energy for "clean" hydrogen because CEC hasn't completed its process to implement its new health policy will result in subsidizing construction of long lasting dirty infrastructure. Having recognized and committed yourselves to considering the health and justice implications of energy decisions, you should now exercise the precautionary principle and not allow subsidies of hydrogen produced with polluting energy sources.