

CHRISTOPHER D. BROWN, AICP
Air Pollution Control Officer

DONNA ROBERTS NASH
Program Coordinator



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MENDOCINO COUNTY
AIR QUALITY MANAGEMENT DISTRICT

December 1, 2009

Mary Nichols, Board Chair
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Biomass for Energy Greenhouse Gas Offset Protocol

Dear Chair Nichols:

I urge the California Air Resources Board to support the Biomass for Energy Greenhouse Gas Offset Protocol. This Protocol will encourage the beneficial use of excess woody biomass, including agriculture related biomass, to produce renewable energy. The excess biomass addressed in this protocol is otherwise subject to open-burning, with significant local air quality impacts or decay and release of greenhouse gas.

While this Protocol applies to all types of excess biomass, forest biomass is the largest and most important focus. The California Board of Forestry recognized this and at their October 7, 2009 meeting unanimously endorsed the Protocol and recommended its timely adoption and implementation by the Air Resources Board.

Biomass is gaining much visibility nationally as an important alternative energy source. California's productive forests already contain unnaturally high amounts of biomass and are accumulating more each day. This biomass is contributing to increased wildfire size and intensity – something Mendocino County residents are well aware of following the recent firestorm in 2008. The fire situation is predicted to worsen due to climate change effects. The Biomass for Energy Protocol will make California a leader in effectively utilizing excess biomass in an appropriate, sustainable manner.

There are clear and significant benefits to air quality, energy production, high wage rural job creation and the reduction of greenhouse gases when excess biomass is transported to a facility that uses it to produce energy that displaces fossil fuels. Currently forest management projects designed to reduce the effects of wildfire do not have sufficient economic flexibility to process and transport excess biomass to an energy facility. The Biomass for Energy Protocol can help provide the funding needed to produce an economically, socially and ecologically sustainable and beneficial biomass-to-energy program.

I encourage the Air Resources Board to act quickly on this issue. Please contact the District at (707) 463-4354 with any questions. Thank you.

Sincerely,

Christopher D. Brown AICP
Air Pollution Control Officer



W. James Wagoner
Air Pollution Control Officer

(530) 891-2882
(530) 891-2878 Fax

MAUREEN KIRK, CHAIR
Supervisor, District 3

JAMES JOHANSSON, VICE CHAIR
Vice Mayor, Oroville

BILL CONNELLY
Supervisor, District #1

JANE DOLAN
Supervisor, District #2

STEVE LAMBERT
Supervisor, District #4

KIM YAMAGUCHI
Supervisor, District #5

ANGELA THOMPSON
Councilmember, Biggs

SCOTT GRUENDL
Councilmember, Chico

JERRY ANN FICHTER
Mayor, Gridley

ALAN WHITE
Councilmember, Paradise

February 25, 2010

California Air Resources Board
Attn: Mary Nichols, Board Chairman
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Support for the Placer County APCD Biomass For Energy
Greenhouse Gas Offset Protocol

Dear Chair Nichols:

The Governing Board of the Butte County Air Quality Management District requests the California Air Resources Board endorse and support the Biomass For Energy Greenhouse Gas Offset Protocol that has been developed by the Placer County Air Pollution Control District. This protocol will encourage the beneficial use of excess woody biomass, including agriculture related biomass, to produce renewable energy. The excess biomass addressed in this protocol is otherwise generally subject to open-burning, including catastrophic wildfires, or decay. Both of these approaches produce significant greenhouse gases and criteria and hazardous air pollutants and do not provide the positive benefit of renewable energy production.

While this protocol applies to all types of excess biomass, forest biomass is the largest and most important focus, and we understand the California Board of Forestry recognized this and at their October 7, 2009 meeting unanimously endorsed use of the protocol and recommended its timely adoption and implementation by the California Air Resources Board.

Biomass is gaining much visibility nationally as an important alternative energy source. California's productive forests already contain unnaturally high amounts of biomass and are accumulating more each day. This biomass is contributing to increased wildfire size and intensity, a situation that many experts expect to worsen due to climate change effects. Because of existing legislation and efforts like the Biomass For Energy protocol, California is well-positioned to claim a leadership role in developing the technology and processes for effectively utilizing excess biomass in an appropriate, sustainable manner.

There are clear and significant benefits to air quality, energy production and the reduction of greenhouse gases when excess biomass is transported to a facility that uses it to

Support for the Placer County APCD Biomass For Energy Greenhouse Gas Offset Protocol

Page 2

produce energy that displaces fossil fuels. Currently forest management projects designed to reduce the effects of wildfire do not have sufficient economic flexibility to process and transport excess biomass to an energy facility. The Biomass For Energy protocol can help provide the funding needed to produce an economically, socially and ecologically sustainable and beneficial biomass-to-energy program.

Our Board respectfully requests the California Air Resources Board's expedited action on the Placer County APCD Biomass For Energy Greenhouse Gas Offset Protocol.

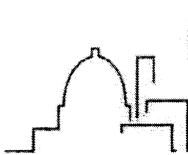
Sincerely,



Supervisor Maureen Kirk, Chair

Butte County Air Quality Management District Governing Board

cc: Supervisor Robert Weygandt, Chair, Placer County Air Pollution Control District Governing Board
Tom Christofk, APCO, Placer County Air Pollution Control District



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
The Power To Do More.™

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

March 10, 2010

Ms. Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

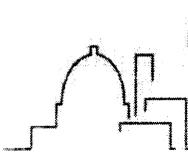
Subject: Biomass for Energy Greenhouse Gas Offset Accounting Protocol

Dear Chair Nichols,

The Sacramento Municipal Utility District (SMUD) has been approached by the Placer County Air Pollution Control District (PCAPCD) to support their proposed "Biomass for Energy Greenhouse Gas Offset Accounting Protocol." SMUD strongly supports the need expressed in the draft protocol to reduce the risk of forest fires and make the best use of biomass wastes that may negatively impact the state's air and water quality, as evidenced by SMUD's Problem Wastes to Green Electricity program. We see a great opportunity here for the ARB to work with PCAPCD to develop a framework for funding projects which can create additional renewable electricity from slash piles and use forest thinning for both forest fire prevention and renewable energy generation. We see the protocol developed by PCAPCD as a strong step in the right direction towards a methodology for prioritizing funding of these types of projects.

Sacramento and other parts of California's Central Valley are severely impacted by air quality issues which are projected to worsen as a result of climate change. Forest fires have a significant impact on local air quality, release large amounts of CO₂, and are projected to worsen as a result of climate change. SMUD, like PCAPCD, sees a strong opportunity to leverage the carbon market to reduce forest fires, reduce air quality impacts, and help the state meet its RPS goals with in-state biomass resources that would otherwise be wasted.

The PCAPCD Biomass for Energy Greenhouse Gas Offset Accounting Protocol represents a potential framework for creating an additional value stream to help enable projects to make use of forest waste to generate renewable energy. SMUD also recognizes the desire of local air agencies to identify greenhouse gas reductions with air quality co-benefits, which is a strong driver for the creation of such a protocol. PCAPCD has come up with a number of potential ways that such a protocol could be used to leverage funding from uncapped sources to make these projects happen using a CEQA carbon offset framework.



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
The Power To Do More.™

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

SMUD encourages the ARB to consider these approaches, along with other approaches using auction revenue to enable these projects. Projects that can both help the state mitigate and adapt to climate change impacts such as these are certainly worthy of consideration as the ARB makes decisions about how to dedicate funding from a cap and trade program. ARB endorsement of the protocol and funding of such mitigation/adaptation related projects with general allowance auction proceeds would contribute significant ancillary environmental and economic benefits for all Californians.

Sincerely,

Michael DeAngelis
Manager, AR&DGT Program
Sacramento Municipal Utility District
6201 S Street, MS B257
Sacramento, CA 95817
Email: mdeange@smud.org
Telephone: (916) 732-6589
Fax: (916) 732-6423

BOARD OF FORESTRY AND FIRE PROTECTION

P. O. Box 944246
SACRAMENTO, CA 94244-2460
Website: www.bof.fire.ca.gov
(916) 653-8007



October 28, 2009

Ms. Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Chair Nichols:

Enclosed is a copy of the Board's resolution in support of the Placer County Air Pollution Control District's proposed *Biomass for Energy Greenhouse Gas Offset Accounting Protocol*. This resolution was adopted by unanimous vote of the Board during its meeting of October 7, 2009.

As you are aware, Governor Schwarzenegger has issued an executive order (S-06-06) directing that twenty percent of California's renewable energy resources be derived through utilization of biomass material. Biomass power generation currently supplies 2% of California's total electrical demand, although significant additional resources exist. The attendant societal benefits of biomass energy production from facilities that are sized appropriately to ecosystem needs, particularly reduction of greenhouse gas emissions and treatment of hazardous forest fuels, are well established. It is clearly an underutilized resource for energy generation in California.

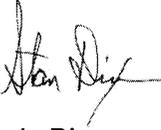
The Board resolution recognizes that removal of excess woody biomass from forested landscapes in California is regulated through state and federal policies. Unfortunately, much of this material is currently disposed of through open pile burning or is shredded and left to decay in the forest. The alternative utilization of this excess biomass for the production of renewable energy will provide significant reductions in greenhouse gas emissions and support emissions reduction goals outlined in the California Climate Change Scoping Plan. Such reductions would be achieved through the elimination of methane emissions from open pile burning or shredding and displacement of fossil fuel combustion for equivalent electrical generation.

In addition to the direct societal benefits associated with biomass energy production, the resolution recognizes that there are complementary benefits achieved through utilization of excess biomass. These benefits include reduction in criteria air pollutant emissions, additional watershed protection, and critical economic support for local communities and forest management infrastructure.

In adopting the resolution, the Board found that the Placer County Air Pollution Control District's innovative leadership in promoting ecosystem services, renewable energy generation from underutilized biomass resources, and greenhouse gas emission reduction was commendable.

The Board therefore strongly urges the California Air Resources Board to likewise endorse the use of this proposed protocol. Questions may be directed to the Board's Executive Officer, George Gentry, at 916-653-8007 or by email to george.gentry@fire.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Dixon", written in a cursive style.

Stan L. Dixon
Chairman

Enclosure

cc: Arnold Schwarzenegger, Governor
Jim Boyd, Commissioner, California Energy Commission
Tony Brunello, Deputy Secretary, Resources Agency
Terry Dressler, President, California Air Pollution Control Officers Association
Gary Gero, President, California Climate Action Registry
Randy Moore, Region 5 Forester, USDA Forest Service
Robert Weygandt, Chair, Placer County Air Pollution Control District

STATE OF CALIFORNIA
BOARD OF FORESTRY AND FIRE PROTECTION
RESOLUTION

In Support of the Biomass for Energy Greenhouse Gas Offset Accounting Protocol

Whereas, the Board of Forestry and Fire Protection (Board) recognizes that excess biomass is generated from existing forest management operations, including thinning for wildfire hazard reduction, defensible space clearing, and commercial timber harvest, where such forest management operations are conducted under State Forest Practice Rules and Regulations, or Federal National Environmental Policy Act requirements.

Whereas, the Board recognizes that while some recoverable biomass generated from forest management operations should remain on-site to provide environmental benefits, most of such generated biomass is excess to on-site needs and is disposed of through either in-field open pile burning or is masticated, to reduce fire hazard.

Whereas, the Board recognizes that utilization of excess biomass for the production of renewable energy, as an alternative to open pile burning or mastication, can provide significant reductions in greenhouse gas emissions through: (1) elimination of methane emissions from open pile burning or mastication; and (2) displacement of fossil fuel combustion for equivalent energy.

Whereas, the Board recognizes that utilization of excess biomass for energy provides additional co-benefits including but not limited to: reduction of criteria air pollutant emissions, protection of watersheds, economic support for local communities, and critical infrastructure necessary for effective forest management.

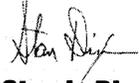
Whereas, the Board recognizes that renewable energy generation from excess biomass supports the mandate to provide twenty percent of California's renewable energy resources from biomass material, as directed by Governor Schwarzenegger on April 25, 2006 in Executive Order S-06-06.

Whereas, the Board recognizes the need for the *Biomass for Energy Greenhouse Gas Offset Accounting Protocol* to provide a quality accounting methodology to quantify greenhouse gas reductions from excess biomass for energy production projects.

Now Therefore Be It Resolved, that the Board supports the *Biomass for Energy Greenhouse Gas Offset Accounting Protocol*, as proposed by the Placer County

Air Pollution Control District, and recommends its timely adoption and implementation by the California Air Resources Board.

APPROVED:



**Stan L. Dixon
Chairman**

ATTEST:



**George D. Gentry
Executive Officer**

Dated at Sacramento, California this 7th Day of October

2009

File Code: 2400/3000/5100

Date: September 23, 2009

Mr. Stan Dixon, Chairman
California Board of Forestry
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Stan,

I am writing this letter to encourage the Board of Forestry to support the Biomass for Energy Greenhouse Gas Offset Protocol developed here in California by Placer County air quality management district staff. This protocol quantifies the greenhouse gas reduction benefits of converting excess biomass to renewable energy rather than disposal by burning or other means, and has the potential to trigger market mechanisms to invest in and reward beneficial conversion of these materials. If the protocol is integrated into forest and energy policies and programs here in California it will result in significant reductions of greenhouse gasses and hazardous air pollutants and facilitate the removal of excess biomass into beneficial uses.

While this protocol applies to all types of excess biomass, forest biomass is the largest and most important focus. California's productive forests already contain unnaturally high amounts of biomass that are accumulating more each day. This biomass is contributing to increased wildfire size and intensity, a situation that is predicted to worsen due to climate change effects. Currently, forest management projects designed to reduce the effects of wildfire do not have sufficient economic flexibility to process and transport excess biomass to an energy facility. The Biomass for Energy Greenhouse Gas Offset protocol can help provide the funding needed to transport excess biomass to produce ecologically beneficial renewable energy.

California is well-positioned to claim a leadership role in developing the processes and policy framework for effectively utilizing excess biomass in an appropriate, environmentally beneficial and sustainable manner. The State's Renewable Energy Portfolio Standard and greenhouse gas reduction goals under Assembly Bill 32 provide the perfect platform for integration of the Biomass for Energy Greenhouse Gas Offset protocol into developing policies and programs. There are clear and significant benefits to air quality, energy production, and the reduction of greenhouse gases when excess biomass is transported to a facility that uses it to produce energy that displaces fossil fuels. I encourage your support for this creative tool.

Sincerely,

/s/ James M. Peña (for)
RANDY MOORE
Regional Forester





COLLEGE OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL SCIENCE, POLICY & MANAGEMENT
DIVISION OF ECOSYSTEM SCIENCE
137 MULFORD HALL MC 3114

BERKELEY, CALIFORNIA 94720
(510) 643-3130
FAX (510) 643-3490

September 25, 2009

California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Board of Forestry:

The biomass to energy protocols proposed by the Placer County Air Pollution Control District (PCAPCD) focus on reducing CO₂, methane, nitrous oxide, and smoke emissions by providing a cost-effective and climate benefitting emission offset program for parties that must apply for permits from the PCAPCD. This is a well written set of protocols that address air pollution topics that are directly in the arena of the air quality districts and boards.

It is a biological reality that trees do not live forever. When many young trees grow together in competition, the stronger trees eventually overshadow and outcompete the shorter trees. Left unmanaged these shorter trees eventually die and decompose (releasing any CO₂ they sequestered) or die in wildfires (releasing CO₂ and smoke). Conversely, these trees can be proactively removed to reduce the risk of catastrophic wildfires, attacks from insects and disease that prey on over-crowded forest stands, or drought-induced mortality.

Natural competition and self thinning of trees results in considerable quantities of dead vegetation in the forest that is slowly releasing CO₂ as it decomposes. The amount of CO₂ and smoke released in wildfires or prescribed fires is a function of how much biomass is burned. Collecting and removing small trees is expensive and time consuming and as a result much waste wood is left in the forest to decompose or burn in a fire, rather than be sent to a biomass powerplant for electricity generation.

The PCAPCD protocol focus on 'excess biomass' addresses a clear problem of reducing air pollution while not getting overly prescriptive on the larger and more complex issues of quantifying net climate benefits from overall forest management and wood product utilization strategies. Since California imports the vast majority of the wood products we use, it makes sense for the air districts and board to focus on discrete issues that do not involve cross-border accounting. The focused nature of these protocols provides a clean vehicle to direct investment towards CO₂ reductions that will also have complementary benefits in terms of reducing smoke emissions from future wildfires. Recent research from Dr. Anthony Westerling and

others at UC Merced suggest that the risk of wildfires will increase under most projected climate scenarios. This implies that the atmospheric costs of doing nothing with these old piles will increase over time. These protocols are a clear example of years of thorough work to produce a cost-effective solution for reducing both air pollution and wildfire risks.

Sincerely,

A handwritten signature in black ink that reads "William Stewart". The signature is written in a cursive style with a long horizontal stroke at the end of the word "Stewart".

William Stewart
Forestry Specialist

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 653-5802
Website: www.fire.ca.gov



R4

October 5, 2009

Mr. Stan Dixon, Chairman
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Chairman Dixon:

The Placer County Air Pollution Control District (APCD) has developed a proposed Biomass Waste for Energy Greenhouse Gas (GHG) Offset Accounting Protocol that will measure GHG reductions as a result of using excess forest biomass for energy production. The Department of Forestry and Fire Protection (CAL FIRE) understands that Placer County has requested that the Board of Forestry and Fire Protection (Board) consider a resolution supporting the adoption of the draft protocol by the Air Resources Board (ARB). The resolution supports the request that the ARB adopt this protocol as a qualified voluntary GHG emission reduction protocol under AB 32, the California Global Warming Solutions Act of 2006.

The protocol quantifies the GHG reduction benefits of converting excess biomass to renewable energy rather than disposal by burning or other means, and has the potential to trigger market mechanisms to invest in and reward beneficial conversion of these materials. If a final protocol is integrated into forest and energy policies and programs here in California, it has the potential to significantly reduce GHG and hazardous air pollutant emissions from both controlled and uncontrolled wildland fires.

Currently, the majority of the fuel hazard reduction projects being implemented in California are accomplished with public funds (state and federal). The biomass waste materials created during project implementation has little economic value and is either chipped and scattered in the wildland or removed through open burning. These are not climate friendly actions as there is now either direct emission from open burning that includes not only GHG emission but criteria pollutants or GHG emissions through accelerated decay of vegetation chipped and scattered on the project area.

The implementation of such a protocol has the potential to provide added value to material removed during fuel hazard reduction treatments and thus provide market support for this activity. The co-benefit of creating such a market is three fold: 1) significant reduction criteria pollutants, 2) GHG benefit through reduced use of fossil fuel for energy production, and 3) an ability to treat more acres for wildfire risk reduction with the same level of public funding.

CONSERVATION IS WISE-KEEP CALIFORNIA GREEN AND GOLDEN

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Stan Dixon, Chairman

October 5, 2009

Page Two

There are clear and meaningful benefits to air quality, energy production, and the reduction of greenhouse gases when excess biomass is transported to a facility that uses it to produce energy that displaces fossil fuels. CAL FIRE encourages the Board to support a resolution that urges the ARB to consider adopting this protocol developed by the Placer County APCD.

Sincerely,

A handwritten signature in black ink, appearing to read 'Crawford Tuttle', with a long horizontal line extending to the right.

CRAWFORD TUTTLE
Chief Deputy Director



Placer County Fire Safe Alliance

Board of Forestry

September 24, 2009

RE: Support Letter for Biomass Waste Energy Greenhouse Gas Offset Accounting Protocol

Dear Board of Forestry

The Placer County Fire Save Alliance urges the California Board of Forestry to support the Biomass Waste Energy Greenhouse Gas Offset Accounting Protocol. With over 50% of Placer County covered by forested land, a significant amount of biomass material is produced through shaded fuel break and defensible space activities. Placer County Fire Safe Councils have identified 35 necessary projects covering 3,245 acres in the current Community Wildfire Protection Plan (CWPP) for the Western Slope of the Sierra Nevada in Placer County. These projects alone will develop a significant source of biomass material that will otherwise be burned or decay.

There are currently no economically feasible methods to process and transport the large quantity of biomass material produced by CWPP and Shaded Fuel Break projects to energy facilities. The Biomass Waste Energy Greenhouse Gas Offset Accounting Protocol could help provide the funding needed to produce an economical and sustainable biomass to energy program.

The Placer County Fire Safe Alliance membership includes Cal Fire, USFS, and BLM. We believe that great gains can be made in the reduction of greenhouse gases through the movement of material to facilities that use this material to produce energy that displaces fossil fuel usage.

It is the hope of our organizations that this protocol is approved.

Regards,

A handwritten signature in black ink that reads "George Alves".

George Alves
Chair, Placer County Fire Safe Alliance

placerfirealliance@earthlink.net
www.placerfirealliance.org
(530) 886-5319



PLACER COUNTY WATER AGENCY
SINCE 1957

BOARD OF DIRECTORS	BUSINESS CENTER
Gray Allen, District 1	144 Ferguson Road
Alex Ferreira, District 2	MAIL
Lowell Jarvis, District 3	P.O. Box 6570
Mike Lee, District 4	Auburn, CA 95604
Ben Mavy, District 5	PHONE
	530.823.4850
David Broninger, General Manager	800.464.0030
Ed Tiedemann, General Counsel	WWW.PCWA.NET

September 22, 2009
File No.

California Board of Forestry
P.O. Box 944246
Sacramento, CA 94244-2460

SUBJECT: Support of Biomass for Energy Greenhouse Gas Offset Protocol

Dear Board of Forestry:

The Placer County Water Agency (PCWA) urges the California Board of Forestry to support the Biomass for Energy Greenhouse Gas Offset Protocol. This protocol will encourage the beneficial use of excess woody biomass to produce renewable energy. The excess biomass addressed in this protocol is otherwise subject to open-burning or decay. Both of these approaches produce significant greenhouse gas emissions and hazardous air pollutants and do not provide the positive societal benefits of renewable energy production.

While this protocol applies to all types of excess biomass, forest biomass is the largest and most important focus, so it is appropriate for the Board of Forestry to provide a leadership role by supporting adoption of the protocol.

Biomass is gaining positive visibility nationally as an important alternative energy source. California's productive forest lands already contain unnaturally high volumes of biomass and are accumulating more each day. High biomass volume can contribute to increased wildfire size and intensity; a situation that could worsen if current predictions regarding the effects of climate change prove accurate. Because of existing legislation and efforts like the Biomass for Energy protocol, California is well-positioned to claim a leadership role in developing the technology and processes for effectively utilizing excess biomass in an appropriate, sustainable manner.

There are clear and significant benefits to air quality, energy production and the reduction of greenhouse gases when excess biomass is transported to a facility that uses it to produce energy that displaces fossil fuels. Currently, forest management projects designed to mitigate catastrophic wildfire do not have sufficient economic flexibility to process and transport excess biomass to an energy

facility. The Biomass for Energy protocol can help provide the funding needed to produce an economically, socially and ecologically sustainable and beneficial biomass-to-energy program.

PCWA asks that the California State Board of Forestry strongly support the Biomass for Energy Greenhouse Gas Offset Protocol.

Sincerely,
PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read 'E. Maisch', written in a cursive style.

Einar Maisch, P.E.
Director of Strategic Affairs

ELM:bb



El Dorado County Fire Safe Council

P.O. Box 1237
Pollock Pines, CA 95726
Phone/Fax: (530) 647-1098

Website: edcfiresafe.org Email: EDCFiresafe@comcast.net

"Public and Private Partners Working Together to Protect People, Homes, and Natural Resources"

September 30, 2009

California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Board of Forestry,

The El Dorado County Fire Safe Council (EDCFSC) has been proactively pursuing finding solutions to the exponentially increasing woody biomass on our forests, both private and public. We work very closely with all of our stakeholders, the Eldorado National Forest, the California Department of Forestry and Fire Protection (CalFire), Sierra Pacific Industries, as well as other private timber related businesses. Our options with the recent closure of the SPI mill in Camino have been drastically reduced on all levels including on-going fuels reduction projects as well as those that have been approved for this coming fiscal year. The problem is huge in that there is no market for our timber that will cover the costs of transporting not only the timber but the woody biomass resulting from these projects.

It is for this reason that I am writing to you to show our strong support of the Biomass to Energy protocols proposed by the Placer County Air Pollution Control District (PCAPCD) that focus on reducing CO2, methane, nitrous oxide, and particulate matter. All of this is accomplished while providing economic incentives for all of us who are involved in addressing the complex issues of hazardous fuels reduction. National forests in California are approaching a critical state and we must put aside our differences (philosophical and political) and work collaboratively to solve these problems.

In 2008 the EDCFSC commissioned a Preliminary Biomass Fuel Availability and Feasibility Review for Siting Biomass Power Facilities in El Dorado County California. TSS Consultants of Rancho Cordova did an excellent job of this initial assessment and a copy of this study can be obtained by contacting the EDCFSC at

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www.edcfiresafe.org. While the study determined that El Dorado County does have the necessary woody biomass fuel resources, we continue to have the basic challenge of getting commitments from the Forest Service and other stakeholders for the on-going supply of these resources to sustain any kind of biomass facility in our County. Litigation, uncertain federal budgets and few ready markets for sawlogs removed as a result of fuels reduction projects, have a huge impact on our ability to plan and promote any realistic commercial scale biomass utilization facility.

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I am a member of a multi-county, central Sierra group, the Sustainable Forestry Action Coalition (SFAC), made up of County Supervisors, Chambers of Commerce, and timber industry representatives. We are actively working on bringing these issues to key policy-makers both at the national and state level. The mission of the EDCFSC is primarily one of educating and motivating our residents to take responsibility for protecting their homes, property and communities from catastrophic wildland fires. We also work collaboratively with our public agency partners to obtain funding for fuels reduction projects. However, there are few alternatives to burning the slash in the forest or sending the woody bi-products of residential clearing "down the hill" to biomass facilities. The first option creates a huge impact on air pollution to say nothing of the negative impact the resulting smoke has on our residents. Transporting our green waste to Sacramento is expensive and the resulting vehicle emissions are significant.

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The focused nature of the protocols proposed by the PCAPCD provides a clean vehicle to direct investment towards greenhouse gas reductions that will also have complementary benefits in terms of reducing smoke emissions from future wildfires. These protocols are a clear example of years of thorough work to produce a cost-effective solution for reducing both air pollution and wildfire risks.

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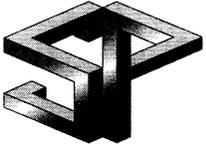
I strongly urge your endorsement of their proposal and look forward to the ensuing dialog between all those committed to working together for solutions.

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Sincerely,

Vicki D. Yorty
Executive Coordinator
El Dorado County Fire Safe Council

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¶



Sierra Pacific Industries

P.O. Box 496028 • Redding, CA 96049-6028 • (530) 378-8000

October 3, 2009

Mr. Stan Dixon, Chairman
California Board of Forestry
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Stan,

We are writing in support of the Biomass for Energy Greenhouse Gas Offset Protocol developed by the Placer County Air Quality Management District. We urge the Board of Forestry and Fire Protection to adopt the resolution offered to the Board by Placer County. The resolution supports the request that the Air Resources Board adopt this protocol as a qualified voluntary Greenhouse Gas (GHG) emission reduction protocol under Assembly Bill 32.

Sierra Pacific Industries is the largest producer of biomass electricity in California. Our sawmills and in-forest projects generate wood byproducts that are the primary source of fuel for these plants. In addition to producing renewable energy, these plants offer a means to reduce the threat of wildfires in California's forests. In that regard, the Placer County protocol quantifies the greenhouse gas reduction benefits of converting excess biomass to renewable energy rather than disposal by natural decay or burning in the forest. It also has the potential to trigger market mechanisms to increase the productive use of these materials.

Much of California's forest land base contains excessively high levels of vegetation compared to historic standards. Ongoing forest management activities are the best mechanism for reducing this vegetation and the threat of wildfires and GHG production. However, forest management projects designed to reduce the effects of wildfire often do not have sufficient economic value to process and transport biomass to our plants. Thus, much of the material that can and should be removed from the forests is being left behind. The Biomass for Energy Greenhouse Gas Offset protocol can help provide the economic incentives necessary to transport biomass to electric generation facilities.

As you know, well-managed, healthy forests are a key component of greenhouse gas reduction efforts. We believe that it is essential to remove more biomass

from California's forests in order to help create these conditions. Approval of the biomass protocol would be a significant step in that direction.

Sincerely,

A handwritten signature in cursive script that reads "Mark Pawlicki".

Mark Pawlicki
Director, Government Affairs