



June 15, 2020

Wildfire Safety Advisory Board
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments on Draft 2021 Wildfire Safety Recommendations

Dear Wildfire Safety Advisory Board:

The Bioenergy Association of California (BAC) appreciates the opportunity to comment on the draft 2021 regulations. Many BAC members work on wildfire mitigation and the reduction of air and climate pollution from wildfires. We appreciate the thoughtful and extensive draft of 2021 recommendations and propose a few additions below to ensure coordination across programs and maximum benefits for wildfire reduction as well as air quality, climate emissions, grid and community resilience, and local economic development.

1. The Bioenergy Association of California

BAC represents more than 75 public agencies and private companies that are working to convert organic waste to energy to meet the state's climate, clean energy, air quality, wildfire reduction, and waste reduction goals. BAC's public sector members include cities and counties in California, air quality and environmental agencies, waste and wastewater agencies and associations, public utilities, community and environmental groups. BAC's private sector members include energy and technology companies, utilities, waste haulers, agricultural and food processing companies, investors, and others.

BAC and its members have participated actively in the Governor's Tree Mortality Task Force and the Forest Management Task Force. BAC also participates in several Commission proceedings that are related to wildfire safety, including the BioMAT (R.18-07-003), interconnection proceedings, distributed energy resources proceedings, the pipeline biomethane proceeding (R.13-02-008), the microgrid proceeding (R.19-09-009), and the Integrated Resource Planning proceeding (R.20-05-003).

BAC submits the comments below on the Draft 2021 Wildfire Safety recommendations.

2. Need to Address Biomass Utilization to Fully Mitigate Wildfire Hazards

Numerous laws and policies require increased forest fuel and other vegetation removal to reduce wildfire risks and impacts.¹ Removing the forest fuel or other vegetation is not enough, however, to fully mitigate wildfire risks. When forest fuel is removed but left in piles, it continues to pose a fire risk. The same is true for grasslands, shrubs, and other vegetation that must be removed around power lines and other infrastructure to create defensible space.

The *California Forest Carbon Plan* and reports by the Little Hoover Commission and Sierra Nevada Conservancy all recommend that forest biomass be used to generate energy as a way to reduce wildfire risks and emissions.² Senate Bill 1122 (Rubio, 2012) also requires 50 megawatts of new, small-scale bioenergy facilities that use the byproducts of sustainable forestry,³ including forest fuel that is removed for wildfire mitigation.

BAC urges the Wildfire Safety Advisory Board, therefore, to add recommendations for increased utilization of forest fuel and other vegetation removed for wildfire mitigation, especially the use for bioenergy production, which is already required by state law. Requiring accelerated implementation of the BioMAT, inclusion of biogas from forest waste in a biomethane or renewable gas procurement program, and other measures would help to reduce wildfire risks and the emissions from either wildfire or controlled burns.

3. Need to Proactively Upgrade Rural Infrastructure

BAC urges the Board to add recommendations to upgrade rural infrastructure. Rural communities are the ones that are most at risk of wildfire, PSPS, and other grid disruptions. Not only are they in the highest wildfire risk areas of the state, but they also tend to be at the end of power lines with outdated infrastructure that is both more vulnerable to disruptions and more in need of upgrades. As part of the state's wildfire mitigation plans, it is critical to upgrade rural technology and to develop microgrids in forested and rural communities that are at highest risk for wildfire and other grid disruptions.

4. Need to Address Air and Climate Pollution from Wildfires

BAC urges the Board to address the air and climate pollution from wildfires, which are also public health and safety issues. According to the state's *Short-Lived Climate*

¹ See, eg, SB 901 (Dodd, 2018); Governor's Proclamation of a State of Emergency, issued October 30, 2015, Emergency Order paragraphs 1 and 2. Available at: https://www.gov.ca.gov/docs/10.30.15_Tree_Mortality_State_of_Emergency.pdf.

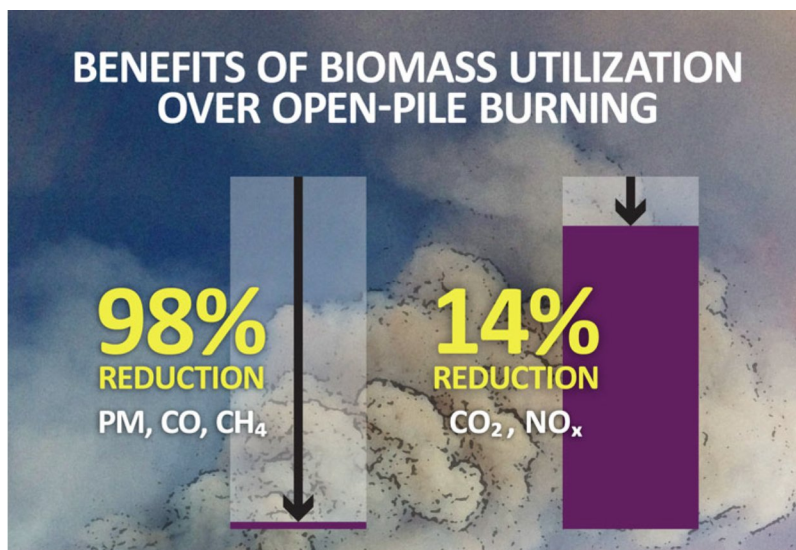
² "*California Forest Carbon Plan – Managing Our Forest Landscapes in a Changing Climate*," adopted by the California Environmental Protection Agency, California Natural Resources Agency and CalFire in May 2018. Little Hoover Commission, *Fire On the Mountain*, Report #242, February 2018.

³ Public Utilities Code section 399.20(f)(2)(A)(iii).

Pollutant Reduction Strategy, wildfires are the single largest source of black carbon emissions, which are the most powerful climate pollutants and also a hazard to public health.⁴ Black carbon is 3,200 times more damaging to the climate than the carbon dioxide emitted by fossil fuel combustion.

In addition to the public health and safety impacts of wildfire emissions, they also impact solar energy production and, longer term, can even impact rainfall and other weather patterns, all of which have significant impacts on energy production and resilience.

The *California Forest Carbon Plan* -- which was adopted by CalEPA, the California Natural Resources Agency, and CalFire -- calls for increased bioenergy production to reduce the carbon and air pollution emissions from wildfire and from controlled burns of forest waste. According to the *California Forest Carbon Plan*, bioenergy cuts black carbon, methane, and carbon monoxide emissions 98 percent compared to wildfire or controlled burns. The figure below is from the *Forest Carbon Plan*.



California Forest Carbon Plan, Figure 19, page 135

The Wildfire Safety Recommendations should include specific recommendations to reduce air pollution and climate pollution from wildfires and from prescribed fires, including recommendations to accelerate new, sustainable bioenergy development.

5. Need to Coordinate with BioMAT, Microgrid, Pipeline Biogas Proceedings.

Several proceedings at the CPUC relate directly or indirectly to wildfire mitigation, including the BioMAT proceeding (R.18-07-003), the interconnection proceedings, microgrid proceeding, and pipeline biogas proceedings. BAC urges the Board to expand the 2021 recommendations to include specific recommendations for each of

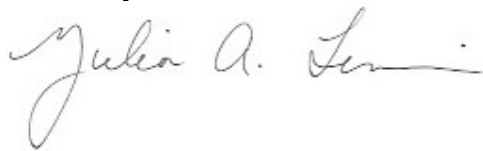
⁴ *Short-Lived Climate Pollution Reduction Strategy*, adopted by the California Air Resources Board in March 2017, at page 40, Table 5. Available at: https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf.

these proceedings to help reduce wildfire risks. Those recommendations should include:

- Steps to accelerate development of small-scale forest bioenergy projects required by SB 1122 (the BioMAT).
- Identifying potential funding sources to help accelerate project development, such as EPIC funding, Cap & Trade funding, air quality mitigation funding, etc..
- Steps to accelerate and reduce or subsidize the costs of interconnection for new forest biomass projects.
- Prioritize microgrid development in forested and rural regions that are most vulnerable to wildfires and PSPS's.
- Require microgrids to use bioenergy from forest waste and other vegetation removed for wildfire mitigation, so that local biomass can provide local energy supplies and increase grid and community resilience.
- Include forest biomass and other vegetation removed for wildfire mitigation as eligible feedstocks in any biomethane procurement program, such as the one that the Commission must consider pursuant to SB 1440 (Hueso, 2018).⁵

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Julia A. Levin". The signature is written in dark ink and is positioned above the printed name and title.

Julia A. Levin
Executive Director

⁵ Public Utilities Code section 650.