



February 28, 2021

VIA EMAIL: Anny.Huang@arb.ca.gov

Anny Huang, PhD
Manager, Emission Inventory Analysis Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire and Forest Management Activities Public Comment Draft

Dear Anny Huang,

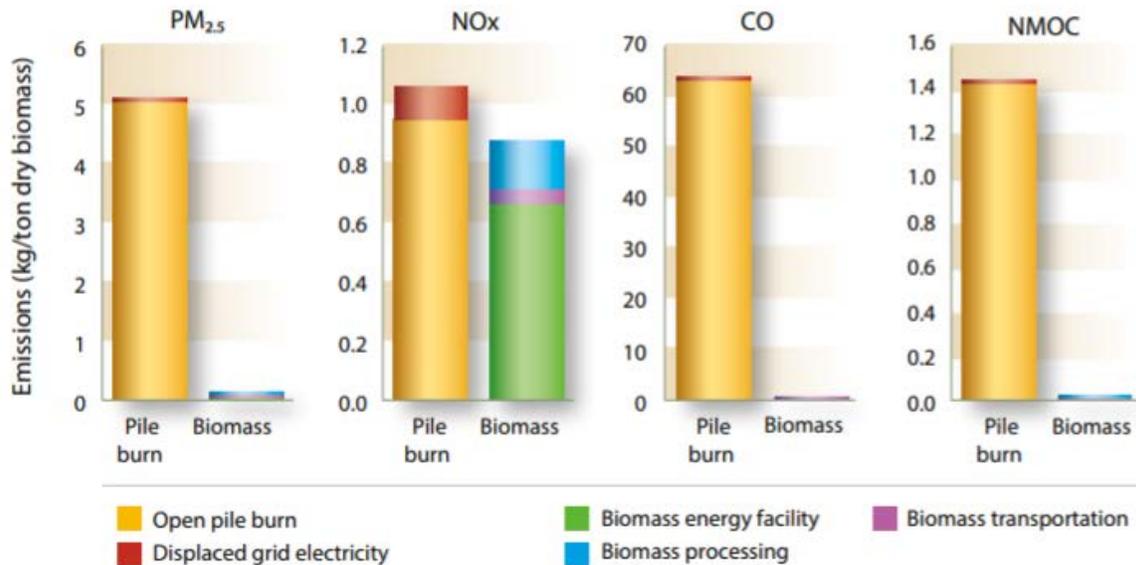
Thank you for the opportunity to comment on the California Air Resources Board (CARB) Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities Public Comment Draft, released in December.

Greenleaf Power is a leading provider of renewable energy in North America and works to protect environmental resources by producing reliable green energy through biomass technologies. In California, Greenleaf Power operates two biomass facilities that collect residual biomass material from agricultural, construction, demolition, landfill, and timber industries and converts that biomass into carbon-neutral electricity for sale to municipal, public power, and investor-owned utilities.

We appreciate that the Public Comment Draft acknowledges that biomass can be used for energy and fuel and would like to highlight the alternative for the extracted biomass used in biomass facilities. Because the material that is used at these facilities has no other merchantable value, it would most likely be open burned, burned in a wildfire or end up in landfills – all of which have substantial emissions implications. Based on an analysis that we had commissioned in 2018, “Fate of Woody Biomass in California” attached, the generation of biomass power provides the lowest emissions of the available disposal methods.

Additionally, the report quantifies the positive impact of preventive activities for forest management on wildfire emissions. As noted on page 8 of the draft, the 2018 emissions level of 39 MMT was the high and the 2020 levels will be much higher. Fuel removal is a necessary wildfire prevention strategy and biomass provides the lowest emissions options of all the disposal methods available for that material.

We would like to bring your attention to the attached July 2015 article published in the California Agriculture Journal that includes the following graphic to visually show the differences between biomass emissions and pile burning, just one potential fate for this excess woody material if it were not to end up in a biomass facility.



Given the continued challenges California will face with wildfires, both naturally occurring and those cause by utility infrastructure, we believe that biomass is one of the best solutions for California going forward and that amendments to the Public Comment Draft are necessary to provide a complete picture of the GHG emissions of biomass facilities. Thank you for your efforts to quantify this complex issue. Greenleaf Power is committed to lowering greenhouse emissions through renewable energy generation from biomass technologies.

Please feel free to contact me at 916-596-2513 or via email at gharmon@greenleaf-power.com.

Sincerely,

Geoffrey M. Harmon
 Geoffrey Harmon
 Treasurer, Greenleaf Power

Attachments:

- (1) Fate of Woody Biomass in California
- (2) Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions.
 Springsteen B, Christofk T, York R, Mason T, Baker D, et al. 2015. California Agriculture Journal July September 142 149.

