



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

April 21, 2022

The Honorable Eduardo Garcia  
Chair, Assembly Utilities and Energy Committee  
1020 N Street, Room 408  
Sacramento, CA 95814

**RE: Assembly Bill 2878 – SPONSOR  
As Amended April 20, 2022**

Dear Assembly Member Eduardo Garcia:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to sponsor Assembly Bill 2878 (Aguiar-Curry), relating to forest biomass waste utilization. RCRC is an association of thirty-nine rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

Assembly Bill 2878 helps achieve the state's forest health and wildfire risk reduction goals by increasing the productive use of forest waste biomass through energy generation and wood products manufacturing. In doing so, AB 2878 will: 1) help reduce future emissions related to the open burning or natural decomposition of forest residuals; 2) increase energy reliability and resiliency in those communities at greatest risk of losing power; and, 3) create jobs and improve the economy in many of California's rural communities.

California is finally making progress on long-overdue forest health improvement and wildfire risk reduction projects. The need for continued progress cannot be overstated in light of the horrifically destructive nature of California wildfires that have occurred the last several years. In 2020, California's wildfires burned over 4 million acres and released over 90 million metric tons of greenhouse gas emissions. Another 2.5 million acres burned last year. Emissions from these wildfires undercut much of the state's progress in reducing greenhouse gas emissions and result in widespread hazardous air quality for extended periods of time.

It is vital to promote the productive use of biomass residuals resulting from forest health improvement and wildfire risk reduction projects, since traditional methods of disposal (open burning and natural decomposition) produce far greater emissions than

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would occur in a biomass facility. Residuals left in place for natural decomposition add to the fuel load and are increasingly likely to be consumed in a wildfire. A recent field study indicates that biomass energy generation results in 98-99 percent lower PM2.5, carbon monoxide, methane, and black carbon emissions compared to open pile burning (along with a significant reduction in NOx and carbon dioxide equivalent greenhouse gas emissions).<sup>1</sup>

AB 2878 builds upon and incorporates the findings and recommendations of the California Forest Carbon Plan and Wildfire and Forest Resilience Action Plan, which highlight the need for forest health improvement to achieve ecosystem benefits, reduce wildfire risk, and improve water quality and yield. AB 2878 includes a comprehensive, multi-pronged approach to achieve these objectives.

AB 2878 helps improve the quality and integration of data related to wildfire, controlled burn, and pile burn emissions into the state's climate change planning efforts. It also requires incorporation of the California Forest Carbon Plan's recommendations into the state's AB 32 scoping plan, thereby ensuring that California minimizes and prevents future fire-related emissions at the same time it seeks to reduce anthropogenic greenhouse gas emissions.

AB 2878 helps improve local energy resiliency and overall grid reliability. It does this by facilitating the use of forest biomass to support rural microgrids and upgrades to infrastructure in forested regions to reduce wildfire risk and support integration of bioenergy. The bill also seeks to incentivize interconnection of bioenergy projects to break down some of the biggest barriers to bringing facilities online. Interconnection is vital to help the state achieve its forest health and wildfire risk reduction objectives, as well as local energy resiliency.

AB 2878 commendably seeks to extend the Bioenergy Market Adjusting Tariff (BioMAT) program to 2030 and consider increasing the cap on the amount of forest biomass waste under that program. The BioMAT program requires utilities to procure electricity from small bioenergy projects, including biomass facilities that use fuels from high hazard zones. These smaller bioenergy facilities can be strategically placed close to the areas where the need for fuel reduction and forest health improvement is greatest – areas which often have lower electrical reliability than the rest of the grid. The program has no statutory end date; however, the CPUC is scheduled to sunset the program on December 31, 2025, regardless of whether the procurement requirements have been met. The rapidly approaching deadline could chill many of these smaller projects that will be instrumental to the state's forest health, climate change, and pollution reduction objectives. Furthermore, accelerating the BioMAT procurement of electricity derived from

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<sup>1</sup> Springsteen B, Christofk T, York R, Mason T, Baker S, Lincoln E, Hartsough B, Yoshioka T. 2015. "Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions." *Calif Agr* 69(3):142-149. <https://doi.org/10.3733/ca.v069n03p142>.

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the use of forest biomass waste will complement the state's wildfire mitigation and forest restoration objectives and avoid air pollution associated with the open burning or natural decomposition of forest residuals.

For the above reasons, RCRC respectfully requests your "Aye" vote when the bill is heard before your committee. Please do not hesitate to contact me at [jkennedy@rcrcnet.org](mailto:jkennedy@rcrcnet.org) or (916) 447-4806 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "John Kennedy". The signature is written in a cursive style with a large, looping "J" and "K".

JOHN KENNEDY  
Policy Advocate

cc: The Honorable Cecilia Aguiar-Curry, Member of the State Assembly  
Members of the Assembly Utilities and Energy Committee  
Laura Shybut, Chief Consultant, Assembly Utilities and Energy Committee  
Greg Melkonian, Consultant, Assembly Republican Caucus