



February 3, 2021

The Honorable Rudy Salas  
Member, California State Assembly  
State Capitol, Room 4016  
Sacramento, CA 95814

**RE: Assembly Bill 322 – SUPPORT  
As Introduced January 26, 2021**

Dear Assembly Member Salas:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for your Assembly Bill 322, which directs Electric Program Investment Charge (EPIC) funding to biomass energy projects. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

RCRC member counties contain much of California's forested lands, have borne the lion's share of destruction caused by wildfires, and have experienced most of the state's Public Safety Power Shutoff (PSPS) events. We strongly support wildfire risk reduction efforts and believe that biomass facilities play a key role in those endeavors.

AB 322 requires the State Energy Resources Conservation and Development Commission to allocate at least 20 percent of EPIC program funds to biomass energy projects. The EPIC program, which awards money for energy research, development, and demonstration projects, is ideally situated to spur the development and deployment of new biomass facilities that will help achieve California's wildfire risk reduction and climate change goals.

Biomass facilities convert residual materials (for which there is often no marketable use) into energy and avoid the emissions that result when material is managed through open burning, left to decompose naturally, or fuels future wildfires. In 2020, California's wildfires burned over 4 million acres and released over 90 million metric tons of greenhouse gas emissions. That is more than all the greenhouse emissions from industrial sources in 2018, well over half of emissions from the entire transportation sector, and more than double all emissions from the commercial and residential sectors.

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When compared with emission of criteria air pollutants, black carbon, and greenhouse gas emissions resulting from burning biomass in open piles, emissions from biomass facilities are significantly lower – even after considering transportation and processing emissions.<sup>1</sup> 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>2</sup>

Additionally, the California Public Utilities Commission noted that biomass facilities are “particularly well-suited for addressing forest management needs in forested areas close to population centers and far from other wood infrastructure” and “where prescribed burns and open burning are restricted or face local opposition, larger-scale biomass operations are not nearby or limited by smaller need, or where other more economically lucrative end-uses for the feedstock do not currently exist.”<sup>3</sup>

Increased investment in new biomass facilities will also provide other derivative benefits, including promoting economic development in rural forested regions and promoting local energy resiliency. Over the last two years, numerous widespread PSPS events have repeatedly left many communities without electricity for extended periods of time. Given the important role that biomass facilities play in forest health improvement and wildfire risk reduction, and their ideal location in and near PSPS-prone communities, deploying biomass-based resources and microgrids may help improve reliability of the electrical system.

For the above reasons, RCRC supports your AB 322. If you should have any questions, please do not hesitate to contact me at [jkennedy@rcrcnet.org](mailto:jkennedy@rcrcnet.org).

Sincerely,



JOHN KENNEDY  
Legislative Advocate

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<sup>1</sup> *California Forest Carbon Plan*, page 130.

<sup>2</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.

<sup>3</sup> CPUC, *Bioenergy Market Adjusting Tariff (BioMAT) Program Review and Staff Proposal*, October 30, 2018, pages 9-10.

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cc: Members of the Assembly Utilities & Energy Committee  
Laura Shybut, Chief Consultant, Assembly Utilities & Energy Committee  
Gregory Melkonian, Consultant, Assembly Republican Caucus



April 13, 2021

The Honorable Luz Rivas  
Chair, Assembly Natural Resources Committee  
State Capitol, Room 3126  
Sacramento, CA 95814

**RE: Assembly Bill 322 (Salas) – SUPPORT  
As Amended April 12, 2021**

Dear Assembly Member Rivas:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for Assembly Bill 322, authored by Assembly Member Rudy Salas, which urges the Electric Program Investment Charge (EPIC) program to consider biomass energy projects for funding. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

RCRC member counties contain much of California's forested lands, have borne the lion's share of destruction caused by wildfires, and have experienced most of the state's Public Safety Power Shutoff (PSPS) events. We strongly support wildfire risk reduction efforts and believe that biomass facilities play a key role in those endeavors.

AB 322 requires the State Energy Resources Conservation and Development Commission to require the EPIC program to consider funding biomass energy projects. The EPIC program, which awards money for energy research, development, and demonstration projects, is ideally situated to spur the development and deployment of new biomass facilities that will help achieve California's wildfire risk reduction and climate change goals.

Biomass facilities convert residual materials (for which there is often no marketable use) into energy and avoid the emissions that result when material is managed through open burning, left to decompose naturally, or fuels future wildfires. In 2020, California's wildfires burned over 4 million acres and released over 90 million metric tons of greenhouse gas emissions. That is more than all the greenhouse emissions from industrial sources in 2018, well over half of emissions from the entire transportation sector, and more than double all emissions from the commercial and residential sectors.

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When compared with emission of criteria air pollutants, black carbon, and greenhouse gas emissions resulting from burning biomass in open piles, emissions from biomass facilities are significantly lower – even after considering transportation and processing emissions.<sup>1</sup> 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>2</sup>

Additionally, the California Public Utilities Commission noted that biomass facilities are “particularly well-suited for addressing forest management needs in forested areas close to population centers and far from other wood infrastructure” and “where prescribed burns and open burning are restricted or face local opposition, larger-scale biomass operations are not nearby or limited by smaller need, or where other more economically lucrative end-uses for the feedstock do not currently exist.”<sup>3</sup>

Increased investment in new biomass facilities will also provide other derivative benefits, including promoting economic development in rural forested regions and promoting local energy resiliency. Over the last two years, numerous widespread PSPS events have repeatedly left many communities without electricity for extended periods of time. Given the important role that biomass facilities play in forest health improvement and wildfire risk reduction, and their ideal location in and near PSPS-prone communities, deploying biomass-based resources and microgrids may help improve reliability of the electrical system.

For the above reasons, RCRC supports AB 322. If you should have any questions, please do not hesitate to contact me at [jkennedy@rcrcnet.org](mailto:jkennedy@rcrcnet.org).

Sincerely,



JOHN KENNEDY  
Legislative Advocate

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cc: Members of the Assembly Natural Resources Committee  
Lawrence Lingbloom, Chief Consultant, Assembly Natural Resources Committee  
Kirstin Kolpitzke, Consultant, Assembly Republican Caucus



June 25, 2021

The Honorable Ben Hueso  
Chair, Senate Energy, Utilities & Communications  
Committee  
State Capitol, Room 4035  
Sacramento, CA 95814

**RE: Assembly Bill 322 (Salas) – SUPPORT  
As Amended June 24, 2021**

Dear Senator Hueso:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for Assembly Bill 322, authored by Assembly Member Rudy Salas, which urges the Electric Program Investment Charge (EPIC) program to consider biomass energy projects for funding. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

RCRC member counties contain much of California's forested lands, have borne the lion's share of destruction caused by wildfires, and have experienced most of the state's Public Safety Power Shutoff (PSPS) events. We strongly support wildfire risk reduction efforts and believe that biomass facilities play a key role in those endeavors.

AB 322 requires the State Energy Resources Conservation and Development Commission to require the EPIC program to consider funding biomass energy projects. The EPIC program, which awards money for energy research, development, and demonstration projects, is ideally situated to spur the development and deployment of new biomass facilities that will help achieve California's wildfire risk reduction and climate change goals.

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industrial sources in 2018, well over half of emissions from the entire transportation sector, and more than double all emissions from the commercial and residential sectors.

When compared with emission of criteria air pollutants, black carbon, and greenhouse gas emissions resulting from burning biomass in open piles, emissions from biomass facilities are significantly lower – even after considering transportation and processing emissions.<sup>1</sup> 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>2</sup>

Additionally, the California Public Utilities Commission noted that biomass facilities are “particularly well-suited for addressing forest management needs in forested areas close to population centers and far from other wood infrastructure” and “where prescribed burns and open burning are restricted or face local opposition, larger-scale biomass operations are not nearby or limited by smaller need, or where other more economically lucrative end-uses for the feedstock do not currently exist.”<sup>3</sup>

Increased investment in new biomass facilities will also provide other derivative benefits, including promoting economic development in rural forested regions and promoting local energy resiliency. Over the last two years, numerous widespread PSPS events have repeatedly left many communities without electricity for extended periods of time. Given the important role that biomass facilities play in forest health improvement and wildfire risk reduction, and their ideal location in and near PSPS-prone communities, deploying biomass-based resources and microgrids may help improve reliability of the electrical system.

For the above reasons, RCRC supports AB 322. If you should have any questions, please do not hesitate to contact me at [jkennedy@rcrcnet.org](mailto:jkennedy@rcrcnet.org).

Sincerely,



JOHN KENNEDY  
Legislative Advocate

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cc: The Honorable Rudy Salas, Member of the State Assembly  
Members of the Senate Energy, Utilities & Communications Committee  
Consultant, Senate Energy, Utilities & Communications Committee  
Kerry Yoshida, Consultant, Senate Republican Caucus