



February 9, 2024

The Honorable Steven S. Cliff
Executive Officer
California Air Resources Board
Sacramento, CA 95814

Re: Comments on California's Draft Priority Climate Action Plan

Dear Executive Officer Cliff:

I am writing on behalf of the Bioenergy Association of California to commend the Air Board for the Draft Priority Climate Action Plan (PCAP). The PCAP provides an excellent summary of the most urgent – and shovel ready – actions the State can take to address climate change, including actions to reduce Short-Lived Climate Pollutants, generate carbon negative emissions, and reduce overall greenhouse gas emissions. The PCAP will also provide significant benefits for public health and safety by reducing the use of diesel and other fossil fuels, mitigating wildfire risks and impacts, reducing open burning of agricultural and forest waste, and reducing pollution from dairies, landfills, and other industrial facilities.

In particular, BAC supports the following priority actions identified in the PCAP:

- Implementing bioenergy projects to reduce landfilling, open burning, and pile and decay of organic waste, which are the biggest sources of SLCP emissions in California.
- Funding CalFire's Healthy Forests program and the Department of Conservation's forest waste to advanced biofuels program, which will reduce wildfire risks and open burning while generating carbon negative fuels such as hydrogen.
- Funding CalRecycle's Organics Recycling program, which will help to meet the landfill diversion requirements of SB 1383 and can also generate carbon negative emissions when landfill waste is converted to energy.
- Funding the Dairy Digester program at CDFA, which is critical to reduce dairy methane emissions and the single most cost-effective of all the State's climate investments.
- Funding industrial decarbonization efforts, which lag behind other sectors in reducing carbon emissions and will require a wider array of solutions such as

decarbonized gas, use of biochar and other additives, carbon capture and sequestration, and more.

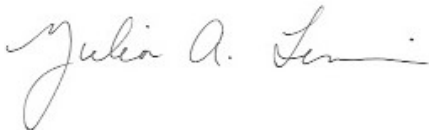
- Funding for microgrids for rural communities and Tribes.

While BAC strongly supports the overall PCAP, we do offer a few suggestions to ensure that any funding received from US EPA provides maximum benefits to California:

1. CARB should prioritize investments in SLCP reductions, which are the most urgent climate measures since they begin to benefit the climate right away, and carbon negative emissions needed to reach carbon neutrality.
2. All funding programs should be required to prioritize projects that provide the greatest carbon reductions on a lifecycle basis.
3. Funding to upgrade the distribution network should prioritize rural and forested regions that are most at risk of wildfire and power disruptions (both planned and unplanned).
4. Funding for bioenergy, healthy forests, Natural and Working Lands, and other categories should explicitly include subsidies for BioMAT (distributed generation bioenergy) projects that help to reduce SLCP emissions, wildfire risks, landfill waste, and open burning.
5. Both the Healthy Soils and Industrial Decarbonization programs should explicitly include the use of biochar to sequester carbon and/or reduce emissions.
6. Transportation funding, including heavy and medium duty truck funding, should include hydrogen fueling infrastructure as well as electric vehicle charging.

Thank you for developing the Draft PCAP and for considering these suggestions.

Sincerely,



Julia A. Levin
Executive Director