



February 20, 2009

John Nickerson  
California Climate Action Registry  
523 W Sixth Street, Suite 428  
Los Angeles, CA 90014

Via Email: [john@climateregistry.org](mailto:john@climateregistry.org)

RE: CCAR Draft Update Forest Protocol

Dear Mr. Nickerson:

On behalf of our client, the California Biomass Energy Alliance (CBEA), I am providing the following comments on the California Climate Action Registry (CCAR) Draft Updated Forest Protocol, particularly on those portions related to carbon accounting and credits for harvested wood wastes and materials. CBEA is the trade association of California's existing solid-fuel biomass power industry, the largest in the nation, made up entirely of "open-loop" biomass plants, and consists of 33 operating facilities, distributed across 19 counties, with a combined generating capacity of over 600 MW of reliable, baseload, renewable power that can be counted on and scheduled. California's biomass plants use wastes produced by society's forestry and agricultural activities. The biomass-power industry provides environmental mitigation services to these important economic sectors, while generating clean, renewable energy.

The existing biomass power industry provides California with significant economic and environmental benefits by:

- Diverting over 6 million tons of waste wood annually for fuel, preventing the alternate, more environmentally harmful, and GHG- generating disposal of this waste, such as landfilling, open-burning, or biodegrading or burning in the forest.
- Diverting the wood waste also provides a net reduction of over 3.8 million tons of greenhouse gas (GHG) emissions per year. Even further, an additional 3.0 million tons of avoided GHG emissions per year results from the biomass industry's displacement of fossil-fueled generation by the electric utilities.
- Employing about 750 direct jobs at the facilities and 1,200 to 1,500 dedicated indirect jobs in the fuel supply infrastructure. Most of these jobs are in rural areas of the State.

Of particular interest to CBEA in the Revised Forest Protocol is the issue of carbon accounting for the generation of GHG reduction credits relative to forest (and agricultural and urban) wood wastes that are used in our facilities as fuel to generate renewable energy. California's biomass facilities are typically the endpoint in the management of this forest waste. CBEA's view is that that owners and/or operators of our facilities have "operational control" and ownership of the biomass forest materials that flow into these facilities – and pursuant to established CCAR protocol any GHG emissions or sinks are the responsibility of, and attributable to, the owner and operator of these facilities.

Biomass-to-energy facilities generate renewable low carbon energy from the combustion of waste forest products – that effectively displaces high carbon fossil fuel energy production. Biomass-to-energy facilities are very interested in being recognized for the GHG gas benefits that are derived from displacing fossil fuel combustion with the production of energy and fuel from low-carbon forest product materials. This is already true with respect to renewable energy credits (RECs) that may be generated by such facilities. The Forest Protocol should **not** assume credit for any GHG benefits that are under the operational control of Waste Biomass Energy or Fuel Facilities. CBEA requests that CCAR clearly recognize this in the final language of the Revised Forest Protocol.

The use of wood waste from the forest as fuel in a biomass-to-energy facility is beneficial to reducing overall GHG emission, and is a benefit that should be attributable to the owner/operating of the facility – not the forest sector for this activity.

Sincerely,

Public Policy Advocates, LLC

A handwritten signature in black ink, appearing to read "Julee Malinowski-Ball". The signature is written in a cursive, flowing style.

Julee Malinowski-Ball

cc: Gary Gero CCAR, [gary@climateregistry.org](mailto:gary@climateregistry.org)  
Derik Broekhoff, CCAR, [derik@climateregistry.org](mailto:derik@climateregistry.org)