

8 March 2018

The Honorable Nury Martinez, Chairwoman
Energy, Climate Change & Environmental Justice Committee
City Hall, Room 470
200 N. Spring St.
Los Angeles, CA 90012

Re: CF#18-0133 – approval of Southern California Public Power Authority renewable power contract with ARP-Loyalton Cogen LLC

Dear Councilmember Martinez:

The Northern Sierra Air Quality Management District supports the LADWP power purchase agreement (PPA) with the Southern California Public Power Authority (SCPPA) for biomass power to be supplied by ARP-Loyalton Cogen LLC commencing this spring.

The Sierra County and Tahoe Basin regions surrounding the Loyalton facility are in the headwaters—or upper watersheds—of the Sierra Nevada, and supply most of the water used by California's farms and cities. These areas are part of the state's natural water infrastructure. The region is undertaking and complying with Ground Water Sustainability (GSA) efforts to insure ground water sustainability. The water basin will continue to be closely monitored.

A combination of legislated changes to forest and fire management practices as well as climate changes in the past 20 years have resulted in state and national forests that have become overly dense and prone to much more extreme wildfires. The recent drought in the western US has resulted in the loss of more than 129 million trees. This biomass has been a large source of fuel contributing to the massive and increasing number of fires across the state of California.

Large fires raise numerous challenges for water management—they can reduce water quality and reservoir storage capacity, while increasing risks of flooding and landslides. The state, including Los Angeles, needs to support programs that restore and ensure future forest health.

A white paper recently released by the non-partisan Public Policy Institute of California (PPIC) (www.ppic.org/content/pubs/report/R_1016JM4R.pdf) describes the threats and potential responses to this wildfire danger. One conclusion from this report that support for lumber mills and biomass generation plants in proximity to forests is warranted. To argue that the mulch market can absorb the volumes of dead and dying trees, or that these trees are suitable for lumber is inaccurate. Most, if not all of the dead trees, have little commercial value because of damage caused by bark beetles. Furthermore, all of the biomass power plant fuel is sourced from tops and limbs from timber production. This source of fuel has no other commercial value and otherwise remains in the forest as a highly combustible material.

Biomass facilities like the Loyalton Cogen plant are an integral part of the long-term protection of the

headwaters forests in the Sierras. These watersheds have been severely impacted by vast forest fires over the past decade. The Loyalton plant ensures that hundreds of thousands of tons of residual biomass can be removed from the national forests under careful supervision of the US Forest Service and CALFire for years to come.

During 2017, California suffered the single most damaging wildfires in its history. Here are the facts:

- 9,133 fires
- 1,381,405 acres burned
- \$13 billion of damages and firefighting costs
- 10,800 structures destroyed
- 46 deaths
- 230,000 persons evacuated

And this was in a year when we had historical rainfall and a passing presumption that wild fire damage and our drought were no longer a risk.

Biomass power plants in California remove more than 6,000,000 tons of dangerous fuels, provide employment for thousands of skilled individuals in our rural communities, and deliver renewable energy 24 hours a day, 365 days a year.

Additionally, the Loyalton Cogeneration facility is a critical solution to reducing smoke emissions from yard waste and forest biomass that would otherwise be burned in an uncontrolled manner in both Plumas and Sierra Counties. The District supports this facility since it plans to utilize biomass as a fuel in a controlled setting—reducing emissions of particulate matter and other pollutants up to 98%, as compared to the open burning of biomass.

Fine particulate matter (PM 2.5) is the main pollutant of concern in Plumas and Sierra County, and the three major sources contributing to high levels of PM2.5 are woodstoves, open burning of yard waste and prescribed burning of forest biomass.

PM2.5 is particulate matter with a diameter of 2.5 microns or less, and has been shown to contribute to asthma development, lung capacity reduction among children, breathing difficulty, eye irritation, exacerbation of cardiovascular problems, and even premature death. It is especially damaging for sensitive individuals such as children, elderly citizens, individuals with pre-existing health conditions and people who are exercising outdoors.

The Northern Sierra Air Quality Management District respectfully ask for your support of the Loyalton contract with LADWP at this time. Favorable consideration of this request will be in the best interest of the citizens in the region as well as the surrounding environment. If you or any member of the committee have any questions pertaining to our active support for Loyalton Cogeneration facility, please call me directly at (530) 274-9360.

Sincerely,



Gretchen Bennett, Executive Director
Northern Sierra Air Quality Management District