

February 28, 2018

The Honorable Nury Martinez, Chairwoman
Energy, Climate Change & Environmental Justice Committee
Los Angeles City Council
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:

On behalf of the staff of the Placer County Air Pollution Control District, I want to express my organization's active support for the Los Angeles Department of Water and Power (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 Nevada 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, and their health is at risk.

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 is that support for lumber mills and biomass generation plants in proximity to forests is warranted. To argue that the mulch or compost markets 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 the length of time they have been sitting in the forest, as well as in some cases the severe

damage caused by bark beetles. Furthermore, all of the biomass power plant fuel is sourced from tops and limbs from fuel reduction activities. 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. The Loyalton plant ensures that hundreds of thousands of tons of residual biomass can be removed from the national forests. One final observation: 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

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.

We respectfully ask for your support of the Loyalton contract with LADWP. If you or any member of the committee have any questions pertaining to our active support for Loyalton Cogen, please feel free to contact me at (530) 745-2321 or ecwhite@placer.ca.gov.

Sincerely,



Erik C. White
Air Pollution Control Officer