



January 29, 2016

The Honorable Edmund G. Brown, Jr.
Governor, State of California
State Capitol, First Floor
Sacramento, CA 95814

RE: Implementation of the Tree Mortality Emergency Proclamation, Biomass Contracting

Dear Governor Brown:

The California State Association of Counties (CSAC) represents all fifty-eight California counties, and the Rural County Representatives of California (RCRC) is a statewide association representing thirty-five rural California counties. CSAC and RCRC are writing to reinforce our support of your Emergency Proclamation on tree mortality and ask that you strongly urge the California Public Utilities Commission (CPUC) to take immediate action to implement the directive related to biomass contracting.

CSAC and RCRC are actively engaged with the six counties that have been identified by the State and the USDA Forest Service (USFS) to contain preliminary high hazard zones for tree mortality. Our organizations, along with several of our member counties, are active participants in the Tree Mortality Task Force, and we are working vigorously to facilitate immediate action to remove dead and dying trees in the high hazard zones consistent with your Emergency Proclamation.

Three months after your Proclamation was issued, we are seeing distinct barriers to fully implementing its directives, particularly in how State, federal and local agencies will work together to effectively manage the massive amounts of dead material that must be removed from the forests. Biomass power plants must play a prominent role in the solution to this crisis, which will require every biomass facility in the state to be operational in order to effectively manage the waste. We are concerned, however, that there is not only insufficient existing infrastructure to manage the necessary volume of woody biomass, but that several facilities are facing imminent closure due to contract issues, further hindering our ability to take quick action on tree removal projects.

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In California, twenty-four biomass electric generating plants are distributed across seventeen counties which produce more than 600 megawatts (MW) of baseload renewable energy combined. Unfortunately, California is at risk of losing this capacity with seven plants having closed in the past two years, with another 60 percent of the total fleet MW at risk of shutting down over the next few years due to outdated or expiring contracts. In fact, there are seven operating biomass facilities with expiring contracts or expiring energy prices likely going off-line in the next six months. Additionally, there are a number of currently idle facilities that will need at least 30 days to restart operations before they can be utilized in any sort of meaningful way to help with the tree mortality emergency.

The Emergency Proclamation appropriately recognizes the importance of biomass infrastructure by stating: "the California Public Utilities Commission shall utilize its authority to extend contracts on existing forestry bioenergy facilities receiving feedstock from high hazard zones." To meet this order, the CPUC needs to extend biomass contracts across the state and promote new long-term contracts expeditiously. CSAC and RCRC ask that you compel the CPUC to take immediate action so that local, State and federal partners can effectively and quickly move to address the tree mortality emergency facing our forests. We appreciate your consideration of our request and would be happy to discuss any questions or comments you may have.

Sincerely,



Staci Heaton
RCRC Regulatory Affairs Advocate



Cara Martinson
CSAC Legislative Representative

cc: Honorable Michael Picker, Chair, California Public Utilities Commission
John Laird, Secretary, California Natural Resources Agency
Matt Rodriguez, Secretary, California Environmental Protection Agency
Mary Nichols, Chair, California Air Resources Board
Wade Crowfoot, Office of the Governor