



**County of El Dorado**  
**Air Quality Management District**

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Dave Johnston  
Air Pollution Control Officer

December 9, 2016

California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

Dear Commissioners and Staff,

El Dorado County Air Quality Management District (AQMD) supports bioenergy projects such as those proposed by All Power Labs and partners under CEC EPIC Grant Funding Opportunity GFO-15-325. Biomass power plants provide several societal benefits including significant air quality improvement. Biomass power plants are a primary alternative to the open burning of agricultural and forest waste. The emissions associated with open pile burning include criteria air pollutants (fine particulate matter (PM), carbon monoxide (CO), volatile organic compounds (VOC), and nitrogen oxides (NO<sub>x</sub>)), greenhouse gases (carbon dioxide (CO<sub>2</sub>)), short lived climate pollutants (methane and black carbon), and air toxics. Comprehensive life cycle assessments show reductions of greater than 99% for PM and black carbon, from 95-99% for CO and VOCs, 70% for NO<sub>x</sub>, and up to 30% for CO<sub>2</sub> can be achieved through biomass plant operation.

While producing significantly less emissions than wildfires, the open burning of forest wastes is contrary to maintaining air quality. By removing forest debris and using it to generate biomass power we can reduce the occurrence of catastrophic wildfires, protect critical upland watersheds, enhance forest ecosystem wildlife habitat, and have a positive impact on air quality. If successful, the project has the potential to create local jobs and improve public health in El Dorado County.

The proposed project is a community-scale 600 kW biomass gasification energy generating facility consisting of four 150 kW units to be located at the former Camino mill site. Our understanding is the intent is to produce energy and hydrogen fuel from dead trees from designated High Hazard areas in El Dorado County. AQMD will work with the project developers to ensure this facility complies with all applicable local, state and federal air rules and regulations. AQMD welcomes any contributions this project will make to improve the air quality in El Dorado County.

Sincerely,

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