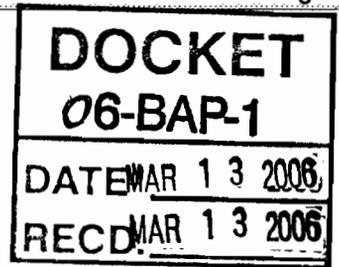


From: Tom Christofk
To: docket@energy.state.ca.us
Subject: Comments on Draft Bioenergy Action Plan Docket 06-BAP-1

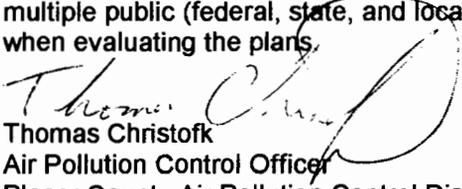


California Energy Commission:

I would like to make two comments regarding the subject Draft Action Plan as follows:

1) It is noted that there is virtually no mention of a role for local governments to play in this Action plan other than "*to encourage local governments and public institutions to follow the state's lead*" in the area of purchasing biofuels, bio-based products, and biopower. I would encourage the CEC to solicit the active involvement of interested county and other local governments throughout both Tier 1 and Tier 2 Actions. The Biomass resources, including existing infrastructure and feedstock, exist at the local level, and there may be unique opportunities to accelerate increased biomass utilization if local governments were solicited to participate in implementation of some of the recommendations. For example, Placer County has mobilized a cross departmental management action team to increase use of the County's considerable woody biomass and infrastructure resources to promote economic opportunities in renewable energy and other means of biomass utilization while concurrently improving and enhancing our environment and the public's health through application of pre-disaster mitigation measures and the net reduction of current pollution generating biomass disposal practices. The initial focus is upon biomass utilization opportunities in the Lake Tahoe area because of it's overwhelming fuel load issues and the potential for an environmental catastrophe.

2) This second comment is an extension of the theme of the first, with the exception that it is recommended that the State's Plan include within the Tier 1 Actions the task to establish a method to quickly integrate or review for opportunities to accelerate biomass utilization among the many developing (and existing) fuel reduction and forest restoration plans that have been and are being developed under the need to prevent or reduce the intensity of wildland fires. These plans often include a large use of prescribed fire as the preferred treatment method, and in certain circumstances the costs of such treatment may be better applied towards use of harvesting the fuel as feedstock for bio energy or bio fuel opportunities. The public may be better served by in some cases shifting from the open burning practices that are currently being employed in the majority of these community wildfire protection plans (with the associated direct costs of labor and equipment and the indirect environmental impact's/costs from the emissions) to one of viewing the fuels as a resource. It is recognized that there will likely be a differential cost between the harvest and treatment of the biomass for energy use vice disposal through opening burning, but this cost may be worth the investment in some situations, especially if there are multiple public (federal, state, and local) and private market driven funding sources available to consider when evaluating the plans.


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