Desert View Power LLC, an affiliate of
Greenleaf POWER

August 30, 2021

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814
Via Electronic submittal: https://www.arb.ca.gov/lispub/comm/bclist.php

RE: AB 617 COMMUNITY AIR PROTECTION PROGRAM – SUPPORT FOR THE EASTERN COACHELLA VALLEY COMMUNITY EMISSIONS REDUCTION PLAN

Dear Board Members:

On behalf of Greenleaf Power and the Company's biomass power plant, Desert View Power (DVP), please accept this comment letter in support of the Eastern Coachella Valley (ECV) Community Emissions Reduction Plan (CERP). Our support extends to our request for DVP's inclusion as a listed working partner alongside the Community Steering Committee (CSC), tribal government and U.S. Environmental Protection Agency (U.S. EPA). Greenleaf Power has served the ECV community for a decade, and we are committed to an active role in support of the South Coast AQMD (SCAQMD) AB 617 endeavors. The following provides an overview of DVP's role locally, regionally, and statewide.

Background

Desert View Power is located on the Cabazon Reservation in the unincorporated Riverside County portion of the Eastern Coachella Valley, downwind of the South Coast Air Basin. The facility began operating in 1992 and was acquired by Greenleaf Power in 2011. It is a woody biomass electrical generation facility, converting wood waste to supply renewable electricity to the California grid. The wood waste, from throughout southern California, would otherwise be sent to a landfill or burned at the source. Emission reduction benefits, as an alternative to open pile burning of woody biomass, have been demonstrated in numerous lifecycle assessments[1]. Furthermore, DVP is an alternative to open burning, which is a constant and growing concern in the Eastern Coachella Valley.

Each year DVP consumes between 360,000 and 390,000 tons of this woody biomass and converts that material into electricity, providing more than 325,000 megawatt hours annually. This is equal to the amount of electricity required to power more than 49,000 homes for a year, or about two-thirds of the households in the Coachella Valley.

[1] Based on measurements from a large pile burn, air emissions reductions compared to use at a biomass power plant were 98%–99% for PM2.5, CO (carbon monoxide), NMOC (nonmethane organic compounds), CH4 (methane) and BC (black carbon), and 20% for NOx and CO2-equivalent greenhouse gases. See "Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions", Springsteen et al. 2015 - http://calag.ucanr.edu/archive/?article=ca.v069n03p142

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Air Quality Landscape

Attainment Status. Greenleaf's DVP is one of several stationary sources in the ECV. The SCAQMD's December 2020 *Coachella Valley Extreme Area Plan for 1997 8-Hour Ozone Standard*[2] finds that given "… transport from the [South Coast Air Basin] and the atmospheric chemistry of ozone, there is very little impact from local emission sources on ozone levels in Coachella Valley." SCAQMD concluded that all stationary sources **combined** in the Eastern Coachella Valley account for less than 4% of total emissions. California Air Resources Board (CARB) staff also acknowledges that "Transport of emissions from the South Coast Air Basin significantly impacts the levels of ozone in the Coachella Valley" in its staff report titled *CARB Review of the 2020 Coachella Valley Extreme 8-hour Ozone State Implementation Plan*[3]. The plan demonstrates attainment of the ozone standard by December 2023.

Best Available Control Technology. Because DVP is located on tribal land, the USEPA regulates DVP's air emissions. Greenleaf has invested in and continues to employ on-site work practices and the Best Available Control Technology (BACT) using state-of the-art equipment. Work practices and BACT are applied to dramatically reduce the creation and release of various criteria pollutants – Particulate Matter (PM), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Sulfur Dioxide (SO2), and Volatile Organic Compounds (VOCs). Efficient combustion practices minimize CO and VOCs. The combination of BACT includes: a baghouse/fabric filter system for PM control, a thermal deNOx ammonia injection system for NOx control and a limestone/DSI system that injects limestone into the fuel feed to the combustion chamber for SO2 control, and hydrated lime into the combustion gases upstream of each fabric filter for SO2 and HCl control.

Greenhouse Gas. Biomass facilities like Desert View Power are net negative emitters of greenhouse gases, since biomass introduces no new carbon into the atmosphere. Where open burning is a constant and growing concern in the Eastern Coachella Valley, DVP continues to be a key local solution to the disposal of hundreds of thousands of tons of wood and agricultural waste. Moreover, DVP's diversion and disposal of woody organic biomass is in alignment with the goals and objectives of SB 1383, adopted in 2018 to reduce short-lived climate pollutants as a key to achieving California's goal of 75% organic waste diversion from landfills by 2025.

Local Involvement

DVP has roughly 30 full-time employees who on average earn more than $28 per hour with full benefits. The company also uses more than 100 contractors each year for maintenance work and supports another 100+ workers in jobs related to the recovery and delivery of woody waste products.

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[2] SCAQMD, December 2020 - http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/2-final-coachella-valley-extreme-area-plan-for-1997-8-hour-ozone-standard.pdf?sfvrsn=6

[3] CARB, November 2020 - https://ww2.arb.ca.gov/sites/default/files/2020-11/Coachella%20Valley%20extreme%20ozone%20staff%20report.pdf

Request to be a Listed Partner - ECV CERP Amendment

The Eastern Coachella Valley AB 617 Community Emissions Reduction Plan is well-intentioned and commendable. CARB shares in its *Eastern Coachella Valley Community Emissions Reduction Program Staff Report*[4] that during its hosted August 3 virtual workshop to solicit additional community perspectives, most chose open burning and illegal dumping, pesticides, and the Salton Sea as the priority concerns for the community. Greenleaf Power's DVP not only shares the same concerns but also serves as a primary solution to address these areawide sources of air pollution.

Our specific request would amend one part of Chapter 5g of the ECV CERP[5]. Table 1, *Goal: Reduce Emissions from Greenleaf Desert Power View Plant (sic)*, provides goals, actions, responsible entities, metrics, and a timeline to achieve emission reductions from the Greenleaf Desert View Power Plant. Greenleaf Power supports the goals of each of the actions. We request Item A be amended as follows:

Work with the CSC, tribal government, Greenleaf Desert View Power Plant, and U.S. EPA

For site-specific actions, we can provide not only technical support to identify and assist communities' understanding of air quality concerns related to Greenleaf DVP but also meaningful outreach about our role as an alternative to and solution for open burning.

Greenleaf Power has consistently voiced our desire to be a willing partner in the effort to address and curtail emissions in the Eastern Coachella Valley. We are committed to this pledge, as we are enthusiastic and have full confidence in Desert View Power's role in substantially reducing GHG emissions from open burning.

We appreciate the Air Resources Board's consideration of the requested amendment and look forward to working with this agency, other relevant stakeholders and the community for the benefit of our region and state. Please don't hesitate to contact Mitchell Martin at mmartin@greenleaf-power.com with any questions or to obtain additional information.

Sincerely,

Mitchell Martin
Operations & Engineering Director

[4] CARB, August 2021 - https://ww2.arb.ca.gov/sites/default/files/2021-08/ECV%20CERP%20Staff%20Report_FINAL_acc.pdf

[5] SCAQMD, July 2021 - http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9