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June 11, 2024

Ms. Melanie Rodriguez
Assistant to the Port Director/
Secretary to the Board of Port Commissioners
Port of Stockton
2201 West Washington Street
Stockton, CA 95203

Submitted via email: mrodriguez@stocktonport.com

Re: BayoTech Hydrogen Hub

Dear Commissioners:

The BayoTech Hydrogen Hub holds tremendous promise for economic development in the region and is poised to play a pivotal role in meeting the escalating demand for hydrogen in California.

Locating the hydrogen hub at the Port of Stockton creates a strategic step enabling Northern California to take advantage of the shift toward cleaner alternative energy solutions for transportation because it will support zero-emission heavy-duty vehicles as they move from the Central Valley and Southern California on Interstate 5 and highway 99. It will also make it possible for heavy-duty vehicles fleets in the Bay Area and the Sacramento Area that serve businesses in the Stockton area to have a much higher level of confidence in their ability to adopt hydrogen technologies, knowing that that they can fuel up with hydrogen in the Stockton area.

Developing hydrogen production and fueling facilities, as proposed by BayoTech, is critical in supporting our state's transition from fossil fuels to new forms of clean energy. Hydrogen produced locally at the Port of Stockton can fuel zero-emission heavy duty vehicles, power generators, and cargo handling equipment in the Stockton region and facilitate these clean technologies across a much larger portion of Northern California.

The BayoTech project will provide a valuable resource to attract new sustainability-focused companies to the community and, in fact, to the entire region. We urge you to grant approval of the BayoTech Hydrogen Hub at the Port of Stockton.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Taylor'.

Tim Taylor
Executive Director, Sacramento Clean Cities Coalition
916.206.2911

June 11, 2024

Jason Cashman
Environmental and Regulatory Affairs Manager
Port of Stockton
2201 West Washington Street
Stockton, California 95203

RE: BayoTech Hydrogen Production and Dispensing Facility Project

Dear Mr. Cashman:

As developer of the advanced fuel agnostic KARNOTM generator, Hyliion depends on wide availability and infrastructure of low carbon fuels such as Hydrogen to truly deliver a reliable zero carbon dispatchable energy supply. Our customers continue to cite availability and cost of hydrogen, storage, and transportation as some of the major concerns in their path to electrification and decarbonization. We are immensely pleased with the efforts of organizations such as BayoTech in solving the Hydrogen availability challenge, cost effectively and reliably.

The U.S. Department of Energy has named Hydrogen as a key component of a comprehensive portfolio of solutions to achieve a sustainable and equitable clean energy future. The State of California has been a global leader in the development of the Hydrogen industry, with projects ranging from production through end use.

Development of Hydrogen production and distribution facilities, such as the one proposed by BayoTech, are critical in supporting communities and companies during the transition from fossil fuels to new forms of clean energy. Hydrogen produced locally at the Port of Stockton can fuel zero-emission drayage trucks, supply shore power when combined with the KARNOTM generators (electricity for ships while docked), and cargo equipment. These applications offer the potential to reduce greenhouse gas emissions with improvement to air quality in surrounding communities of concern.

In addition, Hydrogen infrastructure projects like this can also offer economic benefits by establishing local hydrogen production. BayoTech's project can provide opportunities for workers transitioning away from carbon-intensive sectors, leveraging existing skills while developing new skills.

Thank you for your consideration and opportunity to comment. Should you have any questions, I can be reached at +1 737 228 4973 or govi.ramasmy@hyliion.com.

Sincerely,



Govindaraj Ramasamy
Chief Commercial Officer
Hyliion, Inc.

To: Port of Stockton Commissioners
From: Mary Elizabeth, M.S., R.E.H.S.
Date: 6.17.2024
Re: Port Community Benefits Program and GSNR

Thank you for participating in the 2024 Stockton Earth Day Celebration. Staff was out there answering a lot of questions, particularly about the owl nesting program and was sharing tomato plants with community members.

Here is a picture of my tomato plant which I obtained from Port of Stockton Staff during the Stockton Earth Day Celebration.



This is a community benefit. The Port of Stockton provided the seedling to residents all over Stockton in attendance at Earth Day providing fresh vegetables when planted and tended for. Community needs are high in Stockton and leadership is needed to reverse negative trends in Stockton.

Donations to non-profit organizations, providing land for the Boggs Tract farm, and other actions that the Port of Stockton is taking to improve our community are community benefits. Another benefit that would be really helpful for the farm is a groundwater well to reduce costs. Operation costs are heavy with the cost of water for the farm because CalWater does not have a special rate and CalWater charges the most for water in San Joaquin County. A well with solar energy to provide pump energy would be a great benefit.

The Boggs Tract Community Center had residents at some point form a non-profit foundation which is no longer active but like Parent Teacher Associates that helps with school needs, a foundation for the community center could provide benefits for residents over and above what the County funding provides.

Swimming in Stockton is limited to a couple of months a year for public pools and even more limited when the high school pools are not available. A downtown indoor pool at the old YMCA building would be a valuable community benefit to allow for swimming lessons year-round and a recreational community development hub for the City core where the Port of Stockton is located.

Our community is experiencing unequal heating which results in all of the impacts that can be related to overly hot conditions. This overheating is related to the lack of vegetative cover which provides shade that lessens temperatures. Funding for our urban canopy is not maintained by the City of Stockton. The San Joaquin Community Foundation is in the process of finalizing a scope of work agreement with CalFire the funding organization to enhance the Stockton tree canopy – a community benefit.

When statements of overriding consideration are being made it is not unusual in areas disproportionately overburdened with pollution to have community benefit funding be made available to lessen the impact. In fact, the Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES) has established a community benefit program based on several principles outlined in their website: <https://archesh2.org/community-benefits/>. Development of a community benefit program at the Port of Stockton could be alongside the development of a long-term strategic plan. Please contact me to discuss the development of the Port of Stockton Community Benefit Program included in the BayoTech CEQA documents.

Golden State Natural Resources Wood Pellet Export Project

The draft EIR for the wood pellet export project has not yet been released and we have been informed that the CEQA document could be released at any time. We appreciate the offer to meet with Port Staff so that they can learn more fully about our concerns regarding the project before the Port of Stockton submits comment to the lead CEQA agency, Golden State Financing Authority for the project.

I have attached and provided a link to a recent article which outlines some of the concerns regarding the proposed project. I believe that becoming more knowledgeable will be helpful to get a better idea about the impacts related to the biomass industry. We know all too well about the emissions from our most polluting stationary source in Stockton, DTE.

Climate Change is NOW!



Burning Trees: As the Biomass Industry Grows, Its Carbon Emissions Go Uncounted¹

Wood-pellet companies have devastated forests in the Southeast and New England. Now they're looking to expand.

Climate Change

May 20, 2024 - by Nick Engelfried

The port of Longview, Washington has served as a bustling hub of commerce for more than a century. Ships carrying everything from grain to wind turbine parts pass through it every day headed for distant places — but it's to the timber industry that Longview owes its existence. Located at the confluence of the Columbia and Cowlitz rivers, this town of 38,000 was founded by the Long-Bell Lumber Company in the early 1920s to house workers at its nearby mills.

Today the community is at the center of a political debate with immense implications for the region's forests.

¹ <https://therevelator.org/biomass-emissions-uncounted/>

Longview is one of at least four locations on the U.S. West Coast where companies hope to begin manufacturing wood pellets — compressed wood used as fuel for power generation or home heating — for export on an industrial scale. By turning trees into energy, this growing biomass industry seeks to benefit from subsidies established in Europe and Asia to encourage renewables. If the UK-based Drax Group gets its way, Longview will house a plant capable of producing 450,000 metric tons of pellets annually, enough to run a small power plant for a year.



Logs awaiting export at the port of Longview. Photo: Sam Beebe (CC BY 2.0 Deed)

Drax and other biomass companies say they're promoting carbon neutral energy while practicing sustainable forestry to harvest the wood fuel referred to as biomass energy. However, the industry's behavior in places where it has long operated appears to undermine this claim.

"It starts with logging whole trees and grinding them up in polluting plants," says Brenna Bell, forest climate manager for 350PDX, an environmental group based in Portland that opposes the Longview project. "The resulting pellets are shipped overseas." The pellets are then often burned, or "cofired," with coal, supposedly reducing coal's emissions, and have more recently replaced coal in some power plants. "The most counterintuitive part is none of the associated carbon emissions are counted by governments who classify biomass as clean energy."

Faulty accounting methods have allowed biomass companies to sell themselves as climate-friendly even as they seek to convert carbon-rich natural forests into tree plantations in the Pacific Northwest and beyond. Nowhere are the on-the-ground impacts clearer than in the Southeast, where large wood biomass export projects have operated longer than anywhere else in the United States.

Selling the Biomass Story

The Drax power generating station looms over North Yorkshire, England, tall as a city high-rise. For decades the plant was Western Europe's largest coal polluter, but in 2003 Drax began converting the first of four boilers to cofire wood. Last year the company finished replacing coal at its plant with wood pellets, hailing the milestone as a step toward a "zero-carbon energy future."

Communities in the American Southeast, where Drax sources much of the wood for its plant, weren't celebrating.

"The biomass industry in the Southeast expanded from barely anything 15 years ago to exporting over 9 million tons of wood pellets annually today," says Adam Colette of Dogwood Alliance, which works to protect southern forests. "We're talking over 100,000 acres of forest being cleared solely for this purpose every year. And that's a conservative estimate."

The South has long been among the most logged regions in the country, but the arrival of biomass companies put new pressure on remaining natural forests. A study commissioned by the Southern Environmental Law Center showed forest loss has increased significantly in the area surrounding biomass pellet plants in Virginia and North Carolina.

"The industry calls biomass a climate solution," Colette says. "Smart people in government, even some well-intentioned people in the climate movement, support giving it hundreds of billions in subsidies. You've got to ask, how is that possible? It's not that biomass is as powerful as the fossil fuel industry."

Fossil fuel companies amassed immense political clout over centuries. By contrast, the biomass industry is only decades old. Yet biomass companies have won political favor by peddling a narrative with immense allure for policymakers who want quick fixes to the climate crisis.

On paper, converting existing coal plants to run on wood pellets looks like an easy climate win. But burning wood produces [even more carbon than coal](#) per unit of energy generated. Because

this carbon can theoretically be reabsorbed if forests grow back, some governments consider the process carbon neutral — but continually cut and regrown forests never achieve the carbon storage potential of older trees. And even if the carbon released during deforestation is eventually reabsorbed, it stays in the atmosphere for decades in the meantime. None of this is accounted for by policymakers who see biomass as green energy.

Nor is it only foreign governments subsidizing the industry. In parts of the United States, too, trees are burned for electricity. Ironically these include jurisdictions that regard themselves as among the world's greenest.

Burning the Forest

“We’ve been deluded about biomass in Burlington, Vermont,” says Zack Porter, executive director of the New England-based Standing Trees. “We’re supposedly America’s first city to run entirely on carbon-neutral renewable electricity. Yet our leaders tout that title knowing we still rely on Vermont’s largest point source of carbon emissions: the McNeil biomass power plant.”

Burlington’s Joseph C. McNeil generating station pumps close to half a million tons of carbon dioxide into the atmosphere every year but is considered carbon neutral energy under Vermont’s Global Warming Solutions Act. This designation has been justified partly by biomass companies’ claim that they burn mainly “waste wood,” or branches and other tree parts leftover from logging, as well as wood residues such as sawdust.



The McNeil generating station. Photo: Nick Engelfried

“The problem is, to timber companies ‘waste’ is any wood they can’t find a higher value use for,” says Porter. “They see old or crooked trees that can’t be sold for lumber as waste. But we actually have a scarcity of ecologically important logs and snags in New England forests, and creating more demand to remove them worsens the problem.” Wildlife species that depend on woody debris for habitat include marbled and Jefferson salamanders, both of whom are considered imperiled across parts of their New England range.

At a hearing in Burlington last year, a proposal to heat University of Vermont medical center buildings with steam from McNeil drew intense opposition, suggesting climate groups have momentum as they push policymakers to rethink the role of biomass in Vermont’s grid.

There would be precedent for such a move. New York and Massachusetts have taken steps to exclude forest biomass from benefiting off clean energy incentives, and advocates like Porter think other Northeast states should follow suit.

In fact, there’s a growing national movement to make climate policies more accurately reflect the carbon footprint of wood biomass, both in U.S. circles and beyond. This goal has taken on increased importance as the industry seeks to expand beyond the South and Northeast into regions where it has yet to establish a major presence.

Stopping the Expansion

Back in Longview, climate activists prepare to fight what could become the state’s first industrial-scale wood-pellet manufacturing plant. Locals plan to speak out against Drax’s Longview project at a hearing expected later this year. Across the Columbia River, 350PDX has been educating the public about impacts of the biomass industry by tabling at public events and hosting a screening of the documentary *Burned*. Other West Coast biomass plants have also drawn opposition.

At the port of Grays Harbor, two hours’ north of Longview, Pacific Northwest Renewable Energy wants to build a pellet plant comparable in size to the Drax project. Two more plants, with a combined ability to produce about a million tons of pellets annually, are proposed by Golden State Natural Resources in California.

To bolster political support for these plants in green-leaning West Coast states, the companies involved have leaned into a new talking point: that removing “waste” wood from forests will somehow blunt increasingly devastating fire seasons.

“This industry is playing on people’s justified fear of fire,” said Rita Vaughan Frost, an Oregon-based forest advocate with the Natural Resources Defense Council. “But their demand for a product to constantly deliver to customers will actually shift resources away from fire-management regimes based on the best science, such as Indigenous practices that include prescribed burns.”

Despite purporting concern about fire, the biomass industry on the West Coast has proposed doing something very similar to what it’s already done in the Southeast and New England: turning carbon-rich, biodiverse forests into tree plantations whose purpose is to grow wood as fast as possible for conversion into fuel.

Ironically, this is happening even as the climate benefits of intact forests are drawing unprecedented attention.

In December the Biden administration announced it will amend national forest management plans all over the country with the intent of protecting old-growth forests. And in Washington State there’s a growing movement to protect mature “legacy forests” that don’t yet qualify as old growth but provide significant carbon storage benefits. The biomass industry’s goals complicate such efforts.

“I want people to know we have a precious opportunity right now to keep this destructive industry out of our region before it gets established and expands,” says Bell of 350PDX. “We need to focus on that, because if we let them gain a foothold our work will get that much harder.”