



JDMT, Inc

March 21, 2011

California Energy Commission
Dockets Office, MS-4

Re: Docket No. 10-BAP-01: 2011 Bioenergy Action Plan

1516 Ninth St

Sacramento CA 95814-5512

(Sent via email to [docket@energy.state.ca.us]; one hard copy mailed)

**SUBJECT: *Submission of Written Comments –
Possible adoption of the 2011 Bioenergy Action Plan***

We are pleased to submit our written comments to the California Energy Commission (CEC), concurrent with the Commission's consideration of adoption of the Draft 2011 Bioenergy Action Plan during the March 23, 2011 Business Meeting.

We strongly support adoption of this draft Plan as it stands. Just as adamantly, we ask that the CEC immediately assign specific timelines for initiation of the actions described, and establish a coordinated monitoring program for measuring efficacy of the implemented Actions.

This draft Plan dated March 2011 (CEC-300-2011-001-CTF) is a substantive revision of the draft considered in our prior comments, December 29, 2010; our comments reflect these changes.

Comments

1. More attention has been given to definitions, and this is in response to our earlier concerns.
2. Placement of Findings and Recommendations in the Executive Summary greatly improves the Plan's clarity.
3. Consideration of bioenergy supply chain infrastructure investment has been increased, capturing the relevant concept that "bioenergy development" must be inclusive of *all* aspects, from feedstock identification and acquisition through processing to end with product and residuals management.
4. The Plan is simply an outline. Without *implementation*, this document will hold little long term value. Chapter 6, Implementation of the 2011 Bioenergy Action Plan, contains perhaps the most important addition to the new draft: recognition of the importance to actively seek and foster Industry and Stakeholder direct participation. We commend staff for this much needed emphasis.
5. In this same Chapter, we would underscore the importance of long-term agency action tracking. We would further suggest going forward, that this Tracking be initiated with requests to the administration of each participating agency for their formal commitment to

the actions outlined, and the cooperation and collaboration these actions require. In such times of severely limited budgets and concomitant staffing reductions, these commitments are significant, and costly. Each agency needs to consider what resources must be dedicated to ensure Action completion. We suggest that a written Memorandum of Understanding iterating each Action be developed, reviewed and signed by each participating agency.

We thank you for the opportunity to comment on the proposed 2011 Bioenergy Action Plan, and on the proposed actions by state agencies. We are available for further discussion should staff find this useful. Please contact me at (530) 823-7300 or (530) 613-1712 (mobile) if you have any questions.

Sincerely,

JDMT, Inc

A handwritten signature in black ink that reads "Michael Theroux". The signature is written in a cursive, flowing style.

Michael Theroux
Vice President

Cc: Sarah Michael – CEC
Howard Levenson – Cal Recycle