Placer County
AIR POLLUTION CONTROL DISTRICT

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Erik C. White, Air Pollution Control Officer

December 16, 2016

California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments to Target Scoping Plan Update 2030 Discussion Draft.

The Placer County Air Pollution Control District (PCAPCD) is pleased to provide these comments and recommendations on the Target Scoping Plan Update 2030 Discussion Draft (The Plan).

The Placer County Air Pollution Control District (District) is encouraged by the breadth of topics covered within the Plan, and is looking forward to working with California Air Resources Board (CARB) over the upcoming months on further iterations of this important document. Our comments address tracking of greenhouse gas (GHG) benefits, cross sector relationships and the industry sector, the transportation sector, the natural and working lands sector, and local government considerations.

Tracking the Benefits of GHG Reductions

The District would like to begin by expressing how important the GHG emissions tracking work will be for understanding the outcomes of many decades of work arising out of the proposals outlined within the Plan. As discussed on Pages 22 and 23 of the Plan, the data collected from mandatory reporting, natural working lands "GHG fluxes,1" and the results of international collaboration, are all important metrics in measuring success. In that same vein, the District recommends expanding the purview of the current proposed "Appendix F" to also discuss important issues of additionality when it comes to local government programs.

Currently, there are many activities that local governments may undertake themselves, or require of new development through the permitting process, that help with GHG reductions. The Plan strongly encourages limiting urban sprawl, preserving agricultural lands, and encouraging infill development. At the same time, CARB could provide critical support by describing more clearly how measures such as weatherization, building efficiency, energy efficiency, or onsite or small scale energy production can supplement and compliment state programs, while at the same time avoiding additionality concerns. This is a long standing issue that should be addressed within this Plan, and could bring much needed clarity to this issue. As the Plan states on Page 32, the Plan should "incentivize and accelerate local actions to achieve mutual goals". Understanding where state programs end, and local action begins, is a critical component to making that happen.

1 The term "flux" we believe is meant to reference life cycle analysis concepts; can you elaborate?

Cross Sector Relationships and the Industry Sector

Next, the District would like to commend the effort to recognize cross sector relationships. The District agrees that such an understanding of the issues is very important, and will help build relationships across sectors. Table II-1 is an excellent graphic that supports this intention. The District is very pleased to see how biomass is mentioned in several sectors, and particularly within the Transportation Sector. The District is also pleased to see that CARB recognizes that it there are close relationships between various biomass energy feedstocks, and should be clearly note that impacts on the supply and/or use of one type of feedstock can have impacts (sometimes unintended) on the others. Also, the District is seeking a clarification of one confusing reference within the Table refering to "green field urban development impacts" within the "Industry" sector. Was that intended to refer to when new Industry is developed within an urban community? Clarification is warranted on this language. Another Industry sector related comment is the reference to local air districts on Page 47, which are called out to help develop best available retrofit control technology (BARCT) and quantify co-benefits of GHG reduction. We strongly encourage this, and ask that CARB elaborate on how this collaboration would occur.

The Transportation Sector

The District also recognizes the focus of the plan on the transportation sector, and the heavy emphasis on using vehicle miles traveled (VMT) to assess impacts. The District recognizes the importance of truly understanding and making efforts to reduce VMT to reduce GHG emissions, but at the same time, the District encourages CARB to also recognize the potential health impacts associated with exposing people to toxic air contaminants when VMT reduction strategies may promote more urbanized land uses and locate people near transportation corridors before expanded or alternative transportation options are available. In encouraging such types of land use development, CARB should reference it's "Air Quality and Land Use Handbook, 2005"2, which has several recommendations to avoid residential and other sensitive land development near freeways, rail, ports and other industry centers. While the Plan targets GHG reductions, CARB should clarify that GHG reductions are not being encouraged at the expense of criteria pollutant reductions considerations, and that local land use planners should include consideration of both GHG reductions and criteria and toxic impacts. Note that the District recognizes the recent BIA vs Bay Area AQMD3 case that held that CEQA does not require CEQA documents to describe how existing conditions might impact future residents, unless such conditions might exacerbate the problem. 4 That being said, CARB should identify that local governments are still free to analyze the health impacts of the built environment on their land use decisions, even if it is not a mandate under CEQA, and should do so in practice. The District

2 https://www.arb.ca.gov/ch/handbook.pdf See page 4.

3 California Building Industry Association v. Bay Area Air Quality Management District(2015) 62 Cal.4th 369

4 https://www.opr.ca.gov/docs/Proposed_Amendments_to_Section_15126.2a_Regarding_Hazards_102120 16.pdf.

encourages CARB to continue to recognize the potential issues associated with air quality in urban areas.

Our last comment relating to the Transportation section is a recommendation that the Plan better identify how to motivate people to take transit and alternate modes of transportation, and how boundaries of suburban growth would actually succeed. We need to move beyond expecting that "if we build it, they will come" when it comes to transit, particularly in less populated areas. Facing the hard challenges associated with limiting land conversion must be addressed directly and will require significant social innovation. This can and should include recommendations on incentive funding needs and other transportation strategies that are needed to successfully implement this goal.

The Natural and Working Lands Sector

Our Air District has a long standing history of working on forest health, avoided wildfire, and biomass to energy issues. Based on that experience, we are particularly interested in the Natural and Working Lands section of the Plan. Our first comment is that the structure of this section is different from the other sections within the Plan. The other sections talk about known commitments and potential new measures. The Natural and Working Lands section uses the format from the Forest Carbon Plan Concept Paper,5 which has sections entitled Protect, Enhance and Innovate. This difference in organization is not on its face a bad idea, but the Plan should include a discussion about known commitments. We recognize that there are few known working lands commitments at this time; however, it is critical to draw attention to this fact. This needs to be identified as a barrier to be overcome.

Also, the Plan should be consistent with the Forest Carbon Plan Concept Paper that was released in March 2016. For example, the Plan states in Table II-2 that the land management and restoration activities for the forests should be between 60,000 and 175,000 ac/yr, while the Forest Carbon Plan suggests:

> "California's high-level forest carbon goal is to progressively scale up to get an additional 500,000 acres/year of nonfederal forestlands and smaller federal forest lands under plans and appropriately managed to improve forest health, with performance assessment for carbon sequestration and GHG/black carbon emissions to meet the State's 2030 and 2050 climate targets, watershed enhancement targets as laid out in the California Water Action Plan, and alignment with the State Wildlife Action Plan."

The District fully supports putting restoration goals within the Plan and does not suggest that the Forest Carbon Plan should be the only place where forest management goals should be found

5 http://calfire.ca.gov/fcat/downloads/Forest_Carbon_Plan-ConceptPaper_Draft_PublicOutreach.pdf

(they should also be included in CARB plans, such as the recently released draft Short Lived Climate Pollutant Plan); we are simply suggesting the plans contain consistent information, and encourage staff from the various state agencies to collaborate.

The District would like to see the cross sector interactions section broadened to include more information about the energy sector, so that more details about using biomass waste for renewable power can be discussed, in terms of encouraging the California utilities, the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC) to participate in problem solving and collaboration. One important statement that should be made is that the Renewable Portfolio Standards (RPS) program, while working to incentivize many renewable energy sectors, has provided limited support to the biomass to energy sector, such that it is on an uneven playing field with other heavily subsidized renewable energies, such as wind and solar. This means that biomass derived renewable energy is typically significantly more costly than other renewables. The Plan should acknowledge that biomass electricity prices can be higher than other renewables due to: biomass fuel processing and transport costs; subsidies inequitably provided to other renewables; and the failure to adequately recognize the economic value of the wide range of biomass energy societal benefits, including air pollution reductions, fire fighting prevention costs, and protection of critical forested land resources such as recreation, wildlife habitat, and upper watershed health (water quality, quantity, and timing). It is important for the Plan to recognize this economic discrepancy and to include recommendations on how to address and "level the playing field" for biomass energy. The District was pleased to see recognition of the benefits of distributed generation facilities, and hopes to see such concepts expounded upon in the next iteration of the Plan.

Another important part of this chapter of the Plan that needs expansion is the paragraph about water resources on Page 61. The District would like to encourage CARB to add citations to support and recognize the use of biochar as a soil additive that can help water and nutrient retention.

The next portion of our comments relate to the "Potential Actions" section. As to the two sections relating to "Protection", the District would suggest CARB add some language that reflects a commensurate level of interest in both agriculture and forest lands. We recommend stating a commitment to the current forest practice rules and healthy forest principles. As to the two sections relating to Enhancement, beyond correcting, consistent with the Districts previous comment above,the target listed Table II-2, the District would also like to encourage a broader discussion of "restoration treatments", as referred to in the first bullet under "Enhance" on page 67. This should discuss that feasible waste management for woody biomass is needed to effectuate such treatments.

Under the "Innovate" section, the District points out that the first suggestion of determining the scope of the wood disposal issue is important, but it should not be a prerequisite for action. We know with certainty that there are significant volumes of biomass waste that are beyond the State's current capacity to process, particularly now with the tree mortality reaching the levels of over 100 million dead trees. Also, there is an enormous amount of data already available relating

to biomass waste. CARB should be strategic about spending resources to collect existing data in an expeditious manner, rather than commissioning new studies that would state the obvious: we have more wood waste than we have the capacity to process. We need to identify and implement strategies to effectively and economically handle this material; this includes opportunities to expand current biomass to energy capacity in California.

Nevertheless, the District understands the value that collection and compilation, and perhaps some limited extrapolation, will be helpful in determining which programs should be expanded, and how new processes or programs could assist with the problem. We believe that there will be justification to expand the current 50 mega watt (MW) allocation to the Senate Bill (SB) 1122 program, and reason to continue funding technology innovation and commercialization that utilize wood waste.

The District was pleased to see that black carbon emissions estimates are expected by the end of 2018. It is critical that this work cover non-anthropogenic sources (wildfire). As the Plan itself states on Page 20, wildfire accounts for the majority of black carbon emissions, and as such, this issue deserves more specific discussion. Also, the District has been assessing potential black carbon emission reductions from alternative land management practices, and can collaborate with CARB on this research. The District cannot overemphasize its commitment to the reduction of catastrophic wildfire, through land management practices that are supported by a vast majority of fire science ecologists, foresters and wildlife biologists. As we work through future drafts of the Plan, we will provide significant lists of citations, including the results of our studies, which support the position that land management can reduce wildfire, and therefore can reduce black carbon emissions. We expect these comments will be consistent with comments we plan to provide on the draft Short Lived Climate Pollutant Plan and future versions of the Forest Carbon Plan.

Further, the Plan should acknowledge, and commit to support and participate in, our ongoing work to develop a black carbon open pile burning GHG offset protocol. The protocol will provide additional investment into utilization of biomass wastes for energy as an alternative to open pile burning through the associated reduction in black carbon emissions. We are currently conducting measurement programs to characterize black carbon emissions from a range of open pile burns.

The Plan should acknowledge our ongoing development of an accounting and modeling procedure (GHG offset protocol) to comprehensively quantify the full life cycle GHG benefits of forest fuel treatment projects. We believe the Lawrence Berkeley Laboratory (LBL) Natural Working Lands (NWL) modeling, as described and understood, is inadequate for this purpose for reasons to be detailed in our upcoming comments to the NWL model. As you may be aware, our forest fuel treatment protocol is properly considering GHG benefits, including: mitigating wildfire size and severity; stimulating forest growth; providing wood products, renewable energy and biochar that displace fossil fuels and sequester carbon; and reducing forest type-conversion. Our development team includes a diverse group of forest scientists, private and public land managers, policy makers, and conservation groups. The protocol will support: (1) investment

necessary to conduct fuel treatment GHG offset projects (with GHG credits that are cap-and-trade viable); and (2) investment of Greenhouse Gas Reduction Funds into GHG-beneficial fuel treatment projects. The cost to conduct fuel treatments is most often higher than potential wood and energy product revenues. We strongly encourage and would welcome CARB to be an active participant in the District's efforts in this regard.

In addition, the Plan should recognize the GHG benefits of the production of biochar from biomass wastes, including the well demonstrated long term stability of sequestered carbon, and the ongoing work that is characterizing its benefits to soil water, nutrient retention and plant growth. Such benefits are currently under close evaluation by the Governor's Office of Planning and Research, the California Department of Food and Agriculture, the University of California, Davis, among others. The Plan should commit to your support of a reevaluation, by an independent expert peer review team, of our California Air Pollution Control Officers Association (CAPCOA) approved biochar GHG offset protocol.

Finally, the Plan should make "voluntary renewable electricity allowances" (VREAs) available to electricity produced from biomass wastes that would have otherwise been disposed of through open pile burning. Ownership of the VREAs will incentivize the investment necessary to overcome the difference between the cost to process and transport the biomass wastes and the value at the energy facility.

Local Government Considerations

The District has only brief comments on the Local Government Considerations section that begins on Page 102. First, the District understands the distinction between the target for larger, long range local planning documents (as no more than six metric tons carbon dioxide equivalent (CO2E) per capita by 2030, and two metric tons by 2050, based on the statewide GHG emission reduction goals and predicted population by 2030 and 2050) and individual projects (net zero emissions target), but we suggest adding some language that emphasizes this distinction; perhaps even a table or chart, just to add clarity for the novice reader. In addition, the local communities in California are very diverse. The recommended GHG targets for local government considerations should be general principles, and the Plan should encourage local jurisdictions to develop their own GHG targets unique to their communities.

Second, the District would like to encourage CARB to collaborate with OPR to update CEQA technical advisories that discuss GHG and climate change. The District believes, along with other Districts, that a local government sponsored Qualified Climate Action Plans (QCAPS) should only provide the streamlining benefits described in CEQA Guidelines Section 15183.5 if those plans include mandatory measures. Also, the District feels that a better demonstration of how mitigation measures can be achieved should be strongly encouraged within these QCAPS.

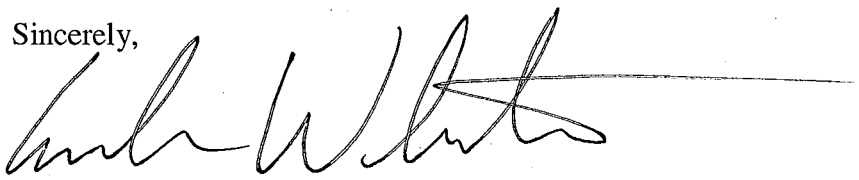
Finally, consistent with our earlier comments, it should be noted that the issue of clarifying additionality is a crucial one that should be reiterated in this section, so that local agencies are

assured of the ground rules and the support they will receive from the state, and more particularly CARB, when they innovate around this heavily regulated subject area.

The District wishes to again thank the staff at CARB for providing an opportunity to comment on the Plan at this early stage of its development. The District will continue to engage in this process, and will supply specific data, language or other information that we possess to help satisfy the requests we made in this letter, or support CARB in incorporating other changes it may want to consider to the Plan.

Thank you for the opportunity to comment on this Target Scoping Plan Update. If you have any questions, or wish to discuss the comments further, please do not hesitate to contact me at (530) 745-2330.

Sincerely,



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