



The Watershed Research and Training Center

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The Honorable Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Response to Draft Short-Lived Climate Pollutant Reduction Strategy Released on September 30, 2015

Dear Mr. Corey,

The Watershed Research and Training Center (WRTC) is pleased to provide the following comments to the Air Resources Board (ARB) in response to the recently released Draft Short-Lived Climate Pollutant Reduction Strategy ("Draft Strategy"). WRTC has been working on forest-related health issues since its founding over 20 years ago. We applaud ARB's recognition of the role that forests and wildfire play in climate processes in California. Reducing wildfire severity should be a key goal of every health-related agency in California.

We are especially supportive of recognition of the importance of certain strategies in "Reducing Black Carbon Emissions from Forest-Related Sources: Additional Reductions by 2030" and the need to increase the rate and effectiveness of forest risk reduction practices. Most importantly, prescribed fire and wood market development are tools that the Watershed Research and Training Center have identified as critical for local forest, community, and economic health.

WRTC commends ARB for cross referencing Forest Programs and other State planning documents such as the Forest Carbon Plan (FCP) and the Bioenergy Action Plan for alignment with the Draft Strategy, but points out that the most recent Bioenergy Action Plan is now 3 years old and does not include actions based on research advances-such as confirmation of the high Global Warming Potential of Black Carbon-made during that time. We would like to see an inter-Agency effort to update that plan. Further, while we would have liked to have seen detailed recommendations for reducing black carbon emissions in the Short Lived Climate Pollutant Reduction Strategy, the absence of detailed recommendations puts emphasis on the agency's need to participate actively writing the FCP. We encourage ARB to dedicate significant resources and staff time such that ARB can engage fully with other State Agencies in the production of the FCP, particularly to ensure that appropriate attention is given Black Carbon emissions reductions within the FCP.

Still, it is imperative that the Strategy include some Recommendations to reduce Black Carbon from forest-related sources. Even broad recommendations can have a deep impact on the ability of forest management entities to justify related work and access public funds to do so. If a Recommendations section cannot be added by the issuance of the final report, ARB should at least declare in writing that the section is needed and give a timeline of less than 1 year in which it will be added.

Finally, the Draft Strategy states that the number and capacity of bioenergy power plants is decreasing, and that a combination of the wood market and distributed bioenergy power plants will need to be developed to address that loss. Currently operating forest biomass power plants will be needed *in combination with* newly developed wood markets and distributed bioenergy power plants in order to support an increase in rate of forest risk reduction practices. The ARB should be more accurate and clear about the impact of the loss of the existing bioenergy power plants on the ability to manage forests for Black Carbon and methane emissions.

Thank you,

Nick Goulette, Executive Director
The Watershed Research and Training Center