Placer County
AIR POLLUTION CONTROL DISTRICT

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Erik C. White, Air Pollution Control Officer

April 10, 2017

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

RE: Comments to Proposed 2017 Climate Change Scoping Plan Update

Dear Chair Nichols and Members of the Board:

Placer County Air Pollution Control District (Placer APCD) appreciates the opportunity to follow up with comments on the latest version of the proposed 2017 Climate Change Scoping Plan Update (Scoping Plan). While many of our comments regarding the December 2016 version of the proposed Scoping Plan remain unaddressed, we continue to look forward to working with you on finalizing and implementing the Scoping Plan.

First, as we mentioned in our previous comments, the California Air Resources Board (CARB) should provide critical support in describing more clearly how measures such as weatherization, building efficiency, energy efficiency, or onsite or small scale renewable energy production can supplement and complement state programs, while at the same time avoiding additionality concerns regarding emission benefits. In order to ensure improvements of the understanding of additionality, within the Greenhouse Gas Emissions (GHG) Tracking section on page 16, or within the Intergovernmental Collaboration section beginning on page 26, CARB should ensure complementary local reduction programs do not run into additionality concerns, by developing a clear methodology on how to determine when state programs end and local programs begin. A simple solution would be to create a "local project renewable and energy efficiency allowance pool", similar to your Voluntary Renewable Energy Allowance program, where allowances from this pool would be given to local additional projects to represent their greenhouse gas reductions.

Another issue we discussed in our December comments relates to the language about health impacts (within Public Health section beginning on page 76). We recommend supporting environmental justice communities by including a more detailed discussion of the potential impacts of locating large populations next to heavily used transportation corridors, and encourage local government to use their broad discretion over land use, beyond California Environmental Quality Act (CEQA), to consider and mitigate these impacts.

We remain extremely concerned about the Natural and Working Lands modeling work and conclusions conducted by the Lawrence Berkeley National Laboratory and provided in Appendix G. First and foremost, there remains a complete lack of background and supporting documentation on this work. As we can best understand based on what has been provided, the forestry section evaluation work was not appropriately conducted, as it is at such a broad scale

that we conclude the GHG conclusions cannot be accurate or representative. This is particularly true for the fuels reduction element, and we strongly urge that this work be removed and entirely redone. The literature shows that GHG benefits of forest fuels treatments are dependent on numerous site specific factors, including the location and nature of the fuel treatments, and to be representative, the quantification of benefits must be conducted on a forest stand and individual tree basis. This stands in direct contrast to the procedures used in Appendix G.

Our remaining comments focus on the significant need to increase information to the public about black carbon from catastrophic wildfire, and more aggressively encourage research to identify black carbon emissions from wildfire. As stated in the proposed Scoping Plan, "CARB is continuously reviewing the latest science in the sector and is committed to working closely with other State agencies and the public to ensure a comprehensive review of the updates to the inventory" (page 108). In order to follow through on this commitment, we recommend the following:

- Recognize the commitments made by CARB within the resolution that approved the Short Lived Climate Plan pertaining to Black Carbon from Wildfire.
- Consider setting emission reduction targets from wildfire prevention. As commented by the Alliance of Regional Collaboratives for Climate Adaptation, "Cal Fire has determined that 95% of wildfires are human caused, and interventions to reduce risk are human actions that can be modeled." Such targets could be incentive based, and should not result in less funding to forest agencies, and at the same time motivate land owners, government agencies, and other stake holders to take forest health seriously.
- Cross reference forest management and fuel reduction targets from draft Forest Carbon Plan specifically, consistently and clearly, beyond what is stated on the top of page 114, and specifically list the fact that Cal Fire and the US Forest Service have each stated that at least half a million acres of forest should be treated per year over the next ten years in order to build forest resiliency and reduce wildfire.
- Section c, Innovate Biomass Utilization Pathways, on page 114, should include:
  - Support for energy procurement requirements under the California Public Utility Commission's Renewables Portfolio Standard (RPS) program for small scale forest biomass to energy advanced technology projects.
  - A statement about the fact that there is more waste wood produced in California than could possibly be composted on an annual basis, even without inclusion of 100 million dead trees.
  - Using biomass waste as a biofuel should be encouraged.
  - Open pile burning and forest fires emit 98% more PM 2.5/black carbon than currently operating biomass facilities, and even further reductions can be realized with new technology.[1] This supports environmental justice communities' needs.

[1] Bruce Springsteen, Thomas Christofk, Robert A. York, Tad Mason, Stephen Baker, Emily Lincoln, Bruce Hartsough *and* Takuyuki Yoshioka. Forest biomass diversion in the Sierra Nevada: Energy, economics and emissions. California Agriculture Journal. July-September 2015, pages 142-149. Online: http://californiaagriculture.ucanr.edu/landingpage.cfm?article=ca.v069n03p142&fulltext=yesdoi:10.3733/ca.v069n03p142

- Existing infrastructure should be supported with grants to provide emissions control technology upgrades, such as Selective Catalytic Reduction (SCR) for the reduction of oxides of nitrogen (NOx), in conjunction with other subsidies.

- The interagency working group on biomass described under "Innovate" section on page 116, and its "holistic plan," should cross reference and build upon the Forest Carbon Plan, and should also include:
  - Clarification that when the Scoping Plan is approved, the working group should start immediately, and that the plan should be complete by January 1, 2019.
  - The importance of ecosystem co-benefits of water quality and quantity.
  - A new Bioenergy Action Plan should be initiated, and closely align with this holistic plan, which you could refer to as a "Biomass Response Plan."
  - The working group should include diverse stake holders, including industry representative from agriculture and forestry sectors and key local government and federal representatives.
  - A full description of research needs to 1) develop comprehensive emissions factors for forest black carbon; and 2) enhance advanced fire modeling and other tools, to understand the benefits of forest fuel reduction and low vs high severity wildfire on forest health, as well as the environmental co-benefits.

Thank you for the opportunity to comment on the Proposed 2017 Climate Change 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,

Erik C. White
Air Pollution Control Officer