October 30, 2013

Richard W. Corey, Executive Officer

Air Resources Board

P.O. Box 2815

Sacramento, CA 95812

Re: Comments on AB 32 Scoping Plan Update

Dear Richard:

Following are comments from California Forestry Association (CFA) on the October 2013 Climate Change Scoping Plan, First Update. CFA is a trade association made up of the large forest industrial landowners in California as well as many of the non-industrial landowners, biomass powerplants, sawmills, veneer mills and a fencing mill.

**Page Specific Comments**

**Pg. 13, Black Carbon**

CFA commends ARB for putting in writing that Wildfires in California produce almost “50 percent of the total black carbon emissions”. However we fail to understand on the very next page (page 14) that the pie chart doesn’t include the contribution from Wildfires to give the appropriate context to other contributors. Three out of four forest acres burned in California each year are on the National Forests. The State has the opportunity to engage the Forest Service, California Region and promote them reaching the Regional Forester’s goal of increasing the pace and scale of forest health and fuels reduction projects to about 500,000 acres/year. The Regional Forester has stated in his March 2011 Ecological Restoration Leadership Intent that they need to treat 9 million acres in the coming 10-15 years.

**Pgs. 24-25, Future Freight Efforts**

To date, the ARB has refused to consider collaborating with CalTrans and the California Highway Patrol (CHP) to reconsider increasing gross vehicle weight (GVW) in California. Studies, where GVW has been increased from 80,000 to 105,000 lbs., have shown about a 19 percent decrease in fuel consumption per unit weight hauled. And, of course, a 25 percent increase in freight per truck means a substantial decrease in the number of trucks on the highway.

California is surrounded by States that have increased their GVW to 105,000 lbs. The CHP has always been against this because they believe it is going back to 3 trailer truck-trains. That is not the proposal here. The surrounding States have a 105,000 lb GVW configuration that simply adds an axle in front of the drive axle on the truck tractor and adds an axle on the back of the single trailer.

This proposal would also eliminate the reconfiguring of truck loads for interstate freight haulers.

**Pgs. 42-43, Forests Sector**

ARB has correctly identified that reducing vegetative fuels that feed wildfires could be used for biopower both in the form of power generation and biofuel.

Over the last couple of years, several standalone biomass powerplants have closed. The industry is shrinking rapidly as the need for peak power rather than baseload power changes with the increase in intermittent renewables such as wind and solar. State Government has to recognize the need for biomass powerplants (and soon to come commercially economic biofuels). Currently about 1 million bone dry tons per year is simply piled and burned in the forests because the power purchase agreement price simply is not high enough for the plants to stay in operation.

It takes about 11 cents/kilowatt for a standalone biomass powerplant to be able to stay in business and maintain all the necessary retrofits to meet emission standards. In today’s California marketplace, utilities want the biomass powerplants to compete with natural gas which is about 4 cents/kilowatt. Consequently, the remaining biomass powerplants are going out of business.

**Pg. 55, Health Impacts of AB 32 Mitigation Measures**

Significant human respiratory health improvements are an opportunity in California by decreasing the size and intensity of wildfires primarily through increasing pace and scale of forest health and fuels reduction projects on the National Forests. Unfortunately the trends in number, size and intensity of wildfires in California are increasing.

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* (Safford and Miller. 2012. “TRENDS IN WILDFIRE SEVERITY: 1984 TO 2010 IN THE SIERRA NEVADA, MODOC PLATEAU, AND SOUTHERN CASCADES, CALIFORNIA, USA”. Fire Ecology Volume 8, Issue 3, 2012 doi: 10.4996/fireecology.0803041).

Recognizing that there are about 11 cents/kilowatt of co-benefits of using forest biomass and other wood waste in a controlled combustion (boiler) environment, namely a biomass powerplant, can make a significant difference in reducing health impacts (Western Governors Association 2006 Biomass Taskforce Report). A biomass powerplant produces 98 percent less criteria pollutants than open piling burning:

Comparison of Emissions Between Biomass Boilers and Field Burning

|  |  |  |  |
| --- | --- | --- | --- |
| Pollutant | Field Burning (lb./ton) | Biomass Boiler (lb./ton) | Percent Reduction for Biomass Boiler (Percent Reduction) |
|  |  |  |  |
| Sulfur Oxides | 1.7 | 0.04 | 97.6 |
|  |  |  |  |
| Nitrogen Oxides | 4.6 | 0.70 | 84.8 |
|  |  |  |  |
| Carbon Monoxide | 70.3 | 0.40 | 99.4 |
|  |  |  |  |
| Particulates | 4.4 | 0.26 | 94.1 |
|  |  |  |  |
| Hydrocarbons | 6.3 | 0.00 | 100.0 |
|  |  |  |  |
| Total | 87.3 | 1.4 | 98.4 |
|  |  |  |  |

Emission factors from “Hydrocarbon Characterization of Agricultural Waste Burning”, CAL/ARB Project A7-068-30, University of California, Riverside, E.F. Darley, April 1979.

**Pg. 71, Interstate, Federal, And International Policy Coordination**

Increasing the gross vehicle weight to 105,000 lbs. would make California equivalent to surrounding States and thereby eliminate interstate load reconfigurations at the State border.

**Pg. 100, Natural and Working Lands**

The ARB properly points out that natural and working lands can act as both a source and a sink of GHG emissions. The Forest Service (Goines and Nechodom, unpublished) conclude that on the current trajectory, California’s National Forests will change from a sink to a source around 2050. The National Forests are overly dense averaging 266 trees/acre on a landscape that can generally only support 40-100 trees/acre. The Forest Service forest health and fuels reduction program is only removing 7 percent of annual growth. The overly dense conditions are getting worse. In California’s Mediterranean climate, the only outcome possible is increasing number, size, and intensity of wildfires.

**Page 101, Planning and Actions to Support Sector Vision**

The Governor needs to take an active role with the Forest Service Regional Forester in dramatically increasing the pace and scale of forest health and fuels reduction projects on the National Forests. The National Forests have 9.784 million acres of productive forestland (50 percent of all the productive forestland in California). The Regional Forester says 9 million acres need forest health/fuels reduction treatments.

Thank you for the opportunity to comment.



STEVEN A. BRINK

Vice President- Public Resources

California Forestry Association

Enclosure

Forest Service Region 5 Ecological Restoration : Leadership Intent

The mission of the Forest Service is to sustain the health, diversity and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations. It is our intent to establish a regional vision and corresponding goals for Ecological Restoration consistent with this mission and the laws, regulations and policies that guide National Forest management.

Our goal for the Pacific Southwest Region1 is to retain and restore ecological resilience of the National Forest lands to achieve sustainable ecosystems that provide a broad range of services to humans and other organisms. Ecologically healthy and resilient land­scapes, rich in biodiversity, will have greater capacity to adapt and thrive in the face of natural disturbances and large scale threats to sustainability, especially under changing and uncertain future environmental conditions such as those driven by climate change and increasing human use. Our goal is based on a commitment to land and resource management that is infused by the principles of Ecological Restoration and driven by policies and practices that are dedicated to make land and water ecosystems more sustainable, more resilient, and healthier under current and future conditions.

Ecosystem services are the goods and services that flow from wildlands and forests that are valued and used by people, and that directly or indirectly support human well-being. Wildlands and forests are valued for basic goods, such as wood, fiber, and water, but these ecosystems also deliver important services that are perceived to be free or limitless such as air and water purification, flood and climate regulation, biodiversity, scenic landscapes, wildlife habitat, and carbon sequestration and storage. The National For­ests are important providers of ecosystem services to humans and to other inhabitants of our wildlands as well. Our commitment to restoration-based manage­ment includes a commitment to a renewed focus on the sustainable delivery of ecosystem services.

In the 21st century, three major drivers of change define restoration needs on the National Forests of the Pacific Southwest Region: climate change and shifting hydrologic patterns; increasingly dense and unhealthy forests; and rapidly growing human populations. These synergistic sources of change are resulting in increasingly over-allocated and undervalued ecosys­tem services (especially water); a dramatic increase in disturbance events such as uncharacteristic large-scale wildfires, floods, and insect and disease outbreaks; new and growing threats from terrestrial and aquatic invasive species; and a growing need to revitalize rural economies in California, Hawaii and the Pacific Islands.

While sound restoration work is being con­ducted throughout the Region to increase forest and watershed resilience, important indicators suggest that disturbance impacts already outpace the benefits of this work, and that we will fall further behind over

time. Wildland fires in California are becoming larger and more frequent. Of greatest concern is a notable increase in the area of forestland burning at high severity over the last quarter-century. Fire exclusion over many decades, in conjunction with other forest management choices, has resulted in dense, middle-aged forests over large areas of California. These forests are highly susceptible to severe wildfire, which fragments forests, emits carbon, increases erosion rates and sedimentation, negatively affects water quality and delivery, and damages old-growth forest habitats that sustain important components of the Region’s biodi­versity. Dense middle-aged forests are also more sus­ceptible to drought stress, large-scale insect outbreaks and disease epidemics.

The ability of the Region’s forestlands to sequester and store carbon has become a matter of national and international significance. Human additions of greenhouse gases to the atmosphere are altering the climate, and federal land manage­ment agencies like the Forest Service are expected to play a major role in U.S. adaptation and mitigation responses to global warming. Mitigation responses revolve around the maintenance and enhancement of carbon sequestration processes on forestlands. In the Mediterranean climate that characterizes much of California, annual summer droughts and frequent fire are the norm, retention of carbon in most of the for­est landscape requires stand structures and composi­tions that are resilient to fire. Nearly a century of fire exclusion in California, coupled with other manage­ment decisions on both private and public land, has resulted in forests that are at an increasing risk of loss due to large scale disturbances. There is an additional crisis taking place in our Southern California Forests as an unprecedented number of human-caused fires have increased fire frequency to the extent that fire-adapted chaparral can no longer survive and is being replaced with non-native annual grasses at an alarm­ing rate. To counter these trends, forest managers will need to significantly increase the pace and scale of the Region’s restoration work. Only an environmental restoration program of unprecedented scale can alter the direction of current trends.

From this point forward, Ecological Restora­tion will be the central driver of wildland and forest stewardship in the Pacific Southwest Region, across all program areas and activities. Future Land and Resource Management Plans, other strategic plans and project plans will identify Ecological Restora­tion as a core objective. Our Ecological Restoration work will include coordination and support for all wildlands and forests in the Region to promote an “all lands” approach to restoration. It will lead to a new way of doing business with our partners and neighbors, to coordinate work and priorities across forests and wildlands regardless of ownership. Col­laboration across ownerships and jurisdictions to achieve Ecological Restoration will require active use of Forest Service State and Private Forestry authori­ties; an expanded effort to engage tribes, partners,

and neighbors and to work in closer coordination with other agencies.

Resource program managers will have the responsibility for promoting Ecological Restoration activities including, but not limited to, management of vegetation, water, wildland fire, wildlife and rec­reation. Activities may include monitoring resource conditions; managing, restoring or enhancing ter­restrial and aquatic ecosystems; or regulating human uses. Activities to be promoted include, among others, forest thinning and prescribed fire to decrease fuel loading and increase forest heterogeneity; meadow and riparian restoration to improve watershed func­tion; environmentally and ecologically sensitive fire management practices; invasive species eradication; and wildlife and fish habitat improvement. Emphasis will be placed on expanding and developing partner­ships to increase organizational capacity and the use of large-scale stewardship contracts operating at the landscape level to achieve restoration goals. We will expand and improve our consultation with tribal governments to utilize their traditional knowledge of stewardship and caring for the land. Emphasis will be placed on collaboration with stakeholders, com­munities, local government, volunteers, and citizens to facilitate dialogue and to decrease conflict in planning and implementing Ecological Restoration efforts.

With Ecological Restoration as the driving force behind the Region’s work, and with a pace and scale sufficient to reverse current trends, it is our intent to accomplish the following in the next 15-20 years:

Work together to achieve a collaborative and finan­cially supported effort among forest land manage­ment agencies, private land owners, and the public to implement a large scale restoration program to accelerate the scale and pace of forest restoration activities on both public and private lands.

Increase forest resilience through treatments (includ­ing prescribed fire and thinning) and wildfire, result­ing in resource benefits to approximately 9 million acres on national forest system lands.

Restore at least 50% of accessible, degraded forest meadows to improve their habitat function and abil­ity to hold water longer into the summer and deliver clean water when most needed.

Decrease the occurrence of uncharacteristically severe wildfires and their associated impacts through en­vironmentally and ecologically sensitive vegetation treatments, fire management, and public education.

Work with key partners in Southern California to expand fire prevention efforts in order to retard the loss of native ecosystems like chaparral and coastal sage scrub.

Ensure vegetation and fire management efforts are grounded in concern for biodiversity and ecological process both before and after disturbances like fire.

Reforest after wildfire where appropriate and imple­ment suitable stand maintenance activities that meet project goals and site conditions.

Ensure the retention and sustainability of forests, forest resources, and forest carbon over the long term, even as climates change.

Expand watershed improvement programs at the for­est level (inventory, prioritization, and scheduling of restoration).

Target fuel reductions activities in key watersheds for protection of aquatic species and municipal water­sheds.

Work with partners to increase restoration actions that will improve habitat connectivity

.Decrease the impacts of invasive species through

preventative practices, rapid response control, management,

rehabilitation and restoration, emphasizing

cooperative work with federal, state, and community

partners.

.Restore landscapes affected by unmanaged recreation.

.Identify the minimum road system needed for safe

and efficient travel for administration, utilization and

protection of National Forest System lands; establish

priorities and a time schedule to decommission or

close unneeded roads.

.Increase conservation education, interpretation and

volunteer programs to promote understanding and

support for restoration actions and increase understanding

of the value of healthy watersheds and the

ecosystem services that they deliver.

With a focus on Ecological Restoration, the following

ecosystem services and community economic

benefits will be enhanced:

.Delivery of clean water and an improved flow regime

that benefits people, fish, and wildlife

.Fish, wildlife, and plant habitat, for both common

and rare species

.Maintenance of biodiversity

.Forest resilience in the face of climate change and

changing disturbance processes

.Carbon sequestration

.Air quality

.Rural economic health

.Outdoor recreation and scenic beauty

.Landscapes for health and renewal

.Wood products

.Wood biomass for energy

.Forage for wildlife and livestock

.Green economic activity

As we work toward the goals outlined above, we will learn and adjust as we go. Over time there will be new science, new ideas, and new collaborations that will improve our understanding. With this new understanding, we will make course corrections in policy and practice and move even more efficiently toward our overall goal of resilient forests and wildlands.