

September 22, 2021

Ms. Rajinder Sahota, Deputy Director
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Short-Lived Climate Pollutants Meeting on September 8, 2021, as part of the 2022 Climate Change Scoping Plan Update

Dear Ms. Sahota:

The Placer County Air Pollution Control District (District) appreciates the opportunity to provide the following comments on the subject Scoping Plan Update (Plan).

The District recognizes that CARB is focused on anthropogenic sources of SLCP, but to the extent that CARB is excluding black carbon (and methane and non-methane volatile organic) emissions from wildfires and prescribed burning (including broadcast and open pile burning) this Plan limits its usefulness. It should consider black carbon sources regardless of ignition source (this is important considering that most wildfires are human caused). Open burning of woody material, almost all of which is human caused, is the State's overwhelming source of black carbon emissions. This smoke is also significantly contributing to other critically important criteria and air toxic pollutants including fine particulate matter and nitrogen oxides. The Forest Carbon Plan and Working Lands portions of the Scoping Plan are well suited venues for this discussion, and would most appropriately be found within this Plan due to the action oriented focus relating to carbon reductions.

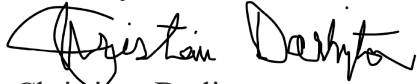
The Plan should also recognize the stated goal of the State to increase the pace and scale of forest fuels treatments and more directly cross reference the other state efforts to reduce wildfire. As we have painfully seen over the last several years, California forests are at extreme risk for catastrophic wildfire resulting from a century of successful fire suppression, lack of proactive fuel reduction projects due to challenging economics and legal challenges that prevent or delay work, and the recent drought related tree mortality crisis. An increase in the pace and scale of forest restoration and recovery projects (including mechanical thinning and prescribed fire) is needed to restore our forests to a fire and drought resilient condition and maintain their ability to effectively sequester carbon. Their ability to reduce the size and severity of wildfire directly reduces black carbon emissions.

The SLCP provides a critical opportunity to support alternatives to open pile burning of biomass wastes – including production of electricity, heat, and/or liquid or gaseous fuels. A reduction in open pile burning directly reduces black carbon emissions, which can be much better managed in

a controlled environment that also provides benefits to Californians in terms of energy productions and jobs.

Thank you for considering these comments. Please let me know if you would like to further discuss these comments, with myself, or with our Air Pollution Control Officer, Erik White.

Sincerely,

A handwritten signature in black ink, appearing to read "Christiana Darlington". The signature is fluid and cursive, with the first name "Christiana" written in a larger, more prominent script than the last name "Darlington".

Christiana Darlington
General Counsel, Placer APCD