California Oaks

Preserving and perpetuating California's oak woodlands and wildlife habitats

July 27, 2015

California Board of Forestry and Fire Protection
P.O. Box 2815
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Re: Oak Woodland Greenhouse Gas Emissions

Forest Practice Committee:

California Oaks writes to extend its remarks of June 29, 2015 concerning unmitigated oak woodland greenhouse gas (GHG) emissions.

According to the Air Resources Board, fireplaces produce 15 percent of the state's black carbon emissions not associated with wildfire. Given the 100-year global warming potential value for black carbon is 900, coupled with the imminent SB32 (Pavley) 2030 and 2050 GHG reduction targets, means fireplace black carbon emissions represent a significant climate change issue.

Had the previously depicted truckload of blue oak firewood been derived from a California Environmental Quality Act project, the oak woodlands conversion GHG emission effects analysis would require estimations for both the direct effect from loss of carbon sequestration capacity and the indirect effect due to carbon dioxide, methane, nitrous oxide and black carbon emissions from burning the firewood. Pursuant to the state's 2050 GHG reduction target, a project must mitigate 80 percent of oak woodlands direct and indirect biogenic GHG emissions. The only way to proportionally mitigate these biogenic emissions is by planting and maintaining the requisite number of replacement oak trees. Notably, planted hardwood rangeland oak trees sequester negligible amounts of carbon until around 20 years old.

For consistency with state GHG policy and law, the Board must designate hardwood rangeland oaks "commercial species" and establish appropriate stocking standards for commercial firewood operations.

Sincerely,

Janet Cobb

Executive Officer

cc: David Mallory, Air Resources Board