

February 9, 2018

Sarah Pittiglio
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on the California Air Resources Board “Draft Initiatives for the Fiscal Years 2018-2021 Triennial Strategic Research Plan” (Plan)

Ms. Pittiglio:

The Placer County Air Pollution Control District (District) recommends the subject Plan support research to advance the quantification of criteria air pollutants, greenhouse gas (particularly strong climate forcing black carbon and methane), and air toxic emissions from forest biomass waste management options and fuel reduction activities, which include:

- Burning of biomass, with a particular focus on black carbon
 - Open pile burning
 - Prescribed under-burning
 - Wood stoves
- Decay and composition of biomass, with a particular focus on methane
 - Mastication and in-field chip and scatter
 - Standing dead and down decay and decomposition
 - Slash piles
 - Chip piles
 - Composting
- Biochar production

Research on the air pollution tradeoffs and impacts of these forest biomass management alternatives is consistent with the Plan’s proposed themes:

- Health and Environmental Justice: Rural low income communities are most impacted by the lack of comprehensive strategy to reduce impacts from biomass waste management.
- Air Quality: Burning of biomass is a significant source of ground level ozone precursors (nitrogen oxides and volatile organics) and fine particulate matter, and is a contributor to the degradation of regional air quality. Decay and decomposition alternatives are a potentially large source of volatile organics.
- Climate: Burning of biomass is a significant source of black carbon. Decay and decomposition alternatives are a potentially large source of methane.

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- Cross-cutting Topics: Overlaps with critically important State priorities including waste reduction, forest tree mortality, water supply (quantity and quality), renewable energy targets, wildfire prevention and fighting, and rural community economic development.

This research is consistent with that recommended by the State's Forest Carbon Action Plan and supports the recommendations of the Little Hoover Commission's recent report "Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada." It is also consistent with Air Resources Board Resolution 17-9, identifying the research need to quantify the fuel reduction project benefits of mitigating wildfire size and severity, thereby reducing criteria air pollutant and climate forcing emissions, particularly black (and brown, yellow, and non-black) carbon.

Thank you for the opportunity to comment. We look forward to working with you to define priorities and identify specific projects that will assist with policy and rule making regarding biomass management.

Sincerely,



Erik White
Air Pollution Control Officer