

June 15, 2018

Shelby Livingston
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on "California's 2030 Natural and Working Lands Climate Change Implementation Plan" (Plan)

Ms. Livingston:

The Placer County Air Pollution Control District (District) is pleased to offer the following comments on the subject Plan:

- We are grateful to see, and support, the Plan's very strong focus on increased investment in forest restoration through selective forest fuels treatment including mechanical thinning and prescribed burning. These activities are well demonstrated to provide huge opportunities in the Sierra Nevada to reduce greenhouse gases through enhanced forest growth, reducing wildfire size and severity, and producing wood products that sequester carbon and avoid fossil fuel alternatives.
- We also support the Plan's directive to incentivize the use of excess biomass – including that generated as a result of both forest, agricultural, and urban activities – for energy or wood products.
- We request the direct support our on-going work to develop a greenhouse gas offset protocol for forest fuels treatment projects. The protocol is a comprehensive methodology for accurately quantifying the GHG benefits of fuels treatments. Over the past two years it has been developed by a diverse group of forest scientists, private and public land managers, policy makers, and conservation groups. It continues to be vetted and has undergone numerous detailed reviews. The protocol will be submitted shortly for adoption into the American Carbon Registry.
- We are extremely concerned about the CALAND model. There is a significant lack of background and supporting documentation. As we can best understand what has been provided, the forestry section evaluation work is conducted at such a broad scale that greenhouse gas conclusions for fuels treatment work could not possibly be accurate or representative. The greenhouse gas benefits of forest fuels treatments is dependent on numerous site specific factors, including the location and nature of the fuel treatments and must be conducted on a forest stand and individual tree basis.

Thank you for considering these comments. We look forward to working with on implementing this plan. Please let me know of any questions.

Sincerely,



Erik White
Air Pollution Control Officer