

May 25, 2016

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Comments on Proposed Short-Lived Climate Pollutant Reduction Strategy (dated April 2016)

Dear Chair Nichols and members of the Air Resources Board:

Please accept these comments on the *Proposed Short-Lived climate Pollutant Reduction Strategy* (Proposed Strategy) from the undersigned land conservation and community sustainability organizations.

We appreciate the Proposed Strategy's recognition of the importance of forest health and the need to reduce forest-related sources of black carbon by decreasing the risk of catastrophic wildfire. We strongly believe, however, that the strategy should include cooperatively developed targets for reducing black carbon from wildfire emissions given the amount of black carbon that comes from this single source. To that end, we echo recommendations we believe will strengthen and clarify the intent of the Proposed Strategy, especially as it relates to SB 605.

General Comment: SB 605, the underlying legislation requiring the development of this plan, does not distinguish between forest and non-forest or "anthropogenic" black carbon emissions. Therefore, given the urgency and potency of black carbon and the fact that forest black carbon emissions account for two-thirds of the state's total black carbon emissions on average, we believe this plan should address the wildfire issue in greater detail by setting targets and making specific, actionable recommendations for how to achieve them. This will provide guidance to other state planning efforts, such as the Forest Carbon Plan and the AB 32 Scoping Plan update.

II.B. Put Organic Waste to Beneficial Use (pp. 24-25): we recommend adding language in this section to better integrate other forms of organic waste diversion within the overall strategy. The emphasis on organic waste diversion from agriculture and dairy operations is critical; but so, too, are other forms of waste diversion such as electricity production from the controlled combustion of forest biomass waste that might otherwise be open-pile-burned or burned up in a wildfire.

II.C. Identify Practical Solutions to Overcome Barriers (pp. 25-26): in order to include the full suite of opportunities within this statewide Proposed Strategy, this section should also address practical solutions to overcoming barriers to using controlled combustion of forest biomass to create energy.



III. Latest Understanding of Science on SLCPs (pp. 31-33): this section talks about the scientific underpinnings and impacts of Arctic warming and sea level rise; it should also address warming in the Sierra and the resulting “snow level rise,” which is predicted to accelerate overall warming in the region and exacerbate impacts such as tree mortality, drought and wildfire.

IV.A. Reducing Black Carbon Emissions – Anthropogenic Sources... (pp. 40-41): this section describes the division of black carbon emissions into two categories, anthropogenic and forest-related. As mentioned above, SB 605 did not make this distinction. As a result, and given the importance of fully addressing black carbon emissions, we urge you to remove this division and include targets and recommendations for all forms of black carbon, including forest-based.

IV.B. Forest-Related Sources of Black Carbon Emissions (pp. 48-49): this section states that because we can’t fully control wildfire and associated black carbon emissions to meet specific targets in any given year, forest-related emissions are not included in overall reduction targets. As outlined elsewhere in this comment letter, we believe that specific recommendations should be included for this sector. This document was meant to be the comprehensive strategy document for the state; it should include recommended actions for all SLCP sectors.

IV.B.2. Recommended Actions to Reduce Wildfire Risk and Black Carbon Emissions (pp. 53): the Proposed Strategy states that the current level of fuel reduction activity is insufficient to improve forest health, avoid catastrophic wildfire and reduce black carbon emissions (p. 50). We and our constituents live in the communities that are going to be directly affected by the increase in wildfire activity and emissions. The State needs to address this issue by including targets and recommendations for reducing forest-related black carbon. Since one concern about targets is the inability to predict annual fire activity, consider moving to a cumulative multi-year framework for measuring results in the forest sector.

VIII.A. Economic Assessment of Measures in the Proposed Strategy (pp. 100-102): while this section acknowledges that most forest management planning is happening outside of the scope of this strategy, we believe it is problematic to consider forest management activities in isolation of this strategy. The goals set forth in this strategy have the potential to become an important part of California’s economy, and they should be duly addressed.

VIII.B. Public Health Assessment (pp. 121-125): we believe that the Air Resources Board should work to quantify public health benefits of reducing short-lived climate pollutants, especially in terms of the monetary cost to society. The availability of this information could greatly inform the costs and benefits of projects across the state, and increase the likelihood of funding to make projects that reduce short-lived climate pollutants and other GHGs possible.

We appreciate the opportunity to comment on this strategy and look forward to working toward healthier forests and reducing wildfire emissions in the Sierra Nevada region. We thank you for your important work on this strategy and look forward to continued engagement as the process unfolds.

All best,



Sincerely,



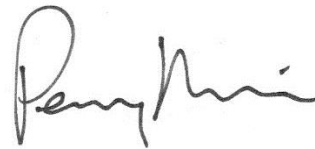
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