



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 Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP). Sierra CAMP is a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region, from the Oregon border in the north to the Tehachapis in the south. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor's Office of Planning and Research, and is hosted as a project of the Sierra Business Council.

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, Sierra CAMP offers the following 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, calls for ARB to "coordinate with other state agencies and districts to develop measures identified as part of the *comprehensive* [emphasis added] strategy." [§39730(a)(5)]. Nowhere does SB 605 suggest that only anthropogenic sources should be addressed. 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.

This document is intended to be the overarching, "comprehensive" document that incorporates strategies for reducing SLCP across all sectors; therefore, we strongly urge the Air Resources Board to work with state and federal agencies, fire districts, local fire

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safe councils and others to cooperatively develop and include measurements, targets and strategies for protecting carbon stored in our forests and reducing black carbon emissions from wildfire as part of this comprehensive planning effort. The recommendations around wildfire emission reductions from this report could then be factored into other forest/carbon planning efforts, such as the FCAT Forest Carbon Plan.

Taking action now to identify and recommend ways to reduce large, damaging wildfires will provide rural forested communities with many benefits, including climate, health and economic. While the Proposed Strategy acknowledges these benefits, it lacks a baseline and targets for achieving those benefits.

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 current strategy prioritizes organic waste diversion from agriculture and dairy operations, but ignores other forms of waste diversion like 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): this section should include recommendations related to sustainable use of forest biomass to produce electricity. Recommendations regarding other forms of biomass utilization or energy production are included, such as overcoming barriers to pipeline injection of biogas, or the need to build market certainty and encourage financing for compost and other soil amendments, or even a new feed-in tariff for natural gas. Similar possibilities exist for forest biomass. 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 SLCs (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. Many of the anthropogenic “miscellaneous activities” that can cause black carbon emissions – including unplanned structure and car fires, and open burning – are similar to forest-related occurrences, such as unplanned rural wildfires and open pile burning of waste material resulting from fuel treatment activities. We have less ability to predict unplanned structure or car fires than we might forest-related occurrences (using wildfire risk assessments and other data); yet forest-related black carbon is not included in this Proposed Strategy. SB 605 is silent on anthropogenic versus other forms of black carbon. As a result, we believe the strategy

document should be amended to include targets for forest-related activities and recommended emission reduction actions.

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 this is a mistake. We know that severe wildfires are increasing in size and frequency, and that there are actions that can be taken to reduce wildfire risk and use of open pile burning that will have substantial emission reduction benefits and important co-benefits to forest health, public health and rural economic sustainability. Specific recommendations should be included for this sector, such as incentivizing sustainable biomass energy production. This will also help to achieve important state goals around increased biomass utilization (per SB 1122, the state's Bioenergy Action Plan, and Governor Brown's Executive Orders) as well as supporting healthy restoration economies in rural forested communities in the Sierra and elsewhere across the state. We can't keep putting off this important issue – first to the Forest Carbon Plan to set priorities and then to some future iteration of the 2030 Scoping Plan. 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): we believe that this strategy should include an inventory and provide benchmarks for tracking results of different actions that are necessary to reduce black carbon emissions from wildfire, such as increased MW of electricity produced from forest biomass, the number of forested acres treated or jobs created. In addition, the Proposed Strategy should identify and include recommendations for specific actions to address impediments to forest-related activities that can reduce black carbon. The report itself 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). This section lacks the targets that are present in other parts of the strategy, lessening the utility of these suggestions as a means of achieving measurable black carbon reductions. Consider adopting a multi-year framework of targets to allow cumulative results to be measured over time instead of year-by-year. In addition, we expected that this report would include proposed strategies for how to measure forest-related emission reduction benefits and co-benefits. Instead, it simply repeats the need to develop such accounting methodologies. We will not be able to get past this issue of how to prove benefit until we have an accepted methodology in place. This Proposed Strategy should outline a process and parameters for developing such an accounting framework, including a deadline for when that framework must be in place.

VIII.A. Economic Assessment of Measures in the Proposed Strategy (pp. 100-102): while this section acknowledges that most forest management planning is

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happening outside of the scope of this strategy, we believe that 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 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.

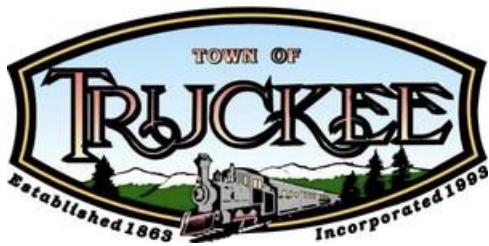
We appreciate the opportunity to comment on this strategy and look forward to working toward healthier forests and reducing wildfire emissions in the Sierra Nevada region. We thank you for your important work on this issue and look forward to continued engagement as the process unfolds.

All best,



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SIERRA NEVADA ALLIANCE



SOUTHERN SIERRA PARTNERSHIP



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