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August 5, 2013

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

Dear Chair Nichols:

**RE: COMMENTS ON 2013 UPDATE TO AB 32 SCOPING PLAN**

Thank you for the opportunity to comment on the 2013 Update to the AB 32 Scoping Plan. This update provides an opportunity to emphasize forest restoration and biomass utilization as important tools to help California achieve Greenhouse Gas (GHG) emission reduction goals while creating multiple benefits for rural economies, public health and natural resource protection.

The Sierra Nevada Conservancy (SNC) is a California state agency within the Natural Resources Agency. The SNC Region constitutes about 25 percent of California's land area, much of which is forested lands. As mentioned in the comments we provided on the *Draft Cap-and-Trade Auction Proceeds Investment Plan* earlier this year, these forests store approximately 420 million tons of carbon<sup>1</sup>. Through forest restoration and efficient use of woody biomass, Sierra Nevada forests can play an even greater role storing larger amounts of carbon thereby helping to achieve 2050 GHG emissions reduction goals.

Forest restoration is essential if we are to maintain the incredible amount of carbon stored in our forests. A critical aspect is conducting the kind of restoration efforts, at the appropriate pace and scale, needed to reduce the risk and consequence of large intense wild fires that emit substantial amounts of GHG. The utilization of forest biomass generated as a result of sustainable restoration efforts, including the production of renewable energy, contribute to our state's efforts under AB 32 in a couple of ways: 1) it keeps that waste from being disposed of by open pile burning or decaying, and 2) the value generated through viable forest biomass markets helps increase the pace and scale of restoration efforts. In addition, the use of

<sup>1</sup> It is estimated that the total above-ground biomass accumulation of productive forests in the Sierra Nevada is almost 840 million tons. Current estimates of forest biomass are based on the weight of above ground living tree matter (minus the half that is water) calculated by using forest inventory data. Stored carbon is then estimated by halving the amount of biomass per unit area, and is usually expressed in short tons per acre.



Ms. Mary Nichols, Chair  
August 5, 2013  
Page 2 of 2

biomass for energy displaces the burning of fossil fuels while providing a reliable power supply and creating co-benefits for rural economies, public health and natural resource protection.

The 2008 Scoping Plan acknowledges the important role of terrestrial sequestration in our forests and other land resources. The 2013 Update identifies six sectors – Energy, Transportation, Agriculture, Water, Waste and Natural Working Lands – as key elements of the post 2020 strategy. Biomass utilization clearly achieves three of the six 2050 vision goals identified for the Energy sector: low carbon generation, sustainable bioenergy systems and localized renewable generation. And, forest restoration is a clear path to realizing the Natural and Working Lands 2050 vision: reduce Greenhouse Gas (GHG) emissions, and maintain and enhance the capacity of natural and working lands to sequester and store carbon. To make these 2050 visions a reality, it is crucial that the Air Resources Board preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.

The SNC recommends that the Air Resources Board's revised Scoping Plan continue to make forest restoration a priority and to further emphasize the positive role biomass utilization will have. These programs will be critical components of the state's ability to meet its short-and long-term AB 32 goals, and we welcome the opportunity to help craft solutions and implement the programs necessary to achieve these goals.

Thank you, again, for the opportunity to provide this input on the 2013 Scoping Plan Update. We look forward to seeing the first draft later this summer.

Sincerely,



Jim Branham  
Executive Officer



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