



January 17, 2017

Mary Nichols, chair
California Air Resources Board
1001 I Street Sacramento, CA 95812

RE: Revised Proposed Short-Lived Climate Pollutant Reduction Strategy (submitted electronically via **2016slcp** comment log)

Dear Chair Nichols and members of the Air Resources Board,

Sierra Business Council (SBC) is a non-profit network of more than 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada.

We appreciate the tremendous amount of work that has gone into the development of this *Revised Proposed Short-Lived Climate Pollutant Reduction Strategy* (November 2016). We are disappointed, however, that the revised strategy misuses SB 1383 as justification to continue ignoring the single largest contributor of black carbon – wildfire emissions.

SB 605, the underlying legislation requiring the development of this plan, calls for a complete inventory of short-lived climate pollutant sources and identification of existing and potential new control measures – especially those that offer public health and economic co-benefits. The bill does not distinguish between human-caused (aka “anthropogenic”) versus any other source.

The follow-up bill, SB 1383, offers a distinction as it relates to black carbon; but (a) we don’t believe that distinction is valid (please see next paragraph), and (b) such a distinction does not preclude the Air Resources Board from going beyond the minimum SB 1383 requirements to more fully address all black carbon components – including forest health and wildfire – as originally contemplated by SB 605. This is especially critical in response to the Governor’s emergency declarations around tree mortality and drought and the need to address the unhealthy condition of many of California’s forests that lead to larger, more intense and destructive wildfires. Forest management, including prescribed burning, can decrease fuel loads and improve overall forest health, thereby providing net benefit by reducing emissions from uncharacteristically large, long-lasting and severe fires.

Regarding point (a) above, 95% of wildfires are human-caused, according to CalFIRE, and the interventions to reduce the risk of large, damaging wildfires are human actions whose benefits can be modeled. Therefore, the SLCP strategy should categorize unplanned wildfire as an anthropogenic source, just as it does “unplanned structure fires.”

Whether or not wildfire is categorized as anthropogenic, we once again strongly urge the Board to include black carbon targets for wildfire in this proposed strategy. While SB 1383 may focus

on anthropogenic black carbon, nowhere does it preclude addressing wildfire. In addition, the proposed strategy's Executive Summary indicates that the SLCP strategy is intended to "inform and be integrated into the upcoming 2030 Target Scoping Plan Update." As such, the SLCP strategy itself should address the full range of sources.

We can be proud that California has cut anthropogenic sources of black carbon 90% since 1960; but that's only addressing one-third of the overall black carbon emissions in the state. The longer we put off setting targets, identifying control measures and funding actions to address the other two-thirds, the more damage will be done by extreme wildfire and the more time it will take to achieve the state's overall GHG and SLCP reduction goals. California can't afford to continue ignoring the risks and missing opportunities to improve natural resource, economic and public health for all Californians.

All best,

A handwritten signature in black ink that reads "Kerri J. Timmer". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Kerri Timmer
Government Affairs Director