SIERRA PACIFIC INDUSTRIES

Forestry Division • P.O. Box 496014 • Redding, California 96049-6014
Phone (530) 378-8000 • FAX (530) 378-8139

January 5, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Modeling Scenarios for NWL- Proposed 2030 Target Scoping Plan

Dear Chair Randolph and Board Members:

Sierra Pacific Industries (SPI) is a family owned vertically integrated timber products company. In California SPI owns approximately 1.8 million acres of forest, operates 10 sawmills and five cogeneration power plants, along with other manufacturing facilities. The company is among the largest lumber producers in the United States, producing everything from timbers and framing lumber to fencing and specialty products. SPI employs about 3,500 people in California.

Sierra Pacific Industries request that the California Air Resources Board staff integrate a life cycle assessment of the different disposal and/or utilization pathways for excess wood biomass required to make California's forests fire resistant and climate resilient. These life cycle assessments must also account for the anticipated wildfire emissions (avoided and incurred) that result from these forest management actions. A good example of the kind of appropriate modeling Sierra Pacific Industries suggests is provided in Cabiyo et al. 2021, Innovative wood use can enable carbon-beneficial forest management in California, PNAS, https://doi.org/10.1073/pnas.2019073118.

The Forest Carbon Action Plan was written by members of 14 different state agencies, 3 federal agencies, and 2 county organizations. A recommendation central to the Forest Carbon Action Plan is the urgent need to create healthier forests that are drought and fire-resistant by removing the excess biomass from California Forests. The goal for these interventions is to reduce tree mortality, ensure adequate sequestration is occurring and to curb the black carbon and other negative emission impacts caused by wildfires. California is spending hundreds of millions of dollars on forest health and fire resiliency projects to achieve this recommendation (Forest Climate Action Team. 2018, pg 143).

The forest interventions that will reduce excess forest biomass can be accomplished using three methods, prescribed fire, mechanical treatments, a combination mechanical and prescribed fire and managed wildfire (currently being referred to as "prescribed natural fire". There are substantial climate and health implications for emphasizing one forestry practice as compared

to another (Buchholz et al. - 2022 - Probability-based accounting for carbon in forests, https://doi.org/10.1007/s11027-021-09983-0; Matz et al 2020_Health impact analysis PM2-5 Smoke Canada, https://doi.org/10.1016/j.scitotenv.2020.138506), Morris 2000 Biomass Energy Production in California: The Case for a Biomass Policy Initiative https://www.nrel.gov/docs/fy01osti/28805.pdf). It is important for California Air Resources Board members to understand how the utilization of wood waste from forest treatments can not only grow the California bioeconomy but also have substantial climate and health benefits if policies are put in place to expand the innovative use of biomass from forest health and fire resiliency projects that are being planned for by the California Natural Resource Agency, CAL FIRE and the USFS.

The state and federal government have a goal of treating 1,000,000 acres of forest annually in order to implement the California Forest Carbon Plan and the California Wildfire and Forest Resilience Action Plan. The primary product of most forest health and wildfire resiliency projects is low-grade wood waste. This amount of activity will conservatively generate approximately 15,000,000 bone dry tons. This woody material can either be burned or find another fate. In order for decision makers to understand what the emission implications are for disposing of this quantity of wood through the alternative methods available or potentially available, CARB staff needs to provide the comparison of emissions between those disposal pathways. Without that analysis the dialog around which management practices to emphasize and what kind of policy can positively influence those outcomes, the discussion will not be fully informed and won't allow the range of alternatives necessary to create good policy.

Cabiyo et al. 2021, *Innovative wood use can enable carbon-beneficial forest management in California*, demonstrates a strong scientific case for incentivizing the disposal of forest biomass in innovative ways that minimizes open burning, aligns the forest management activities with "less intensive" forest management preferred by the California Air Resources Board, and results in substantial reductions in CO2e emissions. The challenge for the California Air Resources Board will be aligning its policies with the California Natural Resources Agency in ways that leverage the energy our forests capture every day in woody biomass and create policies that allow that energy to support the California economy and our climate goals.

Sierra Pacific Industries request that the California Air Resources Board staff integrate a life cycle assessment of the different disposal and/or utilization pathways for excess wood biomass required to make California's forests fire resistant and climate resilient. These life cycle assessments must also account for the anticipated wildfire emissions (avoided and incurred) that result from these forest management actions.

Sincerely,

Cedric Twight, RPF #2469
California Regulatory Affairs Manager
Sierra Pacific Industries