



September 3, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on the California Air Resources Board (CARB) 2022 Scoping Plan Update - Scenario Concepts Technical Workshop

To Whom It May Concern:

The Placer County Air Pollution Control District (District) appreciates the opportunity to comment on the Scoping Plan workshop.

The District (as well as most other air districts) has an exhaustive and comprehensive on-going program to develop and maintain a criteria air pollutant inventory, conduct modeling to evaluate strategies for achieving and/or maintaining compliance with ambient air quality standards, and make ambient air measurements at various location throughout our county. We are concerned about potential inconsistencies and conflicts between our work and that proposed by E3 and UC Irvine. This includes concerns that their modeling: (1) may not accurately consider non-combustion sources of volatile organic compounds, (2) may only consider generalized “sector” emissions and not consider individual facility location specific emissions, (3) may not properly consider the temporal impacts of PM and ground level ozone (e.g., summer vs. winter), and (4) includes health assessments that don’t adequately consider the Federal and State National Ambient Air Quality Standards.

Secondly, we do not understand how the Scoping Plan is addressing the critically important management of natural working lands, and the associated role and use of biomass wastes. The plan must include an accounting of the impact of wildfires, prescribed burns, and open pile burning on greenhouse gases (GHGs), including black carbon, as well as criteria and toxic air pollutants. It must include development of tools for evaluating the potential benefits of forest fuels treatments and use of biomass wastes for energy (including electricity, heat, or intermediate liquid or gaseous fuels).

We are particularly concerned about CARB’s reliance on the “RHESSys” model for forest lands. The RHESSys model is advertised as not being capable of evaluating specific on-the-ground silvicultural management alternatives and not accounting for land type conversion – both critically important for evaluating forest land management options. RHESSys must be confirmed to provide accurate and representative results consistent with actual field measurements. We are not able to understand how RHESSys works – particularly, the details of assumptions, inputs, and modeling procedures must be clearly specified, described, proof-tested/confirmed, and calibrated.

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Thank you for the opportunity to comment on your Scoping Plan Scenario Concepts. We look forward to working with you as the Scoping Plan progresses. If you have any questions, please feel free to contact me at (530) 745-2330, or by email at ecwhite@placer.ca.gov.

Sincerely,

Erik C. White
Air Pollution Control Officer