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Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

26 May 2016

Re: Proposed Short-lived Climate Pollutant Strategy and Draft Environmental Analysis

Dear Air Resources Board members,

Thank you for this opportunity to comment on the proposed Short-lived Climate Pollutant Strategy (SLCP strategy) and Draft Environmental Analysis (Draft EA) following the public workshop in Sacramento on April 26th, 2016. While there are many good aspects of this proposed strategy, it does not make clear the essential role of natural fire. As such, we have the following recommendations:

1. Incorporate natural fire as a core strategy in the black carbon section – recognizing the essential ecological role that fire plays in forested landscapes.
2. Use a historical baseline for forest-based black carbon emissions instead of the arbitrary 2001-2011 threshold which will exacerbate the existing fire deficit.
3. Acknowledge that the existing forest conditions have been shaped by human development and fragmentation.

A recommendation for restoring natural fire ought to be a core element of the proposed SLCP strategy and the Draft EA. There is strong scientific consensus that California forests need more fire, not less.[1] Restoring natural fire regimes to the landscape, with more frequent, low-intensity fires, will help create more resilient forests.[2] A clear acknowledgement of the benefits of natural fire regimes is needed to avoid the impression that all fire suppression is beneficial, when indeed it has contributed to the unnaturally dense and vulnerable forests we are faced with today. Without this recommendation for natural fire, the SLCP strategy is in danger of doing more harm than good for our forests.

There is not a "no fire" alternative for our forest landscape, so our policies need to encourage mixed severity fires at a natural return interval in appropriate areas. Historically, fire was more widespread on the California landscape.[3,4] However, the

[1] Calkin, D.E., Gebert, K.M., Jones, J.G., Neilson, R.P., 2005. Forest Service large fire area burned and suppression expenditure trends, 1970–2002. Journal of Forestry 103, 179–183.
[2] Earles, J.M., North, M.P., Hurteau, M.D., 2014. Wildfire and drought dynamics destabilize carbon stores of fire-suppressed forests. Ecological Applications 24, 732–740. doi:10.1890/13-1860.1
[3] Stephens, S.L., Martin, R.E., Clinton, N.E., 2007. Prehistoric fire area and emissions from California's forests, woodlands, shrublands, and grasslands. Forest Ecology and Management 251, 205–216. doi:10.1016/j.foreco.2007.06.005

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policies of fire suppression have created a substantial "fire deficit" where the fire activity is far below what would be expected under current climatic conditions.[5]

The baseline chosen to measure progress on black carbon emissions from forests should take into account a historical perspective, by considering a historic average instead of the more recent, yet arbitrary 2001-2011 timeframe proposed in the SLCP strategy. Taking this historical perspective recognizes that more fire may be necessary in the short-term to achieve ecologically appropriate fire regimes. Choosing an appropriate baseline is one step that will avoid creating unnecessary impediments to both prescribed and natural fire which help restore ecological function and resilience.

While a baseline can be used to measure progress, we are not suggesting that a specific target be set in the SLCP strategy for forest sources of black carbon. Rather, we support the decision to leave the setting of forest targets, if any need be established, to the Forest Carbon Plan and the Scoping Plan which can take a more integrated perspective on forest management.

The current challenges of managing fire in forested landscapes have been shaped by historical forest management decisions. The Draft EA begins to describe some of the past management activities, such as fire suppression, that have shaped the forest landscape (page 85). However, the Draft EA fails to acknowledge the central role that fragmentation and development have played. Fragmentation increases fire ignition sites and the challenges for restoring natural fire regimes. As human development increasingly expands into forested areas, there is more pressure for fire suppression and fewer opportunities to restore natural fire patterns.

We appreciate your consideration of our recommendations to include natural fire regimes and historical baselines in the SLCP strategy for black carbon and look forward to continuing to work with you on the state's many climate-related plans.

Sincerely,

Paul Mason
V.P. Policy and Incentives

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[4] Van de Water, K.M., Safford, H.D., 2011. A summary of fire frequency estimates for California vegetation before Euro-American settlement. Fire Ecology 7, 26–58. doi:10.4996/fireecology.0703026

[5] Marlon, J.R., Bartlein, P.J., Gavin, D.G., Long, C.J., Anderson, R.S., Briles, C.E., Brown, K.J., Colombaroli, D., Hallett, D.J., Power, M.J., Scharf, E.A., Walsh, M.K., 2012. Long-term perspective on wildfires in the western USA. PNAS 109, E535–E543. doi:10.1073/pnas.1112839109

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