



July 9, 2021

Lianne Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the 2022 Scoping Plan Update June 2021 Workshops

Dear Chair Randolph,

Sierra Business Council (SBC) thanks you for the opportunity to comment on the 2022 Scoping Plan Update following the public workshops held in June 2021. A non-profit organization focused on strengthening the environmental, economic, and community resilience of the Sierra Nevada region, SBC strongly supports the state's climate actions, and in particular, the prioritization of natural and working lands (NWL) as a vital strategy to achieve the state's goal of carbon neutrality by 2045. As ARB proceeds with the Scoping Plan Update, we strongly urge you to 1) adopt a carbon budgeting approach that strategically accounts for and manages the state's carbon sources and sinks; and 2) account for wildfire emissions that are both directly and indirectly anthropogenic, per SB 1383.

Carbon Accounting

In order to meet the 2045 carbon neutrality goal, we urge ARB to adopt a carbon budgeting approach that strategically accounts for greenhouse gas (GHG) emissions, carbon stocks, and fluxes in those stocks. By setting carbon budgets for each sector, and then identifying and implementing strategies to reduce emissions and increase carbon storage in accordance with those budgets, ARB can ensure that the state makes the process necessary to achieve its critical climate goals.

Carbon budgeting is particularly important in the realm of NWL. How we manage, restore, and conserve NWL across our state can determine whether NWL serve as a carbon sink or carbon source. The state's living forest biomass is its greatest land-based carbon sink and one of the richest in the country.¹ Across all NWL in California, appropriate management, restoration, and conservation of NWL have the potential to reduce over 500 MMT of CO₂e by 2050.² Despite this potential, the state's Forest Carbon Plan warns that we are at risk of our forests becoming a net

¹ Forest Atlas of the United States. United States Department of Agriculture Forest Service. <https://forest-atlas.fs.fed.us/benefits-carbon-stocks.html>

² Chamberlin, S. J., Passero, M., Conrad-Saydah, S., Biswas, T., Stanley, C. K. Nature-based Climate Solutions: A Roadmap to Accelerate Action in California. 2020. https://www.nature.org/content/dam/tnc/nature/en/documents/TNC_Pathways12-4.pdf



carbon source.³ Reducing emissions in other sectors will not help us achieve carbon neutrality by 2045 if, in the same period of time, we also lose one of our most important carbon stocks. Given this risk and the pace at which we need to reduce emissions, California should pursue the most ambitious scenario to maximize the carbon storage benefits of NWL.

Anthropogenic Wildfire Emissions

SBC also urges ARB to include anthropogenic wildfire emissions in the 2022 Scoping Plan. SB 1383 requires a 50 percent reduction in anthropogenic black carbon, which is any human caused source of black carbon emissions.⁴ For fires determined by CalFire to have been caused by power lines, motor vehicles, or other human causes, ARB must include those emissions in its plan to meet the anthropogenic black carbon reduction requirement of SB 1383.

In addition, we urge ARB to account for the anthropogenic origin of emissions from wildfires associated with climate change. Research indicates that across the Western US, climate change contributed to an additional 4.2 million hectares of forest fire from 1984-2015.⁵ Even accounting for natural (non-anthropogenic) climate variability, this represents almost a two-fold increase in the amount of fire that we would have witnessed without anthropogenic climate change.⁶ ARB's own research indicates that climate change is increasing the frequency and severity of wildfires in California.⁷ It follows that the emissions from these wildfires were also more likely. Climate science is inherently probabilistic. While this makes wildfire emissions associated with climate change more difficult to quantify, it does not change the fact that these emissions have been increased by anthropogenic climate change, nor does it change their deleterious impact on our communities, economies, health, and environment. Accordingly, all wildfire emissions beyond what we might expect absent anthropogenic climate change must be classified and treated as human-caused, beginning with the 2022 Scoping Plan.

Thank you for your attention to these important issues as ARB works to achieve the State's 2045 carbon neutrality goal. We look forward to discussing these recommendations and continuing to engage with you throughout the Scoping Plan update process.

Sincerely,

A handwritten signature in black ink that reads "Steven R. Frisch". The signature is written in a cursive, flowing style.

Steven Frisch
President, Sierra Business Council

³ California Forest Carbon Plan: Managing Our Landscapes in a Changing Climate. Forest Climate Action Team. 2018. <https://resources.ca.gov/CNRALegacyFiles/wp-content/uploads/2018/05/California-Forest-Carbon-Plan-Final-Draft-for-Public-Release-May-2018.pdf>

⁴ Health and Safety Code section 39730.5.

⁵ Abatzoglou, J. T., Park Williams, A. Impact of anthropogenic climate change on wildfire across western US forests. Proceedings of the National Academy of Sciences Oct 2016, 113 (42) 11770-11775. DOI: 10.1073/pnas.1607171113 <https://www.pnas.org/content/113/42/11770.full>

⁶ Ibid.

⁷ Wildfires & Climate Change. California Air Resources Board. <https://ww2.arb.ca.gov/wildfires-climate-change>