

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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December 10, 2008

Mary D. Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Chairman Nichols,

The Department of Forestry and Fire Protection (CAL FIRE) appreciates the efforts of the Air Resources Board (ARB) to include the forest sector in the Draft Scoping Plan for AB 32, the California Global Warming Solutions Act. Forests play an important role in reducing greenhouse gases (GHG) in California, and CAL FIRE is committed to working closely with ARB, the Board of Forestry and Fire Protection and stakeholders to implement the 5 million metric ton Sustainable Forests target contained in the Plan.

To ensure the success of the Forest Sector measure, we recommend that ARB pursue the following actions identified in or potentially covered by the plan.

- 1) Allocate revenues from program implementation to climate change adaptation programs. We appreciate the revision of the previous Scoping Plan draft to include the potential use of revenues and allowances from actions such as cap and trade auctions and public goods charges for this purpose. "Adaptation" refers to actions that avoid or reduce adverse impacts from the inevitable effects of climate changes that have already been set in motion, and that increase the resilience of natural and human systems to withstand additional climate change impacts.

In the forest sector, adaptation is closely linked to mitigation potential. For example, all climate change scenario models predict longer and hotter dry periods that can lead to increased wildfire, disease, and insect infestation. This could reduce the rate of carbon dioxide sequestration and the total amount of carbon stored on forest lands. Thus, adaptation actions to reduce fire hazard can mitigate (reduce or avoid) GHG emissions. Actions to adapt management strategies, genetic diversity, and regeneration practices to climate change can reduce the climate change stress on forest stands thus protecting the health of forests so they can continue to provide net sequestration GHG benefits. Investments in adaptation planning and management now will reduce emissions in the future.

- 2) Provide funding for greenhouse gas programs outside ARB. The potential use of revenues and allowances for program administration, identified in the current draft, should include resources (staff, funding or in-kind assistance) for other agencies that are contributing to the achievement of the 169 million metric ton (MMT) target. Ensuring achievement of the 5 MMT Sustainable Forest target will require improvement of forest inventories and the state's GHG inventory. Actions to further reduce GHG benefits over the target will require program support and landowner assistance for reforestation, timberland conservation, forest management, urban tree planting, and fuels reduction and biomass utilization for energy. Additional resources for technical guidance, projects and monitoring will be needed to implement and administer a comprehensive program of forestry activities to reduce GHG emissions.
  
- 3) The Renewable Portfolio Standard measure should provide incentives for forest landowners and the biomass industry to utilize forestry wood waste for bioenergy. The Governors Executive Order S-06-06 sets a target of having 20% of the states electricity and biofuels produced from renewable energy sources by 2010. Biomass is, at a minimum, to provide sufficient supply to meet 20% of that target. Recently the biofuels target has been raised to 30% of the overall transportation fuel supply by 2010.

The potential of forest biomass to assist in meeting the renewable energy target is provided in the recently released California Biomass Collaborative publication titled "An Assessment of Biomass Resources in California, 2007". According to this report, forestry provides approximately 40 percent of the technically available biomass in California.

Decades of successful fire suppression have increased the density of forest trees, brush and small woody biomass, resulting in significant fire hazards in many places. Removing brush and small woody materials can reduce the wildfire risk and risk of insect infestations resulting in GHG emissions.

The market value derived through the utilization of woody biomass for bioenergy, including electricity, combined heat and power and biofuels, can help fund fuel reduction activities. This will be an important element to finance the fuel hazard reduction treatments on the level required to reduce wildfire and insect infestation risks.

These activities will thus produce GHG benefits by offsetting fossil fuel reduction and by mitigating wildfire emissions. They will also contribute to adaptation management by increasing the resilience of forests to climate change so that they can continue to provide net sequestration benefits into the future.

Thank you for the opportunity to comment on the Scoping Plan.

Sincerely,



CRAWFORD TUTTLE  
Chief Deputy Director