

California Air Resources Board - Climate Change Draft Scoping Plan Comments on June 2008 Discussion Draft

Section II.B.7 – Sustainable Forests

In the same manner that the Energy Efficiency section discusses the health benefits of green buildings, the section addressing Sustainable Forests should acknowledge the public health impacts of increasing forest fires and the increasing duration of unhealthy air days.

The Scoping Plan should accelerate the early development and certification of additional forestry protocol measures for active forest management. There are significant opportunities for the conservation of large and old carbon-reserve conifers and hardwoods, aggressive reduction of ladder fuels, and the achievement of attendant regional water and air co-benefits across federal, state, and private forest ownerships. Even though technology-based greenhouse gas (GHG) reductions are being prioritized in the near term, the Scoping Plan should also support further implementation of protocols for the forestry sector that will promote voluntary, market-based carbon sequestration to take full advantage of the opportunities in this sector.

Considering the ever-increasing wildfire trend of the past decade, delaying investment in carbon sequestration in the forestry sector has the potential to create far more GHG emissions than the draft Scoping Plan currently recognizes. The draft estimates that California's forests will convert from a net carbon sink in 1990 to being carbon-neutral by 2020. Without early and aggressive actions to reduce the trajectory of wildfire intensity and acreage, these carbon-neutral "business as usual" baseline estimates may be far too low.

Section III.C.6. – Public Health Analyses

In addition to evaluating the public health benefits of reductions in fossil fuel use and improvements in combustion efficiencies, there should be an analysis of the public health benefits of improving air quality by reducing catastrophic wildfires through sustainable forestry practices and the promotion of biomass energy from forest fuels. For the residents of the Sierra Nevada and Sacramento Valley, the summer of 2008 has already provided a bleak view of future air quality under an ever-increasing wildfire regime. The Scoping Plan should fully acknowledge the important relationship between forest fires, air quality, and public health.