



March 17, 2017

California Department of Forestry and Fire Prevention (CAL FIRE)
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Sacramento, CA 95814

California Natural Resources Agency
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Sacramento, CA 95814

California Environmental Protection Agency
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RE: Draft Forest Carbon Plan Comments

Dear Forest Carbon Plan Authors,

The Placer County Air Pollution Control District (District) is pleased to comment on the draft Forest Carbon Plan (FCP). The District is the local agency in Placer County that is charged with attaining and maintaining ambient air quality standards and works closely with many state agencies on implementing the State's broad climate goals. This is especially true as they relate to greenhouse gas (GHG) and short lived climate pollutant emissions from natural working lands, as Placer County is home to over 550,000 acres of public and private forests.

The District supports the FCP finding that "forests are unhealthy, with unnaturally dense stands that lack resilience, making them more susceptible to drought, disease, insect pests, and uncharacteristically large, severe wildfires." This is clearly applicable to our Sierra Nevada forests which have recently experienced high tree mortality and catastrophic wildfires. We also support the FCP follow-on finding that "current rates of fuel reduction, thinning of overly dense forests, and use of prescribed and managed fire are far below levels needed to restore forest health, prevent extreme fires, and meet the state's GHG reduction targets."

However, the FCP is too general to be effective and is missing an important opportunity. The FCP needs to make it clear that necessary increase in pace and scale of fuel reduction treatment is being held back by: (1) the economic cost to do the treatment work, which is most often greater than tangible values from the treatment, (2) uncertainty in GHG benefits of treatments, and (3) lack of consensus on the appropriate fuel reduction treatment details, including opposition to treatments from stakeholders that do not want any type of fuels reductions. To help address these road blocks, we request the FCP acknowledge and endorse the following:

Forest fuel reduction treatment GHG quantification procedure

The District is coordinating the development of a novel GHG quantification procedure (protocol) for forest fuel reduction treatments. The protocol comprehensively considers the beneficial fuel reduction treatment impact on reducing wildfire size and severity, stimulating forest growth, and producing wood products and energy that sequesters carbon and displaces fossil fuels. The development team includes a diverse group of forest scientists, private and public land managers, policy makers, and conservation groups. The project is being sponsored by the US Forest Service, CAL FIRE, Sacramento Municipal Utility District (SMUD), Sierra Pacific Industries (SPI), and the District. The protocol is a vital tool to quantify the GHG benefits derived from state funded fuel reduction treatment projects (from both Greenhouse Gas Reduction Funds and the carbon offset market). This tool could identify and differentiate those fuel reduction treatments which produce GHG benefits. GHG impacts are highly case specific and sensitive to various factors, including on-the-ground tree species, age, diameter, density, fire return interval, and atmospheric conditions. The protocol will be submitted to a GHG offset registry for adoption later this spring or summer.

Fuel treatments produce ecologically sound landscapes

There is strong consensus from forest managers and scientists on the ecologically sound restoration procedures—including fuel reduction treatments of mechanical thinning and prescribed burning—needed to return our forested landscapes to a condition that is stable and resilient to disturbance. Restoration objectives for mixed conifer forests ecosystems of the California Sierra Nevada are provided in greater detail by Long et al. (2014), North et al. (2012), and North (2009). Restoration treatment selection must not be guided solely by potential GHG benefits, or lack thereof, or any other tangible or intangible benefits such as water quantity or quality, wood products, or recreation; but in fact must recognize the synergistic and cumulative impacts of all of these. Where applicable, these co-benefits should be recognized, but no single interest should drive the planning process. Restoration treatment work must not be prevented by well-meaning stakeholders that ignore the overwhelming body of science that supports sound forest treatment strategies, but rather categorically object to any forest fuel reduction activities.

Reintroduction of fire

Fire has been excluded from the Sierra Nevada forested landscape and must appropriately be reintroduced with care. In many cases, current fuel loadings are too high to properly apply fire treatment due to the potential for high fire severity and fire escape. In such cases, mechanical thinning will be necessary prior to prescribed fire.

Alternatives to open pile burning must be supported

An increase in prescribed burning will put a burden on regional air quality. It will be important to reduce open pile burning of non-merchantable thinning residues. Economically viable alternatives such as bioenergy, biofuels, biochar, and compost must be supported. Permits for prescribed fire activities could require commitments by applicants to avoid open pile burning,

and incentives could be developed to motivate land owners to find alternative methods of disposal. The District supports the development of small scale strategically located forest biomass to energy facilities to process such residues and other wood waste.

Fuel reduction treatments are not being performed to supply bioenergy facilities with feedstock

As outlined in detail in Hansen (2016), live trees are never harvested for use as biomass energy feedstock. This understanding should be made very clearly within the FCP, perhaps in the last paragraph of Section 9.3.2, on Page 108. The economic value of whole live trees at the lumber mill far exceeds any potential value as an energy feedstock. The only material that potentially makes economic sense for use in energy production is the slash (tops, limbs, brush, and other non-merchantable materials) and mill wastes – and that is only if the economics do not work for higher value uses, such as fiber board or pulp and paper.

Quantification of Black Carbon from Wildfire

Black carbon from all sources has been recognized as a short-lived climate pollutant under Senate Bill (SB) 1383, and SB 605, which require the Air Resources Board (ARB) to 1) Complete an inventory of sources and emissions of short-lived climate pollutants in the state based on available data, 2) Identify research needs to address any data gaps, 3) Identify existing and potential new control measures to reduce emissions, 4) Prioritize the development of new measures for short-lived climate pollutants that offer co-benefits by improving water quality or reducing other air pollutants that impact community health and benefit disadvantaged communities, and 5) Coordinate with other state agencies and districts to develop measures identified as part of the comprehensive strategy.

Wildfire is the largest source of black carbon in California. Catastrophic, large scale fires put California's forest in jeopardy. This Plan confirms that beneficial fuel reduction treatments will reduce wildfire size and severity, stimulate forest growth, generate energy that displaces fossil fuels, and produce wood products that sequester carbon. The FCP needs to go further, however, in identifying more specific actions, data gaps and funding sources to help solve the significant climate change contribution of black carbon from wildfire.

Thank you for the opportunity to comment on this important plan. If you have any questions regarding these comments, please contact Mr. Bruce Springsteen of my staff at bsprings@placer.ca.gov, or by phone at (530) 745-2337.

Sincerely,



Erik C. White
Air Pollution Control Officer

References:

T. Hansen, Guest opinion: Biomass plants run on byproducts, not trees, Mail Tribune, Medford, Oregon, December 11, 2016.

J. Long, L. Quinn-Davidson, C. Skinner, eds. Science synthesis to support socioecological resilience in the Sierra Nevada and southern Cascade Range, Gen. Tech. Rep. PSW-GTR-247, Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station, 712 p. 2 vol., 2014.

M. North, Managing Sierra Nevada forests, Gen. Tech. Rep. PSW-GTR-237, Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station, 184 p., 2012.

M. North, P. Stine, K. O'Hara, W. Zielinski, and S. Stephens, An ecosystems management strategy for Sierra mixed-conifer forests, with addendum. Gen. Tech. Rep. PSW-GTR-220, Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station, 49 p., 2009.