
File Code: 3240
Date: September 2, 2021

Rajinder Sahota
Deputy Director for Climate Change
California Air Resource Board
1001 "I" Street
Sacramento, CA 95814

Dear Ms. Sahota,

Thank you for the opportunity to provide comments about different scenarios proposed by California Air Resource Board (CARB) staff to meet California climate goals (Technical Workshop, August 17, 2021).

We are facing another difficult fire season and air quality is on the minds of millions of people in California and across the nation. These fires have emitted millions of tons of carbon dioxide and particulate matter and will continue until what we hope is an early end to the fire season. These fires are also negatively affecting forested lands across the state, one of our most important carbon sinks. Unfortunately, given the latest climate science projections, high fire hazard conditions and more large, potentially catastrophic fires are expected in the future.

The State of California and U.S. Forest Service signed a Shared Stewardship Agreement in 2020 to work together to improve forest health and reduce hazardous fuels on 1 million acres of forest land per year. The goal is not only healthier forests, but also resilient forests that will resist and recover from wildfires and other disturbances. If we assume that 25% of the 1 million acres are treated mechanically, about 3 million dry tons of woody biomass per year will be burned in piles or left on site to decompose, unless there are economic markets for it. Open pile burning and on-site decomposition produce significant greenhouse gases compared to combustion or gasification of woody biomass.

We encourage CARB's consideration of policies and regulatory support that include "all available technologies" and markets that might be commercially viable to encourage both public and private investments. This includes retention of existing markets, such as biomass energy (e.g., BioRAM and BioMAT contract facilities), mulch/soil amendments, and others. Just as important, we should aggressively pursue additional new markets, such as cellulosic liquid and gaseous biofuels, biochar, cellulosic nano cellular crystals for cement, mass timber, and many others to absorb the volumes of forest management byproducts that are expected to be produced over the next several decades.

Through our USDA wood utilization program, we have granted partners more than \$70 million over the last 15 years to encourage use of forest biomass. We look forward to partnering with the



state for even more investments to retain and develop woody biomass markets. Please contact Larry Swan, Regional Biomass & Wood Utilization Program Leader, at 707-562-8917 or laurence.swan@usda.gov if any further details or information would be helpful.

Sincerely,

X 

Jody Holzworth (for:) Jennifer Eberlien

Signed by: Department of Agriculture
JENNIFER EBERLIEN
Regional Forester

cc: Chief Thom Porter, CAL FIRE, Katie Harrel, California Board of Forestry, Matt Baker, Deputy Secretary, California Natural Resources Agency (CNRA), Jessica Morse, Deputy Director, (CNRA,), Alice Reynolds, Senior Advisor, Governor's Office