



July 27, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: 2022 Scoping Plan Update – Natural and Working Lands

Dear California Air Resources Board,

During the July 20, 2021 workshop, CARB presenters asked for policy objectives to consider when updating the Scoping Plan as it relates to natural and working lands (NWL). On behalf of our businesses, Humboldt Redwood Company, Humboldt Sawmill Company, Mendocino Redwood Company, Mendocino Forest Products, and Allweather Wood, we are submitting policy objectives that will serve to reduce the state's carbon emissions. By way of introduction, our companies own 440,000 acres of forestland that are sustainably managed for forest products and are third party certified as operating sustainably. Allweather Wood ranks as the largest waterborne preservative treated lumber manufacturer in the western U.S.

The state's forests are one of greatest tools for sequestering carbon and they do it for free. However, we are losing tens of thousands, if not millions, of acres of forests each year due to wildfires. It is imperative we control this cycle of emissions from wildfires that exacerbate climate change which result in more emissions from wildfires. The excess fuel we find in the state's forests as a result of several decades of wildfire suppression is something we can control to reduce the impacts from wildfires. The state has a goal of treating 500,000 acres with the federal government treating an additional 500,000 acres. If acreage at this scale cannot be treated annually it is hard to imagine fire vulnerability will ever be reduced given the size of the state and the amount of forest and rangeland. Our first proposed policy objective is to attain this goal as the state is a long way from reaching it currently. Management strategies under this goal are:

- Put a person in charge of achieving this goal who prioritizes projects to save lives, property, and natural and working lands.
- Give this person CEQA exemption authority for 200,000 acres per year to be used on the highest priority fuel reduction projects, similar to the 35 projects given CEQA exemption authority by Gov. Newsom in 2019.
- Reduce the liability standard for prescribe burn projects to increase the number of acreages treated and maintained through such projects. Coupled with this strategy is a strategy to increase the number of allowable burn days that are currently limited by air quality management districts.

A second policy objective is tied to the goal of treating 1 million acres annually in the state. As the number of fuel reduction projects increase to meet this goal there will be a very significant source of woody material that currently is piled and burned, brought to a biomass facility, or left in the forest for fuel in the next wildfire. Piling and burning achieves the goal of reducing fuels but is counter to emission reduction efforts of the state. Recent research from the Placer County Air Quality Management District found significant reductions in emissions when forest fuels are brought to a biomass facility when compared to piling and burning (99% reduction in PM 2.5 and black carbon, 95 to 99% reduction in CO and VOCs, including methane, 40% to 70% reduction in NOx, and 30% reduction in CO2). Therefore, this proposed policy objective is to increase the use of biomass power across the state to reduce the emissions associated with fuel reduction projects. Management strategies under this goal are:

- Create a subsidy for transportation costs associated with getting the fuel to a biomass plant which currently does not pay its way to such a facility.
- Create long term fuel supply contracts to encourage investment in new facilities or to open mothballed facilities. There are roughly 12 mothballed facilities hooked up to the grid that could be operating with the right combination of subsidies and contracts.
- Long term power purchase agreements are needed, again to encourage investment.

Lastly, it was interesting to hear CARB staff describe the forests of the state as being so badly impacted by wildfire and other causes that they are now carbon emitters rather than carbon sinks. The Forest Inventory and Analysis National Program has 16,665 plots across the state of which 5,369 are currently forested. Each year, about 10 to 20% of these plots are revisited and measured by field crews. The data from this program shows the forests of the state are still clearly a carbon sink. CARB should rely on actual data instead of models when evaluating something as important as the ability of the state's 31.6 million acres of forestland to sequester carbon.

Thank you for the opportunity to comment. We look forward to being involved in the process to update the Scoping Plan especially as it relates to NWLs.

Sincerely,



John Andersen

Director, Forest Policy

Registered Professional Forester #2503

Humboldt and Mendocino Redwood Companies