

**From:** Gary Hughes <garyhughes.bfw@gmail.com>

**Sent:** Saturday, February 27, 2021 8:59 AM

**To:** Huang, Anny@ARB <anny.huang@arb.ca.gov>

**Cc:** Rachel Smolker <rsmolker@riseup.net>

**Subject:** Informal comment From Biofuelwatch on Wildfire Emissions Estimate report

Ms Huang, Thank you for service. Please do keep me informed about next steps in this process. I think more public meetings would be of assistance. Also, I am curious about a public record -- will other stakeholder comments be made public? This comment I provide truly is 'informal' thanks for your assistance in keeping me informed about this process. Thank you, Gary

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Ms Huang,

Thanks for receiving this brief informal comment on the [ARB Wildfire Emissions Estimate Report](#) by email. I provide this on behalf of our organization Biofuelwatch.

This is a really interesting and important exercise and the Air Resources Board staff was generous in offering substantial amounts of time to prepare comments. These comments are unfortunately brief, the topic merits far more attention.

We hope that this discussion can continue, and as transparently as possible, with an effort to operationalize these findings to insure that the significant climate damage occurring from industrial intervention and extraction in California's forests can be made public and policies be implemented to see that climate damage dramatically mitigated as soon as possible. We must control what we can control, and this would include providing publicly available data on the greenhouse gas emissions resulting from silviculture applications.

The wildfire emissions data discussion is interesting, and should continue. There is a long way to go in this field. We caution against coming to any final determinations that begin in any way to integrate wildfire emissions, or even more speculative, "avoided" wildfire emissions, into state or regional greenhouse gas emissions inventories.

The emissions from wildfire can be a special case and need to be parsed out and considered separately from the emissions that occur from human economic activity in the forest ecosystem.

Never forget that wildfire is an essential evolutionary process in California's forests, but industrial suppression tactics including but not limited to backfires need to be further analyzed for costs and benefits. It is to say that wildfire suppression tactics (i.e. backburning, or 'backfires') can contribute to extreme fire behavior, including extreme wildfire emissions events. It would be impossible to ascertain which emissions were associated with backfires (human ignited fire as a suppression and wildfire 'control' tactic). But it is certainly possible to ascertain which emissions are associated with logging

activities. The public needs to know this information about the greenhouse gas emissions from human economic activity in the state's forests.

Nevertheless we concur that this effort to estimate wildfire emissions is altogether an important field of study and we certainly encourage state authorities to continue with this discussion in as open and publicly available manner as possible.

We do have some feedback to offer. These are our primary concerns:

--the explicit exclusion of soil carbon loss in the ecosystem carbon stock change calculations results in grievous underestimation of emissions from forest management, especially from highly intensive management practices such as clear cutting. Soil carbon loss is a known significant source of emissions from deforestation and forest degradation. Maintaining soil carbon is intrinsic to maintaining a climate and wildfire resilient forest. We consider the exclusion of soil carbon loss in calculations concerning activities like intensive timber extraction to be a gift to the timber industry that hides the extent of the damage occurring from those extractive and intensely industrial activities.

--the carbon sequestration values in 'harvested wood product carbon sink' on the other hand are overly generous. In fact, the entire premise of climate benefits from supposed carbon sequestration in harvested wood products is highly speculative and fails to recognize the longevity of a pulse of carbon in the atmosphere and the brevity of carbon residence in a manufactured wood product. The granting of a carbon sequestration value to harvested wood products has translated in real life to a 'get out of jail free card' for the timber industry and if such a value is to be assigned it must be recognized as an Anthropogenic Carbon Pool, not forest carbon. Once the carbon is out of the forest it is no longer forest carbon. Anthropogenic Carbon Pools are notoriously impermanent. Impermanence means that harvested wood products are in essence nothing more than delayed emissions.

--we found the dynamic of 'foregone sequestration' (that reasonably predicted future carbon sequestration that will not occur when a tree is killed) to be inadequately addressed. It can be years if not decades, if at all, that a forest stand can return to the condition in which it was in when it was logged. That means hypothetically that carbon that the forest would have continued to sequester remains in the atmosphere, instead of being sequestered in a forest that is growing older. Proforestation is increasingly recognized as an imperative for an integrated response to climate change, estimating foregone sequestration would be an effective tool for helping teach decision makers and the general public the true climate costs of industrial forest interventions.

There is lots of work still to do here and I look forward to further engagement in the future.

Thank you for your attention to this brief informal comment.

Regards,

Gary

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