



---

February 26th, 2021

Anny Huang, Manager, Emissions Inventory Analysis Section  
Air Quality Planning and Science Division  
California Air Resources Board  
1001 I Street, Sacramento, CA 95814

**Re: Comments on Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities**

Dear Ms. Huang,

Thank you for the opportunity to comment on the draft report “Greenhouse Gas Emissions from Contemporary Wildfire, Prescribed Fire, and Forest Management Activities.” Sierra Business Council has long believed that better understanding how the greenhouse gas emissions from wildfires compare to the emissions from forest management activities will enable policymakers, resource managers, and the public to make more informed judgments about how we manage both our forest and air resources.

While this report marks an important step in this line of inquiry, it leaves a simple -- yet important -- question unanswered. The current draft lacks definitions for any of the events or activities considered in the report: wildfire, prescribed fire, and the five categories of forest management activities (thinning, clearcutting, mastication, harvesting, and other mechanical). While these terms have, to some extent, common sense definitions, different agencies and land managers use different categorization and accounting methods in tracking their own activities. For example, does this analysis consider managed fire or backfire used to manage wildfire to be wildfire or prescribed fire? Since thinning and clearcutting are both methods of harvest, what does harvest mean in this instance? What types of activities are categorized as “other mechanical”?

Providing answers to these questions, in the form of definitions of these key terms, would significantly enhance interpretation of the report. These definitions would also shed light on any underlying assumptions that may have important policy implications.

Additionally, the report excludes soil carbon estimates in its analysis of ecosystem carbon stock change by forest management type. While we understand that this exclusion was likely made to simplify a complex analysis, soil is also one of the most crucial elements of forest ecosystems and a very significant carbon stock. At minimum, we recommend that the authors of this report include a discussion of the

implications of excluding soil carbon estimates so as to, once again, shed light on the implications of assumptions underlying this analysis.

Thank you again for the opportunity to comment on the draft report. We look forward to reading the final report.

Sincerely,

A handwritten signature in black ink that reads "Steven D. Frisch". The signature is written in a cursive style with a large, prominent 'S' at the beginning.

Steven Frisch  
President, Sierra Business Council