



February 25, 2015

California State Board of Forestry and Fire Protection  
Forest Practice Committee  
Ms. Susan Britting, Chair  
P.O. Box 944246  
Sacramento, CA 94244-2460

RE: TECHNICAL RULE ADDENDUM #2 (GHG).

Dear Chair Britting,

In 2010 the CEQA Guidelines added 14 CCR 15064.4 requiring lead agencies to calculate or estimate the amount of greenhouse gas emissions resulting from a project. As a result, CAL FIRE made analysis of Greenhouse Gas emissions a requirement of timber harvesting plans (THPs) submitted pursuant to the Z'berg Nejedly Forest Practice Act. To the best of our knowledge every single approved THP containing such an analysis made the determination that timber operations will have a net climate benefit. Beyond that, to the best of our knowledge, every single CAL FIRE Official Response addressing public concerns regarding Greenhouse Gas emissions contained responses similar to: "the Department has concluded that the impacts from implementation of this management regime will have a net benefit from a climate perspective."

The Department's conclusion of net benefit is consistent with findings of the California Air Resources Board (CARB) that the forest sector is **the only** economic sector in the state's greenhouse gas (GHG) inventory that, on net, absorbs and stores ("**sequesters**") more greenhouse gases than it emits.<sup>1</sup> In that document CARB reported that between the years 2000 and 2008 the forestry sector emitted 0.19 million tonnes of CO<sup>2</sup> equivalent annually (0.04% of total emissions), yet sequestered an average of 4.28 million tonnes of CO<sup>2</sup> equivalent annually. CARB conducted a fully CEQA compliant environmental analysis as part of the Climate Change

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<sup>1</sup> "California Greenhouse Gas Inventory for 2000-2008 — by Category as Defined in the Scoping Plan," California Air Resources Board,  
[http://www.arb.ca.gov/cc/inventory/data/tables/ghg\\_inventory\\_scopingplan\\_00-08\\_2010-05-12.pdf](http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-08_2010-05-12.pdf)

Scoping Plan in response to AB32 (2006), publishing the finding that forest management will have **no significant adverse environmental impacts**<sup>2</sup> in regards to GHGs.

California Environmental Protection Agency Air Resources Board		California Greenhouse Gas Inventory for 2000-2008 — by Category as Defined in the Scoping Plan								
million tonnes of CO <sub>2</sub> equivalent		(based upon IPCC Second Assessment Report's Global Warming Potentials)								
	2000	2001	2002	2003	2004	2005	2006	2007	2008	
<b>High GWP</b>	<b>10.95</b>	<b>11.34</b>	<b>11.97</b>	<b>12.75</b>	<b>13.57</b>	<b>14.23</b>	<b>14.92</b>	<b>15.27</b>	<b>15.65</b>	
Ozone Depleting Substance (ODS) Substitutes	8.55	9.30	10.12	10.92	11.74	12.41	13.05	13.47	13.89	
Electricity Grid SF <sub>6</sub> Losses [3]	1.14	1.15	1.07	1.05	1.05	1.04	1.00	0.97	0.96	
Semiconductor Manufacturing [2]	1.26	0.89	0.78	0.78	0.78	0.78	0.87	0.84	0.80	
<b>Agriculture [4]</b>	<b>25.44</b>	<b>25.37</b>	<b>28.42</b>	<b>28.49</b>	<b>28.82</b>	<b>28.99</b>	<b>29.90</b>	<b>28.26</b>	<b>28.06</b>	
Livestock	13.61	14.10	14.56	14.88	14.81	15.36	15.63	15.96	16.28	
Enteric Fermentation (Digestive Process)	7.49	7.64	7.96	7.97	7.97	8.26	8.33	8.52	8.70	
Manure Management	6.12	6.47	6.70	6.91	6.84	7.10	7.30	7.44	7.58	
Crop Growing & Harvesting	8.01	7.46	9.48	9.41	9.51	9.03	9.08	8.53	7.95	
Fertilizers	6.55	6.21	8.06	8.02	8.03	7.58	7.44	7.08	6.72	
Soil Preparation and Disturbances	1.37	1.18	1.34	1.31	1.41	1.37	1.56	1.36	1.15	
Crop Residue Burning	0.09	0.07	0.07	0.08	0.07	0.08	0.08	0.09	0.09	
General Fuel Use	3.82	3.81	4.39	4.20	4.50	4.60	5.19	3.78	3.82	
Diesel	2.51	2.68	3.02	2.94	3.15	3.38	3.85	2.66	2.93	
Natural Gas	1.00	0.75	0.95	0.85	0.82	0.69	0.77	0.79	0.72	
Gasoline	0.31	0.38	0.40	0.41	0.52	0.52	0.57	0.32	0.17	
Other Fuels	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	
<b>Forestry</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>	
Wildfire (CH <sub>4</sub> & N <sub>2</sub> O Emissions)	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	
<b>Total Gross Emissions</b>	<b>458.03</b>	<b>473.23</b>	<b>474.15</b>	<b>473.15</b>	<b>483.88</b>	<b>476.73</b>	<b>475.31</b>	<b>480.85</b>	<b>477.74</b>	
<b>Forestry Net Emissions</b>	<b>-4.72</b>	<b>-4.53</b>	<b>-4.40</b>	<b>-4.33</b>	<b>-4.32</b>	<b>-4.17</b>	<b>-4.04</b>	<b>-4.07</b>	<b>-3.98</b>	
<b>Total Net Emissions</b>	<b>453.31</b>	<b>468.69</b>	<b>469.75</b>	<b>468.82</b>	<b>479.56</b>	<b>472.56</b>	<b>471.27</b>	<b>476.77</b>	<b>473.76</b>	

[1] Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions  
 [2] These categories are listed in the Industrial sector of ARB's GHG Emission Inventory sectors  
 [3] This category is listed in the Electric Power sector of ARB's GHG Emission Inventory sectors  
 [4] Reflects use of updated USEPA models for determining emissions from livestock and fertilizers

Unless submitted as part of a forestland conversion, THPs submitted to CAL FIRE must comply with resource conservation standards and demonstrate achievement of maximum sustained production. Compliance with the resource conservation standards guarantees future site occupancy by appropriate species at minimum stocking densities. Demonstration of maximum sustained production guarantees that forests are managed to, at a minimum, balance growth with harvest over time. The objective of any silvicultural prescription is to harvest the existing stand in such a way to promote future growth of retained trees, or create stand conditions conducive to the successful establishment of a new crop of trees. The amount of atmospheric carbon removed by trees is directly related to growth of those trees. Active sustainable forest management in compliance with California's rules and regulations that maintains a crop of healthy, vigorously growing trees in a diversity of age classes can have nothing but a positive climate effect.

There exists another option to the THP-by-THP approach for addressing GHG and timber harvesting. CEQA Guideline 14 CCR 15385 allows the Board of Forestry to develop a policy which THPs refer to for general matters allowing those THPs to concentrate on issues specific to the individual THP. This mechanism is known as Tiering and is applicable to GHG analysis.

<sup>2</sup> 2014, APPENDIX F, Final Environmental Analysis for the First Update to the Climate Change Scoping Plan, Air Resources Board

CAL FIRE consistently concludes that THPs have net benefit from a climate perspective. CARB's CEQA analysis determined that the forest sector is a net sequesterer and that forest management will not have a significant impact on the environment. There is ample evidence supporting a Board policy statement declaring THPs that comply with the Forest Practice Rules (demonstration of MSP and Resource Conservation Standards in particular) will not have a significant impact on the environment as they pertain to Greenhouse Gas emissions.

We respectfully request that the Forest Practice Committee refine discussion of GHG in connection with Cumulative Impacts Analysis to include only those potential impacts from **forestland conversion**. Sustainable forest harvest can only have a net climate benefit and the CEQA analysis has already been conducted concluding that sustainable forest management will have no significant impact on the environment provided the lands remain dedicated to timber production.

In addition, we respectfully request that this committee evaluate the CEQA analysis conducted by CARB related to the Climate Change Action Plan and develop a Policy Statement that proposes THPs compliant with demonstrations of maximum sustained production and resource conservation standards cannot have a significant impact on the environment. Individual THPs could then **reference ARB's Climate Change Scoping Plan Final Environmental Analysis in lieu of conducting a project specific GHG analysis.**

Thank you for your consideration of this matter. CLFA is available to answer any questions you may have regarding this proposed strategy of addressing GHGs in THPs.

Sincerely,



Clayton E Code  
RPF #2867  
CLFA Vice President

