



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

May 26, 2016

Mr. Ryan McCarthy
Science & Technology Policy Advisor
Office of the Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95812

RE: Draft Short-Lived Climate Pollutant Reduction Strategy

Dear Mr. McCarthy:

The Rural County Representatives of California (RCRC) is an association of thirty-five California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. We appreciate this opportunity to comment on the proposed Short-Lived Climate Pollutant (SLCP) Reduction Strategy (Draft Strategy) and draft Environmental Analysis, particularly as it pertains to black carbon and methane emissions reductions.

Forest-Related Sources of Black Carbon Emissions

Much of California's forested lands are located within RCRC member counties including more than seventy percent of the lands managed by the USDA Forest Service. RCRC has long urged the State to address the escalating wildfire problem, particularly as temperatures rise and amplify the need for better forest management practices on both state and federal lands. Now, many rural forested counties are also grappling with the compounded risk of high severity wildfire due to the 29 million dead trees resulting from drought-induced tree mortality in 2015 alone, which places the State in peril of experiencing the worst fire season in its history in 2016.

RCRC acknowledges the good work the State is doing on the Forest Carbon Plan to address the long term carbon storage and emission goals from California's forest lands. However, California's wildfire problem is getting worse each year, with the Draft Strategy estimating a full 66 percent of all black carbon emissions in California coming from wildfires in 2013, the year of the Rim Fire. While we appreciate the discussion of benefits

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to forested communities and the numerous mentions of efforts to reduce wildfire and increase carbon sequestration, RCRC still feels the California Air Resources Board (ARB) has yet to fully embrace its role in reducing emissions in the forest sector by setting emissions reductions goals and targets and establishing a carbon accounting methodology for the sector. The forest is not a sector that can be continually delayed and dealt with at a later date - once the carbon sequestration capacity is gone, it will be decades before it can be replenished. The time to set goals and targets has already passed, and it is time for the State to catch up and get to work on California's forests before wildfire and invasive pests nullify our good work to this point.

Reducing Methane Emissions

Reducing methane emissions from landfills has been the subject of greenhouse gas emissions reductions since ARB's Landfill Methane Control Measure, which was an early action measure from Assembly Bill 32. More recently, with the adoption of Assembly Bill 1826 (Chesbro; 2014), a commitment has been made to divert commercial organics from landfills beginning in 2016, phasing implementation through 2019, with the goal of reaching 50 percent organic diversion from landfills in 2020. RCRC worked with the author's office, CalRecycle, and stakeholders to craft legislation that was feasible and realistic and supported the legislation.

RCRC still maintains the principal focus of ARB, CalRecycle, and the stakeholders in the near term should be implementation of AB 1826 and the remaining recommended actions for organics diversion: align financial incentives with organics diversion, collaborate to overcome barriers, and to foster markets. The mechanics to divert organics from landfills is not the problem; it is the infrastructure needed to process the organics once diverted. It will be challenging enough to build the necessary facilities not only financially, but due to the constraints of the permitting process. CalRecycle estimates it will require an additional 100 new or expanded facilities to process the diverted organics from AB 1826. Quite frankly, it is unrealistic to believe that 100 new facilities can be built within the next three and one-half years given the challenges of the permitting process. Yet the Draft Strategy proposes to accelerate the existing organic diversion goal before implementation of AB 1826 has even begun.

We recognize and appreciate that the Draft Strategy has eliminated the stated goal of 75 percent organics diversion by 2020. However, we still must oppose the 90 percent organics diversion goal by 2025, as well as any additional regulations in the near term to accomplish these goals. The goal is unrealistic and any new regulatory action should not be considered until after the other identified actions in the Draft Strategy have been carried out. RCRC whole-heartedly supports the other recommended actions. It is fundamental to monitor progress through annual reporting and improving understanding of landfill emissions prior to development of additional regulations. Any additional regulations should not be considered until after 2020, after evaluation of the progress of implementation of AB 1826 and a more thorough and accurate understanding of landfill emissions.

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With respect to methane emissions from landfills, RCRC requests that the SLCP Reduction Strategy reinforce the goal in AB 1826 and focus on the five strategies that will aid industry and local governments in achieving that goal rather than impose additional regulations.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or sheaton@rcrcnet.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", written over a light gray circular stamp.

STACI HEATON
Regulatory Affairs Advocate

cc: Mary Nichols, Chair, California Air Resources Board
RCRC Board of Directors