

BOARD OF FORESTRY AND FIRE PROTECTION

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Christopher Calfee, Special Counsel
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California Resources Agency
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Mr. Calfee:

The California Board of Forestry and Fire Protection (Board) has reviewed the proposed amendments to the CEQA Guidelines prepared in accordance with Public Resources Code section 21083.05 requiring the Natural Resources Agency to adopt and certify guidelines for the mitigation of greenhouse gas emissions. The Board submits the following comments.

§15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions

(b) A lead agency may consider the following when assessing the significance of impacts from greenhouse gas emissions on the environment

The Board suggests additional language that conveys the idea of considering the significance of the impacts from a long term perspective. For forestry in particular, this is an important point, as forestry projects are a long term process.

For example, the proposed amendments addressing significance read:

- (1) *The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.*

The Board suggests the following amendment:

- (1) *The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting, when considered in a temporal and spatial context.*

Forest Land Conversion and GHG Emissions

The Board supports amending to the CEQA Guidelines, Appendix G, Agriculture Resources section to include a consideration for forestland and believes it will encourage recognition by lead agencies that their decisions to approve projects may have a significant impact on the State's forestlands and result in increased GHG emissions and lost sequestration capacity.

CEQA encourages the consideration of environmental effects as early as possible in the project planning and approval process. Uses that conflict with maintaining productive forests and declining parcel sizes that make forest management impractical contribute to an erosion of the State's forestland base.

For example, the proposed amendments addressing forest and timberlands read:

Would the project:

Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526)?

Result in the loss of forest land or conversion of forest land to non-forest use?

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Board suggests the following amendments to the Agriculture and Forest Resources section of the Checklist to better address forest land conversion issues.

Add to Appendix G, II. Agriculture and Forest Resources

Would the project:

Introduce, allow for or encourage new uses that conflict or interfere with, discourage or prohibit the existing primary forest use, through the rezoning or subdividing of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526) or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) in accordance with Government Code sections 51120, 51133 or 51134?

Convert forest land or timberland to a non-forest/non-timberland use such that the subject property would no longer be forest land as defined by Public Resources Code section 12220,(g) or no longer devoted to growing timber (ref. Public Resources Code section 4621)?

Contribute to a change in land use or conditions that substantially decrease the ability to maintain or manage agricultural land or forestland as a working landscape?

Result in a cumulatively considerable decrease in the public benefits derived from, forest land or timberland, including, but not limited to: wood products

and other forest products; aesthetics; fish, wildlife and flora; biodiversity; water quality; recreation; or carbon sequestration?

Add to Appendix G, VII. Greenhouse Gas Emissions

Would the project:

c) Reduce the long term capacity of the land to reduce GHG levels by converting or removing trees and other vegetation that sequester CO2.

Fire Protection and GHG Emissions

The Initial Statement of Reason (ISOR) states:

One large source of GHG emissions, for example, is wildfire on forestlands and rangelands, which release carbon as a result of material being burned.[ISOR, page 4]

Wildfire and its emissions may be increased significantly where lead agencies approve development in wildland areas, thereby increasing the hazard and frequency of fires. Introducing housing developments into forested or brush covered landscapes results in more frequent ignitions. In addition, controlling wildfires is complicated and substantially hindered when protecting structures and saving lives becomes the focus of firefighting efforts. It is also more difficult to implement fuels treatments for the purpose of lessening fire severity and spread where housing developments are present. Lead agencies considering the approval of development within wildland settings must give serious consideration to the potential hazards, and resultant emissions that may arise from that approval. Therefore, the Board proposes the following amendments.

Add to CEQA Guidelines Appendix G, Environmental Checklist, VIII Hazards:

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires resulting from alterations in fire hazard severity and/or risk through changes in vegetation condition or land use that lessen defensible space, increase fuels, contribute to more frequent ignitions or complicate fire control operations and emergency evacuations where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Miscellaneous Comments

Add to (c) Mitigation Measures Related to Greenhouse Gas Emissions, p 14.

- Measures that utilize materials, such as forest wood waste, for carbon neutral alternative energy generation that would have otherwise produced emissions.

Sincerely,

A handwritten signature in blue ink that reads "George Gentry". The signature is written in a cursive style with a large initial "G".

George D. Gentry
Executive Officer