

**DOCKETED**

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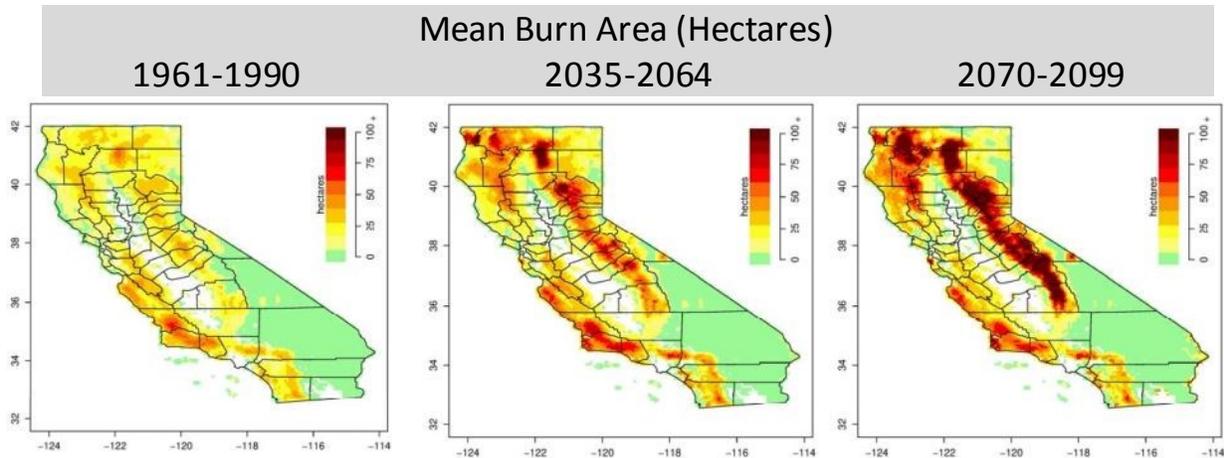
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**Advanced Large-Scale Fuel Mitigation Strategy Needed**

*Additional submitted attachment is included below.*

# Climate Change Fire Threat Presents a Replicable Opportunity for Economic Growth and Social Justice in California

By Robert Perry



Source: Westerling, 2018

The Gulf Coast has its hurricanes. The East Coast, torrential rainfall (and sometimes hurricanes). For California, the primary threat from climate change is wildfire, and there are 129 million dead trees waiting to go up in flames (hopefully, not all at once). The Thomas Fire's notoriety as California's largest wildfire lasted all of [seven months](#), and the title currently held by the [Mendocino Complex Fire](#) will likely not last as long. Future fires will only get bigger, and there is a distinct possibility that a major portion of the Sierras could become engulfed in flames, eliminating much of the forest that preserves the precious winter snowpack providing us water, and life.

At the multi-agency [workshop on Climate Adaptation and Resiliency](#), the central focus was on the wildfire threat. Understandably, most of the strategic elements centered around managing areas adjacent to the energy grid and vulnerable communities. But to my mind, the conversation did not adequately acknowledge the sheer scale of the problem and address the need for a large-scale, coordinated mitigation effort. As detailed in [the presentation](#) by Guido Franco, David Stoms, and Susan Wilhelm of the CEC, "[t]he large number of dead trees has no historical precedent," and "[t]here is a *potential* for mass fires that burn extremely hot but slowly." While these potentially extreme events would result in a massive carbon release into an already saturated atmosphere, this latent threat should also be seen as an opportunity to manage a valuable timber resource utilizing advanced technologies, *provided that solutions are scaled to match the threat.*

I agree with Jana Ganion, Sustainability & Government Affairs Director of the [Blue Lake Rancheria](#) tribe, and her recommendation to remove biomass generation as part of California's Renewable Portfolio Standard Program and instead convert remaining forest residue [into biochar](#) as a [soil amendment](#) to support replanting and growth of indigenous trees and flora. It is also clear that remote rural communities in fire hazard zones that rely on transmission lines should be redeveloped as standalone community microgrids, so some of the 40 high-voltage transmission lines that currently run through hazardous timber zones can be retired.

This is also an opportunity where a healthy amount of advanced technology and automation, supervised by a trained operations crew, could significantly accelerate the harvesting of usable timber, while converting remaining forest residue into biochar material that will retain water and accelerate timber regrowth. Ms. Ganion likened the situation to the multi-state effort that combatted the Dust Bowl, and she is absolutely right that a large-scale, coordinated effort will be needed with a similar mandate and adequate funds to execute it properly.

Part of an effective climate adaptation solution must also involve developing advanced technology to efficiently extract harvestable timber and convert remaining residue into biochar. Anything less is “whistling past the graveyard.” According to Gov. Brown’s May 2018 [press release](#) announcing [Executive Order B-52-18](#), “[s]ince [convening a Tree Mortality Task Force](#) in 2015, more than 1.2 million dead or dying trees have already been removed from the state’s forests.” At a rate of 480,000 trees per year, the 129-million-dead-tree will be solved in 269 years! We need to drastically scale up our efforts so most of those trees become a usable resource and not firewood.