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**FINAL FUELS MANAGEMENT REPORT ON WESTCARB
MANAGEMENT PILOT ACTIVITIES IN SHASTA COUNTY,
CALIFORNIA**

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FINAL REPORT ON WESTCARB FUELS MANAGEMENT PILOT ACTIVITIES IN SHASTA COUNTY, CALIFORNIA

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Public Interest Energy Research Program

Prepared By:

 **Winrock International**

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Preface

The Public Interest Energy Research (PIER) Program supports public interest energy research and development that will help improve the quality of life in California by bringing environmentally safe, affordable, and reliable energy services and products to the marketplace.

The PIER Program, managed by the California Energy Commission (Energy Commission) conducts public interest research, development, and demonstration (RD&D) projects to benefit the electricity and natural gas ratepayers in California. The Energy Commission awards up to \$62 million annually in electricity-related RD&D, and up to \$12 million annually for natural gas RD&D.

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This *Final Report on WESTCARB Fuels Management Pilot Activities in Shasta County, California* is a report for the West Coast Regional Carbon Sequestration Partnership – Phase II (contract number MR-06-03L, work authorization number MR-045), conducted by Winrock International. The information from this project contributes to PIER's Energy-Related Environmental Research program.

For more information on the PIER Program, please visit the Energy Commission's Web site at www.energy.ca.gov/pier or contact the Energy Commission at (916) 654-5164.

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Abstract

This report summarizes efforts by Winrock International, WM Beaty and Associates, and other Shasta County, California partners to implement hazardous fuel reduction/biomass energy pilot activities in WESTCARB Phase II (2006-10). Wildfire is a significant source of GHG emissions in California and throughout the WESTCARB region. WESTCARB developed methodologies to evaluate, validate and demonstrate the potential of reducing hazardous biomass for biomass energy to contribute to GHG mitigation and adaptation. The report describes hazardous fuel reduction pilot activities on private lands in Shasta County; pre- and post-treatment measurements to quantify forest carbon impacted by treatment and/or fire; and analysis of data from these pilots to determine the net GHG impact of the fuel reduction treatments.

Keywords: Carbon, sequestration, hazardous fuel reduction, forest, Shasta County

Executive Summary

Introduction

The West Coast Regional Carbon Sequestration Partnership (WESTCARB), led by the California Energy Commission, is one of seven US Department of Energy regional partnerships working to evaluate, validate and demonstrate ways to sequester carbon dioxide and reduce emissions of greenhouse gases linked to global warming.

Earlier analyses by Winrock showed wildland fire to be a substantial source of greenhouse gas (GHG) emissions throughout the region. Actions to reduce hazardous fuel loads, so as to reduce the probability, areal extent, or severity of wildfires, could result in lower net GHG emissions when compared to a baseline scenario without such treatments. Fuel reduction may also contribute to carbon sequestration by enhancing forest health or growth rates in post-treatment stands. Finally, for treatments where fuel removal to a biomass energy facility is feasible, additional GHG benefits may be created by substituting the biomass for fossil fuel rather than leaving the biomass in the forest to decompose.

Hazardous fuel reduction/biomass energy pilot activities were implemented in the two WESTCARB terrestrial pilot locations, Shasta County, California and Lake County, Oregon. These projects provide real-world data on carbon impacts of treatments, costs, and project-specific inputs to a related WESTCARB task, in which Winrock International and the WESTCARB Fire Panel are working to investigate whether the development of a rigorous methodology to estimate GHG benefits of activities to reduce emissions from wildland fires is feasible.

Purpose

This report provides results from the WESTCARB Phase II hazardous fuel reduction pilot activities in Shasta County, California.

Project Objectives

The overall goal of WESTCARB Phase II is to demonstrate the region's key carbon sequestration opportunities through pilot projects, methodology development, reporting, and market validation. WESTCARB research will inform policymakers, communities, and businesses on how to invest in carbon capture and storage technology development and deployment to achieve climate change mitigation objectives.

The specific objectives of the Phase II Shasta County fuel reduction pilots are to investigate the feasibility of fuels-treatment-based terrestrial sequestration by conducting pilot projects in a representative West Coast forest; compile information on site conditions, fuel treatment prescriptions, and costs; and inform and field-test the WESTCARB fire GHG emissions methodology.

Methodology for measuring impacts of hazardous fuels treatments

Pre- and post-treatment measurements were made on three fuels treatment projects in Shasta County, California: Berry Timber, Davis, and HH Biomass. The fuel reduction activities were located in the southeast corner of the county; all three projects were located on privately owned land. These projects

involved removal of non-commercial biomass and sawtimber with the overall objective of reducing fuel loading and risk of catastrophic wildfire. Treatments also included chipping and removal of biomass fuel to a biomass energy plant. The actual fuels treatments were not initiated under WESTCARB support, but they provided an opportunity to conduct on-the-ground measurements of actual hazardous fuel reduction efforts.

Data were collected in a total of 35 plots (15 on Davis, 9 on HH, and 11 on Berry Timber). Pre- and post-treatment measurements on these plots addressed live trees greater than 5 cm diameter at breast height, canopy density, standing and lying dead wood, understory vegetation, forest floor litter and duff. These represent the forest carbon pools that are likely to be affected by fire, treatment, or both, and so are critical to the accounting of hazardous fuel reduction treatment impacts and potential wildfire impacts on forest carbon.

These measurements were used to determine the carbon stocks before and after treatment and before and after a potential wildfire, for each project area. Growth modeling was conducted with the Forest Vegetation Simulator for both with and without treatment stands. Emissions from a potential fire were modeled in both with- and without-fuels treatment scenarios using both the Fuel Characteristic Classification System and the Forest Vegetation Simulator fire and Fuels Extension (FVS-FFE). FVS was also used to project growth on burned stands, incorporating the impacts of fire on the future stand.

The substitution of harvested biomass for existing energy sources was taken into account where fuels were extracted to a biomass energy plant. Board feet of timber harvested was converted to metric tons of carbon, with retirement rates applied.

Project Outcomes

Berry Timber

Treated stands without wildfire have total stocks of 51.2 tons of carbon per acre, with 44.2 t C/ac in the same stands following a wildfire, including carbon stored in long term wood products and energy offsets.

Incorporating the risk of fire of 0.64% to calculate net emissions or removals, the fuels treatment on the Berry Timber project resulted in an effective immediate net carbon emission of 69.2 t CO₂-e/ac (18.9 tons of carbon per acre).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 83.2 t CO₂/ac and emissions of 116.2 t CO₂/ac over 60 years (Table A1).

Table A1. Net short and long term emissions from fuels treatment without fire on Berry Timber in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-4.5	-4.5
Commercial timber	3.7	2.6
Treatment emissions	-86.9	-118.8
NET	-83.2	-116.2

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at which point it will be necessary to re-treat the forest. According to the FVS-modeled results, if a wildfire were to occur in the year of treatment, after 10 years the net emissions from treatment would be 31.5 t CO₂/ac.

Davis

Including carbon stored in long term wood products and energy offsets, treated stands without wildfire have total stocks of 47.9 tons of carbon per acre compared to stocks of 38.7 t C/ac in treated stands following a wildfire.

Incorporating the risk of fire of 0.64% to calculate net emissions or sequestration (section 2.2.6), the fuels treatment on the Davis project resulted in a net carbon emission in year one of 11.0 t CO₂-e/ac (3.0 t C/ac).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 39.2 t CO₂/ac and emissions of 60.1 t CO₂/ac over 60 years (Table A2).

Table A2. Net short and long term emissions from fuels treatment without fire on Davis in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-15.4	-15.4
Treatment emissions	-23.8	-44.7
NET	-39.2	-60.1

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at

which point it will be necessary to re-treat the forest. According to the FVS-modeled results, if a wildfire were to occur in the year of treatment, after 10 years the net emissions from treatment would be 20.2 t CO₂/ac.

HH biomass

Including carbon stored in long term wood products and energy offsets, treated stands without wildfire have total stocks of 55 tons of carbon per acre compared to a stock of 45.3 t C/ac in treated stands following a wildfire.

Incorporating the risk of fire of 0.64% to calculate net emissions or sequestration (section 2.2.6), the fuels treatment on the HH Biomass project resulted in a net carbon emission in year one of 32.3 t CO₂-e/ac (8.8 t C/ac).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 83.6 t CO₂/ac and emissions of 90.5 t CO₂/ac over 60 years (Table A3).

Table A3. Net short and long term emissions from fuels treatment without fire on HH biomass in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-23.8	-23.8
Treatment emissions	-59.8	-66.7
NET	-83.6	-90.5

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at which point it will be necessary to re-treat the forest.

According to the FVS-modeled results, if a wildfire were to occur in the year of treatment, after 10 years the net emissions from treatment would be 41.4 t CO₂/ac.

Conclusions and Recommendations

In all three projects, the treatments resulted in overall carbon emissions. This result clearly has negative implications for the future potential of fuels treatments as a carbon projects offset category. Within the treated areas, all three projects had significant net emissions when considering treatment and the risk of a potential wildfire. Davis experienced the lowest emissions, but the treatment on Davis did not decrease fire intensity. If a fire were to occur in the year of treatment, all projects would still experience net emissions, though the impact of treatment emissions would be approximately halved in all cases.

All three of the pilots led to a projected decrease in crown fire potential, which decreases fire severity and size. While treatments lead to net carbon emissions in both the short and long term in all three

projects, there are, of course, additional benefits to fuels treatments, such as increased ability to successfully fight fires and decreased cost of fire fighting; reduced loss of life and property; and reduced potential damage to wildlife habitat.

The results from this study in combination with the paired study in Lake County and the allied study in Mendocino National Forest underlie the unsuitability of fuels treatment as a potential greenhouse gas offset generating activity. Instead we argue the shift should be made to policies minimizing greenhouse gas emissions from wildfires and from fuel treatments while minimizing wildfire risks to lives, homes, wildlife habitat, and livelihoods in the WESTCARB region.

1.0 Introduction

1.1 Background and overview

The West Coast Regional Carbon Sequestration Partnership (WESTCARB), led by the California Energy Commission, is one of seven US Department of Energy regional partnerships working to evaluate, validate and demonstrate ways to sequester carbon dioxide and reduce emissions of greenhouse gases linked to global warming. Terrestrial (forestry and land use) sequestration options being investigated include afforestation, improved management of hazardous fuels to reduce GHG emissions from wildfires, biomass energy, and forest management. Shasta County, California and Lake County, Oregon were chosen for Phase II terrestrial sequestration pilot projects because of the diversity of land cover types present, opportunities to implement the most attractive terrestrial carbon activities identified in Phase I, and replication potential elsewhere in the WESTCARB region.

Earlier reports identified fire as a significant source of GHG emissions throughout the WESTCARB region. Estimated emissions from fires for the 1990-96 analysis period were: 1.03 MMTCO₂e per year on average for Oregon (Pearson et al 2007a); 1.83 MMTCO₂e per year for California (Pearson et al 2009); 0.18 MMTCO₂e/yr for Washington (Pearson et al. 2007b); and 0.47 MMTCO₂e/yr for Arizona (Pearson et al. 2007c).

The estimated baseline GHG emissions helped focus attention in Phase II on the questions: can actions by landowners to manage forest fuel loads be shown to produce measurable GHG reductions by decreasing the risk, severity, or extent of catastrophic wildfires? If so, can scientifically rigorous methods for measuring, monitoring, and verifying these GHG reductions serve as the basis for new protocols and market transactions, ultimately allowing landowners who reduce hazardous fuels to receive “carbon credit” revenues and improving the cost-effectiveness of fuel reduction? To explore these questions, hazardous fuel reduction (and where possible, removal of fuel for biomass energy generation) was chosen as a WESTCARB Phase II pilot activity in Shasta and Lake counties, and the WESTCARB Fire Panel was formed to develop fire GHG methodologies and protocols as needed.

1.2 Project Objectives

The overall goal of WESTCARB Phase II is to validate and demonstrate the region’s key carbon sequestration opportunities through pilot projects, methodology development, reporting, and market validation. WESTCARB research will inform policymakers, communities, and businesses on how to invest in carbon capture and storage technology development and deployment to achieve climate change mitigation objectives.

The specific objectives of the Phase II Shasta County fuel reduction pilots are to:

- Verify the feasibility of fuels-treatment-based terrestrial sequestration by conducting pilot projects in representative West Coast forests;
- Compile information on site conditions, fuel treatment prescriptions, and costs;
- Inform and field-test the WESTCARB fire GHG emissions methodology by:

- Collecting measurements of real-world fuel treatments to quantify:
 - the carbon stocks available to be burned before and after treatment,
 - the direct impacts of fuel treatments on carbon stocks in different carbon pools (e.g. increases in dead wood, decreases in dense growth), and
 - the fuel removed from the forest for potential biomass energy applications;
- Providing input data for fire models used to simulate fire behavior and emissions in the baseline (without-treatment) and with-treatment scenarios.

1.3 Report Organization

The report is organized into four sections: 1. Introduction; 2. project approach; 3. results; and 4. conclusions/ recommendations. Section 2 summarizes the private- and federal-lands fuel treatments chosen for study as WESTCARB pilot activities, and methods used for pre- and post-treatment measurements and data analysis. Section 3 provides results of those measurements and analyses. Section 4 discusses the findings and provides recommendations based on this research.

2.0 Project Approach

2.1 Fuel reduction project locations and descriptions

Pre- and post-treatment measurements were made on three fuels treatment projects in Shasta County, California. These projects all involved removal of non-commercial biomass and/or sawtimber with the overall objective of reducing fuel loading and risk of catastrophic wildfire. All also involved chipping and removal of biomass fuel to the Wheelabrator Shasta biomass energy plant in Anderson, California. The actual fuels treatments were not initiated under WESTCARB support, but they provided an opportunity to conduct on-the-ground measurements of actual hazardous fuel reduction efforts.

2.1.1 Fuel reduction on Berry Timber project (PG&E)

Location

The project area encompassed 845 acres and is shown in the map in Figure 1. It is located just southeast of the town of Shingletown in Shasta County, CA. The legal description is portions of Sections 25, 34, 35 & 36 Township 31 North, Range 1 East, M.D.B.&M. The forest type of the project area is Sierra Nevada Mixed Conifer, (Ponderosa Pine, Sugar Pine, White Fir, Douglas-fir and Incense Cedar.) Minor amounts of California Black Oak reside on the project area as well.

Treatment

The PG&E Berry timber harvest operation was conducted in the summer of 2007.

The area was treated under an individual tree selection silvicultural prescription focusing on the merchantable trees 10 inches diameter at breast height (dbh) and greater. Trees identified for harvest were trees showing signs of distress, mechanical defect, evidence of insects/disease and trees growing too close together. Biomass thinning of trees between 4 and 9 inches (dbh) was conducted on a small portion of the project area. Trees were extracted intact and tops and branches of commercial trees chipped and hauled to the Wheelabrator biomass energy facility along with the pre-commercial trees. A total of 3.461 million board feet of sawlogs were harvested from the project. A total of 173 loads of biomass were shipped to Wheelabrator Biomass Energy Plant in Anderson, comprised of 4,357 green tons of biomass with 39.3% moisture content (2,644 bone dry tons). The logging method was mechanical ground based, utilizing whole tree harvesting. All tree tops, limbs and biomass were chipped on the landing and sent to Wheelabrator Shasta Energy.

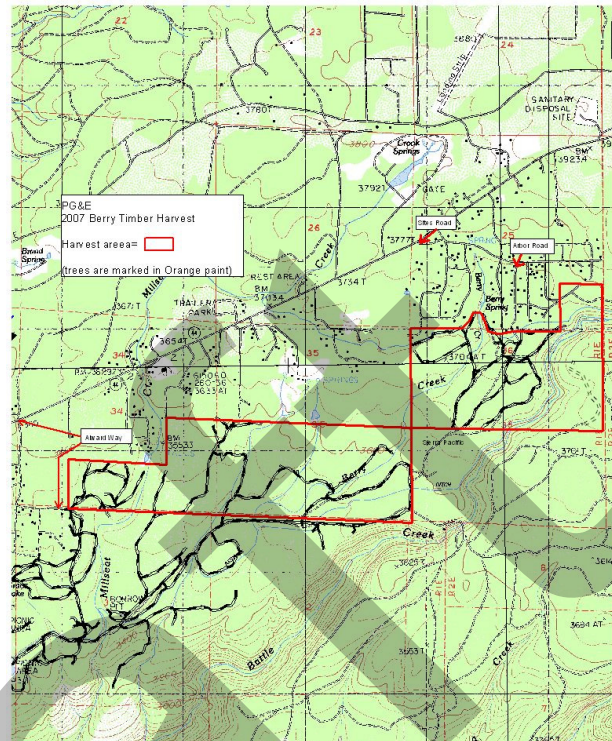


Figure 1. Map of harvest area for PG&E Berry Timber project

2.1.2 Fuel reduction on Davis Biomass project (W.M. Beaty & Associates, Inc. / Brooks Walker et al)

Location

The Davis Biomass project is located approximately three miles east of Whitmore, CA at approximately 3,000 foot elevation on the west slope of the Southern Cascades on forestlands managed by W.M. Beaty & Associates, Inc. The project area consists of 2,200 acres of uneven-age natural stands of mixed conifer and ponderosa pine along with a portion of a 30 year old ponderosa pine plantation that was established after the 1977

Whitmore Fire.

Treatment

The objectives of the project were to thin small overcrowded trees in the understory of the conifer forest to improve the health and vigor of the remaining trees and reduce hazardous fuel ladders and



Figure 2: Loading thinned trees for delivery to biomass energy plant

fuel loading. Trees targeted for removal included suppressed trees between 4 and 12 inches (dbh) with poor live crown ratios. Vigorous trees of this size class with good live crown ratios were retained along with all live trees of larger size classes (12 inch dbh and greater). Although the logging contractor was not required to cut trees less than 3 inches dbh, some were thinned out to facilitate removal of the target trees.

The treatment was completed over three years (2007 – 2009) with the removal of 1,804 chip van loads totaling 24,998 bone dry tons (BDTs) that were delivered to Wheelabrator Shasta Energy Co., Inc. in Anderson for electricity generation. While this treatment might have been completed in one long operating season, the following factors contributed to extending the treatment over three operating seasons:

- the onset of early fire seasons,
- operators being called away to other jobs, and
- the inability to operate in this area during the winter.

As fire hazards increased with the onset of each summer, each year the humidity levels dropped below 20% by 9 or 10 o'clock in the morning and fire hazard restrictions forced operational shutdowns. However, the objectives of the project were accomplished by thinning the understory to promote residual stand health and vigor and reduce the risk of catastrophic loss by reducing fuel loads and ladder fuels which will aid fire suppression efforts should a wildfire occur.

2.1.3 Fuel reduction on HH Biomass project (W.M. Beaty & Associates, Inc. / Red River Forests Partnership and Bank of the West, Trustee)

Location

The HH Biomass project is located approximately two miles north of Shingletown, CA at approximately 3,500 foot elevation on mixed conifer forestlands managed by W.M. Beaty & Associates, Inc.

Treatment

Objectives of the 1,445-acre biomass thin project were to increase stand health and vigor, reallocate the species composition to mimic a more “natural” historic forest and to reduce the risk of loss from catastrophic wildfire by reducing ladder fuels and total fuel loading. Trees targeted for removal included suppressed trees between 4 and 12 inch dbh with poor live crown ratios.

Except for a special “Shaded Fuel Break” prescription within 100 feet of the main roads, vigorous trees of this size class with good live crown ratios were retained along with all live trees of larger size classes (12 inch dbh to 36+ inches dbh). Within 100 feet of some main roads almost all understory trees were



Figure 3. Stand in HH Biomass project after thinning

thinned out and the re-sprouting brush was then treated to create a “Shaded Fuel Break”. Although the logging contractor was not required to cut trees less than 3 inches dbh, some were thinned out to facilitate removal of the target trees.

The treatment was completed over three years (2007 – 2009) with the removal of 1,917 chip van loads totaling 26,104 bone dry tons (BDTs) that were delivered to Wheelabrator Shasta Energy Co., Inc. in Anderson for electricity generation. The objectives of the project were accomplished by thinning the understory to promote residual stand health and vigor and to reduce the risk of catastrophic loss by decreasing fuel loads and ladder fuels which will aid fire suppression efforts should a wildfire occur.

2.2 Methods

2.2.1 Field measurements before and after fuel treatments

The location of field sampling plots was pre-assigned in a geographical information system (GIS) prior to fieldwork (Figures 4a, b, c). Data were collected in a total of 35 measurement plots¹ (15 on Davis, 9 on HH, and 11 on Berry Timber). Plot coordinates were generated randomly in advance of the field work. The field team navigated to the pre-assigned points. Plot measurements were taken in accordance with USFS General Technical Report NRS-18 (Pearson et al. 2007d), and included the following measurements at each plot location within fuel treatment units:

- All trees >5 cm diameter at breast height, measured in nested plots and marked for post-treatment measurements;
- Canopy density, tree heights, and height to live crown, as inputs to fire behavior models;
- Standing dead wood;
- Lying dead wood, measured along transects (plus dead wood density from collected samples).
- Understory vegetation, forest floor litter and duff, measured in clip plots;

These represent forest dimensions that will influence fire severity and the forest carbon pools that may be affected by fire, treatment, or both. The protocols used for these measurements are described in Annex A.

¹ The number of plots was the result of available resources and field time rather than being statistically calculated.

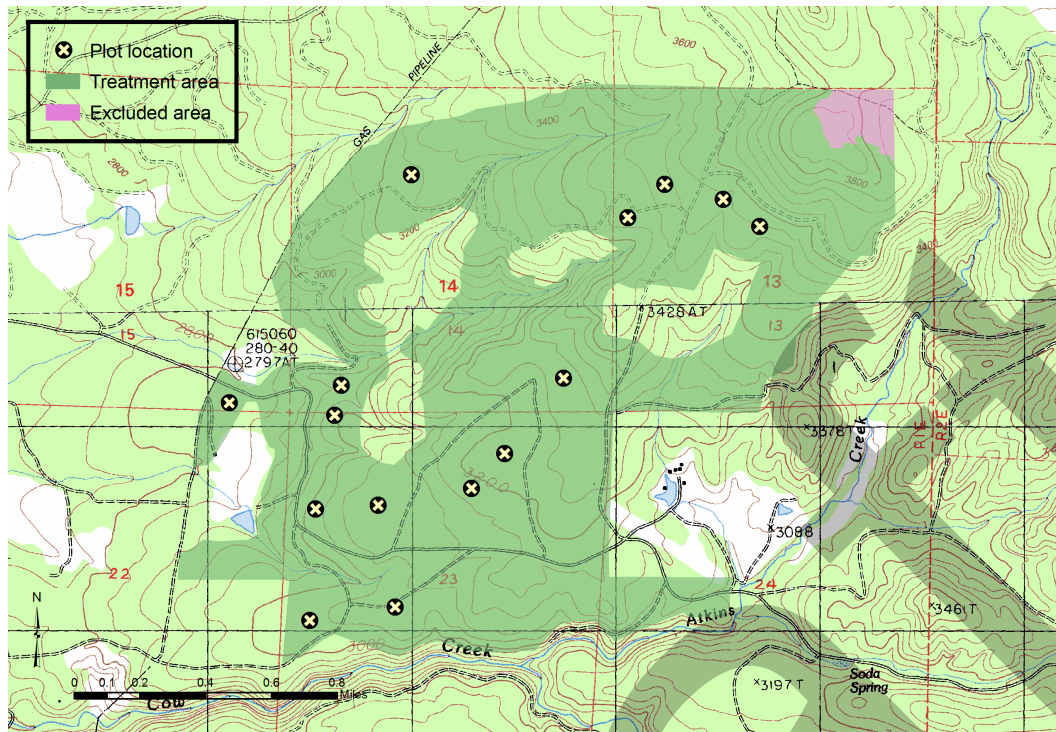


Figure 4a. Davis Mountain treatment area and plots

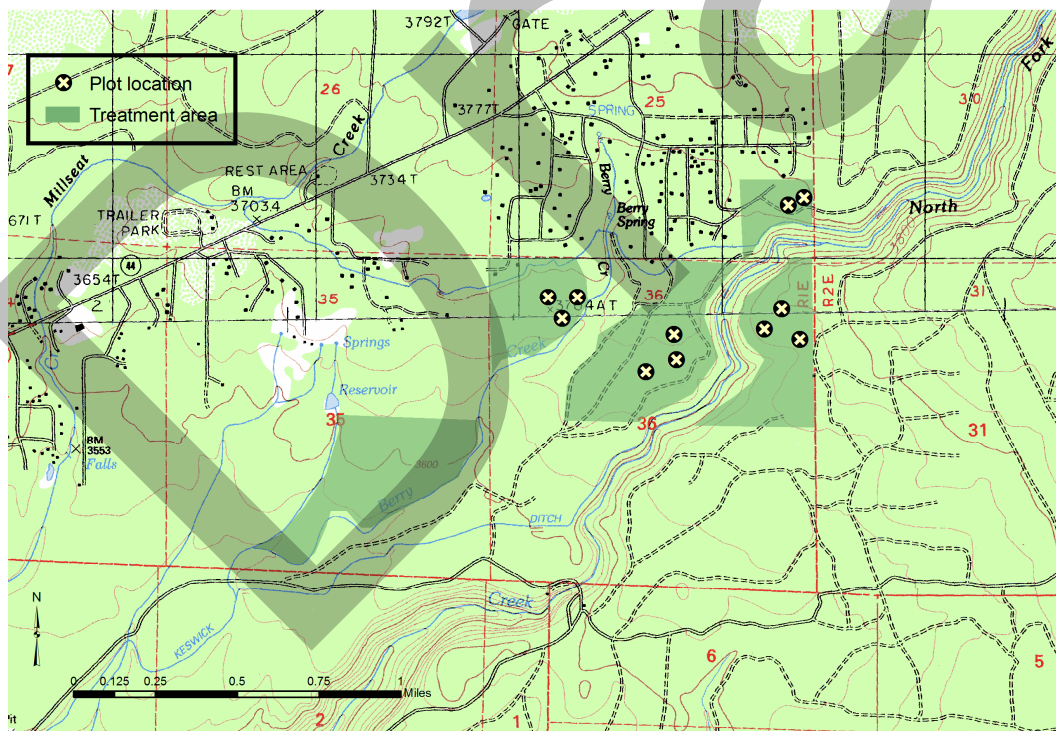


Figure 4b. Berry Treatment area and plots

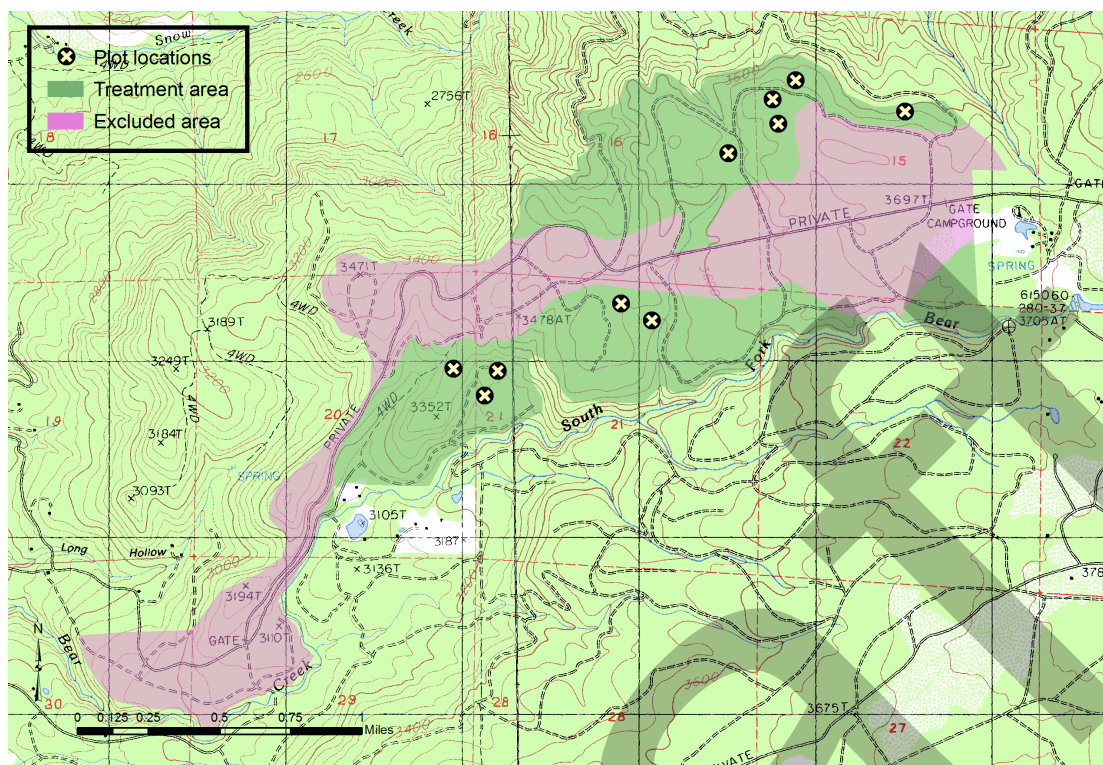


Figure 4c. HH treatment area and plots

The date of treatment at each site and the dates of pre- and post-treatment measurements by Winrock/Western Shasta RCD crews are shown in Table 1. In order to quantify the effects of treatment on the same carbon pools, the post-treatment measurements were conducted shortly after treatments were completed, on the same plots used for pre-treatment measurements, following a measurement protocol similar to pre-treatment fieldwork. The one difference in the post-treatment measurements was that tree diameters were not measured; instead, trees marked during pre-treatment measurements were counted and assumed to have the same diameter.

Table 1. Dates of fuel treatment and pre- and post-treatment measurements for the three Shasta County fuel treatment sites

Location	Date		
	Pre-Treatment Measurement	Treatment	Post-Treatment Measurement
Davis Mountain	June 2007	2007-2009	June 2009
HH Biomass	June 2007	2007-2009	June 2009
Berry Timber	June 2007	July – August 2007	September 2007

The purpose of the measurements was to identify, in real as opposed to modeled forests, the carbon stocks available to be burned before and after treatment, the direct impacts of fuel treatments on carbon stocks in different carbon pools (e.g. increases in dead wood, decreases in dense growth), and the fuel removed from the forest for biomass energy during treatment. Measurements also provided input data for fire models used to simulate fire behavior and emissions in the baseline (without-treatment) and with-treatment scenarios.

The total carbon stocks were determined using the standard allometric equations of Forest Vegetation Simulator Fire and Fuels Extension Inland California and Southern Cascades variant².

2.2.2 Fire Modeling

Based on the field data disaggregated by carbon pool, emissions from a potential fire were modeled in both with- and without-fuels treatment scenarios. The modeling was conducted using two separate approaches.

1. The FCCS program (**Fuel Characteristic Classification System**) was developed by the Pacific Northwest Research Station to capture the structural complexity and geographical diversity of fuel components across landscapes and to provide the ability to assess elements of human and natural change. FCCS is a software program that allows users to access a nationwide library of fuelbeds or create customized fuelbeds. The fuelbeds are organized into six strata: canopy (trees), shrubs, nonwoody vegetation, woody fuels (lying deadwood and stumps), litter-lichen-moss, and ground fuels (duff and basal accumulations). FCCS calculates the relative fire hazard of each fuelbed, including crown fire, surface fire behavior, and available fuel potentials. It also reports carbon storage by fuelbed category and predicts the amount of combustible carbon in each category.³
2. In addition to the FCCS modeling, fire effects were modeled using the **Forest Vegetation Simulator Fire and Fuels Extension** (FVS-FFE). FVS provides different output to FCCS and FVS can be used to project growth, incorporating the impacts of fire on the future stand.

The two models produced slightly different results, as they use different modeling methodologies and different biomass equations. They also produce somewhat different output. Reported outputs from FCCS include flame length in feet; crown fire potential as a scaled index from 0-9; rate of spread in feet per minute; and carbon consumed for live canopy, dead wood, and total. Reported results from FVS-FFE include flame length in feet; the crowning index in miles/hour; and total carbon consumed. Results for both prescribed fire and wildfire are reported from FCCS, while only wildfire is reported from the FVS-FFE results.

² More information, including the FVS User's Guide and variant descriptions, are available at <http://www.fs.fed.us/fmfc/fvs/index.shtml>.

³ More information is available at the FCCS website: <http://www.fs.fed.us/pnw/fera/fccs/>. The modeling was conducted by Dr. David "Sam" Sandberg – Emeritus of the PNW Research Station Fire and Environmental Application Team.

Although FVS uses a somewhat simpler methodology than FCCS for projecting fire impacts, it is based on established fire models and allows for growth projections. In order to address growth over time, FVS projections are used throughout the results, but FCCS output is presented to demonstrate the range of potential fire emissions.

2.2.3 Fire Risk

Annual burn probability is difficult to project accurately, as it is a factor of the likelihood of ignition and the conditions on the ground at the time of ignition, including fuels, climate, temperature, and topography (see Finney, 2005). Saah *et al.* (2010) determined the relative fire probability and observed annual burn probability for Shasta County, which were used to identify a potential annual burn probability of 0.64% (Eric Waller, 2010, UCB CFRO, pers. comm.). It is important to note that this is a generalized probability and is not based specifically on pre- and post-treatment conditions for these projects, but rather for Shasta County as a whole.

2.2.4 Growth Modeling

Stand growth, both with- and without-treatment and considering all pools, was modeled with the US Forest Service's Forest Vegetation Simulator (FVS), using the Inland California and Southern Cascades variant. The standard allometric equations in the Fire and Fuels Extension (FFE) of FVS were used to produce biomass and carbon reports in conjunction with forest growth. Data from both the 2007 and 2009 inventories were used, with the pre-treatment inventory year counted as year zero to compare with and without treatment scenarios. Growth was projected over a 60 year period, and did not include any additional future treatments. To incorporate the effects of wildfire on growth, FVS-FFE was also used to model wildfire behavior.

2.2.5 Modeled Scenarios

For both fire and growth modeling, four different scenarios were modeled for all three projects. Each scenario includes the following carbon pools: aboveground live, belowground live, standing dead, and lying dead. The treated scenarios also include carbon stored in merchantable timber after 100 years. To simplify calculations, the emissions arising from wood product conversion and subsequent retirement are included at the beginning of the project. The treatment scenarios also incorporate average emissions from equipment use.

	Untreated	Treated
No Wildfire	1.Untreated, no fire	3.Treated, no fire
Wildfire	2.Untreated, wildfire	4.Treated, wildfire

- *Scenario 1* gives the situation where there is no treatment or fire. At time zero it represents simply the carbon stocks (tons of carbon per acre) prior to treatment.
- *Scenario 2* is the carbon emissions and remaining stocks following a wildfire on untreated lands.
- *Scenario 3* is the carbon stocks remaining after the treatment, incorporating any emissions that were a result of treatment activities but in the absence of any fire.
- *Scenario 4* is the carbon emissions and remaining stocks following a wildfire on treated lands.

2.2.6 Biomass Accounting

We assumed that biomass harvested from project areas and burned to produce energy offsets energy that would otherwise be derived from fossil fuels. In California power generation is dominated by natural gas with small contributions from clean energy/nuclear and coal. In January 2007 the California Public Utilities Commission established a performance standard that all new long-term baseload generation must meet (http://docs.cpuc.ca.gov/Published/NEWS_RELEASE/63997.htm). As this performance standard is equivalent to the minimum standard required for any new power generation in California it is considered to be a conservative comparison for this analysis. The CPUC performance standard is equal to 1,100 pounds of carbon dioxide emitted for each Megawatt hour of electricity produced, an amount equivalent to 0.499 metric tons of carbon dioxide.

Literature⁴ and our partners at Wheelabrator indicate that one bone dry ton of biomass produces one MWh of electricity. One bone dry ton is 0.5 bone dry ton of carbon or 1.833 tons of carbon dioxide. Each ton of biomass extracted for biomass energy therefore effectively emits:

$$1.833 - 0.499 = 1.334 \text{ t CO}_2^5$$

⁴ cf. http://bioenergy.ornl.gov/papers/misc/energy_conv.html,
<http://groups.ucanr.org/WoodyBiomass/documents/InfoGuides12929.pdf>

⁵ The assumption of many (including the IPCC) is that biomass burned to produce electricity is carbon neutral. The argument is that all biomass that is burned was once grown, and so one MWh of electricity derived from biomass leads to a positive emissions avoidance of 0.499 t CO₂ (i.e., avoiding natural gas emissions). This would be true if the biomass were grown as part of the project in a plantation, where in the absence of the project the biomass being burned would never have been sequestered from the atmosphere. However, natural forests in California are not plantations. In the absence of the project, CO₂ was sequestered out of the atmosphere by the forest biomass. In the project case, this biomass is burned and released into the atmosphere. In the baseline the biomass remains sequestered in the forest. Thus what the atmosphere “sees” is a net increase in carbon dioxide because of the project. However, because of the project some amount of natural gas does not need to be burned to produce electricity. Specifically, as shown above, for each 1.833 t CO₂ released to produce 1 MWh of electricity through biomass from hazardous fuels, 0.499 t CO₂ are saved due to natural gas not having to be burned. Therefore, burning hazardous fuels rather than natural gas results in a net emission of 1.334 t CO₂.

This subject often leads to confusion. Many interpret the fact that biomass is replaceable in the way that fossil fuels are not to mean that all biomass burned has no net impact on the atmosphere. But as the paragraph above demonstrates, burning biomass does increase the greenhouse gases resident in the atmosphere. Burning biomass might prevent emissions from fossil fuels, but this is by no means permanent. What is being achieved is a delay in the date at which all fossil fuels will be used. It is critical to focus on the atmosphere, i.e. does the project cause an increase or decrease in the concentration of carbon dioxide in the atmosphere? In this case, burning biomass

Because of the biomass removal treatment some amount of natural gas does not need to be burned to produce electricity. Specifically, as shown above, for each 1.833 t CO₂ released to produce 1 MWh of electricity through biomass from hazardous fuels, 0.499 t CO₂ are saved due to natural gas not having to be burned. This is equivalent to 27.2% of the net emission being offset.

2.2.7 Timber Accounting

Of the three projects, only Berry Timber included removal of sawtimber. Board feet of timber harvested is converted to metric tons of carbon according to Smith *et al.* (2006), that provides a factor of 0.44 per thousand board feet to convert softwood lumber to metric tons of carbon. The fraction of carbon in primary wood products remaining over time in end uses and stored in land fill, as described in Smith *et al.* (2006), are then applied: after 10 years, 42.4% of carbon will remain in use as long-term wood products, and 11.6% will be sequestered in landfills; after 60 years, 17.3% of carbon will remain in long-term wood products, and 21.8% in landfills; after 100 years, 11.2% will remain in wood products and 24.3% in landfills.

rather than natural gas leads to an increase in CO₂ in the atmosphere because natural gas burns more cleanly than biomass. If coal were displaced instead of natural gas the savings would be greater while if the displacement is of electricity generated by nuclear power, solar, wind or hydro power then the result is an emission with no net saving.

If the stand is not treated the fuels are available in the forest to be emitted to the atmosphere through wildfires. However, this should not be considered under the biomass energy calculations. If it is then we are double-counting. The baseline fire risk multiplied by the stock gives the baseline emission from wildfires, which is the emission from fuels in the absence of fuel treatment.

2.2.8 Net Impact Calculations

Net project benefits following a treatment must incorporate

- carbon stocks in the forest;
- carbon emissions in a wildfire, accounting for the probability of fire;
- growth;
- carbon stored as long-term wood products;
- emissions offset through energy production.

The net emissions or removals in year one are calculated as

$$[(C_t + C_w + C_e - C_b) * (1 - risk)] + [(C_{tf} + C_w + C_e - C_{bf}) * (risk)]$$

Where

C_t	carbon stocks remaining in the forest after treatment and without a wildfire
C_w	carbon stored as wood products
C_e	reduced emissions from using biomass for energy generation
C_b	carbon stocks in the forest before treatment and without a wildfire
$risk$	probability of fire
C_{tf}	carbon stocks remaining in the forest after treatment and with a wildfire
C_{bf}	carbon stocks remaining in the forest before treatment and with a wildfire

This equation states that the net emissions in year 1 are equal to:

The high probability that there will be no fire multiplied by the difference between stored carbon before and after treatment

Plus

The low probability that there will be a fire multiplied by the difference in total carbon storage after a fire in the treated stand and in the baseline stand.

3.0 Project Results

3.1 Berry Timber Results

3.1.1 Field results

Prior to treatment, the Berry Timber project had a stock of 70.1 tons of carbon per acre across all pools. Following the treatment, the average carbon stock was 49.4 t C/ac. Treatment therefore resulted in a decrease in carbon stocks of 20.7 tons per acre, 30% of pretreatment stocks. The breakdown by pool is shown in Table 2, and the confidence limits at a 90% confidence interval for the aboveground live carbon pool are shown in Table 2a.

Table 2. Berry Timber carbon stocks (metric t C/ac) before and after fuels treatments

Carbon pool	Pre-treatment	Post-treatment	Difference
Trees	39.7	27.1	-12.6
Roots	10.6	7.6	-3.0
TOTAL TREES	50.3	34.7	-15.6
Standing dead	0.5	0.3	-0.2
Down dead wood	12.0	9.3	-2.7
TOTAL DEAD	12.5	9.6	-2.9
WOOD			
Forest Floor	7.2	4.6	-2.6
Shrubs/herbaceous	0.2	0.4	0.2
TOTAL	70.1	49.4	-20.7

Table 2a. Upper and lower confidence limits at 90% CI for Berry Timber aboveground live carbon stocks (metric t C/ac) before and after fuels treatments

Aboveground live carbon	Pre-treatment	Post-treatment
LCL	32.3	20.4
mean	39.7	27.1
UCL	47.1	33.8
CI as a % of mean	18.6 %	24.7 %

3.1.2 Potential fire emissions

Using FCCS-created fuel beds, a wildfire in the untreated stands would yield 46.6 tons of CO₂ per acre of emissions, while a wildfire in the treated stands would yield 31.7 t CO₂ / ac (Table 3). Using the FVS Fire and Fuels Extension, a wildfire in the untreated stands would yield 42.5 t CO₂ / ac of emissions, while a wildfire in the treated stands would yield 26.4 t CO₂ / ac (Table 4).

Table 3. FCCS fire modeling results for Berry Timber

	Prescribed Fire		Wildfire	
	Pre-treatment	Post-treatment	Pre-treatment	Post-treatment
Flame Length (ft)	2.5	2.2	6.1	5.0
Crown Fire Potential (scaled index 0-9)	3.6	2.3	4.2	3.0
Rate of Spread (ft/min)	3.6	4.5	18.3	19.4
CO ₂ emissions (t/ac)				
Canopy	-4.6	-1.8	-14.3	-6.2
Dead Wood	-22.4	-18.2	-28.2	-23.1
Litter	-2.9	-1.8	-3.5	-2.2
Total	-29.9	-21.8	-46.0	-31.5

Table 4. FVS fire modeling results for Berry Timber

	Wildfire	
	Pre-treatment	Post-treatment
Flame Length (ft)	6.5	5.7
Crowning index (miles/hr) ⁶	31.4	49.8
CO ₂ emissions (t/ac)	-42.5	-26.4
Total stand carbon remaining	58.1	42.4

3.1.3 Timber and biomass

The commercial harvest on Berry Timber yielded 4,096 board feet of timber per acre. According to the conversion factor in Smith *et al.* (2006), this equals 1.8 t C/ac. Based on carbon disposition rates, a total of 1.0 t/ac will remain stored in either long-term wood products or landfill after 10 years; 0.7 t/ac will remain stored in either long-term wood products or landfill after 60 years; and 0.6 t/ac will remain stored in either long-term wood products or landfill after 100 years.

Wheelabrator received 3.3 bone dry tons of biomass per acre from the Berry Timber project, which represents 1.7 t C/ac. Because this biomass was used to generate energy, it offset 1.7 t C/ac * 27.2% = 0.5 t C/ac, resulting in reduced total emissions of 4.5 t CO₂-e/ac (1.2 t C/ac).

3.1.4 Growth modeling

Based on FVS modeling (Table 5), in the absence of fire, the treatment resulted in an initial decrease in carbon stocks of 20.7 t C/ac (compare columns 1 and 2), and a reduced increase in carbon stocks of 11.7

⁶ The 20-foot windspeed required to cause an active crown fire.

t C/ac after 60 years, for a total decrease in live stocks of 32.4 t C/ac over a 60 year period relative to no treatment.

In the event of a wildfire in year zero, the treated stands contain 15.7 t C/ac less than the untreated stands (difference between columns 3 and 4), but carbon stocks in the treated stands increase more than those in untreated stands over 60 years (25.5 t C/ac), for a total increase of 9.8 t C/ac relative to the untreated stand.

Table 5. Modeled total stand carbon pre and post treatment and with and without fire on Berry Timber project. Modeling conducted using the Fuels and Fire Extension of FVS. Data in metric tons of carbon per acre

Year	Untreated, no fire (1)	Treated, no fire (2)	Untreated, wildfire (3)	Treated, wildfire (4)
0	70.1	49.4	58.1	42.4
10	76.6	52.9	55.2	45.6
20	86.0	58.3	53.6	49.6
30	94.8	64.3	53.0	54.1
40	103.1	70.6	54.1	59.0
50	110.6	77.3	56.3	64.0
60	116.9	84.5	59.6	69.4
<i>Total change</i>	<i>46.8</i>	<i>35.1</i>	<i>1.5</i>	<i>27</i>
<i>Total % change</i>	<i>167%</i>	<i>171%</i>	<i>103%</i>	<i>164%</i>

FVS growth modeling (Table 6) indicates that after 60 years in the absence of wildfire, treated stands continue to have fewer trees per acre, lower basal area, and fewer cubic feet and board feet than untreated stands, while the quadratic mean diameter⁷ (QMD) is greater in the treated stands. However, the rate of change (Table 7) is greater in the treated stands for all measurements except QMD. This indicates that while the treated stands did not catch up to the untreated stands in absolute numbers, they had a lower mortality rate and a higher per tree growth rate overall. In addition, the trees remaining in the treated stands remained larger, on average, than those in the untreated stands.

In the event of a wildfire, treated stands have fewer trees per acre after 60 years, but increased basal area, QMD, cubic feet, and board feet, and they have a higher rate of change in all categories than do untreated stands.

⁷ The diameter corresponding to the mean basal area of a stand.

Table 6. Projected Growth on Berry Timber project, modeled in FVS

	Untreated			Treated		
	Year 0	Year 60 – no fire	Year 60 – wildfire	0	Year 60 – no fire	Year 60 – wildfire
Trees per acre	282	160	73	132	118	64
Basal area	173	251	113	121	213	172
QMD	10.6	17.0	16.8	13.0	18.2	22.3
Cubic feet	4,873	8,799	3,828	3,541	7,383	6,270
Board feet	22,683	47,077	20,509	16,450	38,703	34,334

Table 7. Percent change within each scenario after 60 years of growth on Berry Timber project

	Untreated		Treated	
	No fire	Wildfire	No fire	Wildfire
Trees per acre	57%	26%	89%	48%
Basal area	145%	65%	176%	142%
QMD	160%	158%	140%	172%
Cubic feet	181%	79%	209%	177%
Board feet	208%	90%	235%	209%

3.1.5 Net GHG emissions/sequestration

Including carbon stored in long term wood products and energy offsets, for treated stands without wildfire, the total stock is 51.2 tons of carbon per acre and 44.2 t C/ac in the same stands following a wildfire. Figure 5 shows the tons of carbon per acre sequestered on Berry Timber in each of the four scenarios, the total carbon stored following treatment when wood products and biomass energy are included, and the percent change from untreated to treated and unburned to burned lands.

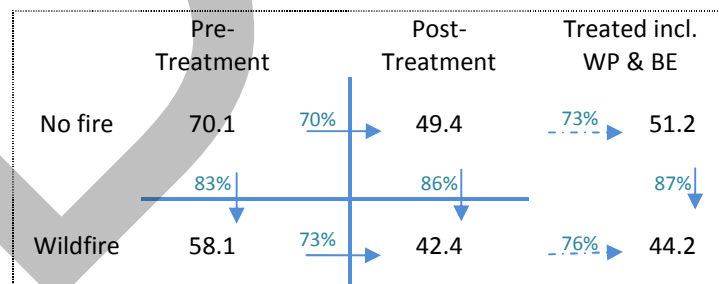


Figure 5. Tons of carbon per acre stored on Berry Timber project lands in each scenario, and included carbon stored in wood products and reduced emissions from biomass used to produce energy. Percentages show change from untreated lands to treated or from unburned to burned. BE = biomass energy. WP = storage in long term wood products and landfill after 5 years

Incorporating the risk of fire of 0.64% and utilizing the equation described above for net emissions or sequestration (section 2.2.6), $[(Ct+Cw +Ce-Cb)*(1-risk)]+[(Ctf+Cw+Ce-Cbf)*(risk)]$, the fuels treatment on the Berry Timber project resulted in an effective immediate net carbon emission of 69.2 t CO₂-e/ac (18.9 tons of carbon per acre).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 83.2 t CO₂/ac and emissions of 116.2 t CO₂/ac over 60 years (Table 8).

Table 8. Net short and long term emissions from fuels treatment, without fire, on Berry Timber in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-4.5	-4.5
Commercial timber	3.7	2.6
Treatment emissions	-86.9	-118.8
NET	-83.2	-116.2

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at which point it will be necessary to re-treat the forest. According to the FVS-modeled results, if a wildfire were to occur in the year of treatment, after 10 years the net emissions from treatment would be 36.0 t CO₂/ac.

3.2 Davis Results

3.2.1 Field results

Prior to treatment, the Davis project had a stock of 50.9 tons of carbon per acre across all pools. Following the treatment, the average carbon stock was 46.4 t C/ac. Treatment therefore resulted in a decrease in carbon stocks of 4.5 tons per acre, 8% of pretreatment stocks. The breakdown by pool is shown in Table 9, and the confidence limits at a 90% confidence interval for the aboveground live carbon pool are shown in Table 9a.

Table 9. Davis carbon stocks (metric t C/ac) before and after fuels treatments

Carbon pool	Pre-treatment	Post-treatment	Difference
Trees	26.7	22.4	-4.3
Roots	7.8	6.3	-1.5
TOTAL TREES	34.5	28.7	-5.8
Standing dead	0.6	1.1	0.5
Down dead wood	9.0	11.1	2.1
TOTAL DEAD WOOD	9.6	12.2	2.6
Forest Floor	6.6	5.1	-1.5
Shrubs/herbaceous	0.2	0.4	0.2
TOTAL	50.9	46.4	-4.5

Table 9a. Upper and lower confidence limits at 90% CI for Davis above ground live carbon stocks (metric t C/ac) before and after fuels treatments

Aboveground live carbon	Pre-treatment	Post-treatment
LCL	22.0	18.1
mean	26.7	22.4
UCL	31.4	26.7
CI as a % of the mean	17.6 %	19.2 %

3.2.2 Potential fire emissions

Using FCCS-created fuel beds, a wildfire in the untreated stands would yield 35.2 tons of CO₂ per acre of emissions, while a wildfire in the treated stands would yield 39.2 tons of CO₂ per acre (Table 10). Using the FVS Fire and Fuels Extension, a wildfire in the untreated stands would yield 37.0 tons of CO₂ per acre of emissions, while a wildfire in the treated stands would yield 34.1 tons of CO₂ per acre (Table 11).

Table 10. FCCS fire modeling results for Davis

	Prescribed Fire		Wildfire	
	Pre-treatment	Post-treatment	Pre-treatment	Post-treatment
Flame Length (ft)	3.4	3.5	8.2	8.3
Crown Fire Potential (scaled index 0-9)	3.7	3.2	4.4	3.8
Rate of Spread (ft/min)	5.2	7.0	27.4	34.6
CO ₂ emissions (t/ac)				
Canopy	-2.4	-2.4	-7.5	-7.5
Dead Wood	-18.9	-22.2	-23.7	-28.2
Litter	-2.8	-2.6	-3.5	-3.1
Total	-24.1	-27.2	-34.7	-38.8

Table 11. FVS fire modeling results for Davis

	Wildfire	
	Pre-treatment	Post-treatment
Flame Length (ft)	5.8	6.8
Crowning index (miles/hr) ⁸	25.1	36.8
CO ₂ emissions (t/ac)	-37.0	-34.1
Total stand carbon remaining	40.5	37.2

3.2.3 Biomass

Wheelabrator received 11.4 bone dry tons of biomass per acre from the Davis project, which represents 5.7 tons of carbon per acre. Because this biomass was used to generate energy, it offset 5.7 t C/ac * 27.2% = 1.5 t C/ac, resulting in reduced total emissions of 15.4 t CO₂-e/ac (4.2 t C/ac).

3.2.4 Growth modeling

Based on FVS modeling (Table 12), in the absence of fire, the treatment resulted in an initial decrease in carbon stocks of 4.5 t C/ac (compare columns 1 and 2), and a reduced increase in carbon stocks of 7.7 t C/ac after 60 years, for a total decrease in live stocks of 12.2 t C/ac over a 60 year period relative to an untreated stand. In the event of a wildfire in year zero, the treated stands sequester 3.3 t C/ac less than the untreated stands (difference between columns 3 and 4), but carbon stocks in the treated stands

⁸ The 20-foot windspeed required to cause an active crown fire.

increase more than those in untreated stands over 60 years (3.6 t C/ac), for a total increase of 0.3 t C/ac relative to an untreated stand.

Table 12. Modeled total stand carbon pre and post treatment and with and without fire on Davis project. Modeling conducted using the Fuels and Fire Extension of FVS. Data in metric tons of carbon per acre

Year	Untreated, no fire (1)	Treated, no fire (2)	Untreated, wildfire (3)	Treated, wildfire (4)
0	50.9	46.4	40.5	37.2
10	59.1	52.6	39.6	38.3
20	70.2	61.4	40.6	41.0
30	80.9	70.2	42.6	43.8
40	91.1	79.4	46.0	47.2
50	100.5	88.2	50.4	51.2
60	108.7	96.5	55.6	55.9
<i>Total change</i>	<i>57.8</i>	<i>50.1</i>	<i>15.1</i>	<i>18.7</i>
<i>Total % change</i>	<i>214%</i>	<i>208%</i>	<i>137%</i>	<i>150%</i>

FVS growth modeling (Table 13) indicates that after 60 years in the absence of wildfire, treated stands continue to have fewer trees per acre, lower basal area, and fewer cubic feet than untreated stands, while QMD is greater in the treated stands and the board feet is slightly higher.

Table 13. Projected Growth on Davis, modeled in FVS

	Untreated			Treated		
	Year 0	Year 60 – no fire	Year 60 – wildfire	0	Year 60 – no fire	Year 60 – wildfire
Trees per acre	405	205	98	164	128	46
Basal area	140	251	126	106	233	124
QMD	8.0	15.0	15.4	10.9	18.3	22.1
Cubic feet	3,141	8,246	4,181	2,730	8,072	4,612
Board feet	12,780	43,022	22,163	12,154	43,657	26,592

However, the rate of change (Table 14) is greater in the treated stands for all measurements except QMD. This indicates that while the treated stands did not catch up to the untreated stands in absolute numbers, they had a lower mortality rate and a higher growth rate overall. In addition, the trees remaining in the treated stands remained larger, on average, than those in the untreated stands.

In the event of a wildfire, treated stands have fewer trees per acre after 60 years and slightly lower basal area, but increased cubic feet, and board feet, and they have a higher rate of change in all categories than do untreated stands.

Table 14. Percent change after 60 years of growth on Davis project

	Untreated		Treated	
	No fire	Wildfire	No fire	Wildfire
Trees per acre	51%	24%	78%	28%
Basal area	179%	90%	220%	117%
QMD	188%	193%	168%	203%
Cubic feet	263%	133%	296%	169%
Board feet	337%	173%	359%	219%

3.2.5 Net GHG emissions/sequestration

Including carbon stored in long term wood products and energy offsets, treated stands without wildfire have an estimated total stock of 47.9 tons of carbon per acre compared to a stock of 38.7 t C/ac in treated stands following a wildfire. Figure 6 shows the tons of carbon per acre sequestered on Davis in each of the four scenarios, the total carbon stored following treatment when wood products and biomass energy are included, and the percent change from untreated to treated and unburned to burned lands.

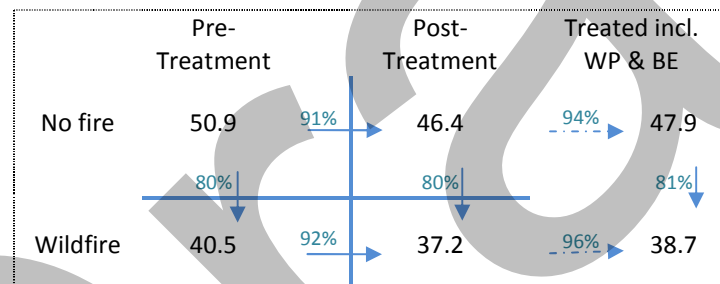


Figure 6. Tons of carbon per acre stored on Davis project lands in each scenario, and included carbon stored in wood products and reduced emissions from biomass used to produce energy. Percentages show change from untreated lands to treated or from unburned to burned.

Incorporating the risk of fire of 0.64% and utilizing the equation described above for net emissions or sequestration (section 2.2.6), $[(C_t + C_w + C_e - C_b) * (1 - \text{risk})] + [(C_{tf} + C_{tw} + C_{te} - C_{bf}) * (\text{risk})]$, the fuels treatment on the Davis project resulted in a net carbon emission in year one of 11.0 t CO₂-e/ac (3.0 t C/ac).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 39.2 t CO₂/ac and emissions of 60.1 t CO₂/ac over 60 years (Table 15).

Table 15. Net short and long term emissions from fuels treatment, without fire, on Davis in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-15.4	-15.4
Treatment emissions	-23.8	-44.7
NET	-39.2	-60.1

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at which point it will be necessary to re-treat the forest. According to the FVS-modeled results, if a wildfire were to occur in the year of treatment, after 10 years the net emissions from treatment would be 20.2 t CO₂/ac.

3.3 HH Biomass Results

3.3.1 Field results

Prior to treatment, the HH Biomass project had 63.9 tons of carbon per acre across all pools. Following the treatment, the average carbon stock was 52.5 t C/ac. Treatment therefore resulted in a decrease in carbon stocks of 11.4 tons per acre, 18% of pretreatment stocks. The breakdown by pool is shown in Table 16, and the confidence limits at a 90% confidence interval for the aboveground live carbon pool are shown in Table 16a.

Table 16. HH Biomass carbon stocks (metric t C/ac) before and after fuels treatments

Carbon pool	Pre-treatment	Post-treatment	Difference
Trees	36.5	27.3	-9.2
Roots	10.7	7.7	-3.0
TOTAL TREES	47.2	35.0	-12.2
Standing dead	0.9	0.2	-0.7
Down dead wood	9.0	11.1	2.1
TOTAL DEAD WOOD	9.9	11.3	1.4
Forest Floor	6.5	5.9	-0.6
Shrubs/herbaceous	0.2	0.3	0.1
TOTAL	63.9	52.5	-11.4

Table 16a. Upper and lower confidence limits at 90% CI for HH Biomass carbon stocks (metric t C/ac) before and after fuels treatments

Aboveground live carbon	Pre-treatment	Post-treatment
LCL	30.1	22.1
mean	36.5	27.3
UCL	42.9	32.5
CI as a % of the mean	17.5%	19.0%

3.3.2 Potential fire emissions

Using FCCS-created fuel beds, a wildfire in the untreated stands would yield 39.2 t CO₂ /ac of emissions, while a wildfire in the treated stands would yield 38.3 t CO₂ /ac (Table 17). Using the FVS Fire and Fuels Extension, a wildfire in the untreated stands would yield 39.6 tons per acre of emissions, while a wildfire in the treated stands would yield 35.2 tons per acre (Table 18).

Table 17. FCCS fire modeling results for HH Biomass

	Prescribed Fire		Wildfire	
	Pre-treatment	Post-treatment	Pre-treatment	Post-treatment
Flame Length (ft)	3.2	2.4	7.7	5.3
Crown Fire Potential (scaled index 0-9)	4.1	3.2	4.7	3.7
Rate of Spread (ft/min)	6.3	5.0	32.3	21.2
CO ₂ emissions (t/ac)				
Canopy	-3.7	-2.8	-11.0	-8.4
Dead Wood	-19.3	-20.7	-24.0	-26.6
Litter	-3.3	-2.9	-4.0	-3.5
Total	-26.3	-26.4	-39.0	-38.5

Table 18. FVS fire modeling results for HH Biomass

	Wildfire	
	Pre-treatment	Post-treatment
Flame Length (ft)	4.9	6.6
Crowning index (miles/hr) ⁹	18.2	36.5
CO ₂ emissions (t/ac)	-39.6	-35.2
Total stand carbon remaining	52.7	42.8

⁹ The 20-foot windspeed required to cause an active crown fire.

3.3.3 Biomass

Wheelabrator received 18.1 bone dry tons of biomass per acre from the HH Biomass project, which represents 9.0 tons of carbon per acre. Because this biomass was used to generate energy, it offset 9.0 t C/ac * 27.2% = 2.5 tC/ac, resulting in reduced total emissions of 23.8 t CO₂-e/ac (6.5 t C/ac).

3.3.4 Growth modeling

Based on FVS modeling (Table 19), in the absence of fire, the treatment resulted in an initial decrease in carbon stocks of 11.4 t C/ac (compare columns 1 and 2), and a reduced increase in carbon stocks of 6.8 t C/ac after 60 years, for a total decrease in live stocks of 18.2 t C/ac over a 60 year period. In the event of a wildfire in year zero, the treated stands sequester 9.9 t C/ac less than the untreated stands (difference between columns 3 and 4), but carbon stocks in the treated stands increase more than those in untreated stands over 60 years (9.9 t C/ac), resulting in no net change in carbon sequestered after 60 years.

Table 20. Modeled total stand carbon pre and post treatment and with and without fire on HH Biomass project. Modeling conducted using the Fuels and Fire Extension of FVS. Data in metric tons of carbon per acre

Year	Untreated, no fire (1)	Treated, no fire (2)	Untreated, wildfire (3)	Treated, wildfire (4)
0	63.9	52.5	52.7	42.8
10	75.4	59.1	49.7	44.9
20	88.9	68.5	49.5	48.9
30	100.0	77.7	51.7	52.8
40	108.2	86.1	55.7	57.5
50	114.6	94.1	61.5	62.7
60	119.9	101.7	68.3	68.3
Total change	56.0	49.2	15.6	25.5
Total % change	188%	194%	130%	160%

FVS growth modeling (Table 21) indicates that after 60 years in the absence of wildfire, treated stands continue to have fewer trees per acre, but the basal area is nearly the same, and they have greater cubic feet, board feet, and QMD than untreated stands.

Table 21. Projected Growth on HH Biomass, modeled in FVS

	Untreated			Treated		
	Year 0	Year 60 – no fire	Year 60 - wildfire	0	Year 60 – no fire	Year 60 – wildfire
Trees per acre	629	197	122	208	147	70
Basal area	197	251	156	132	247	166
QMD	7.6	15.3	15.3	10.8	17.6	20.8
Cubic feet	4,313	8,329	4,911	3,439	8,541	5,968
Board feet	16,521	42,748	24,613	14,849	45,528	33,357

The rate of change (Table 22) is greater in the treated stands for all measurements except QMD. This indicates that after 60 years, treated stands have a higher growth rate and have surpassed untreated stands in overall volume.

Table 22. Percent change after 60 years of growth on HH Biomass project

	Untreated		Treated	
	No fire	Wildfire	No fire	Wildfire
Trees per acre	31%	19%	71%	34%
Basal area	127%	79%	187%	126%
QMD	201%	201%	163%	193%
Cubic feet	193%	114%	248%	174%
Board feet	259%	149%	307%	225%

In the event of a wildfire, treated stands have fewer trees per acre after 60 years, but have higher basal area, and increased cubic feet and board feet, and they have a higher rate of change in all categories except QMD than do untreated stands.

3.3.5 Net GHG emissions/sequestration

Including carbon stored in long term wood products and energy offsets, treated stands without wildfire have a total of 55.0 tons of carbon per acre compared to a stock of 45.3 t C/ac in treated stands following a wildfire. Figure 7 shows the tons of carbon per acre sequestered on Davis in each of the four scenarios, the total carbon stored following treatment when wood products and biomass energy are included, and the percent change from untreated to treated and unburned to burned lands.

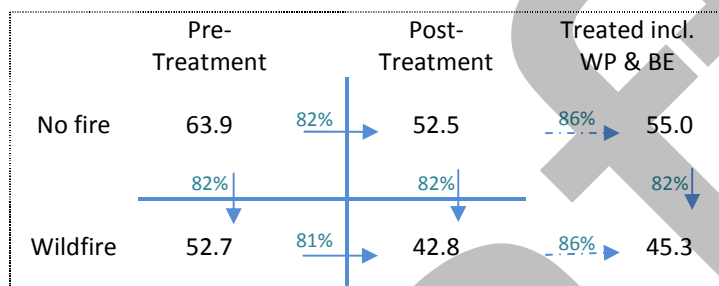


Figure 7. Tons of carbon per acre stored on HH Biomass project lands in each scenario, and included carbon stored in wood products and reduced emissions from biomass used to produce energy. Percentages show change from untreated lands to treated or from unburned to burned.

Incorporating the risk of fire of 0.64% and utilizing the equation described above for net emissions or sequestration (section 2.2.6), $[(C_t + C_w + C_e - C_b) * (1 - \text{risk})] + [(C_{tf} + C_{w} + C_e - C_{bf}) * (\text{risk})]$, the fuels treatment on the HH Biomass project resulted in a net carbon emission in year one of 32.3 t CO₂-e/ac (8.8 t C/ac).

In the absence of a wildfire, the fuels treatments and commercial harvest result in short term emissions of 83.6 t CO₂/ac and emissions of 90.5 t CO₂/ac over 60 years (Table 23).

Table 23. Net short and long term emissions from fuels treatment, without fire, on HH biomass in tons of carbon dioxide per acre (+ = removals; - = emission)

	Short term 10 years	Long term 60 years
Biomass energy	-23.8	-23.8
Treatment emissions	-59.8	-66.7
NET	-83.6	-90.5

For the treatment to yield benefits to the atmosphere, the emissions from treatments will need to be offset by reductions in emissions from a potential wildfire hitting the area. In order for the treatment to have an impact, such a fire would have to occur before fuels have returned to hazardous conditions, at which point it will be necessary to re-treat the forest. According to the FVS-modeled results, if a wildfire

were to occur in the year of treatment, after 10 years the net emissions from treatment would be 41.4 t CO₂/ac.

4.0 Discussion

In all three projects, the treatments resulted in significant net carbon emissions¹⁰. This result clearly has implications for the future potential of fuels treatments as a carbon projects offset category.

The reasons for the net emission from hazardous fuel reductions are multiple. In the case of the Davis and HH projects, deadwood stocks increased following the treatment. This may be due to these projects' focus on removal of pre-commercial trees and a corresponding increase in the amount of limbs and branches left following the treatment. Because the Berry project included sawtimber removal, the live standing carbon removed was far greater than for the other sites. However, due to milling inefficiencies and the retirement of wood over time, only a fraction of the carbon removed as sawtimber is stored in wood products over the long term. The use of biomass for electricity generation also does not compensate for the loss of carbon stored as standing timber, especially given the common use of natural gas and the minimum performance standards required in California.

Both the Berry and the HH treatments led to a decrease fire intensity and in potential CO₂ emissions from fire. There was a greater decrease on the Berry project, likely due to sawtimber removal and the subsequent reduction in the forest crown. Despite the decrease in emissions from fire, both projects continue to have lower standing carbon stocks after a fire in the year of treatment. The treatment on the Davis project led to increased fire intensity. According to FCCS modeling, the treated stand also yielded slightly higher CO₂ emissions from fire, while FVS modeling indicated slightly lower CO₂ emissions after a fire in the treated stand¹¹. The significant increase in both standing and lying deadwood on the Davis project explains the increase in fire intensity in the year following treatment. However, in subsequent years, as the deadwood continues to break down, the intensity of a potential fire is likely to decrease. In addition, the reduction in live ladder fuels improves the ability to control a fire.

The rate of growth on both Berry and HH increased following the treatment, but in the absence of a wildfire, total carbon stocks in the treated areas still had not surpassed those in untreated areas after 60 years. Growth rates on the Davis project were slightly lower following treatment. The treatment in the Davis project removed a smaller percentage of basal area than did the other two treatments, and may not have increased resources for residual trees enough to allow increased growth. However, when growth is projected following a fire in the year of treatment, all three projects experienced higher

¹⁰ A complete accounting of emissions would have also incorporated equipment use. Though this project did not address equipment emissions, a similar project in Shasta County found emissions ranging from 0.8 to 1.8 tons CO₂/ac. While this is not an insignificant amount, it is a small fraction of the emissions which result from the removal of biomass from the forest.

¹¹ The difference between the two models is likely based on the specificity required of input data for each model. FCCS requires certain input data which is not required by FVS and which was not collected in the field. In order to run FCCS, base fuelbed data was used in cases where empirical data was not available.

growth rates with treatment. Treated stands in all three projects also have greater overall carbon stocks by year 30, though it's important to note that there is an annual risk of fire and subsequent wildfires were not modeled. Additionally, with each year following a hazardous fuels treatment, the benefits of the treatment are reduced and the maximum shelf life is probably less than 20 years.

Within the treated areas, all three projects had significant net emissions when considering treatment and the risk of a potential wildfire. Davis experienced the lowest emissions, but as discussed above, the treatment on Davis did not decrease fire intensity. If a fire were to occur in the year of treatment, all projects would still experience net emissions, though the impact of treatment emissions would be approximately halved in all cases.

One critical factor not addressed in this study is the impact of fuels treatment on fire intensity and emissions outside the treated area itself. In many cases, the reduced intensity of fire in a treated area decreases the intensity of fire in the surrounding untreated areas, increasing the beneficial aspects of the treatment without removing additional biomass. This is often referred to as a fire shadow. The size of a fire shadow along with the level of reduced emissions varies based on a number of factors, including topography, location of treatment, climatic conditions, and fire intensity. Incorporating the fire shadow in the overall emission calculations would decrease the net emissions in most cases, but given the extent of emissions for all three projects, it is likely that inclusion of a fire shadow would yield lower emissions but significant emissions would still result from treatment.

All three of the pilots led to a decrease in crown fire potential, which decreases fire severity and size. While treatments lead to net carbon emissions in both the short and long term in all three projects, there are, of course, additional benefits to fuels treatments, such as increased ability to successfully fight fires and decreased cost of fire fighting; reduced loss of life and property; and reduced potential damage to wildlife habitat.

These results are mirrored well in the results from the Alder Springs treatment in Mendocino National Forest conducted under funding from the US Forest Service. In Alder Springs, net emissions of 26.3 tons of carbon dioxide per acre were recorded immediately after treatment climbing to a total of 86.9 t CO₂-e/ac after 60 years.

The results from this study in combination with the paired study in Lake County and the allied study in Mendocino National Forest underlie the unsuitability of fuels treatment as a potential greenhouse gas offset generating activity. Instead we argue the shift should be made to policies minimizing greenhouse gas emissions from wildfires and from fuel treatments while minimizing wildfire risks to lives, homes and livelihoods in the WESTCARB region.

5.0 References

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Annex A: Standard Operating Procedures for Fuels Measurements in 2007

See separate attachment.

Draft