CHRISTOPHER D. BROWN, AICP
Air Pollution Control Officer

DONNA ROBERTS NASH
Program Coordinator

306 East Gobbi Street
Ukiah, California 95482
(707) 463-4354 Fax: 463-5707
mcaqmd@co.mendocino.ca.us
www.mendoair.org

MENDOCINO COUNTY
AIR QUALITY MANAGEMENT DISTRICT

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Members of the Climate Action Team - Public Health Workgroup,

Because of conflicting meetings I am unable to attend the entire session today, but I want to thank you for your work to address the possible health impacts of implementation of AB-32 and the Cap and Trade Regulation.

I would like to point out to the Workgroup one likely impact from AB 32 on rural and tribal residents[1].

Residents of rural areas are often disproportionally impacted by rising energy prices because of the lack of natural gas and a reliance on higher priced propane. Since 2001 propane prices (which are not regulated) have increased dramatically impacting rural residents. It is also foreseeable that the implementation of AB 32 will result in higher energy prices as the cost of GHG offsets are passed on. The per capita income in rural counties is well below the per capita income in the more urban parts of the state. The lack of natural gas in rural areas means that residents do not have access to energy assistance and retrofit funding programs normally funded by a gas utility. These programs are especially helpful in assisting low income residents reduce their energy demand and emissions.

Because of high energy costs many rural residents have switched to the much less efficient wood heating devices. The emission point from wood heating is directly in the neighborhood and in close proximity to residents. Numerous studies have documented the health effects of wood heat on homeowners (and children) as a result of combustion byproducts remaining in the home. Wood heating is also a significant impact on local and regional air quality in many communities in Northern California during the winter months.

An easily foreseeable result of AB 32 implementation in rural areas is an increase in the use of residential wood heating because of higher energy prices. Residential wood heating has significant and documented health impacts.

California does not have any continuing funding which can be used for wood stove replacements or upgrades. Reductions of wood heating emissions – or funding for home efficiency upgrades (reducing wood burning) – are truly the "low hanging fruit" which are waiting to be plucked. Co-benefits include the reducing GHG emissions (including 'black carbon'), criteria emissions and heating costs for rural residents.

I encourage the workgroup to consider these issues as they continue their work.

Thank you for your time,

Christopher D. Brown AICP
Air Pollution Control Officer
Mendocino County Air Quality Management District

[1] Mendocino County has nine recognized tribes – second only to San Diego County in California and the fourth highest of any County in the United States.