Plumas County has submitted a general comment letter regarding the content of the AB32 Scoping Plan, which is attached. The following comments are directed toward the CEQA and the Preferred Alternative presented in Appendix J and enhancements that would benefit the overall program.

1. Developing Climate Adaptation Program Priorities

Local Climate Action Plans could be used to describe how local environmental resiliency would be enhanced and how social and economic benefits of climate adaptation such as green jobs and health and safety benefits or energy security benefits would be targeted to disadvantaged communities (DACs), low income households and small businesses. The Air Board could decide that Climate adaptation planning is a useful and efficient way to educate the public about the local costs of doing nothing about climate change. A local "No Project "(BAU) Alternative would be developed in local adaptation plans that would become a baseline for determining localized impacts from the AB32 program. This is a direct benefit to the AB32 program. Plumas anticipates significant indirect benefits as well from local adaptation plans. If climate adaptation planning and pilot project development is embraced by the AB32 program, the surge of voluntary GHG reduction actions already seen in other sectors that will flow from individuals and localities who are involved in adaptation planning and project prioritization at the local and regional levels. Personal ownership of the AB32 Program will follow from local adaptation planning and implementation. The Proposition 84 IRWM Planning and implementation process is a good example of local ownership and initiative leveraging a state effort at better water management in California. Similarly, local climate adaptation plans would analyze and catalyze a mix of a solar roof installations, low-flow toilet and faucet retrofits, tree plantings, wetland, floodplain/floodway conservation easements, adjustment payments, etc. that would be undertaken in localities in support of the larger AB32 emissions reduction program.

2. Advance Climate Adaptation Science and Support the Environmental Resiliency Studies at Local, Regional and Statewide Scales.

Standing adaptation science panels could be established within the Resources Agency and through PIERS to support the integration of climate adaptation strategies at multiple scales and to facilitate the early dissemination of BMPs and other "no regrets" adaptation options to localities. At the September Climate Change Conference in Sacramento, the local government consultants ICLEI describing their "Worldwide Movement of Local Governments" program, and recommended a "Two-Pronged Approach: Mitigation and Adaptation" for local governments. The Two-Pronged Approach involves an *"adaptation focus on building resiliency to climate change impacts through identifying vulnerable sectors, goal setting, and preparedness planning" and* the *"recognition of local needs for climate adaptation as well as mitigation, linking local*

governments to available climate change science, and identifying opportunities for increasing resiliency in the built, natural and social environment."

Local adaptation planners and local climate adaptation partnerships would take advantage of the assessments being undertaken by state science panels and state agencies while building their regional/local climate science expertise. Regional and local science would incorporate local tribal perspectives, local DAC needs and knowledge, and the expertise of on-the -ground landscape managers and health professionals, including local ARB air district personnel, and the non-governmental sector.

Evaluations of climate adaptation planning and demonstration projects should include assessments of targeted benefits for DACs, evaluations of community fire and flood safety, trends in environmental resiliency, and opportunities enhanced environmental co-benefits from integrated adaptation and GHG reduction strategies and projects. For example, the California Climate Adaptation Strategy: Biodiversity and Habitat Sector Draft Report, defines environmental resiliency. *"Resiliency can be measured as a systems ability to recover from stress or disturbance without undergoing a fundamental change in process or structure." (p.15)* The state and regional-local science teams would develop local indicators for environmental resiliency that would be used to guide integrated GHG emission reduction and adaptation actions and to evaluate progress in achieving in-state environmental benefits and in targeting benefits to DACs and localities negatively impacted by the AB32 program.

3. <u>Climate adaptation strategies supported by the AB32 program would be designed to apply and broaden strategies that are already included as GHG reduction targets for the forest, water, agriculture, and local government sectors in the AB32 Scoping Plan other state natural resource conservation plans such as the California Water Plan and the CDFG's Wildlife Action Plan and Areas of Conservation Emphasis Maps</u>

For example, in the forest sector, climate adaptation strategies for riparian reforestation could include co-benefits of riparian-floodway buffers for water quality and habitat conservation, and enhanced public safety. Climate adaptation strategies for reforestation of burned-over areas could include watershed restoration activities for reducing downstream flood damages. And active forest management projects for fuels reduction would include environmental resiliency strategies for large tree retention and wetland restoration, for enhancing the co-benefits of storm water infiltration and purification.

Climate adaptation plans would at a minimum, integrate AB32 with water management planning (for Proposition 84 IRWM and 1E), and with the DFG's conservation planning (as recommended by the California Climate Adaptation Strategy: Biodiversity and Habitat Sector Draft Report).

For example, the Upper Feather River (UFR) basin is a typical moisture-limited Sierra forest ecosystem and the lowest elevation watershed in the Sierra. More extreme weather, severe floods, droughts, and wildfires will increasingly shape the UFR watershed. The environmental impacts of the changing climate, (fires, floods and droughts) will stress the health, well-being, and safety of local communities. In other words, localized climate change impacts are expected to be early and strongly felt in the UFR basin. And valuable co-benefits such as regional and statewide water and flood control and hydropower operations are also at risk. The DWR's water adaptation white paper specifically calls out the scientifically-based testing of adaptation actions *"The State should sponsor science-based, watershed adaptation research pilot projects to address water management and ecosystem needs. Funding for pilot projects should only be granted to those regions that have adopted IRWM plans that meet DWR's plan standards and have broad stakeholder support."* (Climate Adaptation Strategies for Water, p.30). The California Water Plan includes forest management as a water portfolio enhancing resource management strategy.

As the California Climate Adaptation Strategy: Biodiversity and Habitat Sector Draft Report notes that *" with limited fiscal resources at all levels of government and in the private sector, identifying adequate resources for initiating the strategies is a huge challenge. The* [Air Board and the] *Resources Agency should convene a group of stakeholders and state agency staff to discuss prioritizing strategies as well as existing opportunities to pursue implementation in a time when resources are scarce. All strategies are in need of implementation as soon as possible and require a timeline for achieving goals based on what we can do right now with current resources and what we could do if we had more staff/funding. (p.14) Immediately implement those components of adaptation strategy that have a high probability for success based on current knowledge and that can be modified or adaptively managed as scientific knowledge evolves. (P.6.)*

PLUMAS COUNTY FLOOD CONTROL
& WATER CONSERVATION DISTRICT

December 9, 2008

Mary Nichols
Chair, California Air Resource Board
1001 I Street
Sacramento, California 95814

Re: Comments on AB32 Scoping Plan

Dear Chair Nichols:

While the AB32 Scoping Plan establishes a tremendous framework for California's response to climate change, its failure to sufficiently address climate adaptation bypasses significant opportunities and falls short of important objectives established by the Legislature.

The Scoping Plan seeks to provide positive overall environmental and economic benefits for California. However, AB32 itself anticipated that even a highly successful program would not avoid all of the negative environmental consequences of climate change or an uneven distribution of impacts. For those reasons, the Legislature emphasized its intent to achieve environmental co-benefits and to address localized impacts that fall disproportionately on disadvantaged communities and small businesses.

Appendix J, the functionally equivalent document presented to satisfy CEQA requirements for the Scoping Plan, fails to consider the trade offs between environmental impacts and benefits at an appropriately local scale. Appendix J should emphasize analysis of localized environmental benefits and a least environmentally damaging alternative for California. Instead, the anticipated environmental benefits from AB32 rely too heavily upon success in the regional, national, and even global carbon markets.

The risk in all of this is that the dollars of California's taxpayers, ratepayers, and consumers will scatter with the four winds. Instead, by effectively incorporating climate adaptation, the Scoping Plan could help ensure that reinvestment is targeted back into California to address the wide range of practical challenges we currently face, including helping our forests and watersheds adapt to the changing climate. Including these types of adaptation actions in the Scoping Plan will achieve environmental co-benefits for communities throughout California. Deferring adaptation will defer any such benefits and also defer actions that could slow or reverse the trends of intensifying wildfires and diminishing snowpack. The consequences of deferral will fall upon California's communities as they spend more and more summer days choking on smoke and more and more dollars trying to replace lost drinking water, among the many other challenges they will need to meet.

To effectively address environmental co-benefits and localized impacts, climate adaptation should have equal footing with the many other components of the AB32 program. This sentiment was reflected strongly at the recent Fifth Annual Climate Change Research Conference

in Sacramento, where participants placed emphasis on eliminating presumed priorities and distinctions between greenhouse gas reductions, mitigation, and adaptation.

The Air Resources Board could take the following step to move toward incorporating climate adaptation in the AB32 program:

1. Make a finding that climate adaptation planning is in the interest of the AB32 program for the benefit of people of California and have the Scoping Plan call for the dedication of a portion of AB32 program revenue to local and regional climate adaptation studies and demonstration projects having potentially significant benefits to the overall program.

2. Pursue an MOU with the Resources Agency and the California Energy Commission that would specify how the three parties will work together to provide incentives for local climate adaptation planning and actions that maximize local environmental co-benefits and benefits to disadvantaged communities, while at the same time achieving measurable greenhouse gas reductions and carbon storage.

3. Make a finding that investing strategically in local adaptation plans and projects can help ensure California's dollars are put to work inside California to provide benefits for our citizens and communities.

In previous comments on the Scoping Plan, we have presented the case that landscape-based greenhouse gas reduction alternatives cannot compete with technology-based solutions in the global carbon market. Landscapes are too dynamic and too complex to be easily digestible by an open market, but they are still a critical component of a sustainable future in California. In fact, the recent draft of the California Climate Adaptation Strategy for the Biodiversity and Habitat Sector argues that landscape-based greenhouse gas reductions and carbon storage are a safety net for California's environment against the changing climate.

For all of these reasons, a final component of the AB32 Scoping Plan should be a landscape-based and integrated program for greenhouse gas reductions, carbon sequestration, and climate adaptation.

Sincerely,

/s/ Brian L. Morris

Brian L. Morris
General Manager

cc Mike Chrisman, Secretary for Resources
Regional Council of Rural Counties