



September 21, 2021

Mr. Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: 2022 Scoping Plan Update – Short-Lived Climate Pollutants**

Dear Mr. Corey:

The Rural County Representatives of California (RCRC) is an association of thirty-seven California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county. RCRC member counties are tasked with a variety of decision-making responsibilities related to solid waste and recycling, land use and development, and environmental stewardship in rural California communities and are challenged with economic vitality and social equity at the local level. We appreciate this opportunity to offer preliminary comment on the 2022 Scoping Plan Update—Short-Lived Climate Pollutants (SLCP).

Forest-Related Sources of Black Carbon Emissions

Much of California's forested lands are located within RCRC member counties including more than 70 percent of the lands managed by the USDA Forest Service (USFS). RCRC has repeatedly urged the California Air Resources Board (CARB) to address the escalating wildfire problem as part of the Scoping Plan since the very first iteration of the document in 2008 and has continued requesting the inclusion of wildfire emissions as climate change has exacerbated the need for better forest management practices on both state and federal lands. Now that CARB has begun modeling annual greenhouse gas emissions (GHG) from wildfires, we are disappointed that these emissions continue to be excluded from the analysis of the state's overall SLCP emissions inventory.

RCRC acknowledges the work the state is undertaking in the forest and wildfire sector through the Wildfire and Forest Resilience Task Force. However, the lack of education and serious consideration of wildfire emissions as a source of GHG and other pollutants over the past decade has done immeasurable harm in slowing the progress on obtaining vital funding, policies and infrastructure to facilitate the state's forest resilience,

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restoration and wildfire prevention needs. While CARB continues to exclude wildfires from its calculations based on the notion that they are not an “anthropogenic” source, we would argue that much of the state’s fire activity is due to decades of inactive and ineffective forest management practices that have collided with our current dry conditions to create the perfect environment for prolific, catastrophic wildfire events each year. In fact, studies have shown that human-caused climate change may have doubled the cumulative forest fire area across the western United States since the year 1984<sup>1</sup>. Couple that with the fact that approximately 85 percent of all wildfires in the U.S are ignited by humans<sup>2</sup> and we contend that it is wholly appropriate to classify California’s wildfire emissions as anthropogenic for the purposes of the Scoping Plan and include them in the update process.

RCRC not only continues to strongly recommend including wildfire emissions in the Scoping Plan Update for SLCP and other pollutants, but we also recommend inclusion of infrastructure to utilize woody biomass that needs to be removed from wildlands in order to treat fuels. While we realize biomass is somewhat divisive, woody biomass utilization can come in many forms, from biogas to pellets for export to cross-laminated timber. Biomass sites are also not exclusive to environmental justice communities, and particularly when utilizing woody biomass from forest lands, facilities in forested areas are often preferable due to their proximity to the materials. Biomass infrastructure also helps avoid piling and burning materials from forest management projects, providing a less emitting option for utilizing the materials.

### Rural Community Engagement and Public Process

RCRC recognizes the importance of considering environmental justice communities as part of the Scoping Plan process. We understand their unique challenges and impacts and acknowledge the need to give a certain deference to their interests. However, tourism-dependent rural communities are suffering from acute environmental impacts from wildfires and measurable economic impacts from the resulting damage to the forests and wildlands that urban residents utilize for recreation. RCRC has been frustrated with the public workshop process, which has limited time for general public engagement and even cut off the ability for RCRC representatives and other commenters to speak so that members of CARB’s Environmental Justice Advisory Committee (EJAC) could have special time allotments to comment.

Many rural, forested communities fall under the definition of low income according to Assembly Bill 1550 (Gomez, 2016), have growing immigrant populations, are home to underrepresented tribal communities, and are among the areas that need amplified

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<sup>1</sup> John T. Abatzoglou and A. Park Williams. (2016). Impact of anthropogenic climate change on wildfire across western US forests. *Proceedings of the National Academy of Sciences*.

<sup>2</sup> National Park Service. (2018) Wildfire Causes and Evaluations. Retrieved from <https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm>

Mr. Richard Corey  
2022 Scoping Plan Update—SLCP  
September 21, 2021  
Page 3

consideration during the Scoping Plan process. These are also communities that are not represented by the EJAC, and neither CARB nor the State of California has worked to bring green industry to rural areas that have been economically impacted by the effects of wildfire. The same rural communities struggling with public safety powershutoffs to prevent wildfires are breathing some of the worst air quality in the nation during fire season.

RCRC would caution CARB that the public workshop process thus far, including the SLCP workshop, has seemed exclusive of rural communities and the profound challenges facing them as they work to implement SLCP regulations while their residents are ground zero for one of the most polluting types of GHG emissions events in the state. RCRC would request that future workshops either ensure that the workshop continues until all commenters have been given time to speak in the public comment portion of the workshop or that no special interest groups be given deference over others. RCRC also requests that CARB hold a special workshop with an emphasis on rural communities to focus on the impacts of SLCPs and other pollutants on these areas.

RCRC appreciates your consideration of our comments. If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,



STACI HEATON  
Senior Regulatory Affairs Advocate

cc: Liane M. Randolph, Chair, California Air Resources Board  
Jared Blumenfeld, Secretary, California Environmental Protection Agency  
Members of the RCRC Board of Directors