April 10, 2017

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Re: Sierra Stakeholder Comment on 2017 Climate Change Scoping Plan Update [submitted via scopingplan2030 webform]

Dear Chair Nichols:

The undersigned group of Sierra stakeholders asks that the Air Resources Board use the 2030 Scoping Plan Update to **achieve more robust, sustainable outcomes by accounting for needs and benefits of climate work more equitably across all regions of the state**. We recommend you do this by amending the 2030 Scoping Plan Update to:

a. increase and decouple directed low-income funding from CalEnviroScreen;
b. support increased use of small-scale woody biomass for forested rural communities; and
c. adopt a regional vs. statewide approach to reaching the state's post-2020 greenhouse gas emission reduction goals.

Increase and Decouple Low-Income Funding From CalEnviroScreen

Although it can be harder to recognize in less populated areas, there are disadvantaged people living in poverty in forested rural parts of the state, including the Sierra and Cascade. Families who have been in the area for generations are still trying to recover from the decline of major industries like timber or mining; the people who grow our food are having to work multiple jobs off the farm or ranch to make ends meet; children and adults are plagued by asthma and other health concerns due to legacy issues like mining, smoke from wildfires and air pollution from outside the region. One in five Sierrans lives below the poverty line, a number that is consistently higher than the rest of California; and the region's unemployment rate regularly exceeds and is sometimes as much as double that of the state.

A large proportion of climate funding (via the Greenhouse Gas Reduction Fund or GGRF) is allocated to Disadvantaged Communities (DAC) using the CalEnviroScreen (CES) tool. The criteria used in this tool undercount rural impacts, such as environmental exposures (both local sources and secondary effects from urban areas), climate risks, and other indicators of relative disadvantage that affect sensitivity and vulnerability, especially in the state's forested communities. As a result, many Californians in-need are being left out – left out of the decision-making regarding how funds get spent, left out of the opportunity to help improve statewide conditions, and left out of the public health, economic and community sustainability benefits that come from reducing GHG and other emissions in rural areas.

The ongoing emphasis on CES-defined DACs over low-income, rural or other indicators is a major barrier. AB 1550 tried to address this issue by creating a separate and additional 25% allocation of GGRF funds to low-income communities; but the original amount was reduced to 10% and half of that was then limited to low-income communities located within a half mile of CES-defined DACs. Since there are no CES-defined DACs in the Sierra region – nor in the North Coast, Cascade, or interior Southern California mountain regions – the state's natural resource-based communities are once again cut off from access to funding for projects to address climate impacts.

We ask that directed low-income funding be increased and decoupled from any connection to CalEnviroScreen. By increasing climate-related funding and projects in rural regions, the state can prove program benefit to rural residents, help lift rural people out of poverty, and begin to overcome policy and statutory barriers that are keeping rural people from meaningfully engaging in the state's climate change mitigation and adaptation efforts.

Support Increased Use of Small-Scale Woody Biomass

A combination of aggressive fire suppression and a reduction in active forest management over the years has exacerbated the effects of climate change in California's forests, yielding forests that are increasingly susceptible to severe wildfire and widespread mortality from lengthy drought periods, insect infestation, and disease. Increasing mortality rates and massive wildfires not only turn our forests into net emitters, but they also pose significant threats to public health and safety, biodiversity, and wildlife habitat, along with recreation, tourism, and natural resource-based economies.

Current restoration efforts in the Sierra are still grossly out-of-pace with what the Scoping Plan identifies as necessary to return natural resources to a healthy condition. One of the most effective ways to increase pace and scale as recommended in the Scoping Plan is to reintroduce fire as a management tool. However, current forest densities create an unacceptable risk that precludes the use of managed fire in many places. Incentivizing private investment in regulated woody biomass utilization, thereby spurring restoration activity in California's forests, would have tremendous resource and climate benefits as well as helping hard-to-reach rural forest communities through job creation and workforce development opportunities.

While some people oppose the concept of biomass utilization because the treatment itself causes emissions, it is clear that emissions from controlled combustion are far less than from uncontrolled wildfire or open pile burning. And since most rural facilities are located in areas with low population density and are often coupled with other operations that can use the waste heat and steam, exposure risks are greatly minimized and dirtier-burning fossil fuel use is offset.

> We ask that the Scoping Plan include clear direction and policies to immediately increase the use of smaller-scale woody biomass in forested rural areas as a means of clearing out the underbrush and smaller trees and allowing the increased use of prescribed burning and other management techniques to improve forest health and reduce overall emissions.

Adopt a Regional vs. Statewide Approach

If we've learned anything in California, it's that a one-size-fits-all approach rarely works in a state this diverse. The draft Forest Carbon Plan posits that the best way to achieve statewide goals for stabilizing and ensuring forest carbon benefits is to develop and implement strategies at the regional scale. This concept makes sense since it recognizes that the level of climate impact, significance of statewide benefits provided, and opportunities for improvement differ by region.

A regional approach would allow emission reduction goals, low-income/DAC identification, funding distribution, and technical assistance/capacity-building strategies to be developed on a regional basis, perhaps in conjunction with existing regionally-focused state agencies – such as conservancies – and the regional carbon plans called for in the Forest Carbon Plan draft. Focused regional targets and funding can roll up to achieve statewide GHG reduction and carbon storage goals while doing more to maximize economic, environmental and public health co-benefits at the local and regional scale, as called for in AB 32, Executive Order S-3-05, SB 375, SB 535, AB 1532, and other associated legislation. In addition, by helping rural jurisdictions create restoration economies and achieve key resource and economic goals through implementation of forest health/climate-related projects, the state can create local buy-in and develop capacity that will be necessary to reach the more stringent post-2020 emission reduction targets.

> We ask that the Scoping Plan Update institute a framework for regional planning, implementation and funding that can support natural resource management to achieve climate goals and other co-benefits for rural communities across the state.

What Happens in the Sierra Doesn't Stay in the Sierra

While the Sierra Nevada and other rural regions struggle with the effects of climate change, rural resource-based impacts are not limited just to local residents. Extreme events like severe wildfire, tree

mortality, and drought also affect downstream urban and Valley communities that rely on the resources coming from forested rural parts of the state. Take, for example, the Rim Fire in 2013. On August 22 of that year, Governor Brown declared a state of emergency in Tuolumne County as a result of the fire that damaged homes, forced evacuations, and ultimately burned 257,000 acres, making it the biggest fire in Sierra history and the 3rd largest statewide. The very next day the Governor declared another state of emergency – this one for the City and County of San Francisco – due to the fire's damage and potential disruption of water and power supply to 2.6 million residents and businesses in the Bay Area.

Scientists at state agencies and elsewhere anticipate more frequent incidents like this, and the effects will be devastating to both local communities and other parts of the state. According to the Sierra Nevada Conservancy, emission estimates from the Rim Fire topped 11.3 metric tons of greenhouse gases. Based on U.S. EPA equivalents, emissions from that single event were equivalent to a year's worth of L.A. vehicle traffic (2.3 million cars), or CO_2 from 1.2 billion gallons of combusted gasoline or the electricity needed to power 1.5 million homes for a year.

This is why ARB needs to support more climate and GHG reduction work in rural forested communities. If the state doesn't take immediate action to better manage its rural resource areas, California residents will continue to suffer, and extreme events like the Rim Fire, coupled with ongoing issues like tree mortality, will permanently turn California's forests from carbon sinks to net emitters. The state will soon reach a point, if it hasn't already, where impacts from neglect of our natural and working lands will start wiping out the substantial gains we've been making in urban areas, negating years of emission reduction work and rendering the expenditure of billions of GGRF dollars meaningless. Please don't let this happen.

Sincerely,

Steve Frisch
Sierra Business Council

Jim Wilcox
Plumas Corporation

Staci Heaton
Rural County Representatives of California

Kay Ogden
Eastern Sierra Land Trust

Pam Bold
High Sierra Energy Foundation

Robert Meacher
City of Portola

Amanda Wiebush
Zenith Sustainable Consulting

Julie Regan
Tahoe Regional Planning Agency

Rick Lind
EN2 Resources, Inc.

Kelly Cruce
Climate Adaptation Consultant

David Griffith
Alpine County Dist. 5 Supervisor

Tim Frank
Center for Sustainable Neighborhoods

Norma Santiago
Catalytic Connections

Suzanne R. Lippuner
Community Member