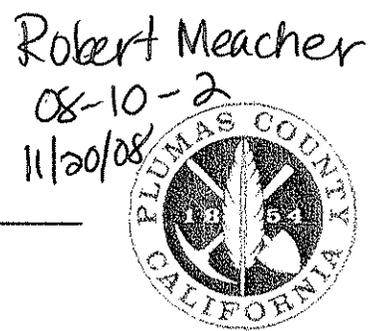


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November 19, 2008

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

Re: Climate Change Scoping Plan, October Final Draft

Dear Mary:

Plumas County has actively participated in the development of the AB 32 Scoping Plan and appreciates the opportunity to comment on the Preferred Alternative (PA) and on the functionally equivalent CEQA document (FED). As a rural County Supervisor, I am most interested in how the "Preferred Alternative" and the FED address environmental and environmental justice issues in rural California.

The preferred alternative is a very laudable mix of feasible and cost-effective GHG emissions reduction strategies that will, with the proposed margin of safety, provide net economic and environmental benefits to California and the Western Region. However, the distribution of impacts (positive and negative) remains to be resolved. Early investments by the AB32 program into sustainable forests and farmlands for their carbon sequestration and clean water co-benefits are essential for local governments and rural California to actually share in the benefits of a low carbon economy and sustainable communities.

Being primarily in Federal ownership, forest communities in California have a small tax base. Local governments can no longer rely on recreational housing development for expanding the tax base with the proposed vehicle-miles-traveled fuel standards in the PA and with SB375. Plumas is therefore appreciative that the ARB has included more discussion of labor training and a green economy. However, more specific discussion of green job opportunities for rural communities is needed, especially for the forestlands of the state.

I also request that the Public health Appendices (Attachments A and D) specifically recognize the health impacts for forest and farm workers and for our communities from declining summer air quality due to intensifying forest fires. Analyses in the Scoping Plan of declining air and water quality due to a changing climate have focused on impacts in the Central Valley and coastal parts of the state. Yet, severe wildfires in forested upland parts of the state can severely degrade both air quality and water quality. Rural disadvantaged communities in forest areas are

at risk for acute heat and smoke effects as they typically are without air purification or air conditioning systems, and because many adults and youth work outdoors.

Increasingly severe and larger forest fires release enormous emissions of GHG gasses for days to weeks as they mobilize or volatilize mercury and other pollutants into the regional air basins and watersheds. Community and household water and wastewater systems are especially vulnerable to waterborne pollution from extreme climatic flooding and fire and drought events. Severe and large forest fires can also cause extensive flood and mud damage to downstream flood control, water supply, and hydroelectric generation facilities, with significant statewide consequences.

Because the environmental baseline continues to change from 2010 to 2020 and because localized impacts are not addressed and mitigated for, the Preferred Alternative needs be revised. The Preferred Alternative, although it is an excellent prescription for California and the western region as a whole, still needs to comply with CEQA and with specific language in the authorizing legislation for AB32 regarding distributional impacts to localities.

Plumas proposes that one functional link between localized impacts and the statewide and regional GHG reduction program is local and regional climate adaptation. Localized climate adaptation is one way to mitigate for distributional impacts associated with the larger scale AB32 program. The PA and the CEQA FED for the final Scoping Plan should include recommendations for the implementation of early climate adaptation strategies that mitigate for disproportionate localized effects of the regional AB32 program - especially for disadvantaged communities.

The PA as it is currently proposed has the effect of promoting regional GHG reduction technology development and regional offset technology trading between capped sectors at the expense of California's environment and disadvantaged rural communities. Including climate adaptation strategies for addressing localized impacts is therefore an essential program element for mitigating a kind of leakage that has thus far received little attention in the Plan. Now that the PA includes a market-based cap and trade and offsets program, the PA must now address the reality that market investments into the environment or into farm and forests landscapes will always be less certain and therefore less attractive than investments in technology-based GHG reduction solutions. Without a Climate Adaptation Strategy for addressing localized impacts as part of the final PA, the AB32 program will have failed to even attempt to achieve its distributional equity goal.

Before December 10, Plumas County will do what it can to incorporate the information just available and soon forthcoming from the Climate Adaptation Strategy workgroups into specific examples of CAS strategies for rural landscapes with targeted benefits for disadvantaged rural communities. From our initial work, we believe that localized benefits from investing a portion of auction revenues, carbon fees, or public goods water charges into researching, demonstrating, and documenting climate resilient and climate buffering management practices for California's forests and farmlands will also generate regional and statewide environmental benefits.

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A Preferred Alternative that includes CAS strategies for mitigating localized impacts is, I believe, the least environmental damaging AB32 Scoping plan alternative under CEQA, and therefore it is an alternative that deserves your serious consideration – even at this late hour.

Thank you again for focusing some of your time and attention to the needs of California's rural landscape and California's rural communities.

Sincerely,

A handwritten signature in cursive script that reads "Rose Comstock". The signature is written in black ink and is positioned above the printed name.

Rose Comstock, Chair
Plumas County Board of Supervisors