



CO 8-57

July 22, 2008

Mary D. Nichols, Chair
California Air Resources Board
1001 I St.
Sacramento, California 95814

Dear Chair Nichols:

Merced County welcomes the opportunity to comment on the June 2008 Discussion Draft of the Climate Change Scoping Plan, and appreciates the efforts of ARB to reach out to local governments during this process. However, we are concerned that the document does not adequately address the serious issue of catastrophic wildfire, and believe that wildfire mitigation and prevention are vital to ARB's success in meeting the goals set forth in AB 32.

As you are aware, in May 2008, Governor Schwarzenegger issued Executive Order S-03-08, which specifically directed CalEPA and the California Resources Agency to oversee the Climate Action Team's development of measures for wildfire fuels reduction and biomass utilization. In light of the Executive Order, the current rampant wildfires around the state, and the Governor's recent emergency declarations, we are troubled that no such measures have been outlined in the Scoping Plan.

Recent wildfires statewide have had major impacts on air quality, contributing significantly to California's carbon and particulate emissions. As the wildfire season progresses, thousands of acres of forest lands will needlessly burn, releasing even more carbon and further contributing to our poor air quality. Catastrophic wildfires are typically on United States Forest Service (USFS) lands, and we maintain that many of those fires, along with the corresponding emissions, could be prevented if USFS lands were more efficiently managed. We are concerned that the Draft Scoping Plan makes only a vague mention of fuels reduction and fails to address emissions from fires on USFS lands.

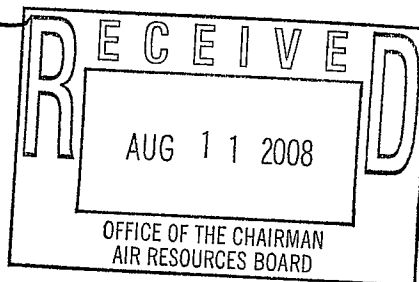
Merced County strongly urges ARB to include in the Final Draft Scoping Plan a firm commitment by the state to join with local governments to advocate at the federal level for enhanced management on USFS lands, as well as an extensive program to quantify wildfire emissions that could be avoided through better forest management practices. This is vital not only in meeting the goals of AB 32, but more importantly to improving the quality of the air and public health. We thank you for your consideration of our comments.

Sincerely,

Kathleen M. Crookham

Kathleen M. Crookham
Chairman, Merced County Board of Supervisors

CC: Governor Arnold Schwarzenegger
Members, California Air Resources Board
Regional Council of Rural Counties



Board of Supervisors

John Pedrozo
Supervisor, District One

Kathleen M. Crookham
Supervisor, District Two

Michael G. Nelson
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**BEFORE THE BOARD OF SUPERVISORS
COUNTY OF MERCED, STATE OF CALIFORNIA**

In the Matter of

RESOLUTION EXPRESSING CONCERN
WITH THE DRAFT AB 32 SCOPING PLAN
AND ASKING THE GOVERNOR TO TAKE AN
ACTIVE ROLE AT THE FEDERAL LEVEL
REGARDING WILDFIRE AND FOREST FIRE
MANAGEMENT

RESOLUTION NO. 2008-153

WHEREAS, catastrophic wildfires continue to threaten lives, property and the natural resources of the state of California; and,

WHEREAS, the insurance losses for the 2007 Fire Season in Southern California were \$1.6 billion and the Angora Fire in the Tahoe basin was more than \$150 million alone, insurers have paid out in excess of \$8 billion to thousands of policy holders from the top 10 California wildfires since 1970; and,

WHEREAS, the estimated loss of employment from the 2007 Southern California fires was in excess of \$500 million; and,

WHEREAS California is approximately 50% publicly owned land and 50% privately owned land but many rural counties have substantially higher percentages of federally owned land; and,

WHEREAS California has over 43 million acres of federal land, much of which has not been adequately managed to mitigate the risk of catastrophic wildfire; and,

WHEREAS two of the three largest wildfires in California in the past 100 years began on federally-owned land; and,

WHEREAS the escalating costs of fighting fires on federal land over the last 10 years has significantly diminished the available resources for the critically needed prevention measures that can minimize these catastrophic fires; and,

WHEREAS, the U.S. Forest Service and Department of Interior have spent over \$1 billion on fire suppression every year since 2000 with suppression costs now consuming over 50% of the total wildland fire budget, as compared to 13% of the total fire budget in 1991, leaving few resources for critically needed preventive maintenance of our national forests in the west and throughout the country; and,

WHEREAS the resources to manage the federal lands to reduce fire risk would be a small investment relative to the skyrocketing costs of fire suppression; and,

WHEREAS the State of California has made significant strides towards reducing the risk of catastrophic wildfires on state and private lands such as ranking lands as to the level of fire hazard, requiring 100 feet of defensible space around homes, requiring ignition-resistant materials on all new construction that is built in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any designated Wildland-Urban Interface (WUI) Fire Area, and many other things to not only address preservation of life and property but the environmental risks of large scale wildfire as well; and,

WHEREAS the increased risk of catastrophic wildfires in California will result in harmful secondary environmental effects, including diminished air and water quality, impacted watershed, increased air pollutant emissions, and threatened habitats of sensitive wildlife species; and,

WHEREAS, approximately *eighty percent* of the State's developed surface water supply originates on watershed lands within our rural counties. California's residents use a portion of this water for domestic, commercial, agricultural, industrial, recreational, and other beneficial uses and these rivers, lakes, and watershed lands also serve as habitat for hundreds of species of fish and wildlife; and,

WHEREAS, the detrimental effects on these watersheds affect all of California, not just rural California; and,

WHEREAS the increased risk of catastrophic wildfires significantly impacts the levels of greenhouse gases in Merced County; and,

WHEREAS the mitigation of wildfire emissions is vital to reach the goals stated in the California Global Warming Solutions Act of 2006 (AB 32); and,

WHEREAS the Draft AB 32 Scoping Plan, released in June 2008, fails to adequately address the need to mitigate wildfires and the importance of quantifying and modeling wildfire emissions on private, state, and federal lands.

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

The Merced County Board of Supervisors declares that there is an ongoing emergency due to the threat of wildfire in California, that the state and the local governments have taken many steps to resolve this issue and now requests that the Governor take an active role at the federal level to demand that the United States Forest Service take action in California's federal wild and forest lands to do the prevention and maintenance work required to mitigate the risk of catastrophic wildfires.

I, **Demitrios O. Tatum**, Clerk of the Board of Supervisors of the County of Merced, do hereby certify that the foregoing resolution was regularly introduced, passed and adopted by said Board at a regular meeting thereof held on July 22, 2008 by the following vote:

Supervisors

Ayes: Kathleen M. Crookham, John Pedrozo, Mike Nelson, Deidre F. Kelsey, Jerry O'Banion

Noes: None

Absent: None

Witness my hand and the Seal of this Board this 22nd day of July 2008.

DEMITRIOS O. TATUM, Clerk

By

Deputy

