County of El Dorado

BOARD OF SUPERVISORS

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September 30, 2008

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

RE: Climate Change Scoping Plan, June 2008 Discussion Draft

Dear Chair Nichols:

El Dorado 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 outline 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.

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El Dorado 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,

Rusty Dupray, Chair Board of Supervisors, El Dorado County

CC: Governor Arnold Schwarzenegger
Members, California Air Resources Board