



December 28, 2021

Alex Yiu
Staff Air Pollution Specialist
California Air Resources Board
Industrial Strategies Division
Climate Change Program Operations Section
1001 I St. PO Box 2815
Sacramento, CA 95812

RE: Working and Natural Lands Alternative Scenarios

Dear Mr. Yiu:

Endangered Habitats League (EHL), as southern California conservation group, appreciates the opportunity to comment on the Working and Natural Lands Scoping Plans Draft Alternative Scenarios.

The scenarios err – and err grievously – in lumping forest and shrublands together in a single category. Conifers forest (for example, towering redwoods) and shrublands (for example, sparse patches of coastal sage scrub hugging the ground) do not look alike, act alike, or have even vaguely similar fire regimes and fire behavior. We call on CARB to immediately withdraw these faulty scenarios.

CARB should first consult with scientific experts on the major differences between these two classes of vegetation, and separate them according into two different categories. The category of shrublands should reflect their unique ecology, carbon sequestration in soil and root systems, propensity to type-convert to flammable weeds after vegetation removal or too-frequent fire, and specific fire modeling characteristics.

In particular, CARB should engage independent experts on appropriate fire management in shrublands. Outside of defensible space for structures, roadside treatments, and strategic fuel breaks for the purposes of staging and access, science-based management does not include broad-scale treatments like vegetation removal and prescribed burning. This differs completely from forest systems, where prescribed fire can rectify fire-deficient conditions. However, due to existing habitat degradation and the baseline high frequency of anthropogenic wildfire in shrublands, such treatments are counterproductive, and will result in type-conversion to weeds, loss of carbon storage and biodiversity, and increase in flammability and fire hazard.

After the above scientific process is conducted, please reformulate a new and scientifically sound set of alternative scenarios. In concept, a combination of the

objectives of Scenarios 1 and 2 (conservation and restoration, carbon sequestration, and climate resilience) will best serve the State. But as it now stands, the conflation of forests and shrublands is a blatant and egregious mistake that renders the scenarios as a whole scientifically indefensible.

EHL would be happy to work with CARB and to recommend qualified fire ecologists for consultation.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", written in a cursive style.

Dan Silver
Executive Director