Feb 5, 2019

**TO:** CARB

**FROM:** Dan Silver, Endangered Habitats League

**RE:** COMMENTS on January 2019 draft Natural and Working Lands Implementation Plan

The Plan (page 16 and elsewhere) appropriately identifies protection of habitat lands as part of the State’s strategy, both for sequestration and avoided conversion benefits.  We commend and support this approach.  It would also be important to specifically note that such protection can take the form of fee title acquisition, in addition to easements.

We concur with directing new growth to existing communities and fostering compact development that reduces vehicle miles traveled (page 15).  It should be recognized that a greater state role is needed if this goal is to be achieved, for example, in directing new development away from high fire hazard severity zones.

The implementation goal (Figure 7, page 18) for natural and working land is expressed as a 50-75% reduction in annual rate of conversion by 2030.  How does this translate into numbers of acres per year that would have to be protected?  Absent such a tangible quantification, it is hard to understand the magnitude of the goal or how to achieve and finance it.

The call for a “balanced” approach (page 16) for chaparral and shrubland between restoration, protection, and fuel management is flawed.  Given the high cost of restoration, acquisition should be the priority, but research into cost-effective restoration techniques should be ongoing.

More problematic is inclusion of “fuel management” in shrublands and chaparral.  Current science shows that vegetation treatments have a very limited role in fire hazard reduction.  They only should be performed immediately adjacent to structures to provide access for fire fighters, or to create strategic fuel breaks, also for access.  Vegetation treatments ignore the predominant role of wind-borne embers in fire spread, and lead to conversion of native habitat to highly flammable weeds which increase fire risk.  Given the increased fire frequency now present in scrub systems due to human activities, prescribed fire, as a practical matter, is becoming obsolete.  Studies have shown that landscape level vegetation treatments are not effective in reducing structure loss.  The Implementation Plan should eliminate the reference to fuel management in scrublands as unscientific and counterproductive, or alternatively, acknowledge its very limited role.

We urge that chaparral and shrubland restoration and management practices (page 17) be assigned acreage goals in the future pending a better understanding of their carbon dynamics.

In general, we urge the Administration to achieve natural lands protection by actively seeking substantial and dedicated greenhouse gas auction revenues for this purpose.  Absent this, it is highly unlikely that the Implementation Plan will have any chance of success.