

California Native Plant Society

Los Angeles / Santa Monica Mountains Chapter

3908 Mandeville Canyon Road
Los Angeles, California 90049

Forest Climate Action Team (FCAT)
fcat.calfire@fire.ca.gov

RE: Comments on the Forest Carbon Plan Draft (FCPD)

California Native Plant Society is dedicated to the preservation of California native plants through conservation, science, education and horticulture. We are one of 33 chapters in California and Baja.

We have serious concerns about some of the statements and proposed actions in your Forest Carbon Plan, especially for the southern California area.

General comments:

1.) The word “forest” in the Forest Carbon Plan Draft (FCPD) includes and affects a broad range of ecosystems from tree farms to wildlands to many chaparral, shrublands, grasslands, meadows, wetlands, and wildland/urban interfaces, even street trees. Yet the Executive Summary seems unable to consider any woody species outside of marketable timber as being carbon sequesters or net sinks of carbon, e.g. page 1: “The vegetation that replaces the trees that have died will not compensate for the carbon loss for decades (if ever; for example where forest converts to shrubs”. A number of chaparral trees/shrub species are known to develop deep, broad root systems that sequester carbon very well. such as *Heteromeles arbutifolia*, *Prunus ilicifolia*, *Quercus berberidifolia*. They recover rapidly after wildfires, sequestering carbon in new roots and woody growth, while preserving watershed value and maintaining soil health. Why are you not considering these valuable plants in your plans to create “healthy forests”? They are especially important as factors in the Executive Summary statement on page 2: “California will manage for carbon alongside wildlife habitat, watershed protection, recreational access, traditional tribal uses, public health and safety...”. Go to the vegetation experts at California Fish and Wildlife for more information.

2.) FCPD Key Findings: bullets 1, 2 and 7 seem self-contradictory:

- *Reducing carbon losses* from forests is essential to meeting the state’s GHG reduction targets.
- Current rates of fuel reduction, thinning of overly dense forests, and *use of prescribed and managed fire* are far below levels needed to restore forest health, prevent extreme fires, and meet the state’s GHG reduction targets.

SCAQMD records show that prescribed or fires managed by Fire Districts or other fire agencies often burn more that the prescribed and permitted acreage in southern California, perhaps due to unpredictable wind gusts or inadequate planning. Our highly diverse topography, soils and highly diverse plant ecosystems makes fire a very dangerous tool for “Reducing carbon losses”.

Define “fuels”. Does that mean any plant species not a marketable timber tree? Does it mean “lollypopping” chaparral trees repeatedly until they die? Does it mean removing all low-growing annuals and perennials until the soil is bare, becomes hydrophobic and no longer retains rainwater

or stores groundwater? The hot temperatures of climate change will aid this kind of plan as the ground-shading native plant canopies are destroyed by “fuel treatments”. That is the way “fuel treatment” is carried out in the Wildland-Urban Interface in southern California. Removal of all that sequestered carbon with no replacement except non-sequestering non-native grasses, non-native mustards and other shallow-rooted noxious weeds does not achieve the goals of carbon reduction and healthy “forests”.

- The limited infrastructure capacity for forest management, *wood processing, and biomass utilization*, and the limited appropriately trained supporting workforce, are major impediments to forest restoration.

It is apparent from reading the FCPD that the FCAT has no knowledge of the extensive development of conversion technologies for processing green waste and wood waste for useful production of energy and/or fuels. Many of these conversion technologies are non-thermal and come in tank sizes to fit the quantities being processed, the frequencies of arriving input and the acreage available. Some of them can become part of other waste-processing facilities, such as sewage/water treatment plants. The Environmental Division of Los Angeles County Public Works has a Solid Waste Management Committee / Integrated Waste Management Task Force with an Alternative Technology Subcommittee that has studied conversion technologies from around the world over many years. FCAT should contact them and discuss what will work best for various scenarios under the Proposed Actions of the FCPD.

3.) Proposed Actions of the FCPD::

A. 4. : Why increase the area “reforested annually” by 25% above the current level ? Is this tree-farming? Or is this a careful replanting in appropriate native vegetative alliances suited to the soils and terrain and sustainable for the future? What will the climate conditions be in 2030?

D. “Innovative solutions for wood products and biomass utilization to support ongoing forest management activities.”

Please see the discussion of sources of information (under bullet 7 above) about different types of conversion technologies.

Please coordinate all activities involving harvesting green waste, wood waste or beetle- or pathogen-killed trees with the California Department of Food and Agriculture (CDFA). More than half the counties in California are under quarantine for some species of pest or pathogen. CDFA requires inspection of, certification on transport of, processing of, and marketing of any products from quarantined areas.

4.) Recommendations for Implementation:

4. “Explore opportunities for regulatory and policy changes and streamlining to advance the activities described in this Plan and implemented at the regional level:

a. “Increase use of prescribed and managed fire for restoration”: This is not a good idea for heavily urbanized areas such as in southern California. It also is a carbon, GHG producer, counter to the primary goal of this FCPD.

d. “Development of new wood product and biomass facilities.” See previous discussions of regulatory and innovative choices.

Comments on Appendix 3: Ecological Assessments: 1.1.4: South Coast and Mountains Region:

1) 1.1.4.1 Overview of the Ecoregion:

The vegetation in the last paragraph is inaccurate. Apparently native riparian, canyon and woodland forests of oaks (several species), maple, alder, ash, sycamore, cottonwood, bay, walnut, and willow that populate the transverse mountain ranges, the hill ranges and the foothills of the San Gabriels don't count as "forest". These are not "patches". they are part of the terrain—part of sometimes miles of canyon or riparian ecosystems. As such they are extremely important factors in any "healthy forest" in southern California.

Figure 10. Vegetation of the South Coast and Mountains Ecoregion is totally incorrect. In fact, this ecoregion is very complex, in soil types, geology, topography and in native plant and animal species, not to mention the Wildland – Urban Interface inhabitants, both native and non-native.

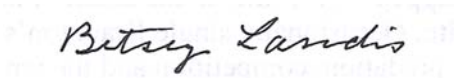
Table 7. Area of sampled land by land status and ownership group, California 2005-2014: South Coast and Mountains Ecoregion. This totals thousand acre-parcels with land status defined as "Unreserved or Reserved forest land: Timberland and Other unreserved forest land." Again the question becomes: is this plan about only marketable trees, i.e. your definition of "Timberland", or is this plan designed for all lands: wildlands, tree farms, restored "forests", or Wildland-Urban Interface areas?

2.) 1.1.4.3 Forest Management:

This paragraph about Figure 11. Fire Return Interval Departure for the South Coast and Mountains Ecoregion suggests that fuel reduction and prescribed and managed fire would be the recommended active land management for this area. If anyone had looked into the fire history around a century ago, one would have found news stories about massive fires in this region. CalFire and FCAT has the responsibility of providing guidance and regulations to local fire agencies. This covers all kinds of wildlands or forested lands or agricultural lands such as rangelands and grass lands. Trying to prevent wildfires by burning and releasing carbon, especially in a region of poor air quality seems to totally defeat the purpose of this FCPD. Loosening air quality requirements to achieve this dubious goal is even worse.

There are many improvements needed to make this Forest Carbon Plan truly workable. FCAT has to move out of the early days of the 20th century and learn what works in the 21st century. Burning is out, especially when avoiding carbon and GHG emissions and when near densely-urbanized population areas.

Sincerely,



Betsey Landis, Vice President
Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society