



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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RE: CARB Natural and Working Lands Scoping Plan Draft Alternative Scenarios

Thank you for the opportunity to comment on the Natural and Working Lands Scoping Plan Draft Alternative Scenarios. The Department of Regional Planning is the planning agency for the unincorporated areas of Los Angeles County. The physical environment of the unincorporated areas is extremely diverse. The natural features found in the unincorporated areas include coastlines, islands, dunes, marshes, tidal flats, sea cliffs, hills, mountain ranges, freshwater ponds, rivers, streams, wetlands, woodlands, deserts, chaparral, grasslands, valleys, and plains. Our Significant Ecological Areas (SEA) Program was established to help conserve the genetic and physical diversity within Los Angeles County by designating biological resource areas capable of sustaining themselves into the future.

Our varied natural features means that all six Natural and Working Lands (NWL) type categories can be found locally in Los Angeles County and many have been designated as SEAs. Our comments on the draft alternative scenarios are to ensure that the scenario objectives comprehensively capture the unique Southern California landscape before modeling is initiated. Please see below for the following comments:

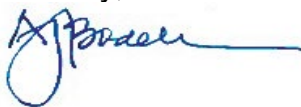
1. Consider separating the Forests and Shrublands category into individual categories. Prescribed burns are not suitable for all environments. The [National Park Service](#) explicitly states that prescribed burns are not appropriate for shrubland ecosystems that are prevalently found throughout Southern California. Continued single-focus on prescribed burns neglects the varied ecosystems found throughout all of the State, some of which do not benefit from prescribed burns. A separate Shrubland category can help to identify successful wildfire prevention techniques that are suitable for native shrubland. Also, a distinction between

Forests and Shrublands would result in a more accurate emissions assessment on the impacts of wildfires and prescribed burning emissions from these different plant communities, given that they are likely to have different emission ratings.

2. Consider including specific objectives in the Deserts/Other lands category to capture the maximum carbon sink potential found in deserts. Inclusion of deserts-specific objectives can enhance the data produced during the modeling process. The candidate species listing of the western Joshua tree by the California Department of Fish and Wildlife can lead to conservation opportunities in the deserts that are typically overlooked. In addition to minimizing land conversion and disturbance in deserts, preservation and restoration of desert biocrusts may provide an opportunity for future desert land management. Biocrusts help to maintain the delicate desert ecosystem and reduce adverse air quality and respiratory illnesses that result from soil disturbances.

We hope to see a revised version of the draft alternative scenarios that incorporates the comments received during this public comment period. If you have any questions regarding the comments provided above, please contact Ms. Thuy Hua, Supervising Regional Planner, Environmental Planning and Sustainability Section, at thua@planning.lacounty.gov.

Sincerely,



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AJB:CC:TH:IC