

Hannigan, Edith@BOF

From: Taylor, Robert <robert_s_taylor@nps.gov>
Sent: Wednesday, June 01, 2016 7:16 PM
To: Elisabeth Landis
Cc: Vegetation Treatment Program@BOF; Hannigan, Edith@BOF; Greg Suba; Frank Landis; Snowdy Dodson; Hartman, Steve; Julie Clark De Blasio; Witter, Martha
Subject: Re: Vegetation Treatment Program PEIR comments from LASMM Chapter CNPS

Thanks Snowdy et al,

That is a terrific letter emphasizing a number of very important points that have generally gone unmentioned by our colleagues!

You made one standout suggestion that could be a very welcome game-changer: Bullet 7, page 2.

I wonder if the CalFire veg clearance folks might get very excited about your suggested large scale program of removing dead and dying trees in the service of a biofuel program? That could be a real win-win project that would get them off their current problematic track, help get us off their case, and allow them to achieve a number of truly appealing things that lots of stakeholders could support:

- Those at CalFire who just really really want to keep cutting woody vegetation on large areas of land get to keep doing that.
- Biologists become CalFire's friends and allies rather than "obstacles to fuel treatment" when biologists are helping them identify vast acreages of dead and dying trees that biologists want them to remove.
- CalFire fuel treatment people get to claim an honest, clear, and demonstrable ecological benefit for their projects that biologists will affirm. No more need to justify projects with defensive, weasel-wordy hand waving about creating vague hypothetical "habitat value" for undefined species.
- CalFire fuel treatment people can keep calling their work "hazard fuel removal," and count the acres as such if they want to. It is not a stretch to characterize a large stand of Sudden Oak Death (SOD)-killed woodland as some kind of fire hazard. They get to claim a fire safety benefit for their projects, so multiple objectives are met. Woo hoo!
- But wait, there's more! If they really help take a lot of diseased, fire prone biomass off the landscape before it burns, and run it through newly constructed biofuel facilities to make something that replaces a fossil fuel, and they also help prepare SOD-killed woodlands for a speedier return to healthy, carbon-sequestering native plant cover, then we avoid some of the current shady carbon accounting and it becomes easier to demonstrate honest benefits for CA's carbon footprint. (If all those trucks and chainsaws don't blow our carbon budget)
- One could honestly call it a proactive natural resource management program addressing expected climate change effects on CA landscapes. This would be especially true if any aids to revegetation on the backside of a treatment are sensitive to expected changes in future habitat suitability for dominant species. Biologists will need to help advise them on that part too.
- New biofuel facilities can be characterized honestly as centers of rural job creation.
- New biofuel facilities can be characterized honestly as renewable energy development.
- Some new biofuel facilities can probably also become sources of certified sterile, pathogen-free compost and other soil amendments. (Let the thermophilic fungi cook the pathogens out of the biomass in big temperature-controlled composting barns or something?) Plug them in with organizations like Ecology Action in Willits and let a thousand gardens bloom.

- Those at CalFire who really really want to keep modeling fire hazard for project planning purposes could keep doing that. Some SOD-killed areas that need treating will also fall near human communities or adjacent to existing anchor points for fire suppression. CalFire could still prioritize some SOD-killed areas that they figure will create new tactical advantages to wildland firefighters and claim some arguable fire safety benefits for their projects in addition to all the other benefits. Why not?
- If the primary objective is removing disease-killed biomass (=dead hazard fuels) to stimulate vegetation recovery (replacement with less hazardous, live fuels), then it will not be necessary to treat an area over and over again to achieve their objectives. So they'll be able to treat a lot more acres in the long run than if they were just making fuelbreaks requiring annual treatment from now until forever. Woot!

One of the scary things about SOD and other impending woodland epidemics is the vast spatial scale of the damage. And CalFire's VTP is a vast, potentially damaging project in search of a legitimate mission. So give it a good one and everyone is happy. If sensitively directed and implemented, CalFire's VTP could actually be a really helpful service to our state. Its huge proposed scope would actually be appropriate to tackling a huge problem like epidemics of woodland dieback. In fact, CalFire is one of the only entities capable of undertaking coordinated work on such a large scale. CalFire management might really love this new mission once they got their heads around it.

I think now would be a terrific time to get a cabal of subject matter experts together to develop this general idea into a more specific proposal. The first thing to prove would be the specific technical feasibility and economic viability of the proposed biofuel facilities. The fact that the VTP does not need to pay for itself will probably be one of the keys to making the whole thing break even. I expect the cost of cost effectively transporting all the biomass (instead of masticating and leaving it onsite) from project sites to biofuel facilities without spreading fungal pathogens will be a challenge.

So what do folks think about this? Does this general notion even pass the laugh test? Did anyone else have an "Aha!" moment thinking about this?

RT

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Centennial Goal: Connect with and create the next generation of park visitors, supporters, and advocates.

On Tue, May 31, 2016 at 1:37 PM, Elisabeth Landis <betseylandis@sprintmail.com> wrote:
 Dear Edith Hannigan and all-

The Los Angeles / Santa Monica Mountains Chapter of California Native Plant Society submits a letter of

comments on the Vegetation Treatment Program PEIR. See attached letter.

We would appreciate a reply that you have received the document and can open the document.

Thank you.

Snowdy Dodson
President
Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society