

## Hannigan, Edith@BOF

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**From:** radiantao@gmail.com  
**Sent:** Monday, May 30, 2016 1:25 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Comments on the VTPIER

I have a comment to make about the VTPIER.

I quote from the report the following:

"Information on responses of wildlife to fuel reduction treatments, including herbicide treatments, is sparse to totally lacking."

Suppose I wrote a business plan and sent it to investors. It had all kinds of projections for profit from making a new food product. however, under risk analysis, it said,

"Information on health effects of this product for consumers, including possible death caused by its repeated consumption, is sparse to totally lacking."

*Would you invest in this business?*

*Then why would you invest in/ accept this program?*

Carl Andrews, MFA, BA, CTM, CSI

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## Hannigan, Edith@BOF

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**From:** Ted Caragozian <ranchitated@yahoo.com>  
**Sent:** Tuesday, May 31, 2016 2:27 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** new plan to degrade the chaparral

Hello Folks. I can't say that I'm impressed with your new "improved" vegetation management plan. It still contains vague, outdated and unsupported proposals. As a proponent of nature, I object. The chaparral is an integral component of California's natural habitat and the priority should be to leave it as intact as possible. Your proposal doesn't reflect this. Maybe we should designate a different agency to draw up a reasonable management plan. Someone who values the chaparral for its intrinsic value, instead of wanting to degrade it so badly.

Sincerely,  
Ted Caragozian, Ranchita

## Hannigan, Edith@BOF

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**From:** coueran@yahoo.com  
**Sent:** Saturday, May 28, 2016 4:51 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Clearing chaparral habitat

You and the Board of Forestry should retract the proposed habitat clearance program and to instead work with the California Natural Resources Agency and the Senate Committee on Natural Resources and Water to create a **Comprehensive Fire Protection Program** that:

- focuses on actual assets at risk rather than habitat clearance
- preserves the rights of citizens to object to destructive projects
- incorporates the most current science
- understands the difference between forests and other ecosystem

Guy Cochrane  
Santa Cruz, CA 95060

## Hannigan, Edith@BOF

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**From:** Brooke Colbourne <brookecolbourne@gmail.com>  
**Sent:** Thursday, May 26, 2016 7:16 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Draft Programmatic Environmental Impact Report

Hello Ms. Hannigan,

As a student who is devoting her life to studying the Environment and the ways which humans can change the way we see the world, I was deeply saddened to be informed by what is in the DPEIR for the states proposed Vegetation Treatment Program. As I read through the plan I noticed many errors that truly do not address what long term effects will be as a result of the plan. I find this incredibly alarming and upsetting. Over my short 23 year life I have gotten to see many parts of California, from San Francisco to Yosemite, to Death Valley, to Borrego Desert, but mostly the coastal regions; Big Sur and Encinitas. As an Environmental Studies major I have learned how important Chaparral is as a habitat for animals specifically in our coastal region. I have seen so many homes built growing up because California is surely a popular place to live. However, I don't think it is fair to take away the homes of animals who dwell in Chaparral. I think this plan needs to be reassessed and the impacts need to be clearly outlined so that people can really see how harmful it is to the environment. Please know that my concern is genuine and as a student I will continue to learn what I can do to minimize the impacts while addressing that other parties may not agree. I fully respect alternate opinions, yet I think that this plans errors need to be reassessed and the plan ideally redeveloped.

Sincerely,  
Brooke Colbourne

**Hannigan, Edith@BOF**

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**From:** Tori Collender <tcollender@usa.net>  
**Sent:** Tuesday, May 31, 2016 3:28 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** comment Cal Fire Vegetation Treatment Plan

Dear Board of Forestry;

Apologies for writing on the last day for comments about Cal Fire's Vegetation Treatment Plan. I didn't realize that the new draft was out.

While I'm sure Cal Fire has been working hard and the prospect of keeping tens of millions of Californians safe in a multi-year drought must be daunting, this doesn't do it. As I read it it's a rehash of the last one. The last one was inadequate on many many fronts.

PLEASE DO NOT APPROVE IT.

respectfully,

Tori Collender  
San Marino, CA.

## Hannigan, Edith@BOF

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**From:** Pietro di Girolamo <pietrodigiolamo@mac.com>  
**Sent:** Tuesday, May 31, 2016 7:36 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Revised Draft PEIR

To the Board:

I am writing in concern for what appears to be an incomplete, partially revised EIR for the Vegetation Treatment Program, which includes inconsistencies, inaccuracies, and misrepresentations of acknowledged experts in the field, leading to questionable or improper measures to deal with wild land and urban interface fire suppression.

Please reconsider adoption of the current draft in favor of providing a more complete, accurate, and transparent EIR that is truly consistent with CEQA requirements.

Pietro di Girolamo, CNPS member and State Reserve docent

**Hannigan, Edith@BOF**

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**From:** Susan Dobrowolsky <susanx2@att.net>  
**Sent:** Tuesday, May 31, 2016 10:16 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Cal Fire's Vegetation Treatment Program

To Whom It May Concern –

Good day.

I am vehemently opposed to the proposed plan and request that you strenuously reconsider the whole thing. Please utilize the available science to redraft a more acceptable plan.

The mere destruction of millions of acres of vegetation and wildlife habitat is not justified.

I implore you to reconsider.

Thank you very much.

Susan Dobrowolsky  
7255 Independence Avenue  
Apt. 321  
Canoga Park, CA 91303

**Hannigan, Edith@BOF**

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**From:** Jim Duggan <jimsflowers@thebulbman.com>  
**Sent:** Saturday, May 28, 2016 8:01 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Vegetation Treatment Program

May 27, 2016

Jim Duggan

P.O. Box 987

Solana Beach, CA 92075

email: [jimsflowers@thebulbman.com](mailto:jimsflowers@thebulbman.com)

California Board of Forestry and Fire Protection

Attn: Edith Hannigan, Board Analyst

email: [VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)

I am writing to express my concern for the state's Vegetation Treatment Program and the current Draft Programmatic Environmental Impact Report, (DPEIR).

It appears that the management of fuel has become more important than the protection of lives and property from wildfire. The use of old data and the misuse of several scientific studies (even though the correct information has been submitted) seem highly inappropriate. We must not move forward with outdated models, poor research and incorrect assumptions.

I urge the board to prepare a revised DPEIR by taking into account current science, not incorrect and outdated views.

Thank you for your consideration

Jim Duggan

## Hannigan, Edith@BOF

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**From:** Suzannah Ferron <suzannah@pobox.com>  
**Sent:** Tuesday, May 31, 2016 1:14 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Vegetation Treatment Program

Dear Members of the Board of Forestry,

I am writing to you as a new homeowner in Shadow Hills, a Marriage and Family Therapist and Ecotherapist, a member of the California Chaparral Institute, and a volunteer at the Hahamongna Native Plant Nursery and the Nogales Nursery at Debs Park, to express my strong concern regarding your potentially devastating vegetation treatment program.

Instead of the one-size-fits all program, I urge you instead to create a program that will:

1. Thoroughly consider the entire fire environment, focusing on fire-prepping/proofing houses, structures and communities rather than bulldozing natural landscapes/habitat
2. Reflect bioregional differences rather than taking a one-size-fits-all approach in an area with clear biodiversity
3. Allow for transparency and independent oversight--citizens have the right to have individual projects such as this one thoroughly evaluated under CEQA for potential environmental impacts,
4. incorporate the most up-to-date science available rather than anecdotal information and outdated, decades-old fire hazard data,
5. Incorporate a thorough, area-specific and complete determination of the long-term environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread in all of the areas affected.

Given this time in our history of unparalleled, human-caused environmental stressors that threaten our rapidly dwindling landscapes, biodiversity and habitats, we must do all we can to preserve them. Ravaging 22 million acres of habitat willy-nilly through mowing it down or, even worse, using chemicals, is an obvious recipe for disaster for our native plant, animal and insect species and will result in dangerous erosion, the encouragement of invasive weeds, depletion of seed banks, an increase in local plant community extinctions, and an increase in animal/insect endangerment and extinction. For the sake of California's future, we need to slow this process down, consult with a range of biologists, native plant experts, arborists, geologists, etc., who have a much more thorough and science-based range of knowledge about native landscapes/habitats/communities and hardscaping specialists who can provide ideas about how to fire-proof houses and communities rather than natural landscapes and habitat. To do otherwise is dangerous to the long-term health of this area.

I do not believe we need to denude nature and destroy what little wilderness there is left for wildlife for the sake of expediency. We can and must do better.

Thank you for your time and consideration on this critical matter.

Sincerely,

Suzannah Ferron

## Hannigan, Edith@BOF

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**From:** Gerald Fisher <jfisher760@aol.com>  
**Sent:** Tuesday, May 31, 2016 6:34 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Millions of acres of California Backcountry & Forest Lands to be burned

To: California Board of Forestry (BOF) and U.S. Secretary of the Interior

The timing of events, EIR comments due May 31, 2016 by BOF, and recent legal settlement agreements re: the San Luis Rey River Watershed/5 major San Diego County Indian Tribes, necessitate an immediate sharing of information. Thus, I hope this email, and others, will work to the best interest of all.

### **[For clarity: Comments to Board of Forestry first]**

#1) **Technical aspects** such as dealing with CEQA issues, Flora and Fauna are supported by the undersigned as presented by the **California Chaparral Institute** and Cindy Buxton, chair of the Forest Committee of **San Diego Sierra Club**.

#2) As a past hotshot crewman for the USFS, current member of the Fire Safe Council, and owner of a designated Conservancy Property, the perspective of the proposed **Wildland Fire approach**, as stated by **USFS and observed by CalFire practices of past years** (no prevention, "keep it burning"), is not in the best interest of the public or lands of all kinds.

### **[Comments to U.S. Secretary of the Interior]**

#1) A substantial portion of the San Luis Rey River Watershed, a major element in 50 years of litigation between the Indian Tribes of La Jolla, Rincon, Pala, Pauma, and San Pasqual, is targeted to be burned. The settlement agreement dated Jan. 30th, 2015, pgs.17 & 18, is clear that the **"...Secretary shall...determine duties of...parties pursuant to Federal law regarding Health, Safety, or environment..."**

A **Fire Management Plan**, including **any** aspects of the proposed BOF before, during, or after any ignition, would be diametrically opposed to the Health, Safety, and Environment of the people, property, and water of the San Luis Rey River Watershed.

In addition, according to law enforcement sources, similar conduct by the general public could be considered as serious as Arson and Murder!

Clearly this is black and white. There cannot be both -- it is one or the other.

Any truthful level of judgement will read in **both** documents the wording "First is Health, Safety and Environment." The destruction by fire to people, places and things, is to be done away with.

Respectfully submitted,  
With the Lord's blessing,  
Gerald W. Fisher, Trustee

Gerald W. Fisher  
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## Hannigan, Edith@BOF

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**From:** Alicia Forsman <aliciaforsman@me.com>  
**Sent:** Thursday, May 26, 2016 10:26 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** California's sensitive eco systems

Greetings,

I am not a scientist, or a firefighter. I am a Californian, who enjoys being able to get out into the fresh air and wild flowers whenever I can.

I do not know what mix of experience those who make up the Board of Forestry must have. Certainly, there are some that don't necessarily

have as good of a grasp about our wildlife as some others. Your contribution to the board is your expertise in other important areas. I would

like to appeal to those who do not have much knowledge about the plants and animals that are native to our State.

When I hear about the various plants, for example, referred to as "brush" and "fuel" I feel like there is little appreciation for their unique value.

Just for one example, the Monarch Butterfly lays it's eggs on one type of plant only, the milkweed. When the eggs hatch into caterpillars, they

eat the leaves of that one kind of plant exclusively. The controlled burn method of preventing wildfires, could seriously endanger the Monarch

by depleting the available milkweeds. No milkweed, no Monarch. The "weeds, brush, fuel build up" is not just a bunch of plants, easily replaced

by any other bunch of plant that will typically invade a burned area given the opportunity.

This is just one example of the relationship of the plants, insects, flowers, shrubs, birds, trees, and so on, have to each other. They are interwoven

into a living eco system that has evolved over thousands of years. The native plants that have evolved here have special mechanisms to help them

survive without much water. They have developed mechanisms that help them retain moisture and survive through the dry months. The invasive

plants that take up residence after the natives have been wiped out, do not have those unique mechanisms to retain moisture. They become the

bone dry fuel for fires. Wherever the native plants have been lost, and periodically burned again, before the individual species can have a chance

to recover to maturity, the more likely it is to be lost permanently.

For some folks, like some I know, there is an attitude of "who cares!" They have interests that are elsewhere. As long as the firefighter's don't

let the neighborhood burn down, let them do their job! Those individuals don't see that as a neighborhood, they have a job to do. They need to

be educated about how to keep their areas "fire safe". That is where there is a need for education.

Anyway, I hope you will reconsider the use of controlled burning as one of those methods for keeping a handle on the threat of fire. It is so very

destructive to our native plants and animals, and not really accomplishing increased safety for the residents here.

Sincerely,

Alicia L. Forsman

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31 May, 2016

Board of Forestry and Fire Protection  
ATTN: Edith Hannigan, Board Analyst  
VTP Draft PEIR Comments  
PO Box 944246  
Sacramento, CA 94244-2460

I have reviewed much of the new VTP-EIR and am submitting comments in my capacity as a fire scientist and published author on numerous scientific studies and reviews pertaining to fire regimes, management and ecology in California.

I reviewed and commented previous versions of the VTP-EIR and am broadly familiar with it's evolution over the past several years.

As with the 2013 version, this latest draft suffers from poor scientific documentation. There are numerous papers cited in the document that are not in the reference list and conversely there are papers listed in the reference list that are not referred to in the document. In many cases citations often don't support (and sometimes contradict) the statement to which they are attached. In other cases, the citation reference a book or large report with no indication of page number on which the supporting information is found. All these issues render the citation invalid and removes any veneer scientific credibility. Some of these errors are documented in the attached table. The table is not exhaustive list of the documentation issues in the VTP-EIR but illustrates the type of short-comings.

Other parts of the document state assumptions without any apparent effort to scientifically support these assumption. One of the most problematic issues, from my point of view as a fire scientist, is the dogged and oft repeated assumption than treatment of wildland vegetation will always have a beneficial (reducing) affect on fire size. The document either does not cite any studies, or cites studies with limited applicability, to support this claim. Vegetation treatments can be effective in reducing fire size if 1) it is a fuel and topography (not wind) driven fire, 2) the fire intersects the treated area, and 3) suppression crews have safe access (although fires will stop on their on at fuel breaks this is uncommon) (Syphard et al, 2011).

There are a number of studies conducted in areas of California where large, very expensive fires (in terms of both suppression and asset loss) occur periodically which directly contradict the assumption fuel treatments universally decrease fire size (e.g., Moritz 1997; Moritz et al. 2004; Keeley and Zedler 2009 and citations therein).

Fuel treatments can also have a negative impact (increase) on fire spread rate and fire size when fuel-bed ignitability is altered. This is potentially most critical when fires are wind-driven and rate of spread is determined by fire-brands igniting receptive fuel beds far ahead of the fire front. Altering the landscape fuels in a manner that leads to a mosaic of highly flammable flash fuels (e.g. grass and herbaceous species) may increase rate of spread and endanger resources adjacent to these fuels. A configuration of intermixed fuels allows "leapfrogging" of ignitions in patches of flashy fuels which then ignite adjacent heavier fuels creating a shotgun-scatter of fire fronts that out-strips suppression resources, often within the first hours in the largest recorded fires.

It has been said that California has two types of fires; the ones we plan for (fuel and topography driven) and the ones that actually do the vast majority of the damage (wind and fire brand driven). As the

largest and most costly fires are wind driven, particularly in southern California, the affect of fuel manipulation needs to be addressed within the wind-driven fire scenario when justifying of the VTP. It is not. Fire brands are mentioned but the potential of the of interaction with treated fuel breaks under wind driven fires is not acknowledged much less addressed and weighed in the design of the plan. This impact of fuel treatments must be addressed if Cal-Fires goal is to reduce losses from fire rather than just increasing acres treated.

The VTP also fails to adequately address an important factor in mitigating large fires which is limiting initial ignition. The majority of fires at lower elevations in California are anthropomorphic in origin and a significant number are ignited accidentally along road ways by car fires, catalytic converter failure, discarding of burning material from vehicles, etc. Cal-fire misses an opportunity to prevent large fires from starting by not considering the potential in this area. Isolating flammable vegetation from road shoulders either by actual manipulation of vegetation in this area or the construction of barriers such as sound walls could have a significant impact. While the latter is initially expensive it is a more permanent solution, causes fewer environmental impacts (and potentially some benefits) and requires lower future maintenance.

There is a large and growing body of literature addressing issues of fire brands and fuel beds that Cal-Fire needs to review and discuss if the VTP-EIR is going to be considered based on current science. I list a number of studies and documents below that would offer an initial introduction to this area of research.

The authors of the VTP-EIR also conflate the terms fire intensity, fire severity and burn severity and they fail to include any definition for these terms in the glossary. This has been problematic in the literature and has been addressed in the literature (Keeley, 2009; Jain et al. , 2004). Hazard and risk are also not defined and are used interchangeably in varying contexts.

California suppression crews and managers are some of the best in the world and frequently put their lives on the line to protect others, Cal-fire should respect these heroes by producing a scientifically supported plan that will ease their burden and make their work safer.

Sincerely,

CJ Fotheringham, BA, Msc, PhD.

A handwritten signature in green ink, appearing to read 'CJ Fotheringham', with a stylized arrow pointing to the right.

Table 1. Specific Issues with scientific documentation.

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Despite this, fire regimes in many California ecosystems have been altered by land use and other anthropogenic factors	Van de Water and Safford, 2011	This is not a primary source for this statement. A very good literature review paper looking at changes in fire return interval, However, it does not test or analyze causes of any changes.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Despite this, fire regimes in many California ecosystems have been altered by land use and other anthropogenic factors	Stephens, Martin & Clinton, 2007	This is not a primary source for statement. This is a paper that estimates pre-historic fire area and emissions. It does not address directly any potential alterations or their causes, only speculates
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	It is estimated that approximately 4.45 million acres burned annually in California before the 1800s	Stephens, Martin & Clinton, 2007	This potentially could be a primary source for statement. However, statement selects only the lowest end of a range given. It is hard assess if this is a sloppy mistake deliberately misleading. What the paper actually says is “Our estimates of Californian prehistoric fire area are between 1.8 and 4.8 million ha (4.4- 11.8 million ac) year which resulted in 4.5–12.0% of the states lands burning annually.” but it doesn't appear to include many areas.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Fire suppression and land use conversions have resulted in a buildup of fuels in some coniferous forest types	McKelvey et al., 1996;	This is not a primary source for statement. Does not present research that supports the statement. Also, the cited document is a congressional report, specific pages where the supporting information can be found i.e McKelvey et al., 1996; p.47-49.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Fire suppression and land use conversions have resulted in a buildup of fuels in some coniferous forest types	Miller et al., 2009	This is not a primary source for statement, The cited paper does not test accumulation only speculates that this may be a factor in their findings of increased stand replacement fires in some forests. P.30 “we hypothesize that this pattern is to a large extent an effect of the current and continuing absence of an agent to remove forest fuels at a rate compatible with their accumulation.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Unfortunately, human activities have increased ignitions and fire frequency in some chaparral vegetation types	Keeley and Fotheringham, 2003	Why is this here? This paper is less to do with a specific vegetation but rather a region. It does not advocate for large scale veg treatment and findings seem to indicate they are ineffective. The point of the paper is that fire regimes in southern California below ~5000 ft elevation has not seen a decrease in fire due to fire exclusion as is the case with some coniferous forest at higher elevations. For whatever reasons, the authors insist on the higher elevation coniferous fuel accumulation model is the standard for the state. The paper they cite clearly states that fuels have not increased at lower elevations in southern California and vegetation treatment has been ineffectual regardless of vegetation type, not just in chaparral.

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Unfortunately, human activities have increased ignitions and fire frequency in some chaparral vegetation types	Syphard et al., 2007	This has similar problems as indicated above.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	These types of anthropogenic alterations are some of the reasons why wildfire frequency in Northern California has increased 18 percent in the period from 1970 to 2003	Westerling et al., 2006	It is not clear what the “these types” are in this statement but it appears to refer to the previous statement which are based in southern California and on very different factors than the Westerling paper they cite.
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	In a national-scale assessment, California was found to have three times the magnitude of wildfire-related risk for the most highly valued human and ecological resources (e.g., moderate/high density housing and municipal watersheds) than the next highest geographic area	Thompson et al., 2011	They probably say this (don't make me read it) but it is based on the same erroneous assumption that veg. Treatment will always, or even mostly, reduce fire risk. N There is no study, data, analysis presented to support this assumption
1-2	2	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Risk due to wildfire is most acute in the wildland-urban interface (WUI), where housing losses have increased significantly during the past three decades	Stephens et al., 2009b	This paper does not address fuel breaks or large scale vegetation treatment but rather advocates for other fire mitigation efforts. Would be better cited as a support for not doing large scale veg treatments
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Projected temperatures in California between 2000 and 2100 are expected to rise 1.7 to 3.0 degrees Celsius in the lower range of projected warming, 3.1 to 4.3 C in the medium range, and 4.4 to 5.8 C in the high range (Cayan et al., 2008). Most of the projected temperature increases will occur during the summer months (Cayan et al., 2008).	Cayan et al., 2008	The first sentence is very nearly plagiarism without quotation marks (S-40, first paragraph). The second citation of the same paper is redundant and unnecessary Not sure why this much detail from one paper is needed. If there is going to be discussion of changes in temperature then the literature should be review in toto not represented by one (random?) paper.
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Due to these temperature increases, predictive models forecast anywhere from a 12 to 53 percent increase in large fires between 2070 to 2099 (i.e., greater than approximately 500 acres)	Westerling et al., 2008	The cited literature supports the statement (kind of but only for coniferous forests) but it is unclear what predictions for > 50 years in the future have to do with a plan for vegetation treatment that's likely only to be valid for 20 years at most.

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	and a median increase of 41 to 69 percent for burned area by 2085	Westerling et al., 2011	The cited literature supports the statement (kind of but only for coniferous forests in Northern California) but it is unclear what predictions for > 50 years in the future have to do with a plan for vegetation treatment that's likely only to be valid for 20 years at most. The paper presents a number of possible outcomes based on different factors at various time scales. Why the authors of the VTP chose the one they did is unclear and reflective of the paper they cite.
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Large fire risk may increase or decrease in Southern California depending upon the change in precipitation magnitude, however, large fire risk increases in Northern California regardless of whether precipitation increases or decreases	Westerling et al., 2008	This paper does not relate to the statement at all. The paper tests snow melt factors on duration of large fires from 1970-2002 for the rocky mountains west to the Pacific and appears to only use coniferous forests
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Regardless of the modeled scenario, the predicted trend is one of increasing fire season and fire size at the statewide scale.	None	They offer no scientific support for this very broad statement.
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	There is also considerable uncertainty about how climate change would affect vegetation composition and structure across the state	Lenihan et al., 2003	One random paper is not enough to represent the available knowledge base for this issue. Other papers cited in this report also address this issue as well as many not cited. When there is more than one single study about a scientific question (i.e. how will climate change affect vegetation distribution) then all relevant studies need to be cited and discussed.
1-3	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Aside from mitigating the probability (risk) of wildfire, and general threat to the environment from catastrophic wildfire, this VTP is intended to be utilized to increase fire resiliency and adaptation to climate change.		Nothing is presented that the vegetation treatments proposed have any effect, much less benefits, to mitigating wildfire risk or will "increase fire resiliency and adaptation to climate change."

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
1-4	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	<p>Despite the uncertainties in future wildfire activity, what is known is that fire behavior in the wildland environment is influenced by the interaction between weather, topography, and fuel ls (Figure 1.1-3; Countryman, 1972). 03</p> <p>Of the three variables, fuels are the only one that can be feasibly manipulated through human activities. Vegetation treatments can influence fire behavior through the manipulation of the amount and arrangement of fuels.</p>	Countryman, 1972	Is everything we know about wildfire behavior based on one paper from 1972? Is manipulation of wildland vegetation our only hope of mitigating fires? What about ignitions? What about issues brought up in previously cited papers (e.g. Stephens et al., 2009b)
1-4	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Properly implemented vegetation treatments have been shown to reduce fire severity and help to protect t assets in the WUI	Safford et al., 2009	A state-wide program is being based on one fire, in one place, in one vegetation type under specific weather conditions? This would be irresponsible and inadequate.
1-4	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Vegetation treatments can improve the resistance and resiliency of some vegetation types to high-severity fire	Stephens et al., 2012	Paper deals only with forests that were once dominated by frequent, low- to moderate-intensity (not wind driven) fire regimes- only a portion of California ecosystems and fire regimes. The authors state "Designing more fire-resistant stands and landscapes will likely create forests that are more resistant and resilient to the changes imposed on them by climate change." This is speculation on their part and not supported by their study.
1-4	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	and strategically placed fuel breaks can help aid in fire suppression efforts	Syphard et al., 2011	Yes, the authors state they can help but usually don't. Authors also cautioned against applying their findings to other veg types.
1-4	1	1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM	Regarddless of the noted benefits, fuels treatments are not appropriate in all locations	Keeley, 2002	Says more than this and there is a much wider body of literature than indicated by citing a single paper

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
2-8	3	OBJECTIVE 3: Reduce the potential size and overall associated suppression costs of individual wildland fires by altering the continuity of wildland fuels.	There is strong scientific agreement that the use of fuel treatments helps to reduce the impact and damage from wildfires	Reinhardt et al., 2008	This paper is not listed in citations but likely Reinhardt, Elizabeth D.; Keane, Robert E.; Calkin, David E.; Cohen, Jack D. 2008 Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States. Forest Ecology and Management. 256: 1997-2006. Saying there is "strong scientific agreement" is grossly inaccurate. Some scientists believe fuel treatments are necessary and/or effective in some vegetation types/fire regimes and some cases there is data that support their belief. However, almost no scientists support that fuel treatment is universally a good way to manage fire in all vegetation and all fire regimes. The science the authors present in support of their program is specific to a narrow range of conditions that do not represent even half of the state. Specifically, the cited papers support fuel treatments in higher elevation coniferous forested systems with historically frequent surface fires.
2-8	3	OBJECTIVE 3: Reduce the potential size and overall associated suppression costs of individual wildland fires by altering the continuity of wildland fuels.	There is strong scientific agreement that the use of fuel treatments helps to reduce the impact and damage from wildfires	Safford et al., 2009;	The cited paper is also specific to Angora fire near Tahoe in coniferous forest. Saying there is "strong scientific agreement" is grossly inaccurate. See above comment.
2-8	3	OBJECTIVE 3: Reduce the potential size and overall associated suppression costs of individual wildland fires by altering the continuity of wildland fuels.	There is strong scientific agreement that the use of fuel treatments helps to reduce the impact and damage from wildfires	Schoennagel and Nelson, 2011	This is not in listed in the literature cited, but may be T Schoennagel, CR Nelson 2011. Restoration relevance of recent National Fire Plan treatments in forests of the western United States Frontiers in Ecology and the Environment 9 (5), 271-277. If the above is the paper they are referring to it is specific to forested systems >2.5km from the WUI and at high elevations. Saying there is "strong scientific agreement" is grossly inaccurate. See above comment.

Page VTP-EIR	Paragraph	Section	VTP-EIR Statement (quote)	Supporting Citation	Issues and Comments
2-8	2	OBJECTIVE 3: Reduce the potential size and overall associated suppression costs of individual wildland fires by altering the continuity of wildland fuels.	Wildfire suppression costs borne by California taxpayers have risen significantly in the past 35 years (Figure 2.2-3). Figure 1.1-1 (Chapter 1) and Figure 2.2-3 suggest a steady increase in both acres burned and suppression costs since the year 2000. This objective seeks to reduce the size of fires through the use of appropriate vegetation treatments. The assumption is that decreasing fire size will have a resulting decrease on overall fire suppression costs		They don't present any scientific evidence that fuel treatments reduce fire size beyond perhaps a few very specific conditions. Studies in some areas indicate that fuel treatments have had no notable mitigating impact on fire size. Keeley et al 1999, 2003, moritz,
2-2	3	2.2 CONCEPTUAL FRAMEWORK OF THE VTP	Given that California is the most bio-diverse state in the Union	Stein et al., 2000 and Stein 2002.	This statement was pulled from the panel report but the supporting papers were not in the VTP-EIR literature cited. It would seem doubtful that any of the VTP-EIR authors directly consulted the papers, simply threw it in for...appearances? This use of the information does not reflect the intent of the panel report.
2-2	3	2.2 CONCEPTUAL FRAMEWORK OF THE VTP	These major vegetation formations generally exhibit similar fire behavior and provide a good first basis for stratifying the state for programmatic assessment	Rothermel, 1983	The cited document missing from lit cited
2-2	3	2.2 CONCEPTUAL FRAMEWORK OF THE VTP	These major vegetation formations generally exhibit similar fire behavior and provide a good first basis for stratifying the state for programmatic assessment	Scott & Burgan, 2005	The cited document is 80 pages-needs page number in citation . Standard fuel models do not test whether geographically distant but structurally similar vegetation types express similar fire behaviors. They also assume so with limited supporting data.
2-2	3	2.2 CONCEPTUAL FRAMEWORK OF THE VTP	These major vegetation formations generally exhibit similar fire behavior and provide a good first basis for stratifying the state for programmatic assessment	Anderson, 1982	This is a very old "how to model fuels" paper and not readily accessible.

## Hannigan, Edith@BOF

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**From:** Sandy Greenwald <sandy.green.wald@gmail.com>  
**Sent:** Tuesday, May 31, 2016 12:15 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** DPEIR Comments

Dear Ms Hannigan and board members,

The DPEIR for the proposed Vegetation Treatment Program fails in the most basic sense, and by its own admission: it actually states that determining environmental impacts is impossible. This is a remarkable conclusion for an ENVIRONMENTAL IMPACT REPORT.

It appears to me this document is a blatant attempt to eviscerate existing environmental protections and allow the Board of Forestry to inflict mortal damage on native shrublands randomly and without suffering the inconvenience of public input or scientific guidance.

I cannot for the life of me imagine any excuse for including 25 year old data, which pre-dates the GIS and digital revolutions. This lack of interest in data quality tells me there is also no interest in conclusions drawn from that data. Apparently the conclusions are foregone, and this entire Report is intended more to minimize outside interference than to arrive at appropriate best management practices.

This document puts huge areas of wildlands at risk of ill-advised devastation, with no assurance that the result will actually increase fire safety. In addition it ignores positive feedback to climate change, which is driving much of our increased hazard. The "old-growth" chapparral must be actually defined and mapped as part of any credible EIR process.

You have not done your homework, and you have ignored people trying to help you. You have wasted time on this failed document that will not pass legal muster. These shortcuts will increase red-tape and obstacles instead of resolving and avoiding them.

Please take this mess back to the drawing board.

Sincerely,

Sandy Greenwald  
629 Miner Rd  
Orinda, Ca 94563

By US Mail and email

May 25, 2016

Mr. J. Keith Gilliss, Chair  
Ms. Edith Hannigan, Board Analyst  
and Mr. Matt Dias, Acting Executive Officer  
VTP Draft PEIR Comments  
California Board of Forestry and Fire Protection  
P. O. Box 944246  
Sacramento, CA 94244-2460  
Email: [VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)

Re: Vegetation Treatment Program Environmental Impact Report (VTPEIR)

Dear Ms. Hannigan, Mr. Gilliss and Mr. Dias:

I request the following items be addressed:

1. ACCELERANTS

While Cal Fire has objectives to benefit the citizens of California, I am concerned about the use of “accelerants” near waterways and on watersheds. Cal Fire Procedures for Vegetation Management Operations section 8344.5.7.5 (and other Cal Fire documents) indicate Cal Fire can use “Alumagel” along with some type of fuel. Other documents also allow for “Flash 21”. Flash 21 is a two part mix (Flash 21A and 21B) along with some type of fuel, AvGas 100, for example.

The effects of fire accelerants on the environment was extensively studied by the USDA Forest Service. The use of Alumagel, for example, results in a residual of aluminum oxide along with many other chemical agents. The USDA Forest Service studies conclude that the LC50 (mg/kg) (lethal concentration) for aluminum oxide alone on trout is 1.17 mg/kg, daphnia 2.6 mg/kg and salamander 1.4 mg/kg respectively. The USDA Forest Service has guidelines and policies regarding the use of accelerants near waterways and on watersheds. Very small amounts of Alumagel can result in lethal effects on life forms in a watershed. The Flash 21 MSDS simply states “Ecological information not available.” Flash 21 should be studied for it’s possible negative effects on the environment before further use. This should also apply to any agent that may be used that has not been studied for it’s negative effects on the environment.

The USDA Forest Service study on accelerants is voluminous while Cal Fire has no such study as part of the VTPEIR.

Based on available public records, Cal Fire does not document amounts of accelerants used in similar operations conducted under the Vegetation Management Program (VMP). Because of

the real potential harm to aquatic species (no less humans drinking water from the watersheds) these agents should be openly addressed by the VTPEIR and data reviewed by independent experts, not just Cal Fire staff.

## 2. OBSOLETE VMP

The VMP is based on science that predates May 18, 1981, when the program went into effect. Indeed the San Francisco court threw out some of the “science” for the VMP. If the VTP is put in place the VMP should be concurrently discontinued. This is not considered in the VTPEIR.

## 3. CONFIRMATION OF COOPERATOR’S PROPERTY LINES AND PROTECTION OF NEIGHBORING PROPERTY

There is no indication the VTP will determine property lines any differently than the current VMP. Most project maps used in the VMP program use the tax assessors data base maps to determine parcel lines. Every tax assessor within the State of California clearly states that the tax assessor’s parcel map lines are approximate and NOT SURVEY LINES, they are for viewing purposes only AND SHOULD NOT BE USED TO DETERMINE LEGAL BOUNDARY LINES.

Often the VMP projects extend to touch these erroneous “parcel lines” and the VMP results in trespass of neighbors’ property. One Cal Fire technical term for this is “slop-over” in the few cases when there is a control line or natural barrier intended to confine the fire. Other VPM’s simply do not have containment lines. The VTPEIR should address specific protections to be implemented including only relying on legal surveys to determine property lines. Also defensible setbacks from property lines need to be defined that consider, fuel, terrain and resources immediately on hand.

## 4. WATER QUALITY, AIR QUALITY AND GLOBAL WARMING

The VTPEIR should address the use of chemical agents (combusted or otherwise applied) and their effects on water and air quality. Toxic Air Contaminants (TAC) Emissions are not considered for the use of accelerants and open air burning of various fuels and ignition sources (“Products”) via sprayers, heli-torches, drip torches, diesel flame throwers, terra-torches and other means. Currently there are no records available to the public on the quantity by type of Products used for VMP’s so research and independent review will need to be conducted without the benefit of records of past use. The amount of Products applied to 600,000 acres will be considerable. (Per the VTPEIR: 300,000 acres prescribed fire).

The VTPEIR should also provide studies and conclusions on the effects of conducting burns on “no burn days” or specifically state that local units may no longer seek exceptions for burning on “no burn days” as is now the case under VMP’s.

The contribution of each gas and chemical agent to the greenhouse effect is affected by the characteristics of that gas or agent. For example, the effect of a mass of methane is about 72 times stronger than the same mass of carbon dioxide. CFCs were phased out via the Montreal Protocol due to their part in ozone depletion. This anthropogenic compound is also a greenhouse gas. What is the effect on global warming of the products and byproducts of the chemical agents that will be used during VTP's? The quantities used are not insignificant. They should be studied individually and in combination and not left out of the "emissions."

## 5. RECORDS TRANSPARENT TO THE PUBLIC

There is no indication the VTP record keeping will be any different than the current VMP. A public records search of numerous completed VMP's produces a dearth of completion reports and quantity and types of chemical agents used. This needs to be corrected. The units should be keeping written records indicating days operations were conducted, acres treated each day, types and quantity of chemical agents used, and a detailed accounting on any "escaped fires", "escaped chemical agents" or any other "slop-over."

## 6. DETERMINATION OF SIGNIFICANCE

The VTP is proposed to be 600,000 acres. Some of the impacts are "considered less than significant" because the treatment area is only 2.4% of the 25 million acres available. To say burning, and applying chemical agents to 600,000 acres, in combination with the myriad of all other local environmental impacts (cumulative impacts) is "less than significant" is inaccurate, at best.

Prescribed burn programs do not always result in resource protection. One recent example is the Boggs Mountain Demonstration State Forest, under the direct management of the California Department of Forestry and Fire Protection. The Boggs prescribed burn program unfortunately had no effect on preventing the 90% loss of the forest during the 2015 Valley Fire. Potential for failures in the program should be acknowledged and weighed against the cumulative impacts of the program, especially when considering dismissing any potential negative impact as "less than significant."

Thank you for addressing these important issues.

Regards,

Peter Gruchawka  
POB 670  
Kenwood, CA 95452  
707-833-5027

## Hannigan, Edith@BOF

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**From:** Theresa Halula <theresa\_halula@yahoo.com>  
**Sent:** Tuesday, May 31, 2016 3:27 PM  
**To:** Vegetation Treatment Program@BOF  
**Cc:** ray.sotero@sen.ca.gov; tony.thurmond@asm.ca.gov  
**Subject:** Comments: regarding draft programmatic EIR

Edith Hannigan, Board Analyst

Board of Forestry and Fire Protection

My comments are in support of extending the comment period for the EIR and that the committee assigned to produce this report actively seek broader scientific input to be reflected in the fire management EIR and policy to be proposed. A review of comments already sent for the committee were not fully incorporated into the revised draft of 4/16. This project is too important to be allowed through without a more diverse approach to protect habitat being discussed for fire prevention action. I request that the Proposed EIR for the Vegetation Treatment Program by CalFire and the California Board of Forestry be denied approval and that the proposed draft EIR be returned to committee for revision following mandated consultation and interviews with outside ecologists and biologists in the area of fire systems of California and vegetation management. There are many people with expert knowledge, many of whom have already provided comments that are not reflected in the 4/16 revision of the EIR.

I was raised in fire country in Southern California, being evacuated from my home and witnessing many wild fires over the years. Large wild fires are destructive to private property and wild lands and drain key resources of our fire control budgets. As a young woman I was employed for a short time to clear brush by hand for fire defense, so I am speaking from an informed position of experience. Fire management is needed where we have created risk to property or wild places over the years due to past fire management policies. However fire management strategies must necessarily be fitted to the ecology of place and implemented with care and respect for wild places.

This proposed action, targeting 22 million acres of California for 'brush clearance' does not reflect contemporary scientific literature for determining the best fire management policies are for California's diverse wild land habitats. Instead the current revision of the report appears to be depending on obsolete scientific literature to determine best practices for fire management. This is a dangerous approach for such an important EIR covering a huge project in such a wide range of vegetation types to be treated.

A one-size-fits-all approach is just an uninformed deception and will damage our wild land ecosystems for many years to come. In the face of climate change projections, explosive development throughout California and the pressure to preserve green space we must listen to biologists while making such a sweeping plan to manage fire across the state.

Recent literature is available detailing the natural succession cycle and time required for natural systems to reach climax states following a wild fire and indicates that restoration is quite variable within each biome being considered. Response and sensitivity to each habitat type is needed.

There are many endangered and rare plants in the areas being planned for clearance. Removing these is in violation of federal rules protecting endangered species. If destroyed, the seed base for these endangered plants many never recover.

We are all aware of the devastation of the large recent fires in Southern California such as

Witch

Laguna  
Station  
Cedar  
Day

Rough  
and many others.

I urge the committee to extend the comment period for six months, take responsibility to schedule interviews with several recognized biologists and revise the EIR based on current fire science.

Respectfully,

Theresa Halula  
1819 Sano Lorenzo Avenue  
Berkeley, California 94707

**Hannigan, Edith@BOF**

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**From:** Cheriell Jensen <cherielj@earthlink.net>  
**Sent:** Tuesday, May 31, 2016 4:59 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Chemical Treatments Propose

The chemical treatment of a vast sea of our California Lands with a desiccant makes absolutely no sense.

Cheriell Jensen  
[cherielj@earthlink.net](mailto:cherielj@earthlink.net)

**Hannigan, Edith@BOF**

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**From:** Lorraine Jones <dragonkingsdaughter@earthlink.net>  
**Sent:** Monday, May 30, 2016 1:11 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Vegetation and Native Plant Management

I have recently read a report proposed by your agency suggesting the removal of large areas of native chaparral through the brutal method of "mastication".

I'm deeply concerned by it and the lack of scientific objectivity in regards to the damage of plants that are part of the natural environment.

Removal of these natives not only allows the proliferation of non-native weeds and grasses, but destroys habitat for animals and birds as well.

Plus the serious issue of potential wildfires that feed upon these non-native grasses and spread quickly to other areas.

Brush removal is not logical, realistic or environmentally sound.

Plus is simply looks awful and is extremely destructible and further damages the ecology and beauty of any area where this practice is used.

I respectfully suggest that this policy not be used now or any time in the future.

Lorraine Jones  
Simi Valley, CA

805-526-3415

## Hannigan, Edith@BOF

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**From:** Suzanne Mitus <nicomitus@yahoo.com>  
**Sent:** Tuesday, May 31, 2016 12:43 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Strongly opposed Calfires proposals

We strongly oppose this wrongheaded and potentially damaging proposal. It will put us personally at risk - we live at the urban/wildlife interface. It will devastate wildlife and encourage weeds and non-native growth.

No place for these monstrous machines in California.

Suzanne

Suzanne Mitus-Uribe  
*Medical and Healthcare Copywriter*  
*Member AMWA*  
[nicomitus@yahoo.com](mailto:nicomitus@yahoo.com)  
626 791 0629

## Hannigan, Edith@BOF

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**From:** George Ollen <ollengeorge@gmail.com>  
**Sent:** Tuesday, May 31, 2016 7:36 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Stop Clearing Chaparral - Keep the Carbon In the Soil !

Dear Ms. Hannigan,

I am writing to demand the end of the clearing of chaparral ecosystems in the name of fire prevention.

Fire prevention of this nature is not a long range strategy with benefit to the planet's climate. Sequestering the excess carbon produced by human civilization can be done most effectively and economically by utilizing the ability of soil and plants to store the carbon we emit. Clear-cutting habitats in the name of fire prevention is a direct threat to the natural ability of Earth's ecosystems to lessen the impacts of our carbon pollution in the atmosphere, which causes climate warming and the demise of the human species as well as that of millions of other species on this planet.

There is no justification for Chaparral clearance that outweighs this basic fact.

George Ollen  
4926 O'Sullivan Drive  
Los Angeles, CA 90032

**Hannigan, Edith@BOF**

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**From:** gaboona <gaboona@sbcglobal.net>  
**Sent:** Tuesday, May 31, 2016 5:07 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Comment re: DRAFT Programmatic Environmental Impact Report (EIR) for Vegetation Treatment Program (VTP)  
**Attachments:** CommentsRe CAVTP RStaeble 23Jan2013.pdf

31 May 2016

To:  
**CalFire**  
**California Board of Forestry & Fire Protection**  
**Edith Hannigan, Board Analyst**  
**DRAFT Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program (VTP)**  
[VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)

**Re: Opposition to the current DPEIR for the California Vegetation Treatment Program**

Dear Ms. Hannigan & Members of the California Board of Forestry and Fire Protection,

The current **DRAFT PEIR for the California Vegetation Treatment Program (VTP)** is astonishing in its failure to incorporate past comments and in its failure to answer relevant questions regarding the basis for its recommendations that would destroy thousands of acres of California wild lands. The current DPEIR for the VTP remains full of glittering generalities and scientific inaccuracies; however, this version seems to make it clear that the its author's attitude at this phase of the process amounts to "this is our Big Plan and we are still sticking to it."

It is certainly easier to blame California's wild lands for catastrophic fires and to recommend "lunar landscaping" approximately one quarter of the state than it is to instead acknowledge that too frequent, human-ignited wildfires (via arson, power lines, car fires, careless hunters, etc...), in fact, result from decades of bad land use planning and lack of appropriately applied fire resources and structure protection measures. There is also a failure to recognize that climate change, with its resulting severe weather and drought patterns, more than ever drives major wildfires with high winds that can race across even "cleared" landscapes that have been recently control burned. At a glance, it appears to be far easier to simply "get rid of the fuel," which means destroying biodiverse habitat and replacing it all with type-conversion to even more flammable invasive foreign annual weeds.

Clearing vast tracts of wild lands will not protect our homes from wildfires. *This oversimplified view ignores recent research and recommendations from fire ecologists and other relevant experts.*

It is apparent that the entire structure and recommendations within the revised VTP ignores current data, misrepresents and misquotes current fire experts, dismisses

It is absurd to state that the proposed VTP will not have a significant adverse impact on the environment of California.

Why has the revised PEIR failed to address the concerns expressed in 2013 by so many persons, organizations, and agencies, including foresters and park managers? Some of us have been following the VTP EIR “process” since 2005 and have lived through several wildfires, including the 2009 Station Fire near our home in the Angeles National Forest. No amount of “vegetative treatment program” — obliteration of natural chaparral cover -- would have stopped the wind-driven fires.

The lack of evidence for stating that the proposed VTP “*would likely result in less than significant cumulative effect on biological resources at the bioregional scale.*” [5-27] attempts to side-step acknowledgement of widespread adverse impacts. This is a blatant disregard for the terms of the California Environmental Quality Act (CEQA).

It appears that much of the DPEIR is based upon data that is decades out of date and that has been superseded by more recent scientific evaluations and research into habitat and wildfire behavior. Why has the revised DPEIR failed to include current data and expert conclusions that do NOT support massive removal of old-growth chaparral and other biodiverse natural landscapes?

Why has this devastating Vegetative Treatment Program not been widely presented to the public for comment? The vast majority of our community here in Altadena, for example, knows absolutely zero about the State VTP. Assurances of public involvement in any future habitat clearance is not sufficiently guaranteed. A statewide VTP is, quite simply, too big a program for sufficient local involvement, as the lack of public outreach during the entire VTP EIR process has demonstrated.

Why have the broad benefits of the plant regimes targeted for mass removal not received proper cumulative impact analysis for the resulting loss of biodiversity, carbon sequestration, recreational and economic benefits, and so forth?

Sadly, in the intervening years between our last comments in January of 2013, many of the concerns raised in the attached letter by Robert Staehle, remain unaddressed.

I urge that the **DRAFT PEIR for the California Vegetation Treatment Program (VTP)** be rejected and yet another revision undertaken that answers the concerns raised by Mr. Staehle; by the California Chaparral Institute and California Native Plant Society; and by so many others. A major change in focus is required involving defense of homes and other properties, fire-preventive systemic reforms in California land use policies, and applying funds to effective, near real-time detection of fires from orbit fast enough that fires can be extinguished before they rage out of control:

**NASA / JPL**

<http://www.jpl.nasa.gov/news/news.php?feature=4775>

**FireSat**

<http://www.firesat.info/>

The focus should not be on removing vast tracts of chaparral and other natural vegetation, because destroying California’s wild lands will never be an answer to the threat of wildfire in our state. The current version of the DPEIR should be rejected and rewritten in compliance with CEQA and the latest research re: effective fire prevention and planning.

May common sense and good science prevail next time around.

Respectfully,

**Lori L. Paul**

[gaboon@sbcglobal.net](mailto:gaboon@sbcglobal.net)

626.798.3235

153 Jaxine Drive

Altadena, CA 91001

- - -

Robert L. Staehle  
153 Jaxine Drive  
Altadena, California 91001

2013 January 24

VegetationTreatment@fire.ca.gov  
State Board of Forestry and Fire Protection  
P.O. Box 944246  
1416 9<sup>th</sup> Street, Room 1506-14  
Sacramento, CA 94244

Re: Comments on Draft Programmatic Environmental Impact Report For The California State Board of Forestry and Fire Protection's Vegetation Treatment Program Environmental Impact Report (VTPEIR) (SCH #2005082054) dated October 30, 2012, but not released for comment until December 2012.

Dear State Board of Forestry and Fire Protection,

Please allow me to formally enter my comments below on the subject document.

In general, I find the environmental, social, medical and other potentially negative societal impacts of the proposed program action to be dangerously under-analyzed, poorly considered, and in some cases missing entirely. The sheer scope of the proposed action, as suggested by the length and complexity of this incomplete EIR, suggests that the proposed action is way beyond the scope of projects intended to be encompassed by the Legislature when the California Environmental Quality Act (CEQA) was considered and passed. The same situation is likely to apply with the National Environmental Policy Act (NEPA), since areas cleared by the VTP will impact federal lands.

The 38,000,000 acres proposed to be treated<sup>1</sup> harbor a wide variety of ecosystems, a multitude of plant and animal species, widely varying geography, weather patterns and microclimates, all interacting in an ecosystem web (system) only barely understood in scientific detail. Consequently, with such a broad analysis taking place over just a few years, it is impossible to account for all the immediate, let alone downstream, negative environmental effects of a project of this magnitude.

Thus, the document appears to be an audacious attempt to set aside in-depth consideration of environmental impact, with each acre getting approximately 3 one-hundred-thousandth of a page of consideration. Clearly the project area cannot even be described except in the most cursory manner in such a document, let alone all the relevant impacts be understood and expressed at the level they will affect the local environment and the people who depend upon that environment, such as those who live downstream, breath the dust

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<sup>1</sup> See page 1 of the description online at [http://www.bof.fire.ca.gov/board\\_committees/resource\\_protection\\_committee/current\\_projects/vegetation\\_treatment\\_program\\_environmental\\_impact\\_report\\_%28vtpeir%29/](http://www.bof.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_%28vtpeir%29/)

generated, and suffer the unintended medical effects that all of us as taxpayers and purchasers of health insurance will need to pay for.

Quite simply, the entire project should be scrapped. In its place, the highest-priority individual candidate projects, taking place over 10s, 100s, or at most 1,000 acres should be identified, carefully considered, and if warranted for proposed action, then be analyzed and opened for public comment through the normal, if imperfect, CEQA and NEPA processes. Only this approach will allow careful enough evaluation of the merits, negative consequences, and likely impacts following each environmental alteration within its specific local and broader geographic context.

Having stated the above, I find the following topics inadequately addressed, or not addressed at all, in the subject document:

- The No-Action alternative is inadequately addressed, and a wide variety of alternatives that might have been considered were not. Only Alternatives that consider, assess, and evaluate the effects of specific local projects enable the ability to adequately account for impacts, obtain targeted public comments, and make a final determination as envisaged by CEQA.
- Compliance with the Migratory Bird Treaty Act and the treaty on which it is based, to which the United States is signatory. How is the proposed action reconciled with each of the specific provisions of the Migratory Bird Treaty Act, for each species of bird in the affected 38,000,000 acres? Habitat loss since that Act was signed has been major, concentrating the fewer numbers of migratory and other birds to smaller ranges with greater need for undergrowth for nesting, protection from predators, and production of the insects, arachnids, plants, and myriad species on which their lives depend. What is the habitat loss, and resulting impact, in detail, for the specific areas on each species affected? What are the local and cumulative effects on the critical “Pacific Flyway” migratory route through California?
- Butterfly and other important insect species are also inadequately addressed. What is the habitat loss, and resulting impact, in detail, for the specific areas on each insect species affected by massive vegetation removal? What changes in insect populations will vegetative treatment cause in each region that might adversely impact agriculture, timber and parklands?
- Increased fire likelihood will occur in some terrains and biomes as result of vegetative cover type-conversion, promoting growth of grasses and other seasonally high flammability foreign species in places of the present, predominantly native vegetative cover. What is the risk of each kind of type conversion for each different biome? Which specific non-native potentially invasive species pose a risk of proliferation, and what are the impacts of each different one doing so on the native habitat, fire frequency, fire intensity, downhill flooding, water quality, groundwater capture and retention, downwind air quality by season, recreational and economic losses?
- Downhill flooding and damage, in and downstream of chaparral, including coastal sage scrub and other shrubland regimes, resulting from the reduced runoff retention of the proposed action. What is the impact, in detail, for the specific areas affected? What is

the affect of clearing millions of acres on freshwater recapture for groundwater resources?

- Lower groundwater retention and recharge, affecting the water supplies of millions of citizens, has not been adequately addressed, and can only be done so at a local level in concert with hydrology studies, consideration of water rights, usage patterns, and future projections of population and building. What is the specific, quantitative effect on the water supply of each private, government, co-op, and other water purveyor and their customers in each affected locale? For example, has the State Water Resources Control Board been informed of the VTP and, if yes, does the Board support the proposed actions across its jurisdiction? What will be the effect on future costs and the price water purveyors will charge water customers? When there is subdivision build-out in response to the perceived reduce fire risk and population pressures in specific affected areas, how will that adversely stress water usage of those people, farms and businesses already using existing water sources?
- With only poorly-quantified loss of bird and bat habitat in the VTP, and changes favoring one species over another, the impact on mosquito-borne disease on human, farm animal and wildlife populations is of concern. What are the forecasted changes in the incidence of vector-borne diseases, including West Nile Virus and Equine Encephalitis? Malaria and other “tropical” vector-borne diseases are increasing their range in response to climate change and other factors. How will the proposed action, that will result in dramatic local reductions of certain bird and bat species that feed on mosquitoes and other vectors, operate in combination with anticipated climate change, to affect human and farm animal, and wildlife infection rates, and what will be the associated medical and social costs, and other negative consequences? What are the uncertainties in these estimates, and how can vector control and medical service entities, public, private, and cooperative, plan for these increased costs and the uncertainties in these estimates?
- Nearly all of the proposed actions will result in a reduced carbon loading above the ground surface, as measured in kg per square meter held more than 10 cm and 1 meter above the ground. How will this changed vertical distribution of carbon over each affected local area change the rate at which decay and other processes release this fixed carbon back into the atmosphere? How will this affect California’s carbon budget, and with what uncertainty? In most locales, changes in vegetative decay as result of the proposed action will release more carbon dioxide and methane into the atmosphere over time than undisturbed terrain. These effects and their consequences are not quantified. Quantitatively, what are these effects, uncertainties, and consequences? Quantitatively, how does the proposed action change the effectiveness of termites and other wood-boring insect production of methane, its incidence as a pollutant, and its effect on local and large scale warming because of its heat-trapping effects in radiative transfer? What are the consequences of so-called control burning of native vegetation, particularly old growth shrubs and trees on carbon sequestration in California?
- With the anticipated increase in farming and rangeland activity envisaged by the proposed action, specifically in each affected local area, how will the alteration in land use affect carbon fixing and release of carbon dioxide, methane, and other greenhouse gasses, and what will be the consequent local, California, and global effects of that change?

- Viewshed values are not quantified in the VTP in terms of number of people whose views are altered from what distances, and the effect this may have on individual homeowner quality of life and property values. As perceived in geometric angular units from individual housing units and driving routes, what is the quantitative loss in viewshed, and the consequent effect on home and property values, especially in living areas surrounded by chaparral, and in other biomes?
- The VTP would decrease recreational values, and have negative impacts in the wide variety of environments. For example, businesses dependent upon recreational use and visitors may suffer when scenic views are destroyed. Quantitatively, in each affected locale, what are these effects, e.g., in terms of hours/capita/year recreational uses, such as hiking, bird watching, dog-walking, mountain biking and equestrian use? And, what are the dollar revenue, expense, profitability and viability effects upon businesses reliant upon these recreational activities?
- The VTP will result in reduced recreational values as a result of trails losing shade along with lost vegetative cover and elimination of scenic vistas. Trails will be eroded by rain and runoff much more quickly, necessitating greater trail maintenance expenditures by myriad County, municipal and non-profit trail entities and land stewards. Because greater funding will be unavailable for many or most of these agencies, many miles of trails will deteriorate and may be closed; injury rates will increase because of poor trail conditions; emergency medical services costs will rise, along with other unintended consequences. What is the dollar impact on each potentially affected entity, of these impacts? What are the sources of uncertainty in these estimates, and what are the quantitative dollar impacts up and down, based on these uncertainties?
- An underlying assumption in the VTP is that fire is inevitable in untreated areas. As prior fire data indicates, wildfires will occur in both treated and untreated areas, as it has ever since lightning and vegetation co-existed. However, fire frequency, intensity, timing with respect to next rains, and other parameters all vary locally. No single fire has ever occurred over the wholesale extent proposed to be covered by this action, yet this EIR purports to understand the impact of Draconian action on an untried scale. Furthermore, recent catastrophic fires have occurred more frequently than vegetative regimes have evolved to survive, because fires are increasingly ignited by human activity, including arson, power lines, careless camp fires, vehicle and structure fires spreading into wildlands, aircraft crashes, and so forth. These fire sources will not be eliminated by the proposed plan.
- Water quality effects are highly variable locally, and impossible to quantify over such a broad project area as that in the VTP. Assurances of that a “checklist” will adequately evaluate local impacts across the broad spectrum of categories is a total circumvention of the CEQA process.
- The VTP does not adequately address carcinogenic effects of greater sedimentation and volatile organic carbon transport in runoff water that enters human, pet, and farm animal drinking supplies. What are these effects, and the consequent medical impacts, social and economic costs? What are the quantitative uncertainties in these estimates?

- The VTP does not adequately address carcinogenic and other negative health effects of greater windborne dust and particulate transport directly into the air breathed by humans and animals, and that finds its way into runoff water that enters human, pet, and farm animal drinking supplies. What are these effects, and the consequent medical impacts, social and economic costs? What are the quantitative uncertainties in these estimates?
- The VTP will encourage ranching and livestock activities in wildlands that were formerly covered by native chaparral and transitional woodlands. What will be the impact, quantitatively, in each affected locale, plus downwind and downstream locales, where there may be increased ranching and livestock activity, including goats (used for clearance purposes), sheep and range cattle?

None of the listed criticisms are intended to ignore or trivialize the impact that wildfires large and small have over California. Indeed, in some biomes, past land management practices have increased fire risk and the extent of occurrence. Rather than a generic, statewide program, specific actions may be appropriate and more effective in many specific locales. Such actions have been ongoing for decades across the State.

The proposed Vegetative Treatment Program appears intended mainly to be an attempt to “streamline” the environmental review process for a poorly-quantified set of actions similar to those heretofore considered on a case-by-case basis with careful local analysis, input, and discussion. The goal of CEQA is not to streamline environmental review; it is to protect the environment and our health and wellbeing from inadequately considered and inadequately reviewed actions. The proposed VTP flies in the face of this intent.

In the case of this specific proposed program, I ask that the “No Action” alternative be selected, and that this project be disbanded.

Thank you for the opportunity to comment,



Robert L. Staehle  
gaboon@sbcglobal.net  
626.798.3235

cc:

Senator Fran Pavley, Chair, California Senate Committee on Natural Resources and Water  
Sussy Nemer, Field Deputy, Los Angeles County Supervisor Michael D. Antonovich (Fifth District)  
Assemblymember Chris Holden, California State Assembly  
Senator Carol Liu, California State Senate  
Hon. Adam Schiff, U.S. House of Representatives  
Hon. Judy Chu, U.S. House of Representatives

## Hannigan, Edith@BOF

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**From:** philodygm@gmail.com on behalf of n/a <mail.address.general@gmail.com>  
**Sent:** Friday, May 27, 2016 11:16 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** irresponsible Vegetation "Treatment" "Plan"

Clearcutting by another name leaving behind the perfect kindling for out-of-control wildfires is a disgraceful dereliction of duty to steward the public's interest in our land and the benefits its ecosystem and habitats maintain simply by remaining intact. Shame on anyone pretending a thicket of weeds less problematic than maintaining existing ecology!!! The fact the plan is riddled with inconsistencies in its employment of science data and fails to meet legal standards in what it must bear to account should incense those to whom it was submitted as a slap in their faces which wastes their time. I hope the reputation of its authors and supporters suffers appropriately such that their tired, discredited approach never again rears its shameful, ugly head to oblige we of the citizenry at large to censure its reprehensible hubris and inveterate short-sightedness!

## Hannigan, Edith@BOF

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**From:** Joseph Puzo <jpspock@san.rr.com>  
**Sent:** Friday, May 27, 2016 11:36 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Chaparral Destruction

How can the destruction of chaparral, an already endangered habitat possibly be a good thing? There is so little natural habitat left due to over building/overpopulation, that many plants and animals are either extinct or on the endangered species list. When the remaining natural habitat is destroyed by removing the natural vegetation, the immediate impact completely wipes out many plants and animals, and prevent any subsequent recolonization. Non native grasses and other invasive species are a problem(and of course a problem created by man), but there are better ways of dealing with it than the "scorched earth" scenario being proposed. Please consider these other alternatives as our only alternatives. Thanks Joseph Puzo-San Diego,CA

## Hannigan, Edith@BOF

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**From:** Cheryl Reagle <cherylreagle@gmail.com>  
**Sent:** Tuesday, May 31, 2016 3:58 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Clearing of native plants.

Please reconsider the current clear cutting plan that destroys habitats for birds and animals with no true value in stopping the spread of fires.

The spread of non native grasses in treated areas only makes the land more flammable.

Many reports have been written that show how clear cutting changes the land ,ruins the natural water shed, destroys habitat,and does little for fire suppression. The Cedar fire was on it's way from the mountains to the beach when it was old growth chaparral that held it back.

Cheryl Reagle

Sent from my iPad

**Hannigan, Edith@BOF**

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**From:** Sharon Reeve <sharon.reevelamesa@icloud.com>  
**Sent:** Friday, April 01, 2016 11:53 AM  
**To:** Vegetation Treatment Program@BOF; cnpssd-l@mailman.ucsd.edu  
**Subject:** Vegetation Treatment Program Environmental Impact Report

Board of Forestry and Fire Protection

Attn: George Gentry, Executive Officer [VegetationTreatment@fire.ca.gov](mailto:VegetationTreatment@fire.ca.gov) Sacramento, CA 94244-2460

Re: Draft Program EIR for the Vegetation Treatment Program Valuable

California has the most unique and valuable native vegetation in the entire US. Heavy-handed tactics to destroy 34 million acres to prevent fire is reckless and not backed by scientific studies! Natural resources such as old-growth chaparral, intact habitat, and important wildlife corridors need to be seen for what they are, assets at risk.

The proposed vegetation treatment will INCREASE THE FIRE POTENTIAL OF TREATED LANDS by replacing native vegetation with much more flammable invasive grasses which will automatically replace killed native vegetation. This is not sound science.

Best Regards,  
Sharon Reeve Masters of Science LEED® AP  
San Diego State University

## Hannigan, Edith@BOF

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**From:** minna riber <minna@earthlink.net>  
**Sent:** Friday, May 27, 2016 9:23 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Keeping our open space safe

Please consider the facts before burning our open space. There are many departments that have been involved with fires whose recommendations are not being considered. We need a consensus of ideas and they must be from all involved departments.

Your report does not meet CEQA standards, it does not address the Environmental Impact and it misrepresents scientific research done by specialists. Basically, it is not clear and not in the best interests of Californians.

It is time for all involved to be on the same page now.

Minna Riber

## Hannigan, Edith@BOF

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**From:** Judy Schriebman <judy@leapfrogproductions.com>  
**Sent:** Tuesday, May 31, 2016 6:22 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Habitat Destruction

Dear Agency:

Your plan to cut down acres of shrubby habitat is completely misguided. It will not reduce fire damage. It will wreak habitat destruction and create great Climate Warming which will increase fire danger. It makes no sense and is biologically and environmentally unsound.

Please come to your senses. There are certain environments that people maybe should not be living in. They should not be destroying the environment they sought to live in and neither should you.

Judy Schriebman  
San Rafael, CA 94903

## Hannigan, Edith@BOF

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**From:** A Spolskly <pangborndowney@gmail.com>  
**Sent:** Friday, May 27, 2016 10:51 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Public Comment: Proposed Vegetation Treatment Program

Hello

First, I really appreciate our firefighters and always fully support increases to the fire budget.

I live in the middle of beautiful California Chaparral covered hillsides. We have delightful birds that fill the air with song and three types of frogs and toads that call in the evening - one of them is the rare spade foot toad that breeds on our land. We also have the California Legless Lizard and Horned Lizard.

The Vegetation Treatment Program as proposed is a mistake. It will not prevent fire damage, in fact, it will make the fire issues worse.

Let me describe the situation near me.

- Home owners who have cleared their land on the slopes over the years cause flooding to homes below me during torrential rains that we get here. That will increase if your proposed clearances are used.
- Home owners who have removed native vegetation have then planted very flammable non-natives such as eucalyptus and pines around their homes which will increase the chances of their homes burning during a wildfire but they are not cited or fined or in any way asked to remove those trees even though they threaten my land would a fire come this way. I was told by the fire inspector that it is because non-natives are fine to plant. They just want to get rid of the native plants.
- We're very good about fire prevention. We have the requisite 50 and 100 foot limitations and we irrigate near the house. Plus we have 10,000 gals of water tanked on our property.
- When land is cleared out here woody weedy species move in so the fire problem actually increases.

Please do the right thing and find a better way. There are many people who could assist you with this. Listen to them.

Also, I am sending this email anonymously because the last time I sent in a public comment the fire inspectors descended on me and harassed me even though they could find nothing wrong on my land. The harassment continued for a full year until they finally gave up. That was a pretty bad experience.

Thank you for reading my comments.

I am a: San Diego County resident of 40 years.

**From:** Peter St. Clair <phstc@aol.com>  
**Sent:** Saturday, May 14, 2016 7:55 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Comments to VTPEIR

Please accept my comments on the latest draft VTPEIR.

1. First and foremost, I cannot find justification for VTP Objective #4. It is not an objective. It is a description of the project.

An acceptable objective might have been natural resource conservation. Such goals are stated and referenced throughout the VTPEIR, but I do not think they are program objectives. They should be.

In this PEIR Vegetation Treatment (VT) is proposed as the only solution to wildfire and the only means of mitigating loss of life and property.

This is clearly not true.

Therefore, VTPEIR has not considered meaningful alternatives.

2. Section 3 is deficient.

One solution would be to significantly scale back the objectives and scope of both VTP and VTPEIR or break apart various programs that together work toward the objectives and consider each on a stand alone, or integrated basis in a new PEIR that would encompass more options.

Unless that is done, the No Project Alternative is a more realistic and effective program and is most likely to achieve our goals and objectives.

The other alternatives that are considered are at best sub-categories of the Proposed Program. Since resource conservation does not appear to be an Objective, I do not see how the Alternatives can be rejected.

3. Different alternatives might fulfill the project objectives at far lower cost and environmental impact.

One is full enforcement of PRC 4291 including structure hardening and "shelter in place" modifications to communities threatened by wildfire. Where implemented, these have proven highly effective in protecting lives and property.

Another alternative may be more applicable in Southern California. Here, something like 90% of wildfires are caused by accidental ignition. VTPEIR does not consider the alternative of widespread education and public outreach as a way of reducing such ignitions and eliminating the need for large scale VT.

4. Section 3 makes statements (eg 3.7.3 page 3-35) about the efficacy of fuel breaks and prescribed burns. While the FBE SPR's are excellent, I have not observed them actually working. In So Cal forests, hired crews cut brush and low limbs and pile them. The piles are ignited. Ground fire results, but the height and density of the piled fuels leads to burning and scorching of tree trunks and limbs. These have not regenerated, more so in pine forests than other areas. So in prescribed burns we lose a lot of healthy young trees. An officer in charge of two recent controlled burns told me, "They burned too hot and too high." No amount of FBE SPR's or PSR's can prevent this.

5. Too often VT becomes a rural jobs program and not a means to protect life and property. VT allows treatments to occur far from communities where life and property are threatened.

6. There is a troubling statement on page 3-8 concerning the No Project Alternative and "consistent application" of SPR's and mitigation measures.

Why should programs carried out in our incredibly diverse state have to be consistent? And why would any program or project be undertaken by CalFire that is unlawful or inconsistent with existing regulations? I think you are treading on thin ice when you criticize the No Project Alternative for what may be a virtue: greater compatibility with "on the ground conditions". Indeed, Section 7.1 page 7-1 suggests CalFire may use PSR's in addition to SPR's any time, any place. Your rejection of the No Project Alternative is in itself inconsistent.

This incredibly top down thinking leads to other problematic conclusions, such as those reached in Section 7 PSA Priority Ranking flowchart, Attachment B. As I read the flowchart, "maintenance" is never more highly prioritized than a "new project". This cannot be true. Indeed maintenance of prior treatments may be mandated--for example growth of annual weeds and flashy fuels on open fire breaks in Southern California.

7. Contrary to what you say on page 7-35 about "shaded fuel breaks", I don't think there are many places in chaparral where this can be achieved. Fuel breaks are more likely to resemble the photos in the VTPEIR.

8. There should be many cases where maintenance has priority in protecting lives and property as well as in conserving natural resources.

I think these problems highlight the difficulty of "checklist" style environmental and project analysis. Indeed, since VTPEIR concludes that SPR's take the place of mitigation, there needs to be far more public involvement than is planned. This includes front end involvement in project design. It includes monitoring. It includes revisions to protocols following project analysis.

Since landscapes change over long periods of time (response to fire is slow and growing slower as drought conditions increase), it is best to prioritize VT correctly and to go slow, taking into account many perspectives on past incidents and responses as well as emerging and changing perspectives on the impact of VT on resource conservation.

VT can accomplish many things, but not everything. Follow through on sheltering in place and hardening structures is perhaps the least costly and fastest way of gaining protections in the WUI.

9. Again with respect to Southern California, the only reason to undertake VT beyond defensible space boundaries would be to conserve resources. But that does not appear to be a program objective. (See Section 3 page 3-9). But it is also possible that the most effective means of

conserving resources is not Vegetation Treatment. Indeed, VT seems only a minor subset of resource conservation efforts.

10. I continue to be confused about the rejection of the few project alternatives that were actually considered. It appears their rejection is without adequate analysis. The rejections assume VT is the overarching goal and method within the State of California to manage resources and manage wildfire and its outcome. That is clearly not true.

11. Paragraph 4 Section 3.3, page 3-9 makes the statement that the most destructive wildfires are predominately in mountain areas. I do not think that is even close to the truth in Southern California. Again, there is a prejudice in the VTPEIR for large scale VT when much smaller scale management under PRC 4291 or in the WUI or in VHFHSZ may work better.

12. Moving to Appendix I, subsection I-1 seems to say "We might listen to the public, but we plan to ignore you." This is pretty insulting. So is most of the analysis on adaptive management. I 2.1 seems to dismiss third parties, including scientists and the benefits of their involvement in project design, monitoring, review and adaptation. Your sense of active adaptive management reminds me of the joy felt by administrators everywhere who revise the annual calendar year budget each month then proclaim they have "made budget" after the final revision in December. Guess what? There is no learning. In natural settings it may take a great deal of time for the ecosystem to respond to something like wildfire--or something like VT. Please give things time. Do not rush to judgment as to what is happening or not happening. Wildfire has been a major player in Western ecosystems for tens of thousands of years.

13. Again in Appendix I, why would you undertake VT in an area that excludes critical infrastructure or forest health? This idea pops up a few times in VTPEIR. This suggests the scope is virtually unlimited. Yet as important as these treatments are, you exclude the public and third party (scientists) from evaluation and approval. See I.4.2 If this is the case there should be very few projects where any notice is given. If not, the scope of VT is greater than implied. And public input is valued at close to zero.

14. I do not understand the language of BIO 6 on page I-21. What "species" is referred to? The oaks, or the wildlife that inhabit oak lands? Who is an "applicant"? This section seems to say that public lands will be managed to suit hunters. Is that an objective of VT?

Here are my comments from February, 2013. Nothing in the newly circulated draft seems to have addressed these concerns and the alternative of enforcing PRC 4291.

**From:** Peter St. Clair [<mailto:phstc@aol.com>]  
**Sent:** Tuesday, February 19, 2013 6:21 PM  
**To:** Vegetation Treatment Program@CALFIRE  
**Subject:** VTPEIR Comment

Please accept my comments on the VTPEIR.

I served on the City of San Diego Open Space Canyons Advisory Committee.

I was a Vice President of the local chapter, California Native Plant Society.

I worked with State Senator Christine Kehoe on her revision of PRC 4291 which was signed into law and is being implemented by CalFire.

I worked with federal, state and local wildlife agency officials, planning and building officials to establish conservation banks and other lands set aside to mitigate development impacts and protect endangered species.

I served on a commission established by Gov. Pete Wilson to implement NCCP, the Natural Communities Conservation Program.

I have experience reviewing environmental documents related to large scale habitat management and wildfire.

VTPEIR project alternatives do not consider the most obvious alternative:

--Reduce fire frequency and intensity by implementing PRC4291 and requiring existing structures to be hardened against fire.

It is obvious that if more private owners were to comply with PRC4291 and local government were to mandate existing structures be hardened against fire, as they do for new structures, then a great deal of the perceived need for VTPEIR could evaporate. These treatments would be on private land and would comply with state and local guidelines for vegetation management and construction.

CalFire has taken the position that PRC4291 does not mandate structural improvements. On the face of it, that is incorrect. PRC4291 is quite clear that construction methods will change as a result of its requirements. It appears that CalFire has not wanted to get into disputes with local planning, zoning and building officials. And thus has backed off fully implementing existing law.

Implementing PRC4291 would reduce the need for vegetation treatments described in VTPEIR.

Additionally, there is insufficient scientific evidence that vegetation treatment programs such as outlined in VTPEIR provide new protections. After the San Diego Cedar and Witch Fires (2003 and 2007) insurance company investigators compared "before" photos of properties that had "cleared" vegetation with "after" photos of properties that survived wildfire and properties that were burned. It appears that some degree of native vegetative cover, including tree-form shrubs, oaks and other trees serve to knock down burning embers before they reach structures, thus reducing or eliminating fire risk. If these shrubs and trees are removed under VTPEIR, it is highly possible that structures and communities will be more vulnerable to wildfire.

Indeed, fuel breaks, improperly maintained, grow annual weeds and grasses. These die back (in Southern California) in spring and create fuel for wildfire that may not have existed absent the vegetative treatment.

And, when the San Diego fires burned from east to west, they leaped across 16 lanes of solid concrete at Interstate 15 in Mira Mesa. This is as wide and as fireproof a "fuel break" as ever existed and it was insufficient to stop Santa Ana driven wildfire.

Peter H. St. Clair  
2341Whitman Street  
San Diego CA 92103  
619-260-1307

## Hannigan, Edith@BOF

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**From:** Peter St. Clair <phstc@aol.com>  
**Sent:** Saturday, May 28, 2016 11:36 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** VTPEIR

I sent detailed comments on VTPEIR earlier in May, 2016 and in 2013.

VTPEIR is poorly researched and written.

I'd like briefly summarize the major fatal problems:

1. The PEIR lacks any fundamental environmental analysis. It is largely a description of the proposed project. PEIR presents no information about impacts. It says all impacts are mitigated by proposed SPA's for vegetation treatment. It proposes a "checklist" program for specific project analysis. The program objectives elevate new treatment over maintenance of existing treated areas. There is no analysis for any of this.
2. The PEIR fails to address obvious alternatives. The most important is PRC 4291, the defensible space act. Structures can be hardened against fire and communities made more fire safe without the extensive vegetation treatment assessed in the PEIR. There are many more existing or potential alternatives that address vegetation treatment outside areas where it is required for defensible space-areas where treatment improves natural resource quality. These are not mentioned as alternatives to vegetation treatment. They may be superior in all respects to just cutting, spraying, burning or ripping out California's native plants.
3. The PEIR fails to incorporate CalFire's own scientific research and data on vegetation types throughout the state. Its "science" is outdated and many of its conclusions from citations are disputed by the very authors of the studies.

The PEIR fails to achieve the minimal levels of accuracy and analysis required by CEQA.

4. The vegetation treatment program virtually eliminates public input. It dismisses post-treatment analysis and review, preferring to adopt something called active adaptive management, which is just a simple way of saying, "If CalFire did it, it was right."

Peter H. St. Clair  
2341Whitman Street  
San Diego CA 92103  
619-260-1307

## Hannigan, Edith@BOF

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**From:** Nancy <summersng@saber.net>  
**Sent:** Monday, May 30, 2016 9:41 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** VTP comments, time sensitive

To Whom It May Concern:

### VTP comments:

Personal observations from a VMP:

**Calfire's burning of areas that were recently burned results in long term / possibly permanent environmental destruction.** This is a personal observation made of a chaparral /forest area where a VMP was conducted in an area that had been burned recently (relative to normal fire return intervals). Evidence of charred stumps of coyote bush which never grew back are located in the same area that was burned over again by Calfire.

The VTP has supplied no assurances that this pattern of burning areas (which have already been recently burned) will not result in very, very frequent burns!

**Northern California has insufficient data to determine historical burn frequency.** Chaparral areas have no old growth trees to provide burn scar evidence. Native American tribes were decimated over 400 years ago due to the introduction of disease. Consequently, their influence in relationship to human caused fire is not indicative of long-term historical patterns. In southern California ash/charcoal evidence in the ocean sediment is indicative of fire frequency. No such evidence is found in Northern California ocean sediment.

**Results of frequent burns are: Hydrophobic soils which do not readily absorb water.** The hydrophobic soil is barren and very hard which results in water running off rather than recharging the ground water and providing surface water for plants, microorganisms and other life forms. When water is not absorbed into the soil, ultimately vegetation dies and a desert is created. The streams become "flashy" resulting in very high, intense flows from rapid run-off which cannot be absorbed by the hydrophobic soils. Because the run-off has abnormally strong force, the streams become eroded and incised. Incised streams lower the historic water table which results in vegetation drying out and further exasperates desertification.

Thus, **frequent burns result in damaged soils which result in desertification** which results in dying vegetation creating more dangerous fuel for fires, destruction of wildlife habitat and loss of wildlife.

**Frequent burning results in destruction of native plants and topsoil which is conducive to an invasion of non-native plants** such as broom, star thistle, medusa head grass and numerous other noxious non-native plants that can out compete native plants. Such non-native plants provide little or no food value to native wildlife and crowd out regrowth of native plants.

Calfire claims that the VTP will reduce the chance of destructive wildfires, however, some species of chaparral such a coyote bush regenerate sufficiently within a year to provide a bridge for fire to spread. Calfire claims that wildlife habitat will benefit, as well as plant species, yet topsoil and native plants are destroyed thus allowing the invasion of non-native plants.

**Herbicides should not be used at all for VTPs due to non-target, "collateral" damage to wildlife and soil.** For example, Glyphosate is toxic to fish and amphibians and Clopyralid is toxic to some crops. Clopyralid does not degrade even when treated vegetation passes through the digestive system of an herbivore.

In summary, the proposed VTP will be counter productive to wildlife habitat, native plants, the watershed, soils and will promote addition climate warming by decimating forest land and vegetative cover.

Sincerely,  
Nancy Summers  
707-322-4263

## Hannigan, Edith@BOF

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**From:** Amber Swanson <ambswa1@gmail.com>  
**Sent:** Tuesday, May 31, 2016 2:08 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Please preserve out California Habitat

Dear Ms. Hannigan and Members of the Board,

I have become aware of the problems with CalFire's Vegetation Treatment Program and the latest DPEIR. As a former botanist with the California Native Plant Society, I would like to voice deep concern with the proposal to destroy habitat in California.

Chaparral provides refuge for thousands of plants and wildlife (many rare and endemic to California) around the state. Once these ecosystems have been destroyed it is impossible to bring them back to the healthy native systems they once were. The benefits of Chaparral are varied from carbon sequestration to erosion control to simply beauty. It is simply not worth the cost of destroying these lands for possibly preventing some fire.

Please reconsider and do everything you can to preserve California's ancient heritage.

Sincerely,  
Amber Swanson  
Botanist

## Hannigan, Edith@BOF

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**From:** billtippets@gmail.com  
**Sent:** Tuesday, May 31, 2016 1:05 PM  
**To:** Anne Fege; Vegetation Treatment Program@BOF; Hannigan, Edith@BOF; Dias, Matt@BOF; keith.gilless@bof.ca.gov; susan.husari@bof.ca.gov  
**Cc:** Dan Silver; Jon\_Keeley@usgs.gov; Wayne Spencer; rwh@californiachaparral.org; gsuba@cnps.org; Jerre Stallcup; asyphard@yahoo.com; franklandis03@yahoo.com; Marti\_Witter@nps.gov; robert\_s\_taylor@nps.gov; ca.fire.ecology@gmail.com; dylan\_tweed@californiachaparral.org; gostodas1@yahoo.com; jkshu@cox.net; sofar@nethere.com; deanna.spehn@asm.ca.gov; wmetz@fs.fed.us; gsilva@fs.fed.us; Short, Lynnette@CALFIRE; kathleen.edwards@fire.ca.gov  
**Subject:** Re: Comments on DPEIR for Vegetation Treatment (to BOF)

Hi Anne,

Thanks for preparing this critical assessment of the DEIR. I haven't read it, but the points you emphasized strongly suggest it is inadequate.

I can't believe a 1.5 mile WUI has been seriously proposed - that is even wider than the 1/2-1 mile urban interface/defensible space that the insurance industry once proposed for the "high risk" wildfire areas in San Diego, and which we successfully fought. I agree there is no rational, scientifically-based justification for more than 100 feet (assumes structures are constructed to or exceed current fire standards), and any project exceptions to increase that should be highly restricted and based on abundant evidence.

Bill Tippets  
Mobile: 619-822-4323

Sent from my HTC EVO 4G LTE exclusively from Sprint

----- Reply message -----

From: "Anne Fege" <[afege@aol.com](mailto:afege@aol.com)>  
To: <[VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)>, <[edith.hannigan@bof.ca.gov](mailto:edith.hannigan@bof.ca.gov)>, <[matt.dias@bof.ca.gov](mailto:matt.dias@bof.ca.gov)>, <[keith.gilless@bof.ca.gov](mailto:keith.gilless@bof.ca.gov)>, <[susan.husari@bof.ca.gov](mailto:susan.husari@bof.ca.gov)>  
Cc: <[dsilverla@me.com](mailto:dsilverla@me.com)>, <[Jon\\_Keeley@usgs.gov](mailto:Jon_Keeley@usgs.gov)>, <[wdspencer@consbio.org](mailto:wdspencer@consbio.org)>, <[rwh@californiachaparral.org](mailto:rwh@californiachaparral.org)>, <[gsuba@cnps.org](mailto:gsuba@cnps.org)>, <[jstallcup@consbio.org](mailto:jstallcup@consbio.org)>, <[asyphard@yahoo.com](mailto:asyphard@yahoo.com)>, <[franklandis03@yahoo.com](mailto:franklandis03@yahoo.com)>, <[Marti\\_Witter@nps.gov](mailto:Marti_Witter@nps.gov)>, <[robert\\_s\\_taylor@nps.gov](mailto:robert_s_taylor@nps.gov)>, <[ca.fire.ecology@gmail.com](mailto:ca.fire.ecology@gmail.com)>, <[dylan\\_tweed@californiachaparral.org](mailto:dylan_tweed@californiachaparral.org)>, <[gostodas1@yahoo.com](mailto:gostodas1@yahoo.com)>, <[billtippets@gmail.com](mailto:billtippets@gmail.com)>, <[jkshu@cox.net](mailto:jkshu@cox.net)>, <[sofar@nethere.com](mailto:sofar@nethere.com)>, <[deanna.spehn@asm.ca.gov](mailto:deanna.spehn@asm.ca.gov)>, <[wmetz@fs.fed.us](mailto:wmetz@fs.fed.us)>, <[gsilva@fs.fed.us](mailto:gsilva@fs.fed.us)>, <[lynnette.short@fire.ca.gov](mailto:lynnette.short@fire.ca.gov)>, <[kathleen.edwards@fire.ca.gov](mailto:kathleen.edwards@fire.ca.gov)>  
Subject: Comments on DPEIR for Vegetation Treatment (to BOF)  
Date: Tue, May 31, 2016 12:14 PM

Attached please find a comment letter on the Draft Programmatic EIR for the Vegetation Treatment Program.

*/s/ Anne Fege* Anne S. Fege, Ph.D.  
Chair, Community Forest Advisory Board, City of San Diego

[afege@aol.com](mailto:afege@aol.com), 858-472-1293

**Hannigan, Edith@BOF**

---

**From:** Wayne Tyson <wt750mv@gmail.com>  
**Sent:** Monday, May 30, 2016 11:08 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Vegetation Treatment Program

Please go back to the drawing board. Don't be a laughing stock. Don't invite a Congressional investigation of misuse of funds.

Firebreaks may provide access and cause slow-moving fires to lay down, but by virtue of the ratio of crew to miles of flame-front in a wind-driven major fire, you will have to keep the crews out of there anyway and the fire will burn past the "break." On top of that, the weed growth that follows such clearance increases ignition potential and accelerates fire spread. The "chips" left behind are excellent ember fodder, so look for an increase in spot and structure fires downwind. A lot of taxpayer money not only wasted, but counterproductive.

I'm keeping my comments to a minimum, because, while I doubt they will be read anyway, they shure'n hell won't be if they're complete, and therefore, voluminous, guaranteeing that they won't be read.

--

Respectfully but directly,  
Wayne Tyson

**Hannigan, Edith@BOF**

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**From:** Elizabeth Wallace <eltwallace@gmail.com>  
**Sent:** Friday, May 27, 2016 9:47 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** California Board of Forestry and Fire Protection DPEIR

Dear Ms. Hannigan:

The DPEIR fails to meet the requirements of CEQA because the proposed program has a significant impact on the environment. In the latest draft, the environmental impacts of clearance operations are dismissed without support.

I have seen the devastation of areas cleared as fire protection. I live in Southern California and watched as fire-hardy chaparral was cleared. The vegetation is replaced by weedy grassland that is prone to quick-moving fires. In addition, our property has been threatened by erosion due to the removal of chaparral.

This draft fails to address the most effective ways to protect lives and property from wildfire. Clearance of chaparral is destructive and allows wind-driven embers to threaten homes. The trees and chaparral I have growing on my property protected my home from fire in 2007 by stopping embers from blowing under my home's eaves.

This draft does not support Cal Fire's mission to protect life, property and natural resources. How will you re-draft this DPEIR to meet the requirements of CEQA and protect property and natural resources?

Sincerely,  
Elizabeth Wallace  
19241 Jasper Hill Rd.  
Trabuco Canyon, CA 92679  
949-370-0590  
[www.etwallace.com](http://www.etwallace.com)

## Hannigan, Edith@BOF

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**From:** Mary Ann Walsh <walshmaryann@yahoo.com>  
**Sent:** Tuesday, May 31, 2016 2:37 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Stop CalFire's destruction of precious native habitat

Dear Ms. Hannigan:

I was distressed to read about the draft EIR submitted by CalFire to destroy millions of acres of irreplaceable California native habitat in a misguided plan to reduce fire danger. This plan, if it goes forward,

The draft ignores the comments that scientists and citizens made on the previous version of the report. I appreciate that CalFire has a very tough job, but this approach, if allowed to go forward, will cause irreversible damage to the ecology of our state. It could turn huge swaths of California into a desert. There must be a better way--one that recognizes the latest scientific thinking about fire ecology, and that sets up a transparent and cooperative process for CalFire to partner with experts who have the same ultimate goal--to protect California from fire devastation.

Respectfully,  
Mary Ann Walsh  
Oakland, CA

**Hannigan, Edith@BOF**

---

**From:** matt@weisman1.org  
**Sent:** Tuesday, May 31, 2016 10:56 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Draft Programmatic Environmental Impact Report (DPEIR)

Board of Forestry

I am writing to express to you, and to my state representatives and to the governor by copy, my opposition to the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program.

**Lack of meaningful communications with citizens of California and opportunity for comment:** Except for a limited number of citizen organizations who track your department's activities, there has been no material and practical outreach communications in media, e.g., email, social media, electronic news, to the citizens of California to inform them and to engage them in a discussion on a proposed plan that will affect nearly one quarter of the state's natural plant resources. Meeting "historical" notice standards is inconsistent with current methods employed by the State of California to communicate with its citizens. Confining the communications announcements is not consistent with the goals of streamlining the review process.

**Absence of scientific or empirical responses to public comments that are based upon science and/or supported by current empirical data.** It is like the State of California being concerned about cancer treatments and only looking to use treatments from a quarter of a century ago because current treatments are different than those of the past and because that while older treatments may not be as effective as new ones, it is the older treatments upon which the State has based its cure and too much effort is required to select from current treatments and adjust the draft program. This Board of Forestry approach is not aligned with the intent and provisions for a streamlined review process.

I am a citizen who, if I had learned earlier of the details of the proposed DEIR, would have engaged earlier in the process, not the last day for comments.

I believe that there are tens of thousands of Californians who if informed would also engage in the discussion and oppose the current DEIR.

Submitted

Matthew C Weisman  
4217 Oakmore Road  
Oakland, CA 94602  
Email: [matt@weisman1.org](mailto:matt@weisman1.org)

## Hannigan, Edith@BOF

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**From:** Ann Wellhouse <ann.wellhouse@gmail.com>  
**Sent:** Friday, April 01, 2016 12:13 PM  
**To:** Vegetation Treatment Program@BOF

Board of Forestry and Fire Protection

Re: Vegetation Treatment Program - By this you will be remembered.

**If you really think it is the right thing to do - sign your own names to it so we know who to blame.**

California is the most beautiful state in the world.

California has the highest diversity of wildlife and the most exquisite wild lands. We are so lucky and so stupid.

California is about to make a terrible mistake by poisoning our beautiful exquisite land and destroying delicate necessary habitats and all the wonderful frogs that call at night in the spring and poisoning the ground nesting birds.

**You are making another Silent Spring. You will be remembered by your destruction.**

People have made the ignorant mistake of putting their homes inside wild lands and now want to destroy those wild lands and the exquisite plants and animals forever. Instead of intelligently regulating safe home sites you choose to destroy habitat.

Chopping California's habitats into little disconnected pieces is a prescription for environmental collapse.

There is not enough water in California's climate to recover these lands once you have destroyed them.

Glyphosate remains in the habitat contrary to what you are telling us. Glyphosate has been shown to cause long lasting environmental health problems for both people and wildlife. I remember, and so do many of you, when people like you said DDT was safe. The sun may degrade Glyphosate but much of it goes into the ground away from the sun and into ground water.

The amount of released carbon will vastly increase our carbon footprint when what we want is to sequester carbon as it is in native habitats. Yes, fires release carbon also but if we allow for smaller fires as would be the natural way of things, that would be low enough to tolerate.

Natural habitats regenerate after fires and continue to sequester carbon. This unnatural zone of destruction will increase the albedo and the land will never recover as a natural carbon reservoir.

By your actions, climate change increases instead of doing the right thing to slow it down.

If you really believe this is the only and best solution, stand up and take responsibility personally. Tell us your individual names so we can know who caused the mess you are about to create.

Please, I beg you, do not leave a legacy of destruction. Protect our lands and stop this irreversible mistake now.

Thank you.

Ann Wellhouse

## Hannigan, Edith@BOF

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**From:** Jim <homegrown53@hotmail.com>  
**Sent:** Tuesday, May 24, 2016 9:29 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Veg Treat Prog PEIR

[VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov), et al~~

25 years ago, I was a leading-edge wildfire policy activist. I co-authored the multi-precedent-setting Ecology of Fire Alternative for the Warner Fire Recovery Project (Willamette National Forest, PNW Region), at the time (and I think still) the only citizen alternative presented as comment on a US Forest Service Draft Environmental Impact Statement to be fully analyzed in the Final (and, to boot, verbatim as submitted.) I subsequently sole-authored the world's first proposal for a Fire Process Research Natural Area, 5 years later called by a sitting Region 6 Forester as having been too far ahead of its time. The list went on. I lived for 15 years quite literally *as* a wildland-"rural" interface under a lifeway that was reliant on the intact, fully-functioning, forest ecosystem. Recently, I stepped down from the Chair of the Southern Oregon Prescribed Fire Network after 5 consecutive terms served by unanimous request.

From that collective experience, I write now to **STRONGLY** alert you to the serious, systemic error in the April 16, 2016 draft of your Vegetation Treatment Program Programmatic Environmental Impact Report.

Many have tried to point it out to you, but somehow it seems to have been missed. Others will claim it was "ignored", but you and I know otherwise, and I shall hypothesize that it simply has not yet been articulated to you succinctly, which I will attempt now to do:

- 1) We can NOT prevent wildfire from burning human structures in, nor proximal to wildlands. Sometimes, yes. In many situations in the past, yes. But evermore, not, for even the degree of success we have had in the past and could have in the future, is and will be at ever-increasing cost, a clearly unsustainable approach.
- 2) The degree to which we can mitigate the **risk** of wildfires burning human structures in or proximal to wildlands by physically removing vegetation in the wildlands is indirectly proportional to the **actual** degree of degradation of the wildland ecosystems said removal results in, and it is not a 1:1 ratio -- it is heavily weighted towards the environmental degradation.
- 3) We humans insist on placing our structures in and proximal to wildlands and concurrently insist that our structures not be burned by wildfires and, by god, we will therefore reactively and preemptively strike those wildlands to make sure that their wildfires do not. That means it is those human structures that are the threat to the wildfires, not the other way around.
- 4) Wildfire is a vital Ecosystem Process, each ecotype evolutionarily adapted with and to particular fire regimes, conveying multiple benefits upon those wildland ecosystems, which in turn, facilitates us to benefit from those ecosystems as well (both types of benefits we call "ecosystem services".)
- 4) Therefore, Physician, Heal Thyself:  
It actually IS OUR RESPONSIBILITY to MANAGE OUR *STRUCTURES* to minimize their susceptibility to being burned by wildfires, while also managing the wildlands in ways that *facilitate Fire to operate in them* in their

natural regimes.

Fire is not the enemy. As the saying goes, we have met the enemy . . .

Which reminds me of another saying I heard once from a Regional Forester retired from the early "Timber Wars" era in the PNW. "When people disrespect one another, they take it out on the land." Perhaps Cal Fire, the California Board of Forestry, and its critics in locked horns with them should reflect on who it is that they are not respecting, why, and need it really be that way?

Consider the opposite: truly collaborative brainstorming. I can say, beyond a shadow of a doubt, it produces *far* better outcomes, *AND* it feels way better.

**Jim Wells**  
**321 Clay St. #115**  
**Ashland, OR 97520**  
**541 968 8035**

**Hello, NSA and other snoops of all stripes! Auto-place it where the sun don't shine, ya' scurvy dawgs.**

## Hannigan, Edith@BOF

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**From:** Jim <homegrown53@hotmail.com>  
**Sent:** Monday, May 30, 2016 10:53 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** RE: Veg Treat Prog PEIR

**Below** a spellcheck error I just caught in the public comment I submitted on May 24. Since the mis-wording lost the meaning of the sentence, please accept this edit of my comment now.

Jim Wells  
541 968 8035

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---

From: [homegrown53@hotmail.com](mailto:homegrown53@hotmail.com)  
To: [vegetationtreatment@bof.ca.gov](mailto:vegetationtreatment@bof.ca.gov)  
Subject: Veg Treat Prog PEIR  
Date: Tue, 24 May 2016 21:29:14 -0700

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2) The degree to which we can mitigate the **risk** of wildfires burning human structures in or proximal to wildlands by physically removing vegetation in the wildlands is **inversely** proportional to the **actual** degree of degradation of the wildland ecosystems said removal results in, and it is not a 1:1 ratio -- it is heavily weighted towards the environmental degradation.

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**541 968 8035**

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## Hannigan, Edith@BOF

---

**From:** Jim <homegrown53@hotmail.com>  
**Sent:** Tuesday, May 31, 2016 10:36 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** FW: Veg Treat Prog PEIR

Well, well. I guess I have just too much on my plate these days and enjoy too little sleep.  
Now I must beg to correct my correction, **below**.

Because my statement at issue is that reduction of wildfire risk via mechanical vegetation removal comes at a price of actual ecosystem degradation, and that degradation far exceeds that reduction. Note we are trading "risk" for "actual".

**Jim Wells**  
**541 968 8035**

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---

From: [homegrown53@hotmail.com](mailto:homegrown53@hotmail.com)  
To: [vegetationtreatment@bof.ca.gov](mailto:vegetationtreatment@bof.ca.gov)  
Subject: RE: Veg Treat Prog PEIR  
Date: Mon, 30 May 2016 22:53:00 -0700

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**541 968 8035**

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Subject: Veg Treat Prog PEIR

Date: Tue, 24 May 2016 21:29:14 -0700

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## Hannigan, Edith@BOF

---

**From:** Chuck Williams <chukwil@yahoo.com>  
**Sent:** Tuesday, May 31, 2016 3:03 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** VTP Draft EIR comments

Board of Forestry & Fire Protection  
Attn. Edith Hannigan  
Re: VTP Draft EIR comments

May 30, 2016

May I suggest Cal Fire consider using these methods of controlling fire which also aide wildlife:

### BUFFER ZONING

With so much of California's biodiversity being fire dependent , it is a mistake for Calfire to not be involved with city and county planning departments on locating and maintaining firebreaks. Cities and counties have the ability to create buffer zoning around parks and nature preserves, which need fire occasionally to keep them healthy. Such zoning can keep homes and other development from being built so close to natural areas as to endanger them and make fire control more difficult.

Some of the types of uses allowed in such zones that would be more compatible with both fire and nature are: nature study, education and research centers; organic farms; environmental tourism, outdoor guides; so-called "green" cemeteries, which have native landscaping; rural residences built underground or of bermed-earth design that are essentially fireproof; and possibly even extreme bicycle routes and frisbee courses in areas where erosion and pedestrian conflict can be controlled.

### WILDLIFE CORRIDORS

In a similar fashion as with buffering nature preserves, Cal Fire could work in cooperation with other agencies and private land owners to create wildlife corridors between wildlife preserves with buffer zones allowing low impact uses immediately adjoining them and zones of moderate impact further away.

### SMOKE MANAGEMENT & CARBON SEQUESTRATION

Burn piles that are lit on top instead of on the sides or bottom, create a whole lot less smoke pollution and CO2 release. This method could be added to Appendix J,VII. Mitigation of Smoke Management Plan.

If the burning piles are extinguished by smothering or water before they burn down to ash, a lot of charcoal will be created. Scattered around the area this carbon will be sequestered in the soil for many decades.

### PATTERNED GRASS MOWING

For fire protection, many large fields of grass are either totally mowed every year (often more then once), or the perimeter is mowed in the same place every year leaving the rest of the field to build up a deep layer of dead fuel.

Most native grasses are perennial bunch grasses which won't produce many, if any seeds after their immature seed heads have been cut off. Therefore when they are cut ( or eaten) off every year, the plant eventually dies out.

But the predominantly annual non-native grasses will regrow at a lower position after being cut off, and produce more seeds for the next year resulting in a field becoming totally non-native annual grasses which are not the best for grazing nor natural diversity.

A partial solution is to mow fire breaks in a different pattern each year so that some native bunches will be left unmowed and therefore able to produce seeds that year.

Then over the next 2-4 following years mow the firebreak in a different pattern so that any one bunch of native grass is given a chance to produce seeds by not having their heads cut off.

For example:

Year one— Mow a firebreak around the outer edge of the field .

Year two — mow zig zag across the field north and south.

Year three— mow zig zag east and west.

Year four — mow a five-point star in the field.

Year five — mow a spiral in the field.

Year six — start the sequence of patterns over or invent another design or ten.

Initial mowing can be done early but should leave 3/4 to 2/3 of the field uncut. Later in the season when the native grass has matured its seed (turned brown) a 2nd, complete mowing is OK and will not hurt the the native grass reproduction, but will help lower the fire danger.

This patterned mowing has been seen to increase the number of wildflowers present. If there are no native grasses in the field to start with, this method will not work unless native grass seed is brought in. Also, if there are perennial non-native grasses present (like Harding Grass or European Fescue), patterned mowing may not be as effective unless they are first removed.

Thank You,  
Chuck Williams, 3 Betty St. Ukiah, Ca. 95482 , Ph. 707-462-8984

## Hannigan, Edith@BOF

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**From:** Bahb Woolley <bahbcat@gmail.com>  
**Sent:** Friday, May 27, 2016 6:21 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Mascication is NOT vegetation treatment. Stop wasting money.

Please help us bring sanity to the California Board of Forestry's proposal to clear more than a half million acres of habitat over the next ten years in the name of fire protection. It doesn't work, it never will. All such activity ultimately accomplishes is the elimination of animal homes, destruction of ancient manzanita stems where rare lichens grow, and the spread of noxious weeds that produce stickers the end up in your pet's ears... as well as producing field of highly flammable grasses.

It makes No Sense to destroy habits using large gasoline (desil) guzzling macines. It DOES NOT reduce wildfire. It is ugly and destructive. Simply a waste of time and money.

Sincerley Robert Woolley

## Hannigan, Edith@BOF

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**From:** Nonna King <nonnaking1@gmail.com>  
**Sent:** Thursday, May 26, 2016 1:40 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Baby Birdies are Waiting for you

Dear Calif. Board of Forestry,

Please don't clear the chaparral willy-nilly. It seems your Vegetation Treatment Program would do just that, and maybe you're not paying attention to the environmental impact it will have on our California land, our chaparral, that we love so dearly.

Have you walked through the old-growth chaparral lately? It's gorgeous, today it was filled with Chamise blossoms, purple-needle grass, yellow monkey flower, hummingbirds, large white sage.....it truly is lovely, and the birds, so many baby birds. You can check out my Instagram if you would like to see some of the beauty we belong to...  
@feminina.californica ....but rather it be best you leave the office right now, walk into the chaparral, and listen for the baby birds. Take in the aroma of white sage....Spring is here in the chaparral. And did you know the chaparral only has 3 seasons? ....dry summers, mild, wet winters and spring....

In some of your reports I noticed you are misrepresenting scientists, please stop? This is abuse. ....the people of California are done with abuse....how we treat the land is a reflection of how we treat ourselves...let's change together?

I'm passing your plan around to my artists friends, my musician friends....The awareness is growing among our community of the importance of protecting the chaparral. The number of Californians becoming aware of the chaparral is growing at an exponential rate....here is a chance for you to become one of the leaders in this new movement. Imagine, the Board of Forestry working together with artists and musicians.

Please make a difference. Tell the Truth. Work with us in keeping the chaparral intact.

Sincerely,  
Nonna Zandri  
@feminina.californica

Sent from my iPad