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**North Coast Regional Water Quality Control Board**

May 31, 2016

Mr. Matt Dias  
Acting Executive Officer  
Board of Forestry and Fire Protection  
P. O. Box 944246  
Sacramento, CA 94244-2460

Dear Mr. Dias:

**Subject:** Comments on the on the Public Draft of the Programmatic Environmental Impact Report for the Vegetation Treatment Program of the Board of Forestry and Fire Protection

**File:** Timber, General

Enclosed is a Memorandum dated, May 31, 2016, which provides Regional Water Board staff comments on the Public Draft of the *Programmatic Environmental Impact Report for the Vegetation Treatment Program* (VTPEIR) of the Board of Forestry and Fire Protection.

We fully support the primary goal and purpose of the proposed Vegetation Treatment Program (VTP), which is to reduce costs and losses to human and environmental resources associated with wildfires. We believe the VTPEIR Proposed Program, with the incorporation of our accompanying recommendations, can accomplish this goal. Additionally, we have reviewed and support the Central Valley Regional Water Quality Control Board's comments on the VTPEIR.

Thank you for the opportunity to review and comment. If you or your staff have any questions or concerns regarding our comments or would like additional information, please contact David Fowler (707-576-2756) or Jim Burke (707-576-2289) of our staff.

Sincerely,

Fred J. Blatt  
Division Chief  
Nonpoint Source & Surface Water Protection Division

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Enclosures: 1. Memo from David Fowler, Review and Comments on the Public Draft of the Program Environmental Impact Report for the Vegetation Treatment Program of the California State Board of Forestry and Fire Protection, dated May 31, 2016

cc: Edith Hannigan, Board Analyst, Board of Forestry and Fire Protection,  
[VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)

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## North Coast Regional Water Quality Control Board

TO: Fred Blatt  
Division Chief  
Nonpoint Source & Surface Water Protection Division

FROM: David Fowler  
Representing review staff

DATE: May 31, 2016

SUBJECT: Review and Comments on the Public Draft of the Program Environmental Impact Report for the Vegetation Treatment Program of the California State Board of Forestry and Fire Protection

The North Coast Regional Water Quality Control Board (Regional Water Board) staff have completed reviewing the Public Draft of the *Program Environmental Impact Report for the Vegetation Treatment Program (VTPEIR)* of the California State Board of Forestry and Fire Protection (BOF). Regional Water Board staff fully support the primary purpose of the proposed Vegetation Treatment Program, which is to reduce the costs and environmental impacts associated with wildfires. We believe the VTPEIR Proposed Program, with the incorporation of the comments discussed below, can accomplish this goal.

### Summary

The Vegetation Treatment Program (VTP) proposes to maintain and enhance forest and range land resources by varying the spatial and temporal distribution of vegetation treatments within and across watersheds to reduce the detrimental effects of wildland fire on watershed health. The VTEIR estimates the total treatable acreage to be approximately 22 million acres, with approximately 3.3 million acres within the North Coast Region. To attain the VTP objectives, the VTP organizes treatments into three general categories: 1) Wildland-Urban Interface (WUI), where treatments are focused in WUI-designated areas and generally consist of fuel reduction to prevent the spread of fire between wildlands and structures; 2) fuel breaks, which are strategically placed vegetation treatments that actively support fire control activities; and 3) ecological restoration, with projects generally occurring outside the WUI in areas that have departed from the natural fire regime as a result of fire exclusion and focusing on restoring ecosystem resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition and structure.

The VTP proposes to use a variety of treatments including prescribed fire, manual activities (hand crew work), mechanical activities, prescribed herbivory (targeted beneficial grazing), and targeted ground application of herbicides. Prescribed fire methods include underburning, jackpot, broadcast, and pile burning, and establishment of fire control lines. Mechanical methods include using heavy equipment for chaining, tilling, mowing, roller

chopping, masticating, brushraking, skidding and removal, chipping, and pile burning. Manual methods include hand pull and grub, thin, prune, hand pile, lop and scatter, hand plant, and pile burn. Prescribed herbivory includes targeted grazing or browsing by cattle, horses, sheep, or goats. Herbicides include ground applications only, such as backpack spray, hypohatchet, or pellet dispersal. The relative distribution of projects by activity type is expected to be approximately 50 percent prescribed fire, 10 percent hand treatments, 20 percent mechanical treatments, 10 percent herbicide treatments, and 10 percent prescribed herbivory.

The VTEIR contains a discussion and analysis of the Proposed Program and five alternatives. The alternatives include no project (status quo), Wildland-Urban Interface (WUI) only (Alternative A), WUI and fuel breaks (Alternative B), projects limited to Very High Fire Hazard Severity Zones (VHFHSZ) (Alternative C), and reduction of prescribed fire treatments to reduce air quality impacts (Alternative D).

## Comments

The hydrologic and water quality-related standard project requirements (SPR) are listed in sections 2.5.1, 4.2.3.1, 4.3.3.4, 7.2.1.10, Appendix I.5.2 of the VTPEIR. A table titled “Watercourse and lake protection zone buffer widths by watercourse classification and hill slope gradient” is included below PSR HYD-3 in each section. The table lists the standard Forest Practice Rules (FPR) watercourse and lake protection zone (WLPZ) widths for watersheds without listed anadromous salmonids. The Table does not list WLPZ widths for watersheds with listed anadromous salmonids, including Class II Large watersheds. Regional Water Board staff recommend including WLPZ widths and protections for watersheds with listed anadromous salmonids.

Additionally, the tables in section 7.2.1.10 and Appendix I.5.2 are not designated with any table number. The reference to the tables in the HYD-3 description in those sections state “(Error! Reference source not found.)” Regional Water Board staff recommend the references be corrected.

Although the VTPEIR estimates that approximately 50 percent of the total program area will be treated with prescribed fire, methods of ignition and the use of accelerants is discussed in only one paragraph in section 4.1.6.1. Aquatic impacts of prescribed fire activities are discussed in section 4.2.2.3.1, but are restricted to direct temperature effects from the burn, and do not consider the impacts of accelerants or their residue. Although a 2002 US Forest Service report, *Residues of Fire Accelerant Chemicals, Volume I: Risk Assessment*, prepared by Labat-Anderson, Inc., for the USFS Intermountain Region, determined that the use of most forms of accelerants pose no significant risk to the environment, there is no discussion at all of the potential risk of accelerants or their residue in the VTPEIR. The US Forest Service report is not listed in the VTPEIR references (Section 9). Regional Water Board staff recommend the VTPEIR include a discussion of accelerants, their residues, and their potential environmental impact.