

From: N.D. Fenton <nanidrew@comcast.net>
Sent: Tuesday, May 31, 2016 5:24 AM
To: Vegetation Treatment Program@BOF
Cc: nanidrew@comcast.net
Subject: PUBLIC COMMENT RE Vegetation Treatment Program

Re: Draft Programmatic Environmental Impact Report for the Vegetation Treatment Program of the California State Board of Forestry and Fire Protection (SCH #2005082054)

Notice of Completion & Environmental document Transmittal was filed with state clearing house (SCH #2005082054). Calfire 's filing proposes a project called *Vegetation Treatment Program (VTP) utilized to "Communities near Wildland" "in any zoning designation depending on local government ordinances" that will "Reduce Wildland Fuel & Restore native ecosystems"*

Dear CA State Board of forestry,

The community of San Lorenzo Valley in Santa Cruz county believes, along with others, that our state flora would be better managed and better off from fire hazards if California State Board of Forestry and Fire Protection withdrew this PEIR for Vegetation Treatment Program.

1 NO EXPLANATION, NECESSITY OR PURPOSE is found that is logical or science and fact based for a VTP program

2. Statutory authority is not found yet claimed by CalFire without reference to any Public Resource Code -- it claims (page E-1 of the DPEIR): *"The Board recognizes the need for a continuous fuel reduction program to ensure a high level of fire protection across the SRA in their Strategic Fire Plan, and has the statutory responsibility to establish policy for wildland resources in the SRA."*

Public Resource code section 4741 states the board shall assist by making its wildland fire prevention and vegetation management expertise available to local governments, not conduct it:

Sec.4741: In accordance with policies established by the board, the department shall assist local governments in preventing future wildland fire and vegetation management problems by making its wildland fire prevention and vegetation management expertise available to local governments to the extent possible within the department's budgetary limitations. Department recommendations shall be advisory in nature and local governments shall not be required to follow such recommendations.

3. CalFire's VTP proposal, is voluntary, and not authorized by law, and finally not believed that it will be followed.

4. The purpose for the VTP is not based on current science, distorts the facts, threatening to the public and their safety. No biologist has recommended such activity, and must be science based, a requirement of PRC 21001 because CalFire is a "certified regulatory agency .

5. The April 1, 2016, Notice of Availability states *"Similar projects are currently undertaken by CalFire as part of the existing Vegetation management Program (VMP) The Vegetation Treatment Program (VTP) intends to lower the risk of damaging wildfires on SRA lands by managing vegetation to modify and or reduce hazardous fuels - are all parts of CalFire's comprehensive fire prevention strategy.*

CALFIRE'S CURRENT VMP includes many exemptions, one called "FIRE HAZARD TREE REMOVAL" exemption allows logging of fire retardant trees (coast redwood)

In Santa Cruz County since at least 2010, CalFire has been issuing exemption permits in a hazardous fuel reduction program on a form called REMOVAL OF FIRE HAZARD TREES WITHIN 150 FEET OF A STRUCTURE EXEMPTION (form RM-73 (1038C)(12/06) is a notice of timber ops that are exempt from THP requirements. The filings [http://thp.fire.ca.gov/THPLibrary/North Coast Region/Exemption%20Notices/](http://thp.fire.ca.gov/THPLibrary/North_Coast_Region/Exemption%20Notices/) have only been recently available to the public, displays the exemption is being used to cut down fire retardant Coast Redwood trees anywhere even watercourses, Class I. It is a catastrophe and ongoing. Homeowners are solicited to cut down their fire resistant redwoods for quick cash, only possible with CalFire's assistance. How can CalFire be trusted with another VTP program when a permanent loss of "rain forest" trees has permanently altered tree species, creating new fire hazard potential, increasing landscape flammability, by agency not able to be trusted to run a fire prevention programs

STRUCTURE PROTECTION EXEMPTION

(Removal of fire hazard trees up to 300 feet from an Approved and Legally Permitted or (Habitable) Structure

- FIRE HAZARD 150 ft. (§ 1038(c)(1)-(5))
 FIRE HAZARD 300 ft. (§ 1038(c)(6))*

Under 8 mbf

8-15 mbf

B. Estimate what percentage of timber will be

Redwood 100 %; Ponderosa/Sugar p

[http://thp.fire.ca.gov/THPLibrary/North Coast Region/Exemption%20Notices/2016/20160414_1-16EX-108SCR.pdf](http://thp.fire.ca.gov/THPLibrary/North_Coast_Region/Exemption%20Notices/2016/20160414_1-16EX-108SCR.pdf)

6. All Maps are illegible.

7. The Notice of completion filed with the state clearing house is signed by someone, yet no name is typewritten. It could be signed by Matt Dias, a person who has not declared a conflict of interest, yet one is known as he is a Forester for Big Creek Lumber, among other positions.

Yours,
DREW FENTON
Boulder Creek, CA