By US Mail and email

May 25, 2016

Mr. J. Keith Gilless, 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

Re: Vegetation Treatment Program Environmental Impact Report (VTPEIR)

Dear Ms. Hannigan, Mr. Gilless 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,

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