California Native Plant Society
ORANGE COUNTY CHAPTER

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occnps.org

The California Native Plant Society is a statewide non-profit organization. Its membership is open to all.

CNPS' mission is to conserve California native plants and their natural habitats, and to increase understanding, appreciation, and horticultural use of native plants.

The Orange County Chapter of CNPS focuses that mission on the native plants and natural vegetation of Orange County and adjacent Southern California.

May 31, 2016

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
PO Box 944246
Sacramento, CA 94244-246 0
VegetationTreatment@bof.ca.gov

RE: Vegetation Treatment Program Draft PEIR Comments

Dear Ms. Hannigan and Members of the Board:

The Orange County Chapter of the California Native Plant Society has long been concerned that efforts to pre-emptively control wildfire, via "pre-fire" manipulation of the vegetation, do more harm than good to the native vegetation that we work to preserve and enhance. Study of the 2016 version of the proposed Vegetation Treatment Program indicates that it, too, may well do more harm than good to native vegetation in State Responsibility Areas, in Orange County and in the rest of California.

A few specific comments on the VTP:

Comment 1: On Invasive Plants: In Orange County, wildfires are an irregular occurrence in our wildlands, and evolutionarily necessary to its ecological integrity. Invasive non-native plants, however, are a constant threat to that integrity. OCCNPS has an active program to lessen that threat (occnps.org/invasives). We agree with the VTP's Chapter 4.2.2.3.1, especially the first and third bullets:

> A recent thorough study of the relationship between fire and invasive species in California is in a chapter from *The Landscape Ecology of Fire* (Keeley et al., 2011). **Essentially, [the relationship] is much more complicated than previously understood** [emphasis added]. Some of the conclusions are worth including here:

- Fires are natural ecosystem processes on many landscapes. Perturbations to the fire regime, such as increased fire frequency and fire suppression, are the real "disturbances" to these systems and can lead to alien plant invasions.
- In forests, both too little fire and too much fire can enhance invasions. Restoration of historical fire regimes may not be the best way to balance these two risks.
- Repeated fires in shrublands decrease fuel volumes, decrease fire intensity and increase alien plant invasion. Decreasing fire frequency may be the best means of reducing alien invasions.
- Prescription burning that targets noxious species in grasslands is often not sustainable unless coupled with restoration.

The VTP appears **not** to have taken this study to heart. Throughout all parts of Chapter 4.2 that discuss invasive plants, the assumption seems to be that invasion of non-natives after a VTP treatment will be reduced to "less than significant" [but recall the old saying: "Give a weed an inch and it'll take a yard"] by applying Standard Project Requirements BIO-8 and/or BIO-9.

1. BIO-8: "Only certified weed-free straw and mulch is to be used." This SPR is repeated mantra-like throughout Chapter 4.2.2, as if it were the cure-all for weed invasion.

   OCCNPS' long-term experiences and anecdotal observations have shown that:
   - "Certified weed-seed-free" straw usually isn't weed seed free.
   - Applying mulch thick enough to smother weed seeds will also likely smother the native seeds that are already in the soil awaiting overstory removal so they can germinate.
   - Weed seeds (blown-in, bird-dropped, e.g.) are often capable of germinating within mulch and sending roots through the mulch into the soil, thus getting an even bigger head start over native seeds.
2. BIO-9: "The project coordinator is to determine if there is a significant risk of introducing invasive plants and, if so, develop specific mitigation measures using principles outlined the California Invasive Plant Council's *Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers* (2012)." This publication is an industry standard. Its BMPs should be integrated from the start into all phases of project planning and implementation—not just consulted at the end, as BIO-9 seems to imply.

OCCNPS suggests removing BIO-8 and replacing it with a rewritten BIO-9:

> New BIO-8: "At the outset of project planning, all who are involved in planning and coordination shall study the most recent edition of *Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers"* (California Invasive Plant Council, cal-ipc.org/ip/prevention/landmanagers.php) and integrate the BMPs it details into all phases of implementation and mitigation."

The use of mulch, including but not limited to "weed-free" straw, can be a BMP. OCCNPS agrees that mulch has appropriate uses.

The best mulch is formed by the vegetation's own fallen leaves, left undisturbed to allow soil organisms to recycle the nutrients in the leaves back into the soil for the roots to absorb again.

Comment 2: On Vegetation Treatment in Southern California: OCCNPS is pleased to see that Chapter 4.2.3, *Mitigation and Standard Project Requirements*, includes recognition that southern California's shrubland vegetation is different from the rest of the state's vegetation types:

> BIO-5: Vegetation treatment projects that are not deemed necessary to protect critical infrastructure or forest health in San Diego, Imperial, Riverside, Orange, Los Angeles, Ventura, Santa Barbara, Kern, and San Bernardino counties shall:
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> - Be designed to prevent vegetation type conversion.
> - Not take place in vegetation that has not reached the age of median fire return intervals.
> - Not re-enter treatment areas for maintenance in an interval shorter than the median fire return interval outside of the wildland urban interface and excluding fuel break maintenance.
> - Not take place in old-growth chaparral without consultation regarding the potential for significant impacts with the CDFW and the CNPS. **[Comment: More specificity is needed on the purposes and outcomes of this consultation.]**
> - Take into account the local aesthetics, wildlife, and recreation of the shrub-dominated subtype during the planning and implementation of the project.
> - During the project planning phase, provide a public workshop or public notice in a newspaper that is circulated locally describing the proposed project during the project planning phase for projects outside of the WUI. The notification will be used to inform stakeholders and to solicit information on the potential for significant impacts during the project planning phase. **[Comment: Using only a local newspaper to inform the public about projects is not adequate in this electronic age. You have an email notification list, at a minimum derived from the previous VTP iteration and increased by this iteration—use it! CA.gov must have IT staff knowledgable in the use of social media—use them!]**

Comment 3: On Fuel Breaks: The VTP cites Syphard, et al (2011a)[1] but not Syphard, et al (2011b)[2]. Each study shows that fuel breaks within wildlands don't, by themselves, deter or slow the spread of fires; their main value is as firefighter and equipment access to a fire's vicinity. With that in mind, OCCNPS is puzzled that the VTP would include fuel breaks as a valid method of wildfire control. Furthermore, several studies cited in the VTP show that fuel breaks are likely to be sites from which non-native plants invade wildlands—this corroborates our long-term

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1. 2011a: Syphard, A.D., J.E. Keeley, T.J. Brennan. *Factors Affecting Fuel Break Effectiveness in the Control of Large Fires on the Los Padres National Forest, California*. International Journal of Wildland Fire 20.6 (2011): 764-775
2. 2011b: Syphard, A.D., J.E. Keeley, T.J. Brennan. 2011. *Comparing the Role of Fuel Breaks Across Southern California National Forests*. Forest Ecology and Management 261(2011): 2038-2048. doi: 10.1016/j.foreco.2011.02.030.

anecdotal observations. Why would anyone want to expend the time, effort, and funds to install and maintain fuel breaks, when fuel breaks don't do what they're intended to do, and are an entryway for invasives into wildlands?

Comment 4: On WUI in OC: The VTP's requirement of a 1.5-mile-wide buffer zone at the WUI is unrealistic in Orange County. The Fire Hazard map at right shows that all OC's SRA Zones are bounded if not surrounded by incorporated development. OC's WUI is our reserve lands: some are in SRA Zones and some are in incorporated areas. The SRA Zones are:

1. The OC portion of Chino Hills State Park, about 1/3 of the whole park.
2. The Santa Ana Mts. foothills, a patchwork of five OC nature parks, small-acreage private lands, and inholdings in the National Forest.
3. Rancho Mission Viejo—the yellow areas are now much extended as development proceeds—and Caspers (county)Wilderness Park and Starr Ranch Audubon Sanctuary.
4. Crystal Cove State Park and Laguna Coast and Aliso and Wood Canyons (county) Wilderness Parks.

Applying a 1.5-mile "buffer" of vegetation treatment in the Zones' state and county parks would remove most if not all of the parks' vegetation and the habitats it forms—i.e. removing the very reason the parks were set aside under NCCP or similar mitigation agreements.

OCCNPS does agree that it is necessary to do some vegetation treatment in the WUI, to help protect homes from wildfire. Such treatment must be part of an overall fire-safe program that starts from the house and works out, rather that working in from the wildland.

Thank you for the opportunity to comment on the VTP EIR.

Respectfully,

Celia Kutcher
Conservation Chair