

Hannigan, Edith@BOF

From: Brandon Pratt <rpratt@csub.edu>
Sent: Tuesday, May 31, 2016 5:55 AM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report (DPEIR)

Dear Ms. Hannigan,

I recently had a chance to read the Draft Programmatic Environmental Impact Report (DPEIR) and want to express concerns about some of the management approaches. In particular, the approach of fuels treatment (mastication, spraying with herbicide, clearing) in chaparral should be generally abandoned throughout the state. Such treatments transform these ecosystems and diminish the many important services that they provide (e.g. carbon storage among others), as well as their significant biodiversity. Another common phenomenon is that once these stands are altered annuals (many non-native and invasive) become more abundant. This makes these landscapes more prone to frequent fires, and thus more dangerous, because these annuals are dry for much of the year and thus able to carry a fire. A focus on providing defensible space around structures is a strategy that is more effective in limiting loss than the fuels manipulations that are commonly employed. Also, wise development strategies that build-in defensible space around new developments along the urban-wildlands interface will prove more effective in the long term.

I have studied fire and chaparral for many years and spent much time in the field and traveling around the state in chaparral systems, thus I have extensive experience on this topic. I have also engaged land managers in similar systems in Western Australia, central Chile, South Africa, and the Mediterranean Basin and discussed shrubland management in the context of fire. As a California state and federal tax payer I find the notion of funding a destructive and degrading fuels management approach to wildfire management distressing. I teach about these topics to both undergraduate and master's students and they too find this situation distressing. The risk (fuels manipulations may make a system more likely to frequently burn) and dubious cost to benefit of this management approach should weigh heavily in decisions to manage fuels in chaparral systems. If this is done I am confident that it will save tax payer dollars and help preserve the states most extensive, diverse, and uniquely Californian ecosystem type.

Sincerely,

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