## Hannigan, Edith@BOF

**From:** Nancy <summersng@saber.net>
**Sent:** Monday, May 30, 2016 9:41 PM
**To:** Vegetation Treatment Program@BOF
**Subject:** VTP comments, time sensitive

To Whom It May Concern:

**VTP comments:**

Personal observations from a VMP:
**Calfire's burning of areas that were recently burned results in long term / possibly permanent environmental destruction.** This is a personal observation made of a chaparral /forest area where a VMP was conducted in an area that had been burned recently (relative to normal fire return intervals). Evidence of charred stumps of coyote bush which never grew back are located in the same area that was burned over again by Calfire.

The VTP has supplied no assurances that this pattern of burning areas (which have already been recently burned) will not result in very, very frequent burns!

**Northern California has insufficient data to determine historical burn frequency.** Chaparral areas have no old growth trees to provide burn scar evidence. Native American tribes were decimated over 400 years ago due to the introduction of disease. Consequently, their influence in relationship to human caused fire is not indicative of long-term historical patterns. In southern California ash/charcoal evidence in the ocean sediment is indicative of fire frequency. No such evidence is found in Northern California ocean sediment.

**Results of frequent burns are: Hydrophobic soils which do not readily absorb water.** The hydrophobic soil is barren and very hard which results in water running off rather than recharging the ground water and providing surface water for plants, microorganisms and other life forms. When water is not absorbed into the soil, ultimately vegetation dies and a desert is created. The streams become "flashy" resulting in very high, intense flows from rapid run-off which cannot be absorbed by the hydrophobic soils. Because the run-off has abnormally strong force, the streams become eroded and incised. Incised streams lower the historic water table which results in vegetation drying out and further exasperates desertification.

Thus, **frequent burns result in damaged soils which result in desertification** which results in dying vegetation creating more dangerous fuel for fires, destruction of wildlife habitat and loss of wildlife.

**Frequent burning results in destruction of native plants and topsoil which is conducive to an invasion of non-native plants** such as broom, star thistle, medusa head grass and numerous other noxious non-native plants that can out compete native plants. Such non-native plants provide little or no food value to native wildlife and crowd out regrowth of native plants.

Calfire claims that the VTP will reduce the chance of destructive wildfires, however, some species of chaparral such a coyote bush regenerate sufficiently within a year to provide a bridge for fire to spread. Calfire claims that wildlife habitat will benefit, as well as plant species, yet topsoil and native plants are destroyed thus allowing the invasion of non-native plants.

**Herbicides should not be used at all for VTPs due to non-target, "collateral" damage to wildlife and soil.** For example, Glyphosate is toxic to fish and amphibians and Clopyralid is toxic to some crops. Clopyralid does not degrade even when treated vegetation passes through the digestive system of an herbivore.

In summary, the proposed VTP will be counter productive to wildlife habitat, native plants, the watershed, soils and will promote addition climate warming by decimating forest land and vegetative cover.

Sincerely,
Nancy Summers
707-322-4263