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May 31, 2016

California Board of Forestry and Fire Protection  
Attn: Edith Hannigan, Board Analyst  
Via Email: [VegetationTreatment@bof.ca.gov](mailto:VegetationTreatment@bof.ca.gov)

Dear Ms. Hannigan and Members of the Board:

The recently revised Draft Program Environmental Impact Report for the proposed Vegetation Treatment Program again fails to meet the requirements of good science, rational project analysis, and the California Environmental Quality Act (CEQA). It also fails to address the most effective ways to protect lives and property from wildfire. In this light, our comments from February 15, 2013 remain relevant as to the many issues of concern with the revised DPEIR.

The latest draft again contains:

- Environmental impacts of clearance operations that are dismissed without support;
- Clearance of northern chaparral being justified by unsupported concepts;
- Research from several scientists that continues to be misrepresented (despite corrections that have been submitted); and
- A continuing lack of transparency concerning public involvement and notification process regarding clearance projects.

The document also reveals a significant number of inconsistencies as it initially references current science, only to qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document abounds in ambiguity. It appears to be a program in search of confirming data rather than one developed from analysis examining the actual problem.

The most concerning issue, however, relates to the failure of the document to provide a key component of a programmatic EIR - providing a more exhaustive consideration of effects and cumulative impacts than could be accomplished at the project level (14 CCR § 15168).

Instead, volumes of repetitive text are punctuated with the unsupported claim that determining impacts is impossible, deferring to project managers to determine with a checklist and standard project requirements that depend on subjective judgments.

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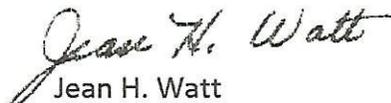
This effort to clear native vegetation appears to ignore the Greenhouse Gas Reduction Fund expenditures that specify preserving habitat, specifically forest habitat. It is another sign of two agencies working under the same banner that are, in fact, working against one another. In addition, there is a glaring lack of analysis on the GHG emissions from the use of heavy equipment in the proposed vegetation removal and the loss of carbon sequestration from the removed vegetation that further counters the State's intent to reduce GHG impacts in California.

How does the DPEIR justify ignoring a thorough examination of impacts as required by CEQA? The DPEIR vacillates between claiming the Program is too large and complex to analyze, or the actual treatment areas are too small to have an impact.

As a consequence, the current DPEIR fails to provide adequate support for concluding that the proposed program will not have a significant effect on the environment.

Friends of Harbors, Beaches and Parks strongly opposes the conclusions of this faulty document, as we did in our letter of February 15, 2013 for the prior Draft. We believe that it is imperative that the Board and staff re-evaluate the baseline approach to formulate a new and comprehensive program to address vegetation treatment only within the immediate vicinity (100 meters) of occupied residential structures in California.

Sincerely,

  
Jean H. Watt  
President

cc: Russ Henley, Natural Resources Agency

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February 15, 2013

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Environmental Nature Center  
Great Park Environmental  
Coalition

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Board of Forestry and Fire Protection

Attn: George Gentry

Executive Officer

[VegetationTreatment@fire.ca.gov](mailto:VegetationTreatment@fire.ca.gov)

Sacramento, CA 94244-2460

Re: Draft Program EIR for the Vegetation Treatment Program

Dear Mr. Gentry and Board Members:

Friends of Harbors, Beaches and Parks (FHBP) is a countywide non-profit organization in Orange County, California. Our mission is to protect the natural lands, waterways and beaches. In addition to our Coalition of more than 80 conservation and community groups, FHBP has more than 5,000 individuals that support our regional work. We are writing you today to provide comments on the Draft Program Environmental Impact Report (PEIR).

While we support the program's intended goal to "lower the risk of catastrophic wildfires" we do not support the approach. We are surprised to read that the State Board of Forestry and Fire Protection (BOF) plans to eliminate vegetation through the removal, rearrangement or conversion of vegetation. This is not only unacceptable but also demonstrates the BOF is moving in a backwards direction from appropriate scientific methodologies. The removal of vegetation ~~have~~ has significant and unavoidable impacts to our ecosystems and our communities including:

- Loss of endangered and threatened species
- Loss of native habitat for our wildlife
- Increased erosion
- Decreased water quality,

In normal instances of habitat removal, say for a housing development, the state and federal resource and permitting agencies would require quantified restoration and/or protection of adjacent areas through acquisition and dedication.

If the BOF would like to reduce the number, frequency, and size of catastrophic wildfires we respectfully recommend you start by implementing good land use planning that no longer puts people in harm's way. State regulations should require that local jurisdictions no longer allow residential development at the Wildland-Urban Interface (WUI). By increasing the WUI and adding or expanding roadways into natural areas, there is an increase in not only the danger to those new home owners, but an increase in the fire ignition points.

It also seems the BOF believes the native vegetation is at fault. We disagree and so does the science. Instead the entire environment needs to be evaluated from the location of the homes to the types of homes and building materials, emergency and evacuation plans as well as the types of fire suppression available (such as hardening the edges of roadways, properly maintained utility lines, etc.) It is disturbing to think that in 2013 the State of California actually believes removing habitat is the best approach to protecting that habitat and homes.

Another land use recommendation would be to understand where and why fires are starting. We recommend you review the study completed by Hills For Everyone which documents 100 years of fire history near Chino Hills State Park. You'll discover that in the approximate 97 year history, of the 103 fires they were able to obtain data for two of the fires were natural. The remainder (101 fires) were human caused and the most common causes were arson, car fires and powerlines. In other words it seems fire prevention needs to be aimed at the humans igniting the fires and having increased access to the wildlands because of poorly planned developments and road access. This study is available online at: <http://www.hillsforeveryone.org/projects/fire-study.html>

Additionally, if removing the vegetation actually solved the problem of catastrophic wildfires we would agree with you. But the reality is, when you remove the native vegetation, the non-native vegetation moves in in its place. Non-native vegetation dries earlier, ignites easier and spreads wildfire faster than native vegetation. By removing native vegetation you simply increase the amount of fuel, its ability to ignite and its ability to spread fire. You get the exact opposite of what you had hoped for – more and more intense fires.

We are also disturbed by the PEIR approach. Can the entire state of California be treated as one big habitat when local conditions exist that should be considered when planning for wildfire suppression? We believe individuals and organizations should be allowed to review each individual project under the requirements of the California Environmental Quality Act. Instead, the BOF proposes a “trust us” approach that includes a yet-to-be created checklist and the specific management actions on the lands.

We also disagree that the plants and animals are at risk from catastrophic wildfire. The reality is, the bigger risk for them, based on your plans, is loss of habitat. Instead of losing a few hundred acres from a wildfire in a season they will lose more than 38 million acres of habitat in one fell swoop. To that end, FHBP requests that the BOF retract the Vegetation Treatment Program PEIR and create a program that will properly consider the entire fire environment, reflect regional differences, allow for independent oversight, and incorporate the most up to date science.

Thank you for your time and consideration of our comments.

Sincerely,

  
Jean H. Watt  
President