



Kern Audubon Society
PO Box 3581
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January 9, 2018

Board of Forest and Fire Protection
P. O. Box 944246
Sacramento, CA 94244

RE: Draft Program Environmental Impact Report Regarding the Proposed Statewide Vegetation Treatment Program

The Kern Audubon Society wishes to comment on the proposed VTP DEIR in regards to birds: population, nesting, and foraging issues.

In looking at the list of professionals used to prepare the document, it is noted that there was an absence of ornithological experts used for analysis and comments. Since the vegetation, especially chaparral, to be treated is the primary feeding sources for a variety of bird species, especially the endangered California gnatcatcher and blue-gray gnatcatcher, there must be more studies on the effect of the VTP on specific bird populations. This is missing the document.

Within the DEIR's mitigation portion, there needs to be an initial statement as to how bird populations will be assessed and steps to be taken as to reduce the negative effects of the three treatment option. This statement is basically a protocol analysis, a guideline for on-site assessment. The California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service have both prepared such protocols. Within the DEIR there is no such statement. Such a statement is necessary to the selection process and to validate any proposed mitigation measure related to birds.

We hope that the above recommendations will be included in the FEIR.

Sincerely,

Harry Love, Conservation Chair
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