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January 9, 2018

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
VTP Draft PEIR Comments
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Ms. Hannigan:

The Butte County Board of Supervisors supports the California State Board of Forestry and Fire Protection's Vegetation Treatment Program (VTP). The Programmatic Environmental Impact Report (PEIR) for the VTP adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. Further, the PEIR clearly identified the limitations of the program in regards to environmental impacts and the mitigation measures that will minimize those impacts. For the health and well-being of those facing wildfire risks, we strongly encourage the California State Board of Forestry and Fire Protection Board to accept the PEIR and begin implementation of the VTP.

Butte County has first-hand experience in the dangers posed by wildfires. We experienced four catastrophic wildfires in 2017. Unfortunately, this year's impacts are not unprecedented. We routinely face wildfire devastation along the vast wildland-urban interface (WUI). The Butte County community, primarily through the leadership of the Butte County Fire Safe Council, have taken considerable efforts to reduce wildfire fuels and risk. However, local wildfire fuels reduction programs have been stymied by existing rules and procedures that are outdated, inefficient, and costly. Under current rules, wildland fire prevention programs require conducting a project-by-project Environmental Impact Report (EIR), which results in increased costs and delays without any environmental benefit. A typical project can take up to 3 years to go through the EIR process. In the case of a small 45 acre project, the EIR costs alone could be \$45,000. The cost of conducting an EIR has increased from 2-5% to 10-15% of project costs, and has become a major cost component of wildfire reduction programs. The increased cost of conducting EIRs comes at the expense of wildfire fuel reduction projects. Having the ability to work under the VTP would have enormous benefit without posing adverse impacts to the environment.

The VTP describes a well-reasoned strategy to reduce wildfire fuel threat on SRA lands on a state wide scale. The program has undergone extensive review and refinement over the past four years. The treatment activities such as manual (hand crew work), mechanical, prescribed herbivory, and targeted ground application of herbicides are clearly described with appropriate limitations. The VTP PEIR

adequately assessed the potential impact from the VTP as it is implemented in the wildland urban interface (WUI), including strategically placed fuel breaks and ecological restoration. The VTP PEIR offers the right balance of a state-wide program, local implementation and environmental safeguards. Given the enormity of statewide wildfire risks, adoption of the VTP is long overdue.

The Butte County Board of Supervisors offers its support for the VTP. The draft VTP PEIR adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. We recommend the California State Board of Forestry and Fire Protection Board accept the PEIR and implement the VTP.

Sincerely,

A handwritten signature in blue ink that reads "Steve Zahner". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Chair
Butte County Board of Supervisors

cc: Butte County Fire Safe Council
Butte County Forest Advisory Committee
Butte County Federal/State Land Use Coordinating Committee