

January 12, 2018

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
Re: VTP Draft PEIR Comments
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The year 2017 saw major fires throughout the state. These events resulted in the loss of many structures and, unfortunately, the loss of life. Mendocino, Napa, and Sonoma were hard hit, and were then followed by the Thomas fire in Ventura County. In my career as a forester, I have witnessed firsthand the impacts related to these occurrences and their heartbreaking aftermath. It is now recognized that aggressive fire suppression over many decades has added to this problem by allowing fuel loads far in excess of those experienced prior to European settlement, and these fuel loads add to the explosiveness of contemporary fire events.

We have wrestled with this issue for a number of years, and we have identified the appropriate measures to provide a least some mitigation to the reality of living with wildfire. The Board has adopted a State Fire Plan, expanded their local planning outreach, provided standards for fuel clearance, and worked to provide an easing of the regulatory burden for vegetation management. All of these play an important role.

The tool of vegetation management can provide a mechanism that allows for managing and ameliorating these excessive fuel loads. Unfortunately, although the desire of the Board and CAL FIRE (as well as their local partners) is to increase the pace and scale of vegetation management projects, they are sometimes stymied by the need for environmental review and permitting.

This EIR is, without a doubt, one of the most important and meaningful efforts undertaken in light of the foregoing. You have, no doubt, heard from numerous fire departments about its utility and necessity. California needs to increase the management of its lands to prevent forest fires and build resiliency in the landscape. The Vegetation Treatment Program Programmatic Environmental Impact Report (VTP PEIR) would create a streamlined process for communities to engage in prevention projects that would reduce hazardous vegetative fuel conditions and restore ecosystem resiliency. The ability to tier the environmental analysis for these projects off the VTP PEIR would substantially reduce costs to communities and allow them to address hazardous vegetative fuel and potentially reduce catastrophic losses in an economic and timely manner.

The Executive Summary captures this:

“CAL FIRE will implement the VTP with the intent of lowering the risk of damaging wildfire in the SRA by utilizing environmentally appropriate vegetation treatments. Subsequent activities under the VTP will only be implemented in the SRA where the VTP objectives may best be achieved. These objectives are:

- 1. Modify wildland fire behavior to help reduce losses to life, property, and natural resources.*
- 2. Increase the opportunities for altering or influencing the size, intensity, shape, and direction of wildfires within the wildland urban interface.*
- 3. Reduce the potential size and total associated suppression costs of individual wildland fires by altering the continuity of wildland fuels.*
- 4. Reduce the potential for high severity fires by restoring and maintaining a range of native, fire-adapted plant communities through periodic low intensity treatments within the appropriate vegetation types.*
- 5. Provide a consistent, accountable, and transparent process for vegetation treatment monitoring that is responsive to the objectives, priorities, and concerns of landowners, local, state, and federal governments, and other stakeholders.”*

A combination of manmade and natural factors has resulted in drastic increases in economic losses, resulting from not only wildfire suppression, but also lost lives, homes and infrastructure. This crisis requires a statewide strategy. A statewide VTP PEIR will help jurisdictions implement projects that benefit communities regardless of geographical boundaries and will place these individual projects within the larger context of fuel reduction work in California. Our membership looks forward to working with the Board and CAL FIRE on this critical issue, and fully support adoption.

George D. Gentry

A handwritten signature in blue ink that reads "George Gentry". The signature is written in a cursive, flowing style.

Vice President Regulatory Affairs
California Forestry Association