



January 5, 2018

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

We appreciate the opportunity to comment on the Vegetation Treatment Program Environmental Impact Report (VTPEIR). The Kern Chapter of the California Native Plant Society supports practices that protect California native vegetation. We also are sympathetic to your concern about efficient and effective ways to protect life and property.

Although, while some proposed actions may benefit native vegetation, others have the potential to cause significant impacts to rare natural communities. The VTP Draft PEIR lacks the specificity necessary to insure the project will not result in significant impacts to biological resources. Analysis used in the document is based on broad geographical areas that contain widely variable habitats and on an outdated vegetation classification system.

The maps provided lack detail which would be required for proper analysis. For example, the map which includes the foothills in Kern County, on the west side of the Sierra Nevada, show that chaparral grows much lower than in actuality on the west side of the Sierra Nevada mountains. The citizens of Woody would be horrified if their blue oaks were removed! Fire breaks are too numerous to count and poorly defined "WUI" are drawn around population centers.

Having a thorough understanding of each particular ecosystem is critical to determining an appropriate treatment regime. Treatments should be designed for site specific ecological conditions. A reasonable expectation is that the PEIR would have, by now, identified specific areas that have been prioritized and analyzed in sufficient detail to justify the project.

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Another concern is that best practices will not be used in reaching the goals stated. Input from experts to specific projects is important. Use of contemporary data on plant location, such as available at CNPS, is required. Qualifications of the project manager, and control over implementation of the project to insure adherence to standards are crucial to the success. The PEIR does not provide assurances.

Further, any treatment requires follow-up. Fire breaks have destroyed native plants which are replaced by invasive, flammable species. Cost of maintaining the initial project needs to be included in allocation of resources.

Fire suppression alone is inadequate. Cal Fire must address the political and social issues related to fire damage. A commitment is needed to working with the legislature and other parties to address those issues associated with wild fires. The standard procedure of clearing habitat to reduce wildfire has not worked. That's because while vegetation management such as fuel breaks and prescribed burns can help during non-extreme fire events, they do little to suppress extreme events. Cal Fire needs to begin addressing the question, "How do we protect lives and property?" rather than "How can we stop a wildfire?" It would mean spending as much time and money on helping people retrofit homes as on vegetation treatments. Such long-term solutions, unlike fuel breaks, do not require costly maintenance. Our goal should be to reduce the damage when wildfires arrive, not pretend we can prevent them from happening at all.¹

Respectfully:

A handwritten signature in cursive script that reads "Fred Chynoweth".

Fred Chynoweth and Lucy Clark
Kern CNPS Conservation Co-Chairs

¹ *Richard Halsey, the director of the California Chaparral Institute,*
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