California Native Plant Society

Los Angeles / Santa Monica Mountains Chapter

15811 Leadwell Street, Van Nuys, California 91406

January 8, 2018

Edith Hannigan, Board Analyst
Board of Forestry and Fire Protection
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RE: Recirculated Revised Draft Program Environmental Impact Report Regarding the Proposed Statewide Vegetation Treatment Program (VTP) November 7, 2017

Dear Edith Hannigan:

The Los Angeles / Santa Monica Mountains Chapter of California Native Plant Society (LASMM, CNPS) membership area covers the Santa Monica Mountains, western portions of the Los Angeles Basin, the San Fernando Valley west through the Simi Hills, and north to the Mojave Desert. The following are our comments on this Recirculated Revised Draft Program Environmental Impact Report (PEIR) Regarding the Proposed Statewide Vegetation Treatment Program (VTP).

General Comments:

This VTP is obsolete. Due to the chaotic weather patterns, powerful winds and extreme temperatures of a changing climate, prescribed fire scheduling is impossible and dangerous. Climate is changing NOW!

Natural ecosystems are being stressed to the point that “managing” the native plant alliances/native plant habitats with mastication, mechanical removal of understory and shrubs, using herbicide indiscriminately or during windy conditions, will probably irretrievably destroy these systems, with the loss of both native flora, fauna and will diminish the resources available to migratory animals. In Southern California shrub systems knit watersheds together through intricate interlacing root systems, retain groundwater and prevent erosion of unstable slopes and steep coastlines. The treatments proposed in this VTP are not protective of watershed values.

As a representative of Santa Barbara County Public Works explained to a reporter in a Los Angeles Times article (January 8, 2018) “If the watershed had not burned, there would be as much as 20 feet of vegetation cover thanks to dense chaparral that could soak up rainwater. Half an inch of rain would not even hit a person sitting under that canopy of trees. Now it hits the dirt directly and it is instant runoff and carries that sediment.” This was part of a report on possible effects of heavy rain on recent wildfires in southern California. The one mentioned above is the Thomas Fire, now recorded as the largest wildfire ever in California and still not quite out.

Note: Not everyone thinks of chaparral as “shrubs”. The photo below was taken today during a rainstorm in the Santa Monica Mountains . The background hillside is mixed mature chaparral. The cleared area at the bottom of the slope is a California walnut grove with the understory cleared for fuel clearance and

now very weedy.. Are California walnuts “shrubs”? The foreground is mature coast live oaks. Are coast live oaks “shrubs”? Does this look like a “Rangeland”? No. This looks like a very healthy watershed.

Forestry and Cal Fire need all their budgets to fight, for the foreseeable future, large difficult wildfires and to continue to thin out beetle- and pathogen-killed trees, especially in coniferous forests.

How much of the Cal Fire-indicated “treatable area” acreage has burned in the wildfires of the last ten years? Where, in this PEIR is that acreage noted and subtracted from the treatable acreage? Those burned areas are freshly burned or are in recovery and should be monitored, perhaps restored, but not subjected to the destructive methods proposed for treating vegetation in this VTP for at least another ten years. Recent fires in Southern California , besides the record-breaking Thomas Fire are the La Tuna, Rye, Creek, Skirball to name a few. The Spring Fire occurred a few years ago in Ventura County and in part of the Santa Monica Mountains. Then there is the Nuns Fire in Sonoma and Napa Counties in Northern California. Looking at the “treatable area” maps in this VTP PEIR, it seems that most of these wildfires occurred in those “treatable areas”. This proposed VTP PEIR is too late to do any preventable vegetation management, only careful monitoring and possible restoration of native shrublands and woodlands are realistic vegetation management programs now in those burned areas. Local organizations and local Fire Safe Councils are better able to perform any of the above activities than Forestry / Cal Fire.

Why aren’t Forestry and Cal Fire working to promote and support more local Fire Safe Councils? Especially in Southern California, these councils are very important for treating and monitoring open areas and residential areas. Organizations like California Invasive Plant Council (Cal-IPC), California Native Plant Society (CNPS) and others do weeding in some of the CalFire-indicated “treatable areas”.

Wouldn’t the yearly activities of local Fire-Safe Councils and these interested organizations be more effective in reducing high wildfire hazard conditions than the VTP goal of “treating” 60,000 acres of the designated 2,300,000 acres once every 386 years?

Are there yearly reports of the work done and the areas treated, at least from the Forestry/Cal Fire-sponsored Fire Safe Councils? Are these reports part of Forestry/Cal Fire’s yearly report to the governor and the legislature?

Do Cal Fire and Forestry work with the California Department of Food and Agriculture (CDFA) to safely process the harvested material as these trees are probably in quarantine areas? CDFA requires permits and certain conditions on moving quarantined trees or other plant material and defines accepted processing of such material.

Comments on particular sections of the Recirculated Revised Draft VTP PEIR:

1. ACRONYMS AND OTHER ABBREVIATIONS:

Where is the acronym for California Department of Food and Agriculture (CDFA)? They are responsible for preventing the spread of pest- or pathogen-infested plants. Quarantine areas are declared in areas where these infestations occur. Permits are required for handling, moving the infested material out of the quarantine area, processing, storing and treating these plants. The shot-hole borer/fusarium infested trees are one example. Plant species infected with phytophthora oomycete are another.

2. GLOSSARY OF TERMS:

a. Chipping: If beetle-infested trees are chipped, the chips must be smaller than 1 inch in length or diameter to prevent the spread of fusarium. This particular chipped material may be used as mulch onsite or used in power generation facilities but, without permission from CDFA may not be sold to homeowners or garden supply stores. Phytophthora infected woodchips can be used for power generation, or otherwise sterilized.

b.Feller-buncher: If beetle-infested trees or trees infected with phytophthora are cut by the feller-buncher they may not be loaded onto trucks unless the trucks are permitted by CDFA to move these logs to a designated location where they will be sterilized or destroyed.

c. Mastication: If the mastication equipment is working around beetle-infested trees or some of the many species of shrubs and trees infected with phytopthora the cut material probably should be sterilized or pile-burned. The equipment and workers' tools and boots will have to be sterilized after use in such areas. CDFA can provide more definite information on end uses for this material.

3. E.6 ALTERNATIVES ANALYZED

a. No Project – This alternative is stated to be a continuation of the current Vegetation Management Program which is essential non-functional in the current chaotic climate change weather conditions. There is no way to predict reliably when prescribed burns could take place, or whether burning is wise in highly-stressed native or non-native forestlands, grasslands or shrublands.

b. Proposed Program – This alternative still involves the use of vegetation management methods that generally will be damaging to the areas treated, not easily controllable in current unpredictable wind and weather events, and will not cover enough acres in the State to make a significant difference to the frequency of wildfires now occurring in the State. The phrase "enhancing fire resiliency through ecological restoration" is not reassuring since "ecological restoration" in this document seems oriented toward business interests such as timber harvesting, grazing, and industrial / residential environments, not preservation and restoration of native chaparral, coastal sage and desert shrublands even though many of these species are fire resilient.

c. Alternative A: WUI Only – This alternative is already handled by local fire authorities, local jurisdictions, homeowner associations and Fire Safe Councils in most Wildland-Urban residential areas in Southern California. Does Cal Fire get yearly reports on the WUI acreage monitoring and fuel clearance data? If not, why not? Alternative A does not require necessarily State-level involvement, if the local people are doing their job.

d. Alternative B: WUI and Fuel Breaks – See above for the work done by locals in WUIs. Maps of possible fuel breaks in Southern California are so full of errors as to be useless. Unless Cal Fire has more accurate maps and onsite information, planning fuel breaks where there are streets, houses, already built fire roads and fire breaks, and trespassing on federal lands or California University Reserves or the occasional industrial and business centers would not be a good idea.

e. Alternative C: Very High Fire Hazard Severity Zone – This alternative is already totally out of control. Cal Fire cannot treat enough of these acres per year to affect the wildfire frequency now upon us. The best Cal Fire can do is to restrict treatment activities to the forest lands with the many dead or dying trees. Concentrating on the forests is, at this point in time, the best use of the Vegetation Treatment Program.

f. Alternative D: Treatments that Minimize Potential Impacts to Air Quality – This alternative would not use prescribed fire as Cal Fire's preferred treatment in order to minimize potential health and environmental impacts. Since climate change is making it all but impossible to carry out a "prescribed" burn, that is an excellent idea. Using hand or controlled herbivory might work better. Pile burning might be required with some of the infested/infected trees in the forest, however.

4. E.7 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES: TABLE ES-1:

a. Aesthetics and Visual Resources: Significant and unavoidable due to loss of perennial and annual flower species seed banks and chaparral trees and shrubs of many shapes and sizes with bright flowers, berries and other fruits throughout the year. Most of the methods proposed will rip these plants out by the roots, burn them up, tear them up and harrow the soil to destroy their seed banks.

b. Air Quality: In Southern California any extended smoke episode causes serious air pollution problems. With uncertain wind and temperature as climate changes, stagnant air will be as bad as winds if prescribed burns get out of control. Significant and unavoidable environmental impacts in this time of unpredictable weather.

c. Biological Resources: The information in Appendix B: Biological Resources has absolutely nothing to do with biological resources. What does a section on VTP Water Drafting Guidelines, a large number of microscopically small print data-filled tables on the living styles (below ground, ground level, trees and shrubs) of multitudes of unidentified species, and the Cal IPC manual on BMPs for land managers for "Preventing the Spread of Invasive Plants" have to do with specific native plant species and native animal species affected by the proposed treatments of this VTP?

If the onsite treatment kills the species, what difference does it make if the VTP uses special pipes and keeps the water clean?

What difference does it make to list the locations of where a large number of unidentified species live if every description ends with "some will die, but maybe a few will survive"?

Where are the native plant species identified, number of listed native plant species affected by VTP treatments in "treatable areas" around California?

Including the Cal IPC manual "Preventing the Spread of Invasive Plants" in Appendix B makes it clear that this document is not interested in the world-renowned native biodiversity of plant species in California, but only in the mechanics of disturbing and perhaps destroying some aspects of this biodiversity.

According to the tables of animals' living styles, there are significant and unavoidable environmental impacts if VTP methods are used.

d. Climate Change / Greenhouse Gas: Page E-2: "The impacts of climate change suggest a continuing and even accelerated risk from wildfire." "These future climate scenarios combined with continuing projections of residential growth into the wildland suggest that ensuing wildfire-related problems are poised to become even larger in the near future."

The future is NOW. Wildfires are doing what the VTP treatments were supposed to do, but on a larger scale. Significant and unavoidable impacts are occurring every year. The best VTP is to actively promote Fire Safe Councils and require yearly reports of the acreage they monitor and maintain. Fire and forestry personnel can mitigate the effects of climate change by working to thin beetle/fusarium-killed trees in the coniferous forests and by doing their best fire-fighting efforts to keep down the acreage now being lost due to climate change causing severe weather and wind conditions.

Large acreage is now burned by these wildfires reducing the need to treat those acres for years to come. Greenhouse gas emissions are large as well during the wildfire, but the carbon sequestered in all those buried root systems is still there, perhaps to regenerate root sprouts—an unintended preventative mitigation to mastication and mechanical treatments proposed by the VTP. Current and future conditions will cause significant impacts that may be mitigatable.

e. Geology, Hydrology, Minerals and Soils: Appendix C: Geology, Hydrology and Soils: Again, this is a general discussion of geology, etc. aimed at timber harvesting that does not address geological problems with watersheds, groundwater, coastal bluff stability or any issues concerning chaparral, coastal sage scrub, or desert habitats. There are three published essays: Factors Affecting Landslides in Forested Terrain, Guidelines for Engineering Geologic Reports for Timber Harvesting Plans, and California Forest Practice Rules. Where is the information on factors affecting landslides in chaparral, coastal sage scrub and desert lands? Where is the information on preparing engineering geologic and soils reports for chaparral, coastal sage scrub and desert lands? Does Cal Fire or Forestry have any California Shrublands and Desert Lands Practice Rules? From the material in this PEIR, the assumption seems to be the only good shrub is one pulled out by its roots and chopped up for mulch. Appendix C has no connection with most of Southern California. Where is any information on environmental impacts to anything but forest lands?

Table ES-1 is full of unsupported and unwarranted assumptions. There are significant and unavoidable environmental impacts from this proposed VTP PEIR.

5. E.9 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS:

In shrublands the VTP treatments using prescribed fire, mechanical ripping up of the ground and mastication would irreversibly affect many ground or underground dwelling biota, as well as tree-dwelling or tree-nesting birds, and the seed banks and root systems of many perennial and annual native plants as well as causing, by removing large root systems and shrubs from watersheds, causing hydrophobic soil conditions, high risk of erosion and loss of groundwater retention ability. If applied to desert shrublands, significant loss of soil stability and resultant severe sand storms would occur as well as loss of listed animals that depend on desert native plants for food. These are significant and unavoidable environmental impacts from the use of those VTP treatments.

6. K. HYD-16 PROCEDURES FOR COMPLYING

a.Table K.1. Disturbance coefficients to be used for HYD-16 is used to calculate the potential of disturbance from different fuel treatment activities and logging systems (required by Calwater Planning Watershed) times the combined acreage where VTP activities are proposed. However, when considering the impact of these different treatments on non-logging sites, the table coefficients seem skewed toward more severe impacts on logging treatments and mild impacts on Fuel Treatments for shrublands and grasslands. See below, with proposed changes based on actual impacts of the various Fuel Treatments. Those changes are more realistic for shrublands in watershed and groundwater retention areas.

Table K-1. Disturbance coefficients to be used for HYD-16.

General Activity	Specific Activity	Per Acre Disturbance Coefficient
Fuel Treatment	Prescribed Fire	0.16 **(change to 1.0)**
Fuel Treatment	Burn Piles	0.08
Fuel Treatment	Mechanical	0.5 **(change to 1.0)**
Fuel Treatment	Hand Treatment	0.08
Fuel Treatment	Herbivory	0.08 **(change to 0.5)**
Fuel Treatment	Herbicide	0.08 **(change to 0.5)**
Logging	Clearcut	1
Logging	Shelterwood/Overstory Removal	0.75
Logging	Selection	0.5
Logging	Commercial Thinning	0.5

b. Prescribed fire destroys or seriously disrupts the complex nesting, resting and feeding of the myriad of species living in the shrubland habitats as well as the pattern of the shrubs in sequestering carbon , supplying water to their leaves and stems, maturing and casting their seeds, nuts and fruits into what? a layer of ashes?
In the very least prescribed fire injures plants at a time when they are recovering from long dry spells of spring and summer and delays the ability of the plants to put out new growth and increase their root system, because the plants are required to spend time repairing fire damage to their canopies, losing scorched fruit that had not yet ripened, healing scorched root collars and, for some plants, using energy to produce root sprouts. The HYD-!6 cosfficient should be **1.0** , the same as the effects of a logging clearcut.

c. Mechanical treatments in which heavy machinery plows up low-growing plants, young shrubs, perennials, whether weeds or native plants, and may dig up mature native shrubs and their roots, essentially destroy the shrub habitat, releasing all the sequestered carbon in their root systems, destroying rodent and reptile tunnels, cover for ground-dwelling and ground-nesting birds like mourning doves, California quail, etc. Don't forget that many species of rodents are essential to maintaining underground seedbanks, plus the manure to fertilize those seeds so the native shrubs can germinate anew when the mature plants are lost. This disturbance, by removing the entire plants and digging up the site, is 100% fatal to the life on the site. The HYD-16 coefficient should be **1.0.** Is your main goal to create grasslands (with non-native grasses) to graze methane-emitting cows in areas where no ranching has occurred for perhaps a century? Or is this an attempt to wreck our watersheds, since most chaparral and coastal sage scrub grow on steep erodible slopes and, through extensive root systems and durable canopies, are the main stabilizing factor on those slopes? See photo of chaparral along a powerline service road. A road-

scraper shaved off the bank along the road. Subsequent rains washed the loose soil from the intricately woven different root systems of the many species of native ferns, perennials, shrubs and trees.

d. Herbivory can damage native shrubs and eat young shrubs completely if not tended closely. We have seen goats eating young oak leaves off coast live oaks and sampling many native perennials. If the site is mostly native plants, there is a good possibility of partial or permanent damage to the habitat. As in "commercial thinning" of logs, herbivory is a tool for thinning of shrub habitat and should have a HYD-16 coefficient of **0.5.**

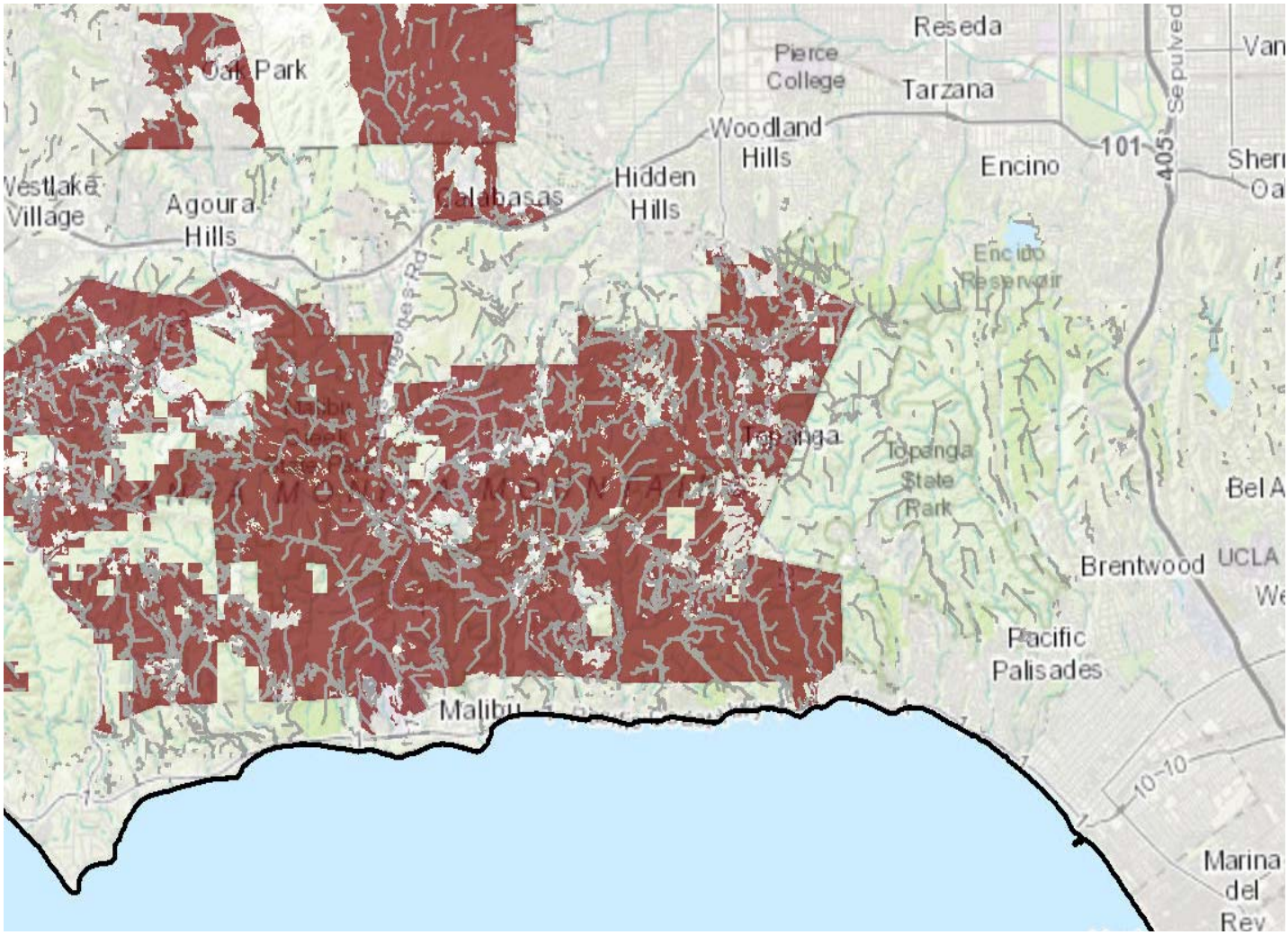
e, Herbicide is a useful tool when used carefully on individual plants, but not when it is used in broadcast spraying. We have seen the results of broadcast spraying in damage to canopies of mature oaks and loss of ceanothus canopies, causing the death of those shrubs – all to kill grass growing on a steep slope. Much erosion followed. So, for broadcast herbicide spraying the HYD-16 coefficient should be **0.5** as another thinning tool like "commercial thinning" in logging or **1.0** if the applicator is careless.

See photos below of a chaparral slope broadcast-sprayed with herbicide on a mildly windy day. The spray killed the groundcover and two or three ceanothus, damaging part of the canopy of a mature oak tree down by the road (on the left). The ceanothus took about a year to die. Then there was a rainy winter and part of the destabilized slope collapsed down into the wet streambed beside a house.

Shortly after the herbicide spraying. Note the dying canopies and bare ground.

The photo on the left shows the slope failure (the dark line running down the slope). The photo on the right is behind the house showing how much mud came down. Fortunately the slope slid down behind the house. Mountains Recreation and Conservation Authority was responsible for the spraying and did come and clear out the mud and debris.

7. a. Appendix A.2.9 Treatment Area



PART OF SANTA MONICA MOUNTAINS FROM POINT DUME EAST TO THE 405 FREEWAY
(Appendix A.2.9 South Coast)
Grey is Modeled Fuel Break Treatment Area
Tan is Modeled Ecological Restoration Treatment Area
Red is Modeled WUI Treatment Area

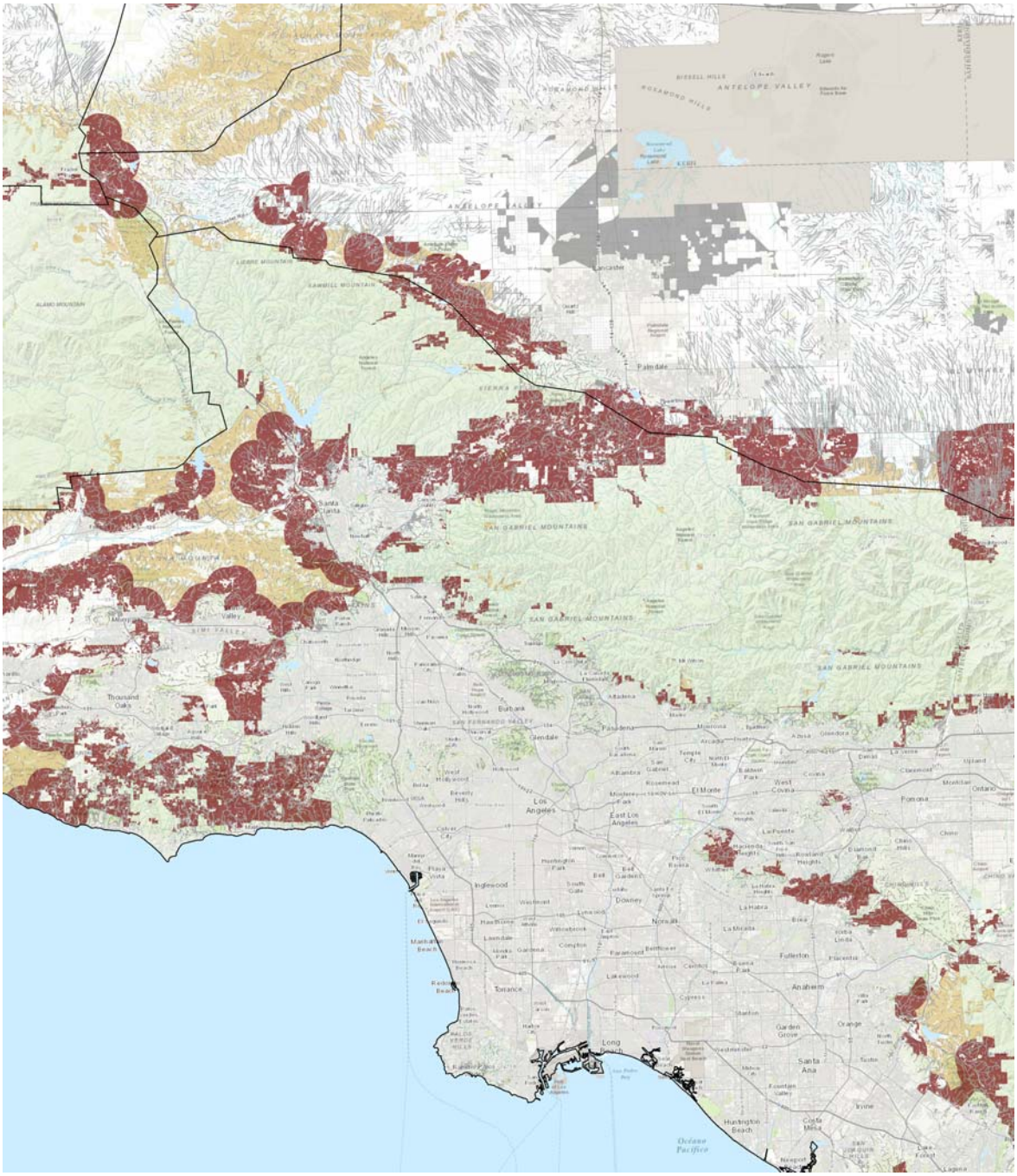
Why so many Modeled Fuel Break Treatment Areas and why are they so fragmented?
There are many well-established fuel breaks/fire roads in the Santa Monica Mountains, but these fragmentary grey lines do not seem to correspond to them—or only partially.

Why is Santa Monica Mountains National Recreation Area included in the Modeled WUI Treatment Area and the Modeled Fuel Break Treatment Area?. Doesn't the VTP respect federal lands? Where are the land trusts, UCLA Reserve, and Santa Monica Mountains Conservancy properties on this map?

Why aren't all the 1000+ houses in Mandeville Canyon above Brentwood and all the residences in Mountaingate north of Brentwood and above the west side of the 405 part of Modeled WUI Treatment Area?

These are just a few examples of the inaccuracies of these maps. Please get more accurate information.

7. b. Appendix A.2.9 Treatment Area



LOS ANGELES COUNTY
(Appendix A.2.9 South Coast)
Grey is Modeled Fuel Break Treatment Area
Tan is Modeled Ecological Restoration Treatment Area
Red is Modeled WUI Treatment Area

Why all the red areas around the Santa Clara River and the San Andreas Fault in the western area of Los Angeles County? These are L. A County Significant Ecological Areas protecting listed wildlife, plants and habitats. So is Puente Hills and the Rio Hondo College Wildlife Sanctuary (red area to right of city center),
See the map of Significant Ecological Areas on the next page. How many are in “treatment areas”?

Significant Ecological Areas and Coastal Resource Areas Policy Map

Figure 9.3

1. Alamitos Bay
2. Altadena Foothills and Arroyos
3. Antelope Valley
4. Ballona Wetlands
5. Cruzan Mesa Vernal Pools
6. East San Gabriel Valley
7. El Segundo Dunes
8. Griffith Park
9. Harbor Lake Regional Park
10. Joshua Tree Woodlands
11. Madrona Marsh Preserve
12. Malibu Coastline
13. Palos Verdes Peninsula and Coastline
14. Point Dume
15. Puente Hills
16. Rio Hondo College Wildlife Sanctuary
17. San Andreas
18. San Dimas Canyon / San Antonio Wash
19. San Gabriel Canyon
20. Santa Clara River
21. Santa Felicia
22a. Santa Monica Mountains
22b. (Portions of the) Santa Monica Mountains (Coastal Resource Area)
23. Santa Susana Mountains / Simi Hills
24. Terminal Island (Pier 400)
25. Tujunga Valley / Hansen Dam
26. Valley Oaks Savannah
27. Verdugo Mountains
28. Santa Catalina Island (Coastal Resource Area)

* The SEAs within cities are shown for reference and visual continuity, and are intended for informational purposes only.

The County considers the biological resources in the Santa Catalina Island and Santa Monica Mountains Coastal Zones to be of significance. The management and review of biological resources in the Coastal Zones differs from the countywide Significant Ecological Area regulatory program. Biological resource management and regulation in the Santa Catalina Island Coastal Zone is implemented through the Santa Catalina Island Local Coastal Program. Biological resource management in the Santa Monica Mountains Coastal Zone is currently implemented through the Santa Monica Mountains Local Coastal Program.

NOTE: Islands are not shown in their true locations.

- Significant Ecological Areas
- Significant Ecological Areas (Incorporated City)*
- Conceptual SEAs
- Coastal Resource Areas
- Coastal Resource Areas (Incorporated City / Ocean)*
- Water Bodies
- Unincorporated Areas
- Cities

Source: Department of Regional Planning, February 2015

There are a number of serious problems with this Recirculated Revised Draft VTP PEIR. Questions and comments from the last draft VTP PEIR have not been answered, except with a formulaic answer that the program will take care of all the concerns of commenters – no details given. Biological information was mediocre or not supplied. The Appendices, which usually are the project research reports, consist mostly of copies of booklets or textbooks on basic geologic failures, handling invasive plants, simplistic biological information, generic rules for handling herbicides and pesticides, every answer very general and non-specific, except where coniferous forests are concerned.

CEQA requires definite answers.

The overall impression given Southern California and the Deserts is that the land might be useful for grazing if the shrubs were removed. Almost all the photos in this document were of forested lands because that is the main interest of Cal Fire and Forestry. Southern California understands the value of shrublands in protecting our watersheds and groundwater supplies. We do not need more ranching in Southern California. We need water.

The best Vegetation Treatment Program for Cal Fire and Forestry would be to concentrate on solving the problem of all the dead /diseased trees in the forests, fighting wildfires as efficiently as possible and encouraging local Fire Safe Councils, jurisdictions and environmental organizations to continue monitoring their home wildlands, judiciously pruning, weeding, restoring WUIs where necessary and educating and encouraging their neighbors to do likewise. This draft VTP PEIR is outmoded and unworkable.

Sincerely,

Snowdy Dodson

Snowdy Dodson
President
Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society

Toyon (*Heteromeles arbutifolia*)
Fire Resilient Chaparral Tree