

Tiburon, Marin County, California

January 12, 2018

Board of Forestry and Fire Protection

Attn: Edith Hannigan, Board Analyst

VTP Draft PEIR Comments

Via email:

Vegetationtreatment@bof.ca.gov

Re: VTP Recirculated Revised Draft Program Environmental Impact Report (PEIR)

Project Scale Analysis

Dear Ms. Hannigan,

The above-mentioned Draft PEIR states that it is intended to establish a framework for vegetation treatment projects that can be “tiered” off the environmental analysis performed for the statewide program. It further states that once a vegetation treatment project is proposed, a Project Scale Analysis (PSA) will be conducted to evaluate the proposed activity for environmental effects that were not analyzed in the PEIR. However, it also makes clear that the VTP has been specifically designed to avoid repetitive and time-consuming preparations of multiple CEQA documents. Considering the immensity of the proposed Cal Fire project, both in areal extent and diversity of vegetation communities and their species, it is naturally impossible to assure that all significant impacts can be covered in a PEIR, therefore, **subsequent documents that receive public review are absolutely essential.**

Chapter 7 of the PEIR is devoted to Project Scale Analysis. Per CEQA Section 15168(c)(4), the adopting agency will “use a written checklist or similar evaluation” to document the assessment of the site and the activities proposed, to determine whether the environmental effects of the operation are covered in the PEIR. Therefore “The Project Scale Analysis (PSA) functions as the environmental checklist that shall be completed by the project coordinator and evaluated by the lead agency for all VTP subsequent activities.”(7. 7-1).

It is, however, **difficult to envision that the project coordinator can make a determination that a subsequent activity is *outside* the scope of the Program EIR based on the checklist.** The PSA functions as an Initial Study and if no negative impacts are identified, then the subsequent activity is in compliance with CEQA. **How will it be possible to “identify negative impacts” as no thresholds of significance have been identified in the PEIR?**

The **Draft PEIR fails to describe and elaborate on the necessary qualifications that the project coordinator must possess in order to be able to assess significant impacts on plants and wildlife on millions of acres – or if the necessary surveys will be appropriately timed to evaluate a project site for special-status species or sensitive plant communities.** In order to evaluate a site and its natural resources, the coordinator, at the least, needs to be a qualified botanist/ecologist and/or a qualified wildlife biologist/ecologist. In view of the statement that it is desirable to avoid subsequent documents, it might seem likely that many, if not most, adverse impacts to, for ex., rare plants and sensitive plant communities, will go unnoticed. (For comparison, it is my understanding that BoF Timber Harvest Plans are based on minimal surveys and receive little public input.)

Thanks you for the opportunity to comment on the VTP Draft PEIR.

Sincerely yours,

Eva Buxton
Botanist