

## Hannigan, Edith@BOF

---

**From:** Kate Bjerke <katebjerke818@gmail.com>  
**Sent:** Friday, January 12, 2018 4:59 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Vegetation Treatment Plan EIR

To whom it may concern,

We are writing to express our concern that specific vegetation treatment projects that will be authorized under the vegetation treatment plan programmatic environmental impact report (VTPEIR) will cause undisclosed significant impacts to rare and endangered plant species. The definition of Special Status Species used in the VTPEIR does not include plants that meet the definition of rare or endangered, even if they are not currently included on any list, as described in Section 15380 of the California Environmental Quality Act (CEQA) Guidelines. It is commonly acknowledged by botanical experts throughout California, the California Native Plant Society, the California Department of Fish and Wildlife, most local governments and many other organizations that plants with a California Rare Plant Rank of 1 or 2 meet the definitions of rare or endangered found in Section 15380 of the CEQA Guidelines. Despite this, the definition of Special Status Species used in the VTPEIR does not include plants with a California Rare Plant Rank of 1 or 2. If impacts to plants with a California Rare Plant Rank of 1 or 2 are not disclosed in the VTPEIR or in project-level review under the VTPEIR, then the significance determinations within the VTPEIR will be inaccurate, and the mitigation proposed will likely also be insufficient. The projects under the VTPEIR could therefore substantially adversely affect species that meet the definition of rare or endangered as found in Section 15380 of the Guidelines, which could lead to local or regional extirpation or even extinction of species, due to the potentially vast consequences of projects approved under the VTPEIR. The Board of Forestry should change the definition of special status species in the glossary and throughout the VTPEIR to include plants with a California Rare Plant Rank of 1 or 2.

Furthermore, mitigation measure Bio-1 would not identify all plants that meet the definition of rare or endangered as found in Section 15380 of the CEQA Guidelines within project areas because the mitigation measure does not include any requirement that scientifically-accepted survey protocols for plants will be implemented. Without identifying all rare and endangered plants in project areas using scientifically-accepted survey protocols, vegetation treatment activities could result in significant destruction of rare and endangered plants and destruction of their habitat. Many plants that meet the definition of rare or endangered as found in Section 15380 of the CEQA Guidelines can only be identified at a specific time of year, when flowers, fruits, or other specific plant parts are present. The VTPEIR does not specify when, or even if botanical surveys must be conducted. If field surveys do not take place at the appropriate times of year, it will be impossible for surveyors to detect the presence of plants that meet the definition of rare or endangered as found in Section 15380 of the CEQA Guidelines within project areas, and therefore vegetation treatment activities could result in undisclosed significant impacts to these species.

The project review and approval process presented in the VTPEIR is far less rigorous than should be expected from the State of California for a project of such a huge scope, with the potential to permanently degrade tens of thousands of acres of natural habitats in California. Without disclosing all impacts to botanical resources, activities approved under the VTPEIR could contribute to the permanent extinction of native California species. Please consider revising the project review and approval requirements presented in the VTPEIR.

Sincerely,  
Kate and Jeb Bjerke  
[2141 9th Avenue, Sacramento, CA 95818](#)  
[916 873 5085](#)