

January 10, 2018

Ms. Edith Hannigan
VTP PEIR Comments
California Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, CA 94244-2460
Email: VegetationTreatment@bof.ca.gov

Re: VTPEIR

The VTP is based on speculation that burning, or poisoning, the plants on property of a willing property owner will result in control of future wildland fires. Implementation of such a mosaic of VTP projects would not have significantly limited the spread of the wind driven fires that jumped for great distances in October / December 2017.

The proposed VTP fires would have numerous negative ecological effects. For instance, burning in the winter is not a usual part of the natural cycle and destroys flowering chaparral that produces the food base for wildlife. Applying pesticides at any time destroys wildlife habitat and may impact water quality far beyond parcel lines.

Catastrophic events have occurred since the last review of this VTP which profoundly affect the plan. Today, Jan. 10, 2018, horrific mud slides are killing people and destroying communities. Torrential rains fell on slopes denuded by the largest fire in recorded California history causing the mud slides.

A “perfect storm” of destruction, which is now the “new normal” for California, must result in a radical adjustment of the VTP. Unprecedented Diablo and Santa Ana wind storms drove fires that Cal Fire could not control. The winds carried embers for miles igniting numerous new fires. Cal Fire focused on evacuating people. Bare concrete parking lots, Highway 101 and massive concrete hospital structures were not spared by the flames.

Cal fire should adjust the focus of the VTP by:

- 1) researching why some structures and areas were not burned
- 2) creating recommendations for how property may be protected
- 3) educating the public and community planners about defensible spaces
- 4) creating evacuation plans
- 5) actively physically constructing defensible space immediately around communities

Cal Fire should not expend resources on prescriptive burns in rural areas because:

- 1) all Cal Fire resources should be spent on the highest priorities as listed above
- 2) Cal Fire prescriptive burns are contributing to the environmental problems caused by largest fires in California history

The environmental consequences of the recent fires include:

- 1) creation of horrific air quality which exasperates respiratory impairment, contributes dramatically to green house gases,
- 2) destruction of vegetation which absorbs runoff, holds hillsides, filters water
- 3) promotion of noxious weeds and radical reduction of plant diversity and outright extinction of plant species
- 4) destruction of habitat for wildlife leading to species extinction
- 5) contribution to global warming by elimination of shade and water retention
- 6) contribution to desertification
- 7) severe economic ramification because of loss of livable and desirable landscape

Because of the very serious environmental impacts that have just occurred, it is essential that the BOD radically redirect the VTP now.

Thank you for addressing these important issues.

Regards,

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