

# **Redbud Audubon Society**

**P.O. Box 5780, Clearlake, CA 95422**

Jan. 11, 2018

**Board of Forestry and Fire Protection**

**ATTN: Edith Hannigan, Board Analyst**

**VTP Draft PEIR Comments**

**PO Box 944244-2460**

**Re: Comments on the Vegetation Treatment Program (VTP) Draft Environmental Impact Report (DEIR) proposed by the California Department of Forestry and Fire Protection (Cal Fire).**

To whom it may concern:

As co-chairs of the Redbud Audubon Society Inc. in Lake County, CA we are commenting on the DEIR for the Vegetation Treatment Program (VTP) proposed by Cal Fire. Lake County has an extensive chaparral community and we are extremely concerned about the VTP proposal and the damage it poses to the plant and animal chaparral community not only in Lake County but the entire state. There are many problems with this proposal including the following:

- The proposal violates the California Environmental Quality Act (CEQA). It fails to comply with the requirements of CEQA because it does not adequately describe the VTP; it does not properly analyze the Program's environmental impacts; it relies on ineffective and unenforceable mitigation to conclude that the VTP's impacts would be reduced to levels that are less than significant; and finally, it fails to undertake a legally sufficient study of alternatives to the VTP.
- The proposal ignores prior (2013) comments submitted by expert scientists in the fields of fire science and ecology, fire management, biogeography, native plant ecology, biodiversity and wildlife conservation biology and wildlife regulatory agencies, including the US Fish and Wildlife Service, the California Department of Fish and wildlife and other environmental organizations.
- The proposal ignores the advice of the California Fire Science Consortium (CFSC) which was commissioned by Cal Fire. The CFSC peer review largely echoed the concerns raised by the other scientists, wildlife regulatory agencies and environmental organizations. It appears there has been no attention paid to scientific feedback.

- The VTP doesn't include any fire prevention techniques that reduce ignition sources like undergrounding power lines, building roadside barriers, regulating fireworks sales and more.
- Alarmingly there is a stunning lack of a detailed accounting of the VTP's environmental impacts.
- The VTP lacks sufficient maps of potential treatment areas.
- It is also alarming that review and determination of projects will happen behind closed doors. It is clear that the public will have no opportunity to be notified of or influence the project.
- The VTP DEIR makes no attempt to identify the locations of important habitat areas to identify the species that would be impacted. It is vague and without standards.
- It fails to evaluate the impacts on chaparral and coastal sage scrub, the latter a unique and increasingly rare community. As Audubon Society members we are particularly concerned about impacts on birdlife in the chaparral communities, including the California Thrasher, Wrentits, and many other species.
- The DEIR fails to adequately analyze or mitigate the Project's water quality impacts and air quality impacts from the prescribed fire activities.

Having pointed out just some of the failings of this proposal it should be noted that there are numerous other ways to address the fire danger in California that would be far less environmentally damaging than what is being proposed. A comprehensive approach that focuses on fuel modifications within and around communities at risk, ignitability of structures and effective land use planning are just a few of these approaches.

The Redbud Audubon Society is joining with other major California environmental and conservation organizations to request that Cal Fire evaluate an alternative to the VTP that is modeled after the Fire Management Plan (SMM Plan) prepared by the Santa Monica Mountains National Recreation Area. The SMM includes numerous alternatives for fuels management action, including community education.

The VTP DEIR must be revised and recirculated. The revision must be in a manner that provides a far more specific process and set of governing criteria for determining how, where and whether a specific project should be implemented, based on up-to-date scientific research. We also request that no further consideration be given to the VTP until the Board of Forestry and Fire Protection has prepared an EIR for the revised Program that provides meaningful environmental analysis in full compliance with CEQA.

Sincerely

Roberta Lyons, Conservation co-chair Redbud Audubon Society, Inc.

Evelyn Wachtel, Conservation co-chair Redbud Audubon Society, Inc.

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