



Sierra Forest Legacy
Protecting Sierra Nevada Forests and Communities



January 12, 2018

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst VTP
Draft PEIR Comments
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The following comments are from Sierra Forest Legacy www.sierraforestlegacy.org
And pertain largely to the Proposed Statewide Vegetation Treatment Program sections that refer to the use of prescribed fire in the PEIR.

1. In Section 3.2 of the Alternatives Evaluated in This Program EIR (PEIR) starting on page 3.3 where the Proposed Program is slated to treat 60,000 acres of the 23 million acres available in this PEIR.

Comment: The VTP should not limit the annual acreage to 60,000 acres since the NO ACTION pertains to all SRA lands in California. The PEIR should anticipate a significantly expanded program of prescribed fire use in response to the last 3 years on unparalleled and destructive fires -- Butte Fire, Valley Fire, Soberanes Fire, and the Thomas Fire – to name a few. Many of these fire landscapes have a significant component of oak woodlands that could be managed with an enhanced prescribed fire program in the coming years.

We appreciate the new partnership we are in with CAL FIRE and other federal and state agencies and NGO called the **Fire MOU Partnership which has a shared purpose of increasing the use of fire for ecological and other objectives.** Those other objectives include public health and safety.

Given the trends in the increased spatial scale of uncharacteristic high severity fire (Miller and Safford 2009), the increased loss of forest carbon (Hurteau et al. 2014) and increased risk to human health and safety (Long et al. 2017) we believe the PEIR for vegetation treatments needs to have a significantly expanded prescribed burn program of at least 100,000 acres a year targeted on community protection in rural WUI areas similar to areas that burned in the recent cited fires.

We contend that given the above trends there will be significant impacts to lives, property and ecosystems absent a broadly expanded prescribed fire program managed by CAL FIRE, with

federal, state and other NGO partners. This expansion should include and expanded prescribed burn cadre, a burn boss certification program and expanded partnership that includes cross jurisdictional fire use similar to what occurred in the Vincent Burn in 2017 on the Sierra National Forest and adjacent to SRA lands and significant human habitation near Shaver Lake.

2. The PEIR considers four alternatives to the proposed program and all limit the scope of treatments in various way either by treatment type or scale or reduction in restoration “tools” available.

Alternative D—Treatments that Minimize the Impacts to Air Quality suggests reducing the level of prescribed fire use from 13,000 acres in the NO ACTION to 6,000 acres in Alternative D.

Comment: Alternative D may be well-meaning (protecting air quality) but is seriously misguided and uninformed regarding prescribed fire as a tool to reduce mega-emissions.

Absent a significant increase in prescribed fire use emission trends and impacts to public health are slated to dramatically increase in the coming years. Prescribed fire is a key tool in reducing wildland surface and ladder fuels that is cost efficient compared to other treatments. Forest ecologists, fire ecologists and atmospheric scientists are in full agreement regarding expand the use of fire in restoration and natural resource AND public health benefits. There is NO-NO FIRE options. Thoughtful, well-planned restoration of prescribed fire is a key tool to mitigate impacts to human health (Schweizer et al. 2017; Schweizer and Cisneros 2016; Long et al. 2017)

Major significant impacts will occur to human safety and public health will occur ABSENT and significantly expanded controlled burn effort by CAL FIRE and federal and state partners. This should be analyzed in the PEIR.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Craig Thomas".

Craig Thomas
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