

ANNE S. FEGE, PH.D., M.B.A.
12934 TEXANA STREET
SAN DIEGO, CA 92129
PHONE 858-472-1293, EMAIL AFEGE@AOL.COM

November 2, 2015

Ms. Edith Hannigan, Board Analyst
and Mr. Matt Dias, Acting Executive Officer
Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, CA 94244-2460

Re: Notice of Preparation for Draft Programmatic Environmental Impact Report for the
Vegetation Treatment Program

Dear Ms. Hannigan, Mr. Dias, and Board of Forestry Members:

Thank you for the opportunity to provide comments on the Notice of Preparation for the Draft Programmatic Environmental Impact Report (PEIR) for the Vegetation Treatment Program (VTP). I have sent comments and participated in local meetings on several earlier versions of the draft PEIR, and appreciate the Board's revisions that provide additional detail and scientific basis in the revised EIR.

Based on reading Chapters 1-4 of the Draft PEIR, I have the following suggestions and requests:

1. Focus treatments in the wildland-urban interface (WUI), where loss of life and property are likely to be greatest, and consider the influence of community and regional planning, ignitability of structures, and fuel modifications directly within and around structures and communities at risk.
2. Strengthen the scientific basis for the effectiveness of the vegetation treatment alternatives. Many claims are made without references.
3. Provide strong rationale for the 1.5-mile-wide wildland-urban interface (WUI), as embers are carried much farther in high winds. Structures need to be built or retrofitted to resist ignition by embers, not rely on "ember-free" WUI zones.
4. Make more complete reference to the recent scientific papers (Alex Syphard et al) on the effectiveness of structure location, fuel reduction volume and distance, firefighter access, and other wildfire conditions that result in the greatest loss to structures and natural resources.
5. Ensure a "project justification process" that starts with a clear need to reduce risks, rather than the attainment of a certain number of treated acres.

6. Address the differences in natural fire return intervals for various forest types, as they have not evolved with identical fire regimes.
7. Provide the scientific basis for the vulnerability of forests and other vegetation to climate impacts. Fuel reduction projects can both enhance adaptation or increase the vulnerability of forests and vegetation to drought stress, invasive species, wildlife risks, and more.
8. Extend the actions relating to the spread of invasive grasses, as the suggested mitigation measures are important but inadequate (cleaning equipment tires, relying on local weed control groups, and timing prescribed burns).
9. Require scientific justification from experts in ecology and restoration, for specific projects that are undertaken to further “natural resource” objectives.
10. Provide for public review of the Project Scale Analysis (PSA) that would document the project’s consistency with the requirements and findings of this PEIR. This could be an annual notice and comment process for each unit, not necessarily for each project.
11. Establish and maintain a list of proposed, current, and completed projects in each unit, with the draft project plans and schedule of public meetings and comments

It is imperative that cost-effective programs be implemented to prevent loss of lives and property, reduce fire suppression costs, and protect natural resources from large-scale wildfires. The vegetation treatments need to be effective, grounded in scientific evidence, minimize cumulative loss of chaparral and other vegetation types, and be complementary to efforts that reduce ignition of structures.

Thank you for this opportunity to comment on documents relating to the Draft PEIR for the Vegetation Treatment Program.

Sincerely,



Anne S. Fege, Ph.D., M.B.A.

Retired Forest Supervisor, Cleveland National Forest

Adjunct Professor, Department of Biology, San Diego State University

cc: Kathleen Edwards-CalFire