

SIERRA NEVADA CONSERVANCY

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September 24, 2015

Ms. Edith Hannigan, Board Analyst
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Ms. Hannigan:

RE: SUPPORT FOR VEGETATION TREATMENT PROGRAM ENVIRONMENTAL IMPACT REPORT

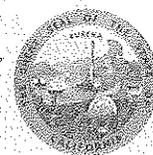
The Sierra Nevada Conservancy (SNC) strongly supports the development and adoption of the Vegetation Treatment Program Environmental Impact Report (VTPEIR). Providing an additional tool to assist landowners and governmental entities in reducing the risk and consequences of large, damaging fires is an important contribution to protecting our forests and watersheds.

In funding projects under our Proposition 84 grant program aimed at restoring forest health and reducing the risk of large damaging fires, we have found that the cost and complexity of California Environmental Quality Act (CEQA) compliance can be a barrier. This is particularly true for small organizations such as Fire Safe Councils, Resource Conservation Districts, private landowners, etc., as the SNC is not resourced to conduct the required analysis and complete the process. The VTPEIR will provide the basis for more efficient CEQA compliance, resulting in increased protection of the environment as well as less risk to our important watersheds that serve the entire state.

The SNC is strongly promoting activities that will improve the conditions for our source watersheds in the Sierra Nevada, by restoring those landscapes to a more fire resilient state at a greatly increased pace and scale. The five objectives identified in the VTPEIR are consistent with those of the Sierra Nevada Watershed Improvement Program (WIP), a joint effort of the SNC and the United States Forest Service, Region 5. This effort is aimed increasing the pace and scale of ecologically sound restoration of our forests and watersheds by increasing investment and addressing policy impediments.

The trend in the Sierra Nevada of more frequent, large and unnaturally severe wildfires is clear. With four years remaining in the current decade, it has already become the second

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ranking decade in terms of total acres burned in the recorded history on the western slope of the Sierra Nevada. With a normal fire season next year, we will establish the new decadal record. We are also seeing increased severity with these fires, with the Rim Fire of 2013 burning at nearly 40% high severity and King Fire of 2014 at nearly 50%.

Reducing this trend will be difficult in the face of the current drought and a changing climate. Reducing forest fuels through ecologically sound treatments represents a proactive effort to help address this situation. Utilizing a wide range of actions as identified in the VTPEIR, including mechanical and manual treatments, prescribed fire, grazing and other proven treatment techniques is essential.

Fire resilient forests provide for stable storage of carbon while reducing greenhouse gas emissions from wildfire, key components to the State's effort at addressing climate change. They also reduce impacts to water quality and quantity, consistent with the California Water Action Plan and other aligned initiatives. Habitat values, recreation and tourism, public health, and local economies also benefit from healthy forests, which would benefit from the VTPEIR.

The VTPEIR will increase the ability to complete restorative actions on a landscape scale, and does so based on sound science and a highly inclusive public process. For these reasons and those stated above, the SNC supports adoption of the VTPEIR and looks forward to working with a wide range of partners in utilizing it to advance our collective goal of climate-adapted, fire resilient landscapes.

Sincerely,



Jim Branham
Executive Officer

cc: Ken Pimlott, Director
California Department of Forestry and Fire Protection
Todd Ferrara, Deputy Secretary
California Natural Resources Agency

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