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From: Theresa Halula <theresa_halula@yahoo.com>
Sent: Tuesday, May 31, 2016 3:27 PM
To: Vegetation Treatment Program@BOF
Cc: ray.sotero@sen.ca.gov; tony.thurmond@asm.ca.gov
Subject: Comments: regarding draft programmatic EIR

Edith Hannigan, Board Analyst

Board of Forestry and Fire Protection

My comments are in support of extending the comment period for the EIR and that the committee assigned to produce this report actively seek broader scientific input to be reflected in the fire management EIR and policy to be proposed. A review of comments already sent for the committee were not fully incorporated into the revised draft of 4/16. This project is too important to be allowed through without a more diverse approach to protect habitat being discussed for fire prevention action. I request that the Proposed EIR for the Vegetation Treatment Program by CalFire and the California Board of Forestry be denied approval and that the proposed draft EIR be returned to committee for revision following mandated consultation and interviews with outside ecologists and biologists in the area of fire systems of California and vegetation management. There are many people with expert knowledge, many of whom have already provided comments that are not reflected in the 4/16 revision of the EIR.

I was raised in fire country in Southern California, being evacuated from my home and witnessing many wild fires over the years. Large wild fires are destructive to private property and wild lands and drain key resources of our fire control budgets. As a young woman I was employed for a short time to clear brush by hand for fire defense, so I am speaking from an informed position of experience. Fire management is needed where we have created risk to property or wild places over the years due to past fire management policies. However fire management strategies must necessarily be fitted to the ecology of place and implemented with care and respect for wild places.

This proposed action, targeting 22 million acres of California for 'brush clearance' does not reflect contemporary scientific literature for determining the best fire management policies are for California's diverse wild land habitats. Instead the current revision of the report appears to be depending on obsolete scientific literature to determine best practices for fire management. This is a dangerous approach for such an important EIR covering a huge project in such a wide range of vegetation types to be treated.

A one-size-fits-all approach is just an uninformed deception and will damage our wild land ecosystems for many years to come. In the face of climate change projections, explosive development throughout California and the pressure to preserve green space we must listen to biologists while making such a sweeping plan to manage fire across the state.

Recent literature is available detailing the natural succession cycle and time required for natural systems to reach climax states following a wild fire and indicates that restoration is quite variable within each biome being considered. Response and sensitivity to each habitat type is needed.

There are many endangered and rare plants in the areas being planned for clearance. Removing these is in violation of federal rules protecting endangered species. If destroyed, the seed base for these endangered plants many never recover.

We are all aware of the devastation of the large recent fires in Southern California such as

Witch

Laguna
Station
Cedar
Day

Rough
and many others.

I urge the committee to extend the comment period for six months, take responsibility to schedule interviews with several recognized biologists and revise the EIR based on current fire science.

Respectfully,

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