

Hannigan, Edith@BOF

From: gaboon <gaboon@sbcglobal.net>
Sent: Tuesday, May 31, 2016 5:07 PM
To: Vegetation Treatment Program@BOF
Subject: Comment re: DRAFT Programmatic Environmental Impact Report (EIR) for Vegetation Treatment Program (VTP)
Attachments: CommentsRe CAVTP RStaeble 23Jan2013.pdf

31 May 2016

To:
CalFire
California Board of Forestry & Fire Protection
Edith Hannigan, Board Analyst
DRAFT Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program (VTP)
VegetationTreatment@bof.ca.gov

Re: Opposition to the current DPEIR for the California Vegetation Treatment Program

Dear Ms. Hannigan & Members of the California Board of Forestry and Fire Protection,

The current **DRAFT PEIR for the California Vegetation Treatment Program (VTP)** is astonishing in its failure to incorporate past comments and in its failure to answer relevant questions regarding the basis for its recommendations that would destroy thousands of acres of California wild lands. The current DPEIR for the VTP remains full of glittering generalities and scientific inaccuracies; however, this version seems to make it clear that the its author's attitude at this phase of the process amounts to "this is our Big Plan and we are still sticking to it."

It is certainly easier to blame California's wild lands for catastrophic fires and to recommend "lunar landscaping" approximately one quarter of the state than it is to instead acknowledge that too frequent, human-ignited wildfires (via arson, power lines, car fires, careless hunters, etc...), in fact, result from decades of bad land use planning and lack of appropriately applied fire resources and structure protection measures. There is also a failure to recognize that climate change, with its resulting severe weather and drought patterns, more than ever drives major wildfires with high winds that can race across even "cleared" landscapes that have been recently control burned. At a glance, it appears to be far easier to simply "get rid of the fuel," which means destroying biodiverse habitat and replacing it all with type-conversion to even more flammable invasive foreign annual weeds.

Clearing vast tracts of wild lands will not protect our homes from wildfires. *This oversimplified view ignores recent research and recommendations from fire ecologists and other relevant experts.*

It is apparent that the entire structure and recommendations within the revised VTP ignores current data, misrepresents and misquotes current fire experts, dismisses

It is absurd to state that the proposed VTP will not have a significant adverse impact on the environment of California.

Why has the revised PEIR failed to address the concerns expressed in 2013 by so many persons, organizations, and agencies, including foresters and park managers? Some of us have been following the VTP EIR “process” since 2005 and have lived through several wildfires, including the 2009 Station Fire near our home in the Angeles National Forest. No amount of “vegetative treatment program” — obliteration of natural chaparral cover -- would have stopped the wind-driven fires.

The lack of evidence for stating that the proposed VTP “*would likely result in less than significant cumulative effect on biological resources at the bioregional scale.*” [5-27] attempts to side-step acknowledgement of widespread adverse impacts. This is a blatant disregard for the terms of the California Environmental Quality Act (CEQA).

It appears that much of the DPEIR is based upon data that is decades out of date and that has been superseded by more recent scientific evaluations and research into habitat and wildfire behavior. Why has the revised DPEIR failed to include current data and expert conclusions that do NOT support massive removal of old-growth chaparral and other biodiverse natural landscapes?

Why has this devastating Vegetative Treatment Program not been widely presented to the public for comment? The vast majority of our community here in Altadena, for example, knows absolutely zero about the State VTP. Assurances of public involvement in any future habitat clearance is not sufficiently guaranteed. A statewide VTP is, quite simply, too big a program for sufficient local involvement, as the lack of public outreach during the entire VTP EIR process has demonstrated.

Why have the broad benefits of the plant regimes targeted for mass removal not received proper cumulative impact analysis for the resulting loss of biodiversity, carbon sequestration, recreational and economic benefits, and so forth?

Sadly, in the intervening years between our last comments in January of 2013, many of the concerns raised in the attached letter by Robert Staehle, remain unaddressed.

I urge that the **DRAFT PEIR for the California Vegetation Treatment Program (VTP)** be rejected and yet another revision undertaken that answers the concerns raised by Mr. Staehle; by the California Chaparral Institute and California Native Plant Society; and by so many others. A major change in focus is required involving defense of homes and other properties, fire-preventive systemic reforms in California land use policies, and applying funds to effective, near real-time detection of fires from orbit fast enough that fires can be extinguished before they rage out of control:

NASA / JPL

<http://www.jpl.nasa.gov/news/news.php?feature=4775>

FireSat

<http://www.firesat.info/>

The focus should not be on removing vast tracts of chaparral and other natural vegetation, because destroying California’s wild lands will never be an answer to the threat of wildfire in our state. The current version of the DPEIR should be rejected and rewritten in compliance with CEQA and the latest research re: effective fire prevention and planning.

May common sense and good science prevail next time around.

Respectfully,

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