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VegetationTreatment@fire.ca.gov
State Board of Forestry and Fire Protection
P.O. Box 944246
1416 9th Street, Room 1506-14
Sacramento, CA 94244

Re: Comments on Draft Programmatic Environmental Impact Report For The California State Board of Forestry and Fire Protection's Vegetation Treatment Program Environmental Impact Report (VTPEIR) (SCH #2005082054) dated October 30, 2012, but not released for comment until December 2012.

Dear State Board of Forestry and Fire Protection,

Please allow me to formally enter my comments below on the subject document.

In general, I find the environmental, social, medical and other potentially negative societal impacts of the proposed program action to be dangerously under-analyzed, poorly considered, and in some cases missing entirely. The sheer scope of the proposed action, as suggested by the length and complexity of this incomplete EIR, suggests that the proposed action is way beyond the scope of projects intended to be encompassed by the Legislature when the California Environmental Quality Act (CEQA) was considered and passed. The same situation is likely to apply with the National Environmental Policy Act (NEPA), since areas cleared by the VTP will impact federal lands.

The 38,000,000 acres proposed to be treated¹ harbor a wide variety of ecosystems, a multitude of plant and animal species, widely varying geography, weather patterns and microclimates, all interacting in an ecosystem web (system) only barely understood in scientific detail. Consequently, with such a broad analysis taking place over just a few years, it is impossible to account for all the immediate, let alone downstream, negative environmental effects of a project of this magnitude.

Thus, the document appears to be an audacious attempt to set aside in-depth consideration of environmental impact, with each acre getting approximately 3 one-hundred-thousandth of a page of consideration. Clearly the project area cannot even be described except in the most cursory manner in such a document, let alone all the relevant impacts be understood and expressed at the level they will affect the local environment and the people who depend upon that environment, such as those who live downstream, breath the dust

¹ See page 1 of the description online at http://www.bof.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_%28vtpeir%29/

generated, and suffer the unintended medical effects that all of us as taxpayers and purchasers of health insurance will need to pay for.

Quite simply, the entire project should be scrapped. In its place, the highest-priority individual candidate projects, taking place over 10s, 100s, or at most 1,000 acres should be identified, carefully considered, and if warranted for proposed action, then be analyzed and opened for public comment through the normal, if imperfect, CEQA and NEPA processes. Only this approach will allow careful enough evaluation of the merits, negative consequences, and likely impacts following each environmental alteration within its specific local and broader geographic context.

Having stated the above, I find the following topics inadequately addressed, or not addressed at all, in the subject document:

- The No-Action alternative is inadequately addressed, and a wide variety of alternatives that might have been considered were not. Only Alternatives that consider, assess, and evaluate the effects of specific local projects enable the ability to adequately account for impacts, obtain targeted public comments, and make a final determination as envisaged by CEQA.
- Compliance with the Migratory Bird Treaty Act and the treaty on which it is based, to which the United States is signatory. How is the proposed action reconciled with each of the specific provisions of the Migratory Bird Treaty Act, for each species of bird in the affected 38,000,000 acres? Habitat loss since that Act was signed has been major, concentrating the fewer numbers of migratory and other birds to smaller ranges with greater need for undergrowth for nesting, protection from predators, and production of the insects, arachnids, plants, and myriad species on which their lives depend. What is the habitat loss, and resulting impact, in detail, for the specific areas on each species affected? What are the local and cumulative effects on the critical “Pacific Flyway” migratory route through California?
- Butterfly and other important insect species are also inadequately addressed. What is the habitat loss, and resulting impact, in detail, for the specific areas on each insect species affected by massive vegetation removal? What changes in insect populations will vegetative treatment cause in each region that might adversely impact agriculture, timber and parklands?
- Increased fire likelihood will occur in some terrains and biomes as result of vegetative cover type-conversion, promoting growth of grasses and other seasonally high flammability foreign species in places of the present, predominantly native vegetative cover. What is the risk of each kind of type conversion for each different biome? Which specific non-native potentially invasive species pose a risk of proliferation, and what are the impacts of each different one doing so on the native habitat, fire frequency, fire intensity, downhill flooding, water quality, groundwater capture and retention, downwind air quality by season, recreational and economic losses?
- Downhill flooding and damage, in and downstream of chaparral, including coastal sage scrub and other shrubland regimes, resulting from the reduced runoff retention of the proposed action. What is the impact, in detail, for the specific areas affected? What is

the affect of clearing millions of acres on freshwater recapture for groundwater resources?

- Lower groundwater retention and recharge, affecting the water supplies of millions of citizens, has not been adequately addressed, and can only be done so at a local level in concert with hydrology studies, consideration of water rights, usage patterns, and future projections of population and building. What is the specific, quantitative effect on the water supply of each private, government, co-op, and other water purveyor and their customers in each affected locale? For example, has the State Water Resources Control Board been informed of the VTP and, if yes, does the Board support the proposed actions across its jurisdiction? What will be the effect on future costs and the price water purveyors will charge water customers? When there is subdivision build-out in response to the perceived reduce fire risk and population pressures in specific affected areas, how will that adversely stress water usage of those people, farms and businesses already using existing water sources?
- With only poorly-quantified loss of bird and bat habitat in the VTP, and changes favoring one species over another, the impact on mosquito-borne disease on human, farm animal and wildlife populations is of concern. What are the forecasted changes in the incidence of vector-borne diseases, including West Nile Virus and Equine Encephalitis? Malaria and other “tropical” vector-borne diseases are increasing their range in response to climate change and other factors. How will the proposed action, that will result in dramatic local reductions of certain bird and bat species that feed on mosquitoes and other vectors, operate in combination with anticipated climate change, to affect human and farm animal, and wildlife infection rates, and what will be the associated medical and social costs, and other negative consequences? What are the uncertainties in these estimates, and how can vector control and medical service entities, public, private, and cooperative, plan for these increased costs and the uncertainties in these estimates?
- Nearly all of the proposed actions will result in a reduced carbon loading above the ground surface, as measured in kg per square meter held more than 10 cm and 1 meter above the ground. How will this changed vertical distribution of carbon over each affected local area change the rate at which decay and other processes release this fixed carbon back into the atmosphere? How will this affect California’s carbon budget, and with what uncertainty? In most locales, changes in vegetative decay as result of the proposed action will release more carbon dioxide and methane into the atmosphere over time than undisturbed terrain. These effects and their consequences are not quantified. Quantitatively, what are these effects, uncertainties, and consequences? Quantitatively, how does the proposed action change the effectiveness of termites and other wood-boring insect production of methane, its incidence as a pollutant, and its effect on local and large scale warming because of its heat-trapping effects in radiative transfer? What are the consequences of so-called control burning of native vegetation, particularly old growth shrubs and trees on carbon sequestration in California?
- With the anticipated increase in farming and rangeland activity envisaged by the proposed action, specifically in each affected local area, how will the alteration in land use affect carbon fixing and release of carbon dioxide, methane, and other greenhouse gasses, and what will be the consequent local, California, and global effects of that change?

- Viewshed values are not quantified in the VTP in terms of number of people whose views are altered from what distances, and the effect this may have on individual homeowner quality of life and property values. As perceived in geometric angular units from individual housing units and driving routes, what is the quantitative loss in viewshed, and the consequent effect on home and property values, especially in living areas surrounded by chaparral, and in other biomes?
- The VTP would decrease recreational values, and have negative impacts in the wide variety of environments. For example, businesses dependent upon recreational use and visitors may suffer when scenic views are destroyed. Quantitatively, in each affected locale, what are these effects, e.g., in terms of hours/capita/year recreational uses, such as hiking, bird watching, dog-walking, mountain biking and equestrian use? And, what are the dollar revenue, expense, profitability and viability effects upon businesses reliant upon these recreational activities?
- The VTP will result in reduced recreational values as a result of trails losing shade along with lost vegetative cover and elimination of scenic vistas. Trails will be eroded by rain and runoff much more quickly, necessitating greater trail maintenance expenditures by myriad County, municipal and non-profit trail entities and land stewards. Because greater funding will be unavailable for many or most of these agencies, many miles of trails will deteriorate and may be closed; injury rates will increase because of poor trail conditions; emergency medical services costs will rise, along with other unintended consequences. What is the dollar impact on each potentially affected entity, of these impacts? What are the sources of uncertainty in these estimates, and what are the quantitative dollar impacts up and down, based on these uncertainties?
- An underlying assumption in the VTP is that fire is inevitable in untreated areas. As prior fire data indicates, wildfires will occur in both treated and untreated areas, as it has ever since lightning and vegetation co-existed. However, fire frequency, intensity, timing with respect to next rains, and other parameters all vary locally. No single fire has ever occurred over the wholesale extent proposed to be covered by this action, yet this EIR purports to understand the impact of Draconian action on an untried scale. Furthermore, recent catastrophic fires have occurred more frequently than vegetative regimes have evolved to survive, because fires are increasingly ignited by human activity, including arson, power lines, careless camp fires, vehicle and structure fires spreading into wildlands, aircraft crashes, and so forth. These fire sources will not be eliminated by the proposed plan.
- Water quality effects are highly variable locally, and impossible to quantify over such a broad project area as that in the VTP. Assurances of that a “checklist” will adequately evaluate local impacts across the broad spectrum of categories is a total circumvention of the CEQA process.
- The VTP does not adequately address carcinogenic effects of greater sedimentation and volatile organic carbon transport in runoff water that enters human, pet, and farm animal drinking supplies. What are these effects, and the consequent medical impacts, social and economic costs? What are the quantitative uncertainties in these estimates?

- The VTP does not adequately address carcinogenic and other negative health effects of greater windborne dust and particulate transport directly into the air breathed by humans and animals, and that finds its way into runoff water that enters human, pet, and farm animal drinking supplies. What are these effects, and the consequent medical impacts, social and economic costs? What are the quantitative uncertainties in these estimates?
- The VTP will encourage ranching and livestock activities in wildlands that were formerly covered by native chaparral and transitional woodlands. What will be the impact, quantitatively, in each affected locale, plus downwind and downstream locales, where there may be increased ranching and livestock activity, including goats (used for clearance purposes), sheep and range cattle?

None of the listed criticisms are intended to ignore or trivialize the impact that wildfires large and small have over California. Indeed, in some biomes, past land management practices have increased fire risk and the extent of occurrence. Rather than a generic, statewide program, specific actions may be appropriate and more effective in many specific locales. Such actions have been ongoing for decades across the State.

The proposed Vegetative Treatment Program appears intended mainly to be an attempt to “streamline” the environmental review process for a poorly-quantified set of actions similar to those heretofore considered on a case-by-case basis with careful local analysis, input, and discussion. The goal of CEQA is not to streamline environmental review; it is to protect the environment and our health and wellbeing from inadequately considered and inadequately reviewed actions. The proposed VTP flies in the face of this intent.

In the case of this specific proposed program, I ask that the “No Action” alternative be selected, and that this project be disbanded.

Thank you for the opportunity to comment,



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cc:

Senator Fran Pavley, Chair, California Senate Committee on Natural Resources and Water
Sussy Nemer, Field Deputy, Los Angeles County Supervisor Michael D. Antonovich (Fifth District)
Assemblymember Chris Holden, California State Assembly
Senator Carol Liu, California State Senate
Hon. Adam Schiff, U.S. House of Representatives
Hon. Judy Chu, U.S. House of Representatives