

Hannigan, Edith@BOF

From: David Jinkens <djinkens@charter.net>
Sent: Thursday, July 25, 2019 8:44 AM
To: CALVTP@BOF
Cc: djinkens@charter.net
Subject: Proposed Statewide Vegetation Treatment Program- Cal Fire
Attachments: NEWSLETTER 29.pdf

Warning: this message is from an external user and should be treated with caution.

To Whom It May Concern:

Thank you for requesting comment on the **Proposed Statewide Vegetation Treatment Program** on State public lands in California. This is a critically important topic, and the Governor should be applauded for his leadership in pursuing the removal of red tape to ensure that public lands are as fire safe as possible.

I1-1

My comments relate to State public lands located within the City limits of South Lake Tahoe, California where the California Tahoe Conservancy owns many individual parcels of vacant land that are located in existing residential subdivisions or directly adjacent to them. The properties are not being maintained in a fire safe condition. Residential property owners adjacent to CTC parcels cannot get the cooperation of CTC managers to create defensible space on their property. In many cases the properties are overgrown with dense foliage that when it becomes dry creates a fire risk. CTC officials do not either understand the risk to people, environment or property or they ignore these risks and resident concerns.

Cal Fire and State government needs to ensure that State-owned public lands within the City limits are made fire safe in the near term to the extent reasonably possible to prevent the City of South Lake Tahoe from becoming another Town of Paradise (Camp Fire). The former Fire Chief here, Jeff Meston, is reported to have said that South Lake Tahoe is less prepared for catastrophic fire than was the town of Paradise. It is arguably less prepared in large part because of the peril posed by State and Federal public lands that are left unmaintained and not fire safe.

I1-2

State property managers within the city limits need to be directed to take immediate steps to make their public lands fire safe and quit providing excuses and reasons for taking no action. Also, why can't Cal Fire call fire prevention actions on state lands just that? Vegetation management says nothing about the need to prevent catastrophic fire and as a result your message may get lost. Call fire prevention just that so that community people understand what you are talking about.

I1-3

Attached is a copy of my most recent Newsletter (#29) that has been focusing on the issue of fire safety on State and Federal public lands within the City limits for over 1 ½ years. In particular see pages 1-3.

I1-4

Whatever rules you adopt, make haste with their implementation within the City limits. Catastrophic fire knows no time and waits for no one. State land managers need to take action now and quit ignoring the problem they are creating. They need to do their jobs and Cal Fire and State government need to make them do their jobs to protect our community.

I1-5

Thank you!

David Jinkens, MPA
Good Government and Public Policy Advocate
(Retired South Lake Tahoe City Manager and Director of Emergency Services)
South Lake Tahoe, CA

NOT NECESSARILY IN THE NEWS

A Community Newsletter and Commentary for South Lake Tahoe
July 23, 2019, Volume 29

“Change will not come if we wait for some other person or some other time. We are the ones we've been waiting for. We are the change that we seek.”

Barack Obama

FIRE PREVENTION– *Knock, knock, is anybody home? Fire hazard abatement needed...now!*



CTC land on a residential street

Since his inauguration, **Governor Gavin Newsom** has been the outspoken leader in the State saying that all actions should be taken to ensure that we reduce the risk of catastrophic fire. As I reported to you previously, the Governor through executive action directed state agencies to reduce the red tape and make fire prevention a top priority. Most of us are grateful for his commitment to our safety. Our own City Council has taken steps in regards to fire safety including the decision to hire more firefighters and keep Fire Station # 2 open. However, the issue of empowering the City Manager, City Attorney, and Fire Chief through a fire/weed abatement ordinance to take appropriate fire-safe actions on all lands within the City limits remains undone. Tahoe home owners must maintain their properties – why do public agencies get a free pass?

I've been told that of growing concerns to some residents is the fact that they are unable to have their fire insurance renewed or the cost for it has increased considerably because we are considered a high risk fire area with no plan in place to reduce the risk.

The problem, as it appears in the South Shore and particularly in the City limits, is that certain parcels of State, Federal and even City-owned properties are not being maintained in a fire-safe condition, and leaders of these agencies appear to not see the danger it poses to residents, visitors and our environment. *People who live next to these parcels see the danger and understand the threat, and they would like to see a proactive plan in place that is implemented in the near term.* A fire hazard abatement and clearing program for public lands in the City limits must be developed by State and Federal land owners and implemented annually, not the current random “hit and miss” basis. This obligation is part of being a public land owner/ manager.

Public officials who manage these lands give a lot of reasons for not maintaining them, namely:

(1) We do not have the money (*ok...re-appropriate existing revenues for fire prevention*); (2) The vegetation infestation next door to private residences is not really a fire hazard because the plants absorb a lot of water (*until they dry out?*); (3) The area is a riparian habitat and we cannot disturb it.

(In many instances it is not a riparian habitat and even if it is it should be maintained to prevent fire). The latter excuse troubles me because it suggests that if a riparian habitat is a fire hazard, there is no remedy to make it fire safe?

The Governor tells State agencies to make their lands fire safe, and state agencies owning vast tracts of land in the City are ignoring the direction for reasons that are unknown. These agencies and officials are charged to maintain these properties but if they burn down because of their lack of maintenance, environmental protection, human life and our precious environment loses big time.

State and Federal property managers want you to believe that we live in a forest. I hate to be the one to tell them that they own vacant parcels within an incorporated California City with people, built property, and a huge tourism base. The City limits is not a forest in the classic sense though we value well maintained open space in the City limits.

Fire officials at the State level who supposedly should be the first to share the desire for fire prevention here don't even answer inquiries about the safety of state lands (for which they have responsibility), and I guess just go along and get along with State agency land holders. I can name names if you wish. *This AWOL on fire safety* is not "fine." They ignore the issue or give you a "canned" response.) Their lack of interest and responsiveness in the basin is unacceptable and in fact, disgraceful. I am sorry to say as well that City fire officials are aware of the danger but do not have the political support from a majority of the City Council to see that public lands (whether local, State or Federal) are made fire safe. *Elected leaders need to be the advocates and champions for fire safety for the community even if the errant agency is owned by the State or USFS.*



USFS land next to multiple single family residences



In contrast, the Resource Conservation District (RCD) Board and **Executive Director Nicole Cartwright** responded favorably and quickly to resident concerns about creating defensible space on public lands next to residences in the City limits. They are responsive and responsible local leaders.

The issue of fire safety will not go away for State or Federal lands within the City limits. The people of the community expect it, and untimely all actions required will be taken by

community members to see that State and Federal lands are made as safe as possible. For those agency officials, you can count on this perseverance. The City Council majority needs to take a stand to ensure that public agencies with vast vacant land holdings in the City limits make them fire safe by whatever means necessary to achieve the goal.

I hope that when the Governor speaks at the Lake Tahoe Environmental Summit this year, he reiterates the need for public agencies to make their lands within the City limits fire safe and spare us another Town of Paradise fire (i.e. the Camp Fire).

CREATING MORE SAFE AND AFFORDABLE HOUSING – *One approach provided in California State law for all cities*



Despite what local government officials are constantly told by regional officials, South Lake Tahoe is not exempt from State law and local officials and staffs cannot pick and choose what laws City government will obey and which ones they will not obey either by design or by neglect.

The Governor of California and the Attorney General are very serious about addressing the affordable housing shortage in California...yes, and even in South Lake Tahoe. The California

Legislature has passed and the Governor signed into law a variety of bills over the last two years telling city official to remove barriers to affordable housing or face the loss of certain funds. The Attorney General has gone so far as to sue certain cities who do not meet the standards set in State law for affordable housing. We want to see workforce housing built and available to the people who need it.

On the following page is a letter sent to the City Council by the President of the South Tahoe Chamber of Commerce urging City officials to obey State law in the area of Accessory Dwelling Units and not rely on bad advice from some staff people who say that State law does not apply to us because we live in the Tahoe Region. Fortunately, the new housing law empowers the City Council to begin to address the housing shortage problem by taking addressing the Accessory Dwelling Unit issue.

July 13, 2019

Re: Accessory Dwelling Units – Implementation of California Law

Dear Mayor Laine and Council Members:

At its regular monthly Board meeting on July 8, 2019, the Board of Directors of the South Tahoe Chamber of Commerce voted unanimously to seek action by the South Lake Tahoe City Council to amend appropriate codes to do the following in support of State law and the delivery of safe, sanitary, and affordable housing within the City limits.

“ACCESSORY DWELLING UNITS –

*A motion was made and seconded that the **South Tahoe Chamber of Commerce** supports new and existing State of California law that allows for existing Accessory Dwelling Units (ADU's) that were built without building permits (SB 1226-Bates) to be made legal if certain health and safety and permitting conditions are met, and existing law that states ADU's can be built to include all zoning districts that allow single-family uses, modifying fees from utilities, such as special districts and water corporations, and reducing parking requirements. The Board further urges all governmental entities and quality affordable housing advocates to work together to ensure that the provisions of California Law are implemented within the City of South Lake Tahoe and other areas of the region as appropriate. The Board notes that local governments in implementing the Law should be focused on creating responsible and reasonable affordable housing to protect and preserve the quality of life in existing single-family residential areas in the City and region. Motion passed unanimously.*

The action of the Board of the South Tahoe Chamber was taken in support of existing California State law to ensure that quality and affordable housing is provided to the work force of our City and Region as applicable.”

The action by the Board of Directors supports its legislative goal to promote the delivery of quality work force and affordable housing for full-time residents in the City limits and El Dorado County. Additional letters will be sent to other governmental entities urging compliance with California Law. We believe as well that this action is consistent with the City government's stated goal to increase the supply of affordable housing for full-time workers and families. We know of no exemption from the requirement of the Law for any California city or County...”

112 FOOT CELL TOWER IN YOUR NEIGHBORHOOD - Really?

Word has it that residents in the area of Needle Peak Road and Ski Run Boulevard are quite concerned with the proposed construction of a 112 foot “cell tower” within their residential area. One resident filed an appeal of the decision of the Planning Commission approving the Verizon tower with the City Council, and I am being told the matter will be scheduled for a public hearing in early August.

What I've learned is that a number of residents in the area are extremely concerned. Some of the concerns are: (1) Lack of notice to all residents for the hearing before the Planning Commission (2) Lack of notice to tenants in a nearby apartment (because the landowner only is sent the notice, not the tenants who live there) (3) Inappropriate location of a large cell tower when other vacant lands outside residential zones are available (4) Unknown and feared health concerns from exposure to a 5G facility (5) Neither the City nor Verizon know or are saying whether the tower is a 5G capable facility and (6) The City has no cell tower location standards in the municipal code. Several other California cities do have cell tower codes **that restrict them from being in residential areas.**

Are large cell towers in residential areas appropriate land use? I would argue that such towers could impact property values and do distract from the residential character of the neighborhood. They should be located elsewhere, and there are plenty of vacant non-residential lands in the City limits and South Shore for them. Corporate interests should not over rule the concerns of people living in residential areas in our City.

OVERTOURISM – *How do we protect our local economy and the integrity of our community?*

Over several months, locals and even certain columnists have expressed concerns for the integrity of the community because of the threat of over tourism.

We of course want to maintain a strong local economy and the many fine visitors who come here are the source of our economic strength.

However, too many people, too much congestion, and over burdening our roads and services may

actually be a detriment to economic sustainability. I do not think people who live here want South Lake Tahoe to become the corporate mecca like it is in Las Vegas. Over tourism may not even be good for corporate profits as over tourism diminishes the visitor experience. Regional officials need to also be cognizant of this fact and resist aligning themselves too closely with corporate interests who do not always share the values of the full-time resident community. We do not want to see a perpetuation of the *corporate-regional government complex*.



For an interesting brief article written about overtourism in Big Sur, CA see:

<https://losangeles.cbslocal.com/2019/07/11/big-sur-overtourism-traffic/>

PUBLIC COMMENT NEEDED ON CAL-FIRE'S CALIFORNIA VEGETATION TREATMENT PROGRAM EIR – *(aka) what should Cal-Fire be doing to make State lands in South Lake Tahoe Fire Safe?*

Tell State fire officials that fuel reduction of State-owned lands within the city limits must be a top priority to protect the people who live here, our visitors and our natural environment. Managers of State-owned lands within the City limits must address fire safety issues.

July 22, 2019 (from a League of California Cities Publication)

“The California Department of Forestry and Fire Protection (CAL FIRE) is seeking public comment on the California Vegetation Treatment Program Programmatic Environmental Impact Report (CalVTP). Tell Cal-Fire that State owned lands like those in the City limits next to or adjacent to residential areas need to be made fire safe on an annual basis and this should be a priority in South Lake Tahoe.

The 45-day public comment period is open until Aug. 9.

CalVTP is a California Environmental Quality Act (CEQA)-compliant program that focuses on protecting natural resources, people, and property through vegetation treatments designed **to reduce the risk of destructive wildfires**. When certified, it will be implemented by the CAL FIRE as well as other local and state agency partners.

All comments received, including names and addresses, will become part of the official public record. A final PEIR will be prepared which will include responses to comments received during this public review period that

raise significant environmental issues.

The board held an informational [webinar](#) on July 11 to discuss the CalVTP and the Draft PEIR. The webinar [power point](#) is available online for viewing.

The program will:

- Assist in expanding statewide vegetation treatment activities up to 500,000 acres per year to achieve the goal established in Executive Order B-52-18; and
- Provide a robust environmental analysis as required by CEQA as well as project-level mitigation measures to help ensure the protection of public trust resources (water, air, wildlife, archaeology, Greenhouse Gas, etc.)

CalVTP treatments include:

- Wildland-Urban Interface fuel reduction, including removal of vegetation to prevent or slow the spread of fires between wildlands and structures;
- Fuel breaks that support fire suppression activities by providing emergency responders with strategic staging areas and access to otherwise remote landscapes for fire control;
- Restoration in ecosystems where natural fire regimes have been altered due to fire exclusion, including restoring ecological processes, conditions, and resiliency to more closely reflect historic vegetative composition, structure, and habitat values; and
- Prescribed burning, mechanical and manual fuels treatment, prescribed herbivory, and limited herbicide use, where appropriate.

Comment Period and Details

The [CalVTP Draft PEIR](#) is available for public inspection for a 45-day public review and comment period, which ends on Aug. 9.

Written comments are preferred via email and may be submitted to CalVTP@bof.ca.gov.

Comments may also be mailed to the following address:

Board of Forestry and Fire Protection

Attn: CalVTP

PO Box 944246

Sacramento, CA 94244-2460

If you have additional questions, please contact CAL FIRE staff at (916) 653-8007 or email

- See more at: <https://www.cacities.org/Top/News/News-Articles/2019/July/Cities-Can-Now-Comment-on-CAL-FIRE-s-California-Ve#sthash.PBoqywmU.dpuf>

Have a great week and always be safe!

David Jinkens, MPA

Good Government and Public Policy Advocate

djinkens@charter.net

“The ear of the leader must ring with the voices of the people.”
Woodrow Wilson

If you would not like to receive this newsletter, please let me know.

Hannigan, Edith@BOF

From: David Jinkens <djinkens@charter.net>
Sent: Thursday, July 25, 2019 12:18 PM
To: CALVTP@BOF
Subject: RE: Proposed Statewide Vegetation Treatment Program- Cal Fire
Attachments: Fire Safe Letter to City from TKPOA.pdf

Warning: this message is from an external user and should be treated with caution.

Please include the attached letter as a component of my earlier submitted comments below! Thank you!

I 11-6

David Jinkens

From: David Jinkens [mailto:djinkens@charter.net]
Sent: Thursday, July 25, 2019 8:44 AM
To: 'CalVTP@bof.ca.gov'
Cc: 'djinkens@charter.net'
Subject: Proposed Statewide Vegetation Treatment Program- Cal Fire

To Whom It May Concern:

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My comments relate to State public lands located within the City limits of South Lake Tahoe, California where the California Tahoe Conservancy owns many individual parcels of vacant land that are located in existing residential subdivisions or directly adjacent to them. The properties are not being maintained in a fire safe condition. Residential property owners adjacent to CTC parcels cannot get the cooperation of CTC managers to create defensible space on their property. In many cases the properties are overgrown with dense foliage that when it becomes dry creates a fire risk. CTC officials do not either understand the risk to people, environment or property or they ignore these risks and resident concerns.

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Attached is a copy of my most recent Newsletter (#29) that has been focusing on the issue of fire safety on State and Federal public lands within the City limits for over 1 ½ years. In particular see pages 1-3.

Whatever rules you adopt, make haste with their implementation within the City limits. Catastrophic fire knows no time and waits for no one. State land managers need to take action now and quit ignoring the

problem they are creating. They need to do their jobs and Cal Fire and State government need to make them do their jobs to protect our community.

Thank you!

David Jinkens, MPA
Good Government and Public Policy Advocate
(Retired South Lake Tahoe City Manager and Director of Emergency Services)
South Lake Tahoe, CA



January 3, 2019

Brooke Laine, Honorable Mayor
and City Council Members
City of South Lake Tahoe
1901 Airport Road
South Lake Tahoe, CA 96150

Re: **LETTER OF SUPPORT TO MAKE CITY FIRE SAFE**

Dear Mayor and Council:

I am writing to you on behalf of the Board of Directors of the Tahoe Keys Property Owners' Association and the 1528 members of our Association.

At its meeting of December 15, 2018, the TKPOA Board heard testimony and reviewed a letter sent to the City Council by David Jinkens (dated November 20, 2018). This letter highlighted "proactive" fire safety steps the City Council could and should take for our area. The TKPOA Board supports the proactive fire safety efforts noted below and encourages the City Council to do the following:

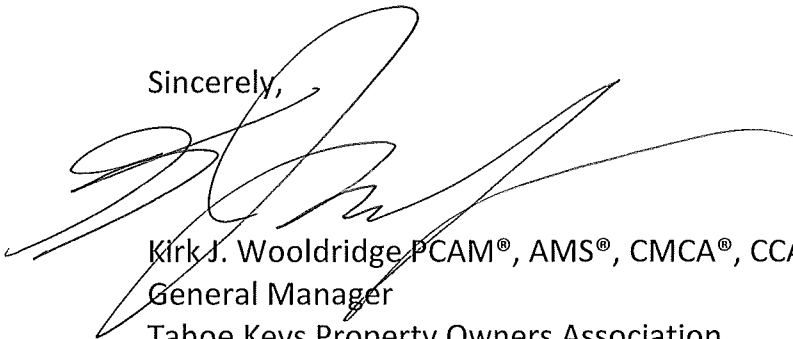
1. **Empower the City Manager through the Fire Chief** to engage all public agencies owning vacant property within the City limits to inspect their lands and proceed with fire prevention measures that are necessary to protect the life, safety and welfare of the community. An inspection report and timeline for action by public agencies is needed to be submitted to the city within a reasonable period of time. Seek cooperation and collaboration on the matter as the first alternative for City action. However, should cooperation and collaboration in a timely manner not be achieved, consider other actions available to City government to achieve this fire safe objective.
2. **Make City-Owned Vacant Property Safe** – All property owned by the City of South Lake Tahoe within the City limits should be inspected immediately and a plan made to make them fire safe. Adequate funds should be allocated to achieve this safety objective and/or grants should be sought.

3. **Make California Tahoe Conservancy (CTC) Vacant Property Safe**– All property within the City limits owned by the California Tahoe Conservancy should be inspected and a plan and timeline set for making them fire safe. Too many of its properties located throughout the City in residential neighborhoods are arguably not safe;
4. **Make United States Forest Service (USFS) Vacant Properties Safe**- All properties owned by the United States Forest Service within the City limits should be inspected and a plan and timeline made to make them fire safe. There are many USFS properties in residential neighborhoods that are arguably fire unsafe.

All of us are aware of the devastating fires in Lake Tahoe (Angora and Gondola Fires) and the recent fires in Paradise, CA and Malibu Area. We support your vigorous efforts to make our City fire safe.

Thank you for your consideration of this request.

Sincerely,



Kirk J. Wooldridge PCAM®, AMS®, CMCA®, CCAM®, CHA®,
General Manager
Tahoe Keys Property Owners Association
356 Ala Wai Boulevard
South Lake Tahoe CA 96150
530-542-6444 Extension: 224
530-541-2521 FAX
kwooldridge@tahoekeyspoa.org
www.tahoekeyspoa.com

Hannigan, Edith@BOF

From: Shannon Wooten <wootengoldqueens@aol.com>
Sent: Monday, July 29, 2019 1:59 PM
To: CALVTP@BOF
Subject: CalVTP

Warning: this message is from an external user and should be treated with caution.

CEQA

My ranch was one of the first to control burn in 1950. I am 5th generation on the ranch. 10,000 acres were burnt with out a hitch. This ranch and others have burned many times since until 1990 when things stopped. The brush has grown back to the point we have to cut back on the number of cattle we can turn out. The deer herds have lost feed also. When we burned regularly wild animals had lots of feed as well as our cattle. Wild fires do not do well in previous burned areas. This is a no brainer get with the program. This is the second year we have been trying to get these control burns going.

12-1

Shannon Wooten
Bonnie Craigs ranch

Sent from my iPhone

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

August 6, 2019

Dr. J. Keith Gilles, Chair
Mr. Matthew Dias, Executive Officer
Ms. Edith Hannigan, Land Use Planning Program Manager
California Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, CA 94244-2460 vegetationtreatment@bof.ca.gov

SUBJECT: Comments on Draft Program Environmental Impact Report for the California Vegetation Treatment Program

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

Thank you for the opportunity to provide comments on the Draft Programmatic Environmental Impact Report (PEIR) for the Vegetation Treatment Program (VTP). Some of these comments have been provided in other letters in the past several years, and are still relevant as some key changes have not been made in this VTP. Vegetation reduction near homes and communities is indeed an essential and effective fire management tool, but only as part of a broader approach to reduction of structure ignitability, location of structures and communities, and suppression preparedness.

13-1

Fuel reduction focus

The VTP is appropriately focused on Wildland-Urban Interface Fuel Reduction and fuel breaks that support fire suppression. It is notable that this VTP acknowledges that fuel breaks are not to be constructed and would not be effective in passively altering or slowing the path of a wildfire. The periodic re-treatment, due to regrowth of vegetation, needs to be addressed in the projection of acres treated.

13-2

Concerns about chaparral type conversion

The fifth objective is to “improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.” The draft PEIR does not reflect the science and reality of chaparral ecosystems for the following reasons:

13-3

- The program description acknowledges that the program would "develop a treatment design that avoids environmental effects of type conversion in coastal chaparral and coastal sage scrub vegetation alliances." Type conversion is high risk in all chaparral ecosystems.
- Chaparral is at risk for reduction of obligate seeding shrubs, not just the extreme conversion to grasses.

13-4

- The estimate of “average” fire return interval for chaparral in Table 3.6-1 is far too low. Most chaparral is at risk for type conversion if fire return intervals fall below ten years, and in drought conditions even below 20 years. 13-5
- There is no “ecological restoration” value if older chaparral stands are burned. Old-growth chaparral is becoming increasingly rare due to increasing fire frequencies and climate change, and should not be subject to any vegetation treatment. 13-6

Focus on structural ignitability

Greater focus still needs to be placed on structural hardiness for reducing flammability, improved alerts and evacuation procedures, enhanced and detailed plans for suppression strategies for each community, and fuel reduction that will facilitate suppression actions. These proposed actions need to be fully developed in this VTP and then implemented through CalFire staffing, resources, and financial support to communities. 13-7

Sincerely,



Anne S. Fege, Ph.D., M.F.S. Forest Science
Retired Forest Supervisor, Cleveland National Forest
Adjunct Professor, Department of Biology, San Diego State University

Table 3.4-2 California Air District Mass Emissions Thresholds for Criteria Air Pollutants

Air District	ROG		NO _x		PM ₁₀		PM _{2.5}		SO _x		CO	
	Construction	Operational	Construction	Operational	Construction	Operational	Construction	Operational	Construction	Operational	Construction	Operational
Mendocino County AQMD ¹	No threshold	40 tpy (stationary)	No threshold	40 tpy (stationary)	No thresholds							
Colusa County APCD	No thresholds											

I4-1
cont.

It is proposed the Project will include extensive burning of wildland “fuels” with the use of, yet to be defined, “accelerants.” The CalVTP Draft PIER does not address the specifics related to the accelerants. The burning of fuels and accelerants will have an adverse effect on human health. The adverse effects must be reviewed by health professionals for potential negative health effects as related to the combustion of both the fuels and accelerants and their combined effects. Because there is documented evidence in State records of Cal Fire employees conducting burns under “no burn day” conditions the health professionals should investigate that aspect as well.

I4-2

The American Heart Association states that more than 121 million adults had cardiovascular disease in 2016. Myocardial infarction spike in heart attacks and stroke occurred after wildfire smoke exposure. Smoke exposure will be certain from the extensive burning proposed under the Project.

A California study found a large increase in emergency department visits for cardiac events by exposure to smoke from wildfires was associated with a large increase in California emergency department (ED) visits for heart disease and stroke during the 2015 wildfire season after a review of more than 1 million ED visits in affected regions. A 42% increase in ED visits for heart attack and a 22% increase in visits for ischemic heart disease were found among individuals ages 65 and older as reported by Ana G. Rappold, PhD, of the Environmental Protection Agency (EPA) and colleagues. Wildfire smoke exposure is an established risk factor for respiratory illnesses such as chronic obstructive pulmonary disease (COPD) and asthma. The increase in hospital ED visits for stroke, heart attack and other cardiovascular causes was most pronounced in elderly people. The population-based epidemiologic analysis, published in the Journal of the American Heart Association, was a joint collaboration between researchers at the University of California, San Francisco, the California Department of Public Health and the EPA.

I4-3

Researchers reviewed more than 1 million ED visits from May 1 to September 30, 2015, when wildfires in northern and central California burned some 800,000 acres.

Smoke contains air pollutants previously associated with respiratory and cardiovascular outcomes, including particulate matter, ozone, carbon monoxide, polycyclic aromatic compounds and nitrogen dioxide. This is compounded by the use of accelerants. "The message to the public -- particularly people with established heart, vascular or respiratory disease -- is that they are at

higher risk when exposed to poor air quality because of wildfire smoke," said co-author Wayne Cascio, MD, director of the National Health and Environmental Effects Research Laboratory at the EPA. "They should consider taking action to lower their exposure." Cal Fire will be increasing exposure by starting fires and must consider alternatives.

14-3
cont.

Burns started by Cal Fire will also generate nanoparticles, the ideal size for deep lung penetration. **Nanoparticles are not addressed in the CalVTP Draft PIER** nor accounted for in the federal Air Quality Index and may be invisible, travel away from the plume of smoke created as a result of the Project and must be studied in depth as a part of this Project. Cal Fire will be increasing exposure to these very dangerous nanoparticles.

14-4

2. ACCELERANTS

The CalVTP Draft PIER states **"No accelerants are proposed for use under the CalVTP."** **This is not a true statement and demonstrates a lack of understanding of the processes in the field and the definition of accelerant.** The document does not ban the use of Helitorch and drip torches. Indeed the document states "Prescribed burning treatment activities may include the use of a helicopter with a helitorch..." and "Hand tools to ignite the prescribed burn could include drip torches and Terra torches, which run on a blend of diesel fuel and gasoline." That is the use of accelerants. The presence of irritating and genotoxic substances in both the gas phase and the particulate phase constituents is considered to have significant health implications and should be analyzed base on the specific volumes of each substance used, how it will disperse in the air, location of sensitive communities relative to the fire operations, and many other factors. The CalVTP plan is to exponentially increase the amount of acres burned thus the accelerants negative effects will become much more significant.

14-5

In fire protection, an accelerant is any substance or mixture that accelerates or speeds the development and escalation of fire. Some examples are Fuel oil no. 1- (kerosene, range oil, coal oil, Jet - A (aviation) fuel), Fuel oil no. 2 (home heating fuel, diesel fuel), Gasoline, Light Petroleum Distillates (LPD), Medium Petroleum Distillates (MPD), Heavy Petroleum Distillates (HPD), Drip Torch Fuel most commonly, a combination of 50% diesel and 50% gasoline mixtures, The Extensive burning will require the use of a significant amount of "accelerants" (unless the Cal Fire crews are limited to only using the boy scout technique of a sharp stick and kindling to start fires). These substances hat have potential negative environmental impacts near waterways and on watersheds. Cal Fire Procedures for Vegetation Management Operations section 8344.5.7.5 (and other Cal Fire documents) indicate Cal Fire can use "Alumagel" along with some type of fuel. Other documents also allow for "Flash 21". Flash 21 is a two part mix (Flash 21A and 21B) along with some type of fuel, AvGas 100, for example. No where in the CalVTP Draft PIER is there mention of banning the use of accelerants. **The effects should not be swept under the rug with the false statement "No accelerants are proposed for use under the CalVTP."**

The effects of fire accelerants on the environment was extensively studied by the USDA Forest

Service. The use of Alumagel, for example, results in a residual of aluminum oxide along with many other chemical agents. The USDA Forest Service studies conclude that the LC50 (mg/kg) (lethal concentration) for aluminum oxide alone on trout is 1.17 mg/kg, daphnia 2.6 mg/kg and salamander 1.4 mg/kg respectively. The USDA Forest Service has guidelines and policies regarding the use of accelerants near waterways and on watersheds. Very small amounts of Alumagel can result in lethal effects on life forms in a watershed. The Flash 21 MSDS simply states “Ecological information not available.” Flash 21 should be studied for its possible negative effects on the environment before further use. This should also apply to any agent that may be used that has not been studied for its negative effects on the environment.

14-5
cont.

Based on a search of available public records, Cal Fire does not document amounts of accelerants used in similar, but very much smaller scale, operations conducted under the Vegetation Management Program (VMP). Because of the real potential harm to aquatic species (no less humans drinking water from the watersheds) and air quality these agents should be openly addressed by the Project and data reviewed by independent experts, not just Cal Fire staff.

3. OBSOLETE VMP

The VMP is based on science that predates May 18, 1981, when the program went into effect. Indeed, the San Francisco court threw out some of the “science” for the VMP. The VMP should be scrapped, but **if the Project does not concurrently discontinue the VMP, the Project should review the combined negative environmental effects of the VMP and the Project. The CalVTP Draft PIER ignores the fact the VMP science is outdated.** The VMP is only referenced in the Strategic Fire Plan section and listed as an ongoing program. That section erroneously states “Updated yearly, Unit Fire Plans identify wildfire protection areas..” They are not updated yearly. Just look them up here:
<https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/fire-plan/>

14-6

4. CONFIRMATION OF PROPERTY LINES AND PROTECTION OF NEIGHBORING PROPERTY AND PROTECTED AREAS

The CalVTP Draft PIER did not address these environmental concerns in the “Program Description & 3.6 Biological Resources” as stated in the responses to comments. It does not address how property lines will be determined nor allowing for protection of natural resources by individual property owners not part of the “Project”.

14-7

Assuming the Project will determine property lines, like the current VMP, there will be negative environmental impacts. Project maps used in the VMP program use the tax assessors data base maps to determine parcel lines. Every tax assessor within the State of California clearly states that the tax assessor’s parcel map lines are approximate and NOT SURVEY LINES, they are for viewing purposes only AND SHOULD NOT BE USED TO DETERMINE LEGAL BOUNDARY LINES.

Use of “tax assessor parcel lines” by the Project may result in trespass of neighboring property. Neighboring property may be serving as protected areas for endangered and threatened species and if damaged will result in a negative environmental impact. The Project should address specific protections to be implemented including only relying on legal surveys or clearly marked property lines (by surveyed fence lines and roads for example) to determine property lines. Also defensible setbacks from property lines need to be defined that consider, fuel, terrain, capability of resources immediately on hand and Cal Fire personnel training and experience.

14-7
cont.

5. WATER QUALITY, AIR QUALITY AND GLOBAL WARMING

The CalVTP Draft PIER states “For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant.” Carcinogens are assumed by the state of California to have no safe threshold below which health impacts would not occur.”

14-8

Based on that **all Carcinogens** on the STATE OF CALIFORNIA, ENVIRONMENTAL PROTECTION AGENCY OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 CHEMICALS KNOWN TO THE STATE TO CAUSE CANCER OR REPRODUCTIVE TOXICITY LIST dated June 28, 2019 (or the list current at the time of proposed use), **should be specifically avoided. The CalVTP Draft PIER does not so state and in fact allows their use.**

The Project should address the use of chemical agents (combusted or otherwise applied) and their effects on water and air quality. Toxic Air Contaminants (TAC) Emissions must be considered for the use of accelerants and open air burning of various fuels and ignition sources (“Products”) via sprayers, heli-torches, drip torches, diesel flame throwers, terra-torches and other means. Currently there are no records available to the public on the quantity, by type of Products used for VMP’s, so research and independent review will need to be conducted without the benefit of records of past use. The amount of Products applied will be considerable.

14-9

The Project should also provide studies and conclusions on the effects of conducting burns on “no burn days” or specifically state that local units may no longer seek exceptions for burning on “no burn days” as is now the case under VMP’s.

14-10

The contribution of each gas and chemical agent to the greenhouse effect is affected by the characteristics of that gas or agent. For example, the effect of a mass of methane is about 72 times stronger than the same mass of carbon dioxide. CFCs were phased out via the Montreal Protocol due to their part in ozone depletion. This anthropogenic compound is also a greenhouse gas. What is the effect on global warming of the products and byproducts of the chemical agents that will be used during VTP’s? The quantities to be used are not insignificant. They should be studied individually and in combination. The CalVTP Draft PIER does not address this specific issue in Section 3.8 as was stated in the response to comments.

14-11

6. COMBINED EFFECTS OF ALL STATEWIDE PROGRAMS AND PROJECTS

Regarding the federal project effects the CalVTP Draft PIER only states **“The annual acreage treated by federal agencies outside the SRA is summarized in Error! Reference source not found.”**

That tells me the combined effect was not analyzed because the annual federal acreage is unknown to the documents authors and or reviewers or does not exist. Apparently no one reviewing the document at/for Cal Fire was concerned about the missing data thus a proper and unbiased analysis of combined effects was not done.

Independent from the proposed CalVTP, other entities will be independently conducting vegetation reduction, most by the use of fire. A partial list includes the U. S. Federal Government including the U.S. Forest and National Park Services, Pacific Gas and Electric Company, Southern California Edison, San Diego Gas & Electric, CalPeco, BVES, PacifiCorp, Midpeninsula Regional Open Space District, other open space districts, State of California, county and local park districts, private land owners, local communities, forest managers, individual counties, Fire Protection Districts, Fire Departments and more. The total combined impact must be documented and analyzed to include, but not be limited to, environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread.

14-12

7. INSECT COLLAPSE

“BIO-1 requires a reconnaissance-level survey of the proposed treatment site to determine whether there is potential for special-status wildlife, including insects and other terrestrial invertebrates, to occur.” **What qualified individuals will conduct the studies and provide the reports?**

14-13

“BIO-2 requires crew members and contractors to receive training regarding biological resources from a qualified RPF or biologist familiar with the life history of the species so crews are aware of potential special-status wildlife in the treatment area and measures to reduce adverse effects.”

“Crew members and contractors” are not going to learn Entomology and locate elusive species with tailgate training. An Entomologists field study is necessary if Cal Fire is serous about protecting endangered and threatened species.

14-14

Current science indicates insects world wide are in collapse. The CalVTP Draft PIER does not address this serous issue. It is not addressed in 3.6 Biological Resources as stated in the CalVTP Draft PIER response to comments.

The current prediction is for total insect populations to decrease by 25% over the next ten years. Chaparral and other canopies are essential for supporting insect populations. Loss of pollinating insects will not only be devastating to agriculture and the state’s economy, but more importantly,

devastating to the plant diversity on which our total environment depends. Many species of plants must be pollinated by insects to survive. Without insects most life will end. The Project must study adverse impacts on insect populations.

I4-14
cont.

8. **NEGATIVE IMPACTS ON PLANT AND WILDLIFE - This issue is not addressed in the CalVTP Draft PIER**

“Wildlife will get out of the way of fire” is not credible. Animals seek shelter from fires by going underground, into thickets, nests or dense growth. Heavy smoke can incapacitate or kill wildlife that are on the run. The endangered and threatened plants and insects will simply be consumed by the flames. It appears the Project will result in a broad stroke one size fits all approach to individual project impacts. Each ecosystem has unique features and inhabitants, many now with endangered or threatened status. Loss of habitat is a very significant issue. How does Cal Fire definitively know the land they will burn is less valuable than the land that MAY save from burning? The Project should include oversight by the agencies with the expertise to make determination of the negative impacts on the environment on a individual project level. This will require commensurate funding for those agencies and the opportunity for public input.

I4-15

9. **COMPOUNDING THE EFFECTS OF THE 6TH MASS EXTINCTION**

The CalVTP Draft PIER does not address this issue. It is a matter of paramount importance which must be addresses per CEQA (cumulative impact and others).

According to the Center for Biological Diversity and many others our planet is now in the midst of its sixth mass extinction of plants and animals — the sixth wave of extinctions in the past half-billion years. Scientists estimate we're now losing species at 1,000 to 10,000 times the background rate, with literally dozens going extinct every day. Frogs, toads, and salamanders are disappearing because of habitat loss, water and air pollution, climate change and ultraviolet light exposure. A 2009 report on the state of birds in the United States found that 251 (31 percent) of the 800 species in the country are of conservation concern mostly because of habitat loss and degradation. Many species of fish are on rapid decline. All salmon species in California are adversely impacted by declines in water quality and loss of riparian shade which will be inevitable because of the proposed project. Freshwater invertebrates are severely threatened by water pollution while a large number of invertebrates of notable scientific significance have become either endangered or extinct due to deforestation. Mammals will be significantly impacted along with countless species of plants. It doesn't take any more than disturbing one card in the house of cards for it to fall. The cumulative effects of the current declines, in addition to the Cal Fire plan, need to be considered and analyzed by experts in each field.

I4-16

10. **RECORDS TRANSPARENT TO THE PUBLIC**

The CalVTP Draft PIER does not address making records available to the public in an accessible and transparent way. The only way available now is via a Public Records Request

I4-17

which seldom provides requested information. If the information is simply not available it is because of atrocious record keeping resulting in hiding information from the public.

A public records search of numerous completed VMP's produces a dearth of completion reports and quantity and types of chemical agents used. This needs to be corrected in the Project. The units should be keeping mandatory written records indicating days operations were conducted, acres treated each day, types and quantity of chemical agents used, and a detailed accounting on any "escaped fires", "escaped chemical agents" or any other "slop-over." Lacking the required records the negative environmental impacts will simply be hidden from the public.

14-17
cont.

11. NOT ONLY SIGNIFICANT AND UNAVOIDABLE BUT SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The following are erroneously classified, they are irreversible.

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk - This is an IRREVERSIBLE effect for many of the people and wildlife effected. The physiological effects can last or end a lifetime.

Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications - Decline of Special-Status Wildlife Species is an IRREVERSIBLE effect and may lead to extinction.

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources - This is an IRREVERSIBLE effect. Once destroyed they won't grow back.

Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource - This is an IRREVERSIBLE effect.

14-18

12. STAFF ACTIONS AND INACTIONS IN THE FIELD - **This is a CEQA issue and has not been addressed.**

The CalVTP Draft PIER is a tome of a document that no one involved in its creation can reasonably believe that any of the field crews will read, no less study. The crew actions and inactions in the field attributed to lack of training or knowledge will result in a "Significant effect on the environment". For example on one past VMP the field crew review in advance of the project (conducted by fire personnel, not biologist) simply stated "no fish seen". This in a prime threatened steelhead spawning stream. The crews, based on that determination proceeded to burn near the stream with the use of accelerants. There were steelhead present that should have been protected. It does not matter how much text is added to the CalVTP Draft PIER if the findings and project conditions and implementation is ignored in the field resulting in a significant negative effect on the environment.

14-19

Past Cal Fire plans were simply “guidance” to staff allowing them to make decisions in the field on “treatment methods” and applications of chemical agents. Given vegetation treatment/management will be conducted on the ground by staff and prison crews, some of which will have little or no education regarding the complex issues of impacts on the environment, it is reasonable to conclude there will be adverse environmental impacts when it comes to implementation of the Project. Cal Fire uses “Trainee Incident Commanders” who may have never worked on a Project before, or for that matter, ever again. It is not reasonable to believe that all Cal Fire staff will carefully study the tome of a document you will be creating and follow up on further education of the potential effects of their actions. By allowing each Unit to determine which areas to burn, Cal Fire should not discount that state funds might be used by local units to clear land for a new vineyard or ease access to hunt club land without achieving the real program goal of protecting human life and property. If the program allows for facilitating conversion of land use, the Project should specifically address those changes and their environmental impact. Therefore the Project should address the potential for improper application of means, agents and methods and the resulting negative environmental impacts. The term “controlled burn” does not apply in all cases. There is a reason Cal Fire employees and members of the public are familiar with terms like “slopovert” and “spot burns.” As part of the Project, Cal Fire should release information on all burns that have gone wrong to educate the public on what may go wrong and the resultant environmental impacts and destruction of property and structures. This information is in no way readily available to the public. As only one example, here is a photo of the result of the October 22, 2018, Brushy Mountain VMP (Fire Behavior: Low to moderate intensity, some spotting, with slope, 1-2 MPH wind) on Cal Fire resources (International 7400 Model 34 wildland pumper 4x4 four-door commercial chassis with seating for four firefighters). How do you expect the public to believe local units will protect property and the environment when they can’t protect their own resources under “Low to moderate intensity burns” with 1-2 MPH winds?

I4-19
cont.



I4-19
cont.

Cal Fire makes it clear that:

- a. Cannot effectively protect expensive state property under near ideal burn conditions.
- b. Multiple “Spot fires” occur outside the defined burn area on an unpredictable basis. Under the near ideal conditions for this burn the fire jumped containment at least 4 times.
- c. Drought-stricken fuels burn with greater intensity and their ignition may not be predictable.
- d. Prescribed fires have the same hazards as wildland fires.
- e. No fire is routine.
- f. Small changes in slope, greatly increase rates of spread.

I4-20

13. SPECULATIVE NATURE OF THE PROJECT **This was not addressed in the CalVTP Draft PIER.**

14-21

It is impossible for Cal Fire to predict with certainty the locations, conditions and extent of fires in the future. The Project should scientifically weigh the benefit of fuel reduction that may, or may not, have an impact on future fires against the certain environmental impacts of the extraordinarily extensive nature of the proposed actions. Alternatives like doing PG&E's job of clearing below power lines is one option. PG&E is in bankruptcy and disarray and states it does not have the staff to do what the court requires. The taxpayers will pay for it one way or another so consider using your resources to address the root of the issue as an alternative to the Project. Another alternative is staging fire crews proactively instead of dispatching crews reactively. The Project should consider and address the following alternatives: a scaled down project proposal, an alternative project proposal or no project. The Project should include and review all points of disagreement among experts and not just select what favors the desired outcome.

14-22

14-23

14. A HIGH BAR

Here we have an agency (project proponent) having a direct interest in a project at the same time preparing environmental documents on that project and serving as the decision-making body. This Project requires particularly diligent scrutiny due to the potential for a conflict of interest. This Project is a self approval process by the California Board of Forestry and Fire Protection (Agency). This Agency is formulating the plan with an intension of exempting the individual projects from citizen and independent scientific review. These reviews are normally required under the California Environmental Quality Act. Citizens have the right to have individual projects evaluated under CEQA.

14-24

Please address the following as it was not addressed in the CalVTP Draft PIER.

Mitigation Monitoring or Reporting (14 CA ADC § 15097) In order to ensure that the mitigation measures identified in the CalVTP are implemented, Cal Fire shall adopt a program for monitoring or reporting on which it has required in the Project and the measures it has imposed to mitigate or avoid significant environmental effects. **Unless Cal Fire has something to hide these reports should be readily available to the public via the Cal Fire web site in a timely fashion.** Please include the specifics on the method for monitoring compliance and implementation of mitigation measures and individual project oversight including:

14-25

- (a) identification of the individual, department, agency, or other entity responsible for performing the mitigation measure and oversight activities that will be conducted by agencies within their area of expertise.
- (b) identification of the timing for implementation of the mitigation measures and oversight activities.
- (c) identification of the specific results or performance standards that the mitigation is intended to accomplish if not clearly stated in the mitigation measures and oversight activities.
- (d) identification of the frequency of inspections or other monitoring and oversight

activities.

(e) reporting to the public of when compliance or other monitoring and oversight activities are completed.

(f) identification of the amount and source of funding to complete monitoring, oversight and reports.

Thank you in advance for your second attempt to address these important issues. Again, I appreciate the sense of urgency on the part of Cal Fire to do something, and I am fully aware of the political and public pressure to “act” but not at any cost. A well thought out plan that is truly impartial, scientifically based and commensurate with the vast scope of the Project, is the only option for the people of California and the planet. The sheer scope of the proposal will result in negative effects on an ecosystem that is in a demonstrably rapid decline. Given the massive resources the state is putting forward, there are certainly solutions with much less negative impact that can be employed.

Regards,



Peter Gruchawka
POB 670
Kenwood, CA 95452
707-833-5027

I4-25
cont.

Hannigan, Edith@BOF

From: nsi@mcn.org
Sent: Thursday, August 8, 2019 12:42 PM
To: CALVTP@BOF
Subject: reL California Vegetation Treatment Program (CalVTP)

Warning: this message is from an external user and should be treated with caution.

August 8 2019

to: CalVTP@bof.ca.gov

from: Beth Robinson Bosk
p.o. box 702
Mendocino, CA 95460
nsi@mcn.org

Public Comment re: California Vegetation Treatment Program (CalVTP)

from the article by Jim Robbins in Science, October 21, 2011

Prior to the work of William Jolly, a Forest Service research ecologist with the Rocky Mountain Research Station's Fire Sciences Laboratory in Montana, computer modeling of fire behavior in dead forests indicated that wildfires would not turn into crown fires as readily there as they do in forests of living trees because many of the dead trees have lost their needles. It was thought that crown fires were the hottest, fastest moving and deadliest of all forest fires.

HOWEVER: it turns out that the behavior of fires in the real world is different from what the models suggest.

William Jolly, a Forest Service research ecologist with Rocky Mountain Research Station's Fire Sciences Laboratory in Missoula Montana had a chance to study forestland burned in 2010 closely.

He found that even under the moderate fire conditions of 2010 blazes in forests with lots of dead needle less trees turned into crown fires. (Mr.

Jolly studied the Saddle Complex fire on the border of Montana and Idaho.

In one day alone the fires burned 17,000 acres. " For a year like this year, not in extreme drought, it's really uncommon" for a fire to burn that much. "It was equally intense as abnormal crown fire but happened under moderate conditions." "AND CROWN FIRES HAPPEN FASTER THAN EXPECTED IN THESE LARGELY DEAD FORESTS."

For fire bosses, the spread rate of the flames is an important consideration. The Saddle Complex fire moved very rapidly. "A mile an hour is fast for a timber fire, and there were reports that this fire was moving up to three miles an hour." . . . "Because the fire did something they didn't expect, they have to learn what the context is for this different type of fire behavior."

ONE REASON THAT DEAD FORESTS STILL HAVE FIERCE CROWN FIRES MAY BE THAT WITH THE FOREST CANOPY DEAD AND THE NEEDLES GONE, MORE SOLAR RADIATION REACHES THE SMALLER LIVE TREES AND GRASSES ON THE GROUND, WHICH DRIES THEM OUT AND EXPOSSES THEM TO MORE WIND, RESULTING IN FIERCER FIRES. He concluded "Not all dead forests are equally combustible. The mix of dead and live trees is critical to fire behavior, and MORE STUDY IS NEEDED on the nature of the most flammable mix. BIG FIRES ALSO CREATE THEIR OWN WEATHER, and research is needon how the weather generated by a burning forest with a lot of dead trees differs from the weather created by a fire in a living forest.

|

15-1

That research has not been done, and CALFIRE should not proceed with their intent of using frilling techniques with herbicides that carry labels warning that fire fighters are not safe in the vicinity of trees so treated with concoctions such as Imazapyr.

15-2

Sincerely
Beth Robinson Bosk

8 August 2019

CalFire
California Board of Forestry & Fire Protection
Keith Gillless, Chair
CalVTP@bof.ca.gov
PO Box 944246
Sacramento, California 94244-2460

Re: Current 2019 DRAFT Program EIR for the California Vegetation Treatment Program

Dear Mr. Gillless and Members of the California Board of Forestry and Fire Protection,

We are writing to you as a wildlife biologist and as an aerospace engineer; both of us as taxpayers and residents in a high-risk fire area at the urban-wildland interface. We submit the following observations, comments, and questions about the latest Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP), as filed under State Clearinghouse number 2019012052; referenced in your letter of June 24, 2019. In short, we find the Draft to be seriously inadequate, incomplete, and the VTP unacceptable in its latest form.

The 2019 Draft PEIR for the California Vegetation Treatment Program (VTP) once again lacks a basis in good science and is astonishing in its failure to incorporate past years of valid comments opposing the VTP’s recommendations to obliterate millions of acres of California wild lands along with the associated biodiversity present on these extensive tracts of land. The current DPEIR for the VTP remains full of glittering generalities and scientific inaccuracies; while ignoring a host of potentially devastating unintended consequences.

16-1

What this proposed statewide Plan would do in actuality is an all too real disaster. Expecting the proposed VTP approach to prevent major wildfires is akin to trying to prevent all dangerous trip hazards and fatal falls by dynamiting every hill and mountain to level out terrain... Both are extreme measures that, in the end, will not achieve their goals.

Specifically, the VTP continues, erroneously, to focus on “fuel treatment” (vegetation removal) as the primary method of *fire prevention*; “fuel” being defined predominantly as native shrub species, such as chaparral, interspersed with small tree species. This Plan is based on the myth that “decades of fire suppression” across California is the primary cause of devastating wildfires. While thinning and removal can reduce fire hazard in certain types of forests, that same principle does not apply to a majority of the native plant assemblages across California’s wild lands. The “fuel suppression” model across

16-2

all plant assemblages has been debunked by numerous experts and agencies, including the National Park Service, the Joint Fire Science Consortium, the CA Dept of Fish & Wildlife, Center for Biodiversity, Endangered Habitat League, and other conservation organizations and academic institutions.

16-2
cont.

As we have asserted before, and must point out again... It is far easier to blame California's wild lands for catastrophic fires and to recommend "lunar landscaping" 20.3 million acres of State Responsibility Areas (SRAs) than it is to acknowledge that *the actual cause of catastrophic wildfire losses is too-frequent, human-ignited wildfires -- via arson, power line arcing, car fires and engine sparks, careless camp fires, etc. -- along with decades of bad land use planning and a lack of mandatory structure protection measures, especially in building codes.*

16-3

The proposed VTP also fails to recognize that climate change, with its resulting severe weather and drought patterns, more than ever drives major wildfires in California through high winds that can ignite even landscapes that have been recently "cleared" or control burned. At a glance, it appears to be much simpler to just "get rid of the fuel" by destroying biodiverse habitat while coincidentally destroying all the wildlife, from insects and birds to megafauna, that live in such wild places. However, doing this would permanently replace stable native plant regimes with foreign, invasive annual grasses and other weeds that support even more rapid fire propagation as lightweight fuels that produce numerous, dangerous embers, especially under windy conditions. Thus clearing vast tracts of wild lands will *not* protect homes and towns from wildfires.

16-4

On the contrary, removing native vegetation can actually *increase* fire risk. There are numerous studies and real-life examples which show that carefully maintained shrubs and islands of habitat around structures can actually "catch" embers before they enter a home or other structure... while complete "defensible space clearing" around these places may actually provide a direct path for blown embers to ignite decks, pile up against doors and walls, enter attics, and follow other paths to ignite homes, which, in turn, turns those decks, homes, etc. into stationary thermal sources of high heat that eventually ignite adjacent structures, and turn them into an unstoppable cluster of burning homes or businesses. "Fuel" is not a term that applies only to wild vegetation; "fuel" is also all of our homes and town structures, gas lines, vehicles, propane tanks, and other flammable items.

16-5

It is apparent that the entire theoretical basis and key recommendations within the proposed VTP ignore current data, and that the plan in places misrepresents and misquotes current fire experts, and dismisses the high value of wild lands to the ecological resiliency and economical well-being of California. The proposed VTP will cost California too much... in dollars, in increased fire risk, and in loss of valuable, healthy habitats, wildlife, and watershed.

16-6

The 2019 PEIR has once again failed to address the concerns raised by so many persons, organizations, and agencies, including foresters, biologists, and parkland

16-7

managers. Some of us have been following the VTP EIR “process” since 2005 and have lived through several wildfires since that time.

16-7
cont.

The 2009 Station Fire burned close to our own home on the border of the Angeles National Forest. No amount of “vegetative treatment program” — obliteration of natural chaparral cover -- would have stopped that fire as it burned through the San Gabriel Mountains and foothill communities and 260 square miles of rugged terrain.

We also have family members who were forced to evacuate for both the La Tuna Canyon Fire (September 2017; cause unknown) and Creek Fire (December 2017; likely caused by sparks from a LA Dept of Water & Power steel power pylon that snapped in high wind). Neither of those fires would have been stopped by massive removal of native vegetation. Indeed, removal of chaparral and understory vegetation among oak woodlands and open forests probably would have increased the fire hazard because cleared lands quickly type-convert to foreign grasses and weed species that become dry and highly flammable during “fire season,” supporting an even more-rapidly progressing flame front than do fires in more mature vegetation. Non-native foreign grasses and weed species that quickly take over after native vegetation is removed dry out and, when ignited, emulate the fast moving, expanding burn pattern of the terrible Australian “bush fires.”

16-8

It appears that much of the 2019 DPEIR remains 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?

16-9

Why has this devastating Vegetative Treatment Program not been widely presented to the public for comment? The vast majority of residents in our foothill community of Altadena know zero about the VTP, including its proposed purpose and massive scale of destruction.

Local public involvement needs to be a requirement before any future habitat clearance project is approved. A statewide VTP is, quite simply, too big a program with too little oversight, especially at the local level. Certainly there has been a lack of comprehensive public outreach during the entire VTP EIR process in our own area located on the urban / wild land interface with Angeles National Forest. The VTP is too Draconian to go forward with contracts and massive vegetation “removal” contracts.

16-10

Also, why have the broad benefits of the wild plant regimes targeted for mass removal not received proper cumulative impact analysis and valuation? Insufficient weight has been given to the statewide loss of biodiversity, loss of carbon sequestration, loss of rainwater capture, loss of recreational and economic benefits, elimination of scenic vistas, and other adverse impacts if the VTP goes forward as proposed.

16-11

It appears that the primary beneficiary of the Draft VTP, if implemented, would be the sellers and contract operators of the giant masticating machinery that would need to be purchased and maintained to clear large swaths of California wildland. How much is intended to be paid to these commercial operators, and how are they to be chosen? How much are those entities spending now to support this plan, and what political contributions are they making?

16-12

Horrific and destructive as they are, even the largest California wildland fires seriously damage much less than 1% of the State's land area in any given event, of which there are, at most, a few in any year. The 2018 total burn area of all California fires was ~1.9 million acres, and ~1.4 million acres in 2017, which were unusually high annual totals. Of this, much of the natural wild land in fire-damaged areas can return to roughly its pre-fire state in several decades. Near us, much of the area burned in the 2009 Station Fire on the slopes of the San Gabriel Mountains had returned to a similar chaparral-covered vegetation regime as existed prior to the 1977 and 1993 fires that burned much of the same area. Ecosystem biodiversity, wildlife populations, and water capture capacity into the aquifer had been significantly restored over the intervening three decades.

16-13

The geographic location of any particular wildland fire is determined *probabilistically*, that is, no accurate prediction can be made beforehand of where a particular fire will start and what area it will burn. In any given year, less than 2% of California wild land has burned, *damaging relatively small areas determined by chance*. In contrast, with ~105 million acres of total California land area, the 20.3 million acres identified in the Draft PEIR as "appropriate for vegetation treatments" represents *19% of California land area that could be damaged with total certainty*.

In addition, once vegetative *type conversion* takes place within "treated" (denuded) areas, the time required for return to pre-treatment conditions is unknown. Though these recovery times are largely unknown, they are likely to be far longer than those after a typical fire, because of the removal of native vegetation is at such a comprehensive and massive scale. In many cases, recovery times after VTP-induced destruction and subsequent type conversion will be indefinite, essentially a *permanent loss*.

16-14

In some dry "treatable landscape" areas, desertification is likely after the proposed "treatment." Desertification can be defined as the loss of vegetation in areas of marginally-adequate rainfall, that in turn heats the ground surface, makes small particles (dust) on the surface vulnerable to wind displacement, and reduces water retention, resulting in the inability of larger vegetation to reestablish itself. The affected land becomes more or less barren and unproductive, looking like a desert where once there had been living soils, trees, shrubs, and critical watershed. When this happens over extended areas, rainfall also decreases, because removed vegetation results in dramatically reduced leaf transpiration, meaning there is less humidity in the local air that in the past often led to cumulus cloud buildup and precipitation in the form of summer showers. Native vegetation impacts the weather, just as the weather nurtures

16-15

native vegetation. The effect of vegetation removal is a vicious cycle of positive feedback, making it very difficult to reverse loss of natural habitat.

It is ironic that the United States and United Nations spend millions of dollars every year to aid some countries, such as in sub-Saharan Africa, to fight desertification. On the African continent, desertification has claimed huge areas over the last few decades, making once-vegetated land unproductive and groundwater resources more scarce. The United Nations Food & Agriculture Organization (UN-FAO) states “Soil degradation caused by deforestation is... a serious threat in Africa. Deforestation exposes the soil to high temperatures which break down the organic matter, increase evaporation, and make soils vulnerable to erosion. Thirty-seven million hectares (91 million acres) of forest and woodlands in Africa are said to be disappearing *each year*” (emphasis added).

16-15
cont.

On the other hand, the draft PEIR proposes to spend millions of dollars that will *cause* desertification by deliberate removal of native trees and shrub cover, because of the misguided concept that removing vegetation from “treatable landscapes” will reduce the occurrence of life-threatening fires.

Keep in mind that another word for the removal of trees and shrubs suggested for much of the “treatable area” described in the draft PEIR is *deforestation*. This is not an action we should aspire to, let alone pay to do to ourselves.

What is the actual cost of the action in the proposed Draft PEIR, as measured in habitat loss; in lost capture of rain runoff into local aquifers; in dead mammals; in dead birds, in lost nesting sites; in each specific threatened or endangered species; in dead reptiles and amphibians; in loss of butterfly species and pollinators; in damaged or eliminated wetlands, in altered blue line streams, in dead fish and fisheries from newly sediment-laden streams?

16-16

What is the actual cost in lost recreational campsites, scenic vistas, eroded hiking, running, mountain biking, dog-walking, and bird-watching trails? What is the likely local economic loss from reduced visitation and tourism? Fewer visitors will spend dollars in communities near destroyed wild lands.

16-17

How much more water will cities, counties, water companies, and water authorities need to import to make up for greater runoff to the ocean of precious rainwater that was heretofore captured by native vegetation and retained in nearby aquifers? During drought years, how much less water will be available to residents and businesses to support their everyday activities, because the lost rainwater will cause them to draw down their local groundwater and reservoir levels at a faster rate? How many communities, now on the brink of having an unsustainable water supply, will run out of water entirely, and what will be the resulting economic impact on those communities and their residents?

16-18

Specifically, which communities with what populations will be put at greatest risk because of the proposed action? With the loss of birds, bats, lizards, frogs, toads, salamanders, insects, and other species that depend on an intact native wildland environment... how much will the mosquito population increase and carry disease to people and their pets? How many more flies will seek out our houses? How many more cases of insect-borne diseases, such as Zika virus, West Nile virus, and Lyme disease can be expected in which communities, and what will these cases cost in lost wages, greater health care costs, and impacts on the performance of children in schools and availability of safe outdoor activities?

16-19

How much will agricultural production be reduced by an increase in insect pests, when so many birds and bats that now keep the insects in check have so much less habitat area in which to nest or roost, to lay their eggs or give birth, and raise their young?

What is the effect of massive acreage clearance on populations of native pollinators as well as on domestic bees? Residential gardens and fruit trees depend upon pollinators. How much more money will residents have to spend on inferior produce from grocery stores, for those whose diets include food they grow themselves, or buy from nearby small producers if the proposed VTP is implemented?

16-20

Invasive foreign vegetation takes over totally cleared areas. Such invasive plant species are different than the native vegetation that's been destroyed. A "treated" area becomes dominated by grasses and annuals that do not build up carbon sequestration rates year-to-year as do ever-growing native perennials. Therefore, the ability of type-converted treated areas to sequester carbon dioxide, and to produce the very oxygen we breath, is dramatically reduced. For each area to be treated, how much will this reduction be, year-to-year, over the fifty years following removal under the proposed VTP?

16-21

With the foliage area of native vegetation dramatically reduced after its destruction by "treatment," the total leaf transpiration area will be reduced by a factor of ten or greater, and sometimes by as much as 100 (e.g., around a 100 year old manzanita, a mature oak tree, or tall conifer). This transpiration, or slow water vaporization at the surface of leaves, has a significant cooling effect in the area covered by taller green vegetation (i.e., large shrubs and trees) that transpire all year. Anyone who has walked from an open field into tree shade on a sunny day has felt this effect. When shrub cover and trees are removed, more sunlight falls directly on the ground, heating the ground and the air near the ground, where animals and people live. In healthy living shrublands and woodlands, some of the sun's energy is converted into plant tissue, sequestering carbon in leaves, limbs, and roots underground. By destroying the perennial trees and shrub cover, treated areas and nearby communities will heat up.

16-22

Annuals that colonize a cleared area stop transpiring (and cooling) as soon as they turn brown and die, often as early as June or July each year, allowing even more sunlight to be absorbed by the ground, raising exposed soil temperatures, and heating the surrounding air. This will create an effect very similar to that of "urban heat islands," except occurring across large tracts of "treated" wild lands.

As result of this “vegetation treatment heat island effect,” what will the negative consequences be in various communities, and how much more electricity will residents need to use to run their air conditioners to remain comfortable, to be productive at work, home and school, and to remain healthy? How many impacted persons will be able to afford the extra cost for air conditioning, and what will they give up to pay for it? With less money available for other expenditures, how much less will they spend on local products and services that drive their community’s economy? What will be the effect on the state’s utilities and the capital expenditures they need to make to keep up with increased demand? How will this effect ratepayers and electricity rates?

16-23

A panoply of significant, tangible, and predictable effects impacting vast areas of vegetation treatment (habitat destruction) remains to be scientifically examined and quantified. Competent, scientific, and quantitative study is a legal and moral requirement presenting unfulfilled in the proposed VTP. What is the plan for conducting extensive studies, including the appropriate and thorough cost / benefit analyses to assess whether the proposed action is worth all its direct and indirect costs and consequences?

16-24

Specifically how will the people and their communities be informed about all the myriad negative effects they are likely to experience in the event the proposed action is carried out? No broad-brush, statewide, one-size-fits-all analysis can prepare individuals and their communities for the short- and long-term negative effects of the proposed action. That is because these effects will vary based on local geography and land use, nearby ecosystems and their biodiversity, the local economy, local water sources and aquifer conditions, and weather and climate parameters. These variables will, in turn, influence birds, bats, reptiles, amphibians, insects and other wildlife feeding, reproduction, and spread of disease. For example, how will mass clearing of millions of acres affect migratory birds along the Pacific Flyway?

16-25

As in the past, we respectfully demand that the DRAFT PEIR for the California Vegetation Treatment Program (VTP) be rejected, and the entire project be cancelled. Failing this, yet another revision must be undertaken that answers the concerns raised in this letter and by the California Chaparral Institute, California Native Plant Society; and by so many organizations, educational institutions, and other state stakeholders that have researched and noted their concerns, in the past and at this juncture.

A major change in approach is required; one that focuses not on removal of natural “fuels,” but instead on:

16-26

- defense of homes and other properties;
- fire-preventive systemic reforms in California land use policies and building codes; and,
- applying funds to implement effective, near real-time detection of wild fires from orbit fast enough that any fires igniting in remote backcountry can be extinguished before they rage out of control, for example:

NASA / JPL FireSat:

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

FireSat

<http://www.firesat.info/> (If the links do not work, simply copy and paste into a Web browser.)

The time has come to eliminate the outdated plan to destroy vast tracts of chaparral and other natural vegetation and all that depends on it, because destroying California's wild lands *will not reduce the threat of wildfire in our state, and will cause tremendous collateral harm*. At the least, the 2019 version of the DPEIR should be rejected and rewritten in compliance with CEQA, including incorporation of the latest research into effective fire prevention and associated urban planning.

Spend the funds wasted on rehashing the same bad VTP on more productive approaches to protecting people and communities from catastrophic wildfires.

Respectfully,

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16-26
cont.

August 8, 2019

Ms. Edith Hannigan
CalVTP Comments
California Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, CA 94244-2460
Email: CalVTP@bof.ca.gov

Re: Comments on the Draft Program Environmental Impact Report for the CalVTP Draft PEIR (“Project”), provided June 25, 2019.

Not addressed: “Concerned that prescribed burning in forests will exacerbate the effects of climate change.”

A recently released new study in the journal Science states that, “planting billions of trees around the world would be the cheapest and most effective way to tackle the climate crisis. Since trees absorb carbon dioxide, which contributes to global warming, a worldwide planting initiative could remove a substantial portion of heat-trapping emissions from the atmosphere.”

17-1

Calfire’s Program proposes to directly work in opposition to the study noted above by, not only destroying vegetation including trees, but by releasing CO2 into the air. Please address this issue of Calfire exasperating the effects of global warming by burning and releasing more CO2 into the air.

Not addressed: “Desertification.” *Dictionary result for “desertification”
The process by which fertile land becomes desert, typically as a result of drought
deforestation, or inappropriate agriculture.
“nearly one fifth of the world’s land is threatened with desertification”

From personal observation of Calfire VMP projects, I have seen, on the ground, the following: Calfire burns areas that have already been burned so recently that the vegetation and soil have not recovered.

17-2

Without protection from vegetation, topsoil is washed away resulting in desertification*. No vegetation is left in order to build new topsoil. Many plant species can not grow because the hydrophobic soil can not hold water. The exposed ground is too hot for many species to grow again. Any new plant growth is exposed to plant eating animal and insect species that wander into the area searching for food. The burned areas are now open to opportunistic invasive species.

Not addressed: “Invasive species” were not addressed adequately or in a realistic manner in “SPR BIO-9.” From personal observation of Calfire a VMP project and proposed areas for VTP Projects, I have seen, on the ground, the following: Invasive plant species such as non-native grasses, non-native thistles, non-native broom and numerous annual non-native weeds. I have personally observed a VMP burned area that is so steep and inaccessible that Calfire resorted to helicopter flyovers in order observe the area burned by their VMP. Even areas that do not have extensive colonization prior to a VMP, or proposed VTP, are vulnerable to airborne non-native seeds such as thistle and seeds from bird droppings with Himalayan blackberry.

17-3

In burned areas non-native plants, such as star thistle, often out-compete native plants. Many non-native plants readily sprout and thrive on areas disturbed by fire where leaf litter is lost and sun-scorched, poor, hard soil remains. Many species of native plants are killed by fire and do not sprout back from the roots. Often native plants require a “nurse plant” in order to “get started” because the native plant needs shade and shelter from the elements. In the VMP that I personally observed the biological support system in the soil appears to have been incinerated as well as many native plants which never grew back.

Not addressed: Burning in the winter is not a usual part of the natural cycle and destroys flowering chaparral that produces the food base for many wildlife species. For example, manzanita blooms in the winter and provides nectar for bees, hummingbirds and a host of other insects / animals. Bears, foxes, coyotes and numerous other wildlife rely very heavily on the manzanita berries as a food source.

17-4

Not addressed: Applying pesticides at any time destroys wildlife habitat and may impact water quality far beyond parcel lines. How is Calfire going to provide training and oversight for the use of pesticides. Herbicides eliminate wildlife shelter and food source by destroying plants. Additionally, pesticides such as glyphosate are toxic to fish and amphibians. Amphibians such as frogs, salamanders and newts often migrate upland away from the riparian zone. Thus they are vulnerable to death by poisoning due to pesticide exposure and habitat destruction. Clopyralid is not permitted in organic compost because it is toxic to some domestically raised vegetables. Clopyralid persists in organic matter even after it is composted. Therefore, environments treated with Clopyralid are contaminated. What justification can Calfire make for taking such a drastic measure and will Calfire be inform landowners about the full ramification of the contaminating pesticides Calfire intends to use on the landowners land?

17-5

17-6

When developing the CalVTP it is essential that Calfire take into account very significant environmental events that have occurred since the VTP Project was first under review starting in 2015.

17-7

During the last few years some of the dramatic environmental influences of climate change have become obvious such as high temperatures, drought, raging winds and adverse affects upon many wildlife and plant species.

Forests and chaparral are essential for providing cool shade for streams, creating and protecting soil, reducing rain and wind force, providing wildlife habitat and absorbing CO². Burning our forests and chaparral obviously exacerbates the adverse affects of climate change.

Streams become too warm for endangered and threatened species such as coho and steelhead salmon. Without protective vegetation, watersheds erode washing silt and precious topsoil into streams. Spawning gravel is embedded with silt and smothers salmon eggs.

The devastating environmental impacts of climate change coupled with the catastrophic effects of incinerating our watersheds must be researched, documented and calculated. Calfire must determine scientifically whether reducing vegetative fuel loads offers benefits that out weigh the benefits of maintaining a healthy ecosystem by avoiding watershed devastation and species extinctions.

17-8

During a VMP I have seen that Calfire burns very steep slopes above watersheds supporting a threatened species of fish, (steelhead). Calfire states they saw no fish in the stream even when the CDFG stream surveys specifically state the number of fish seen.

17-9

The proposed CalVTP fires would have numerous negative ecological effects. For instance, burning in the winter is not a usual part of the natural cycle and destroys flowering chaparral that produces the food base for many wildlife species. Applying pesticides at any time destroys wildlife habitat and may impact water quality far beyond parcel lines.

17-10

17-11

Furthermore, Calfire should research whether reducing fuel load in each area chosen would actually significantly reduce catastrophic wildfire damage in light of climate change, “the new normal.”

Calfire staff explained to me that nothing would have prevented the Calfire Boggs Demonstration Forest from burning up during the Valley Fire in 2015. The carefully managed demonstration forest was dry, the winds were very high and embers blew great distances. Calfire was helpless to stop the fire storm.

17-12

Likewise, Calfire could not stop the Tubbs fire from jumping six lanes of Hwy. 101 and burning up a K-Mart and the Kohl’s department store. These stores were surrounded by large parking lots and NO vegetative fuels.

Calfire should research whether doing VTPs in the areas surrounding Coffey Park in Santa Rosa would have eliminated the fire danger to Coffey Park. Calfire should produce scientific justification, not speculation, showing the VTP will actually reduce catastrophic fires like the Tubbs and Camp fires.

Calfire should produce a cost benefit analysis of the VTP. Is it more cost effective to spend wildfire prevention funds in a way other than with the VTP? Will the catastrophic effects of the VTP (watershed and species devastation, greenhouse gas increases, public health harm) be worth

17-13

the sepculative VTP benefits to our society? If so, in what way?...how much?...what is the dollar amount?

17-13
cont.

EXAMPLE OF POLICY & PLAN VERSUS ACTUAL IMPLEMENTATION

Calfire has been doing prescribed burns under VMPs. The VMP had an EIR and policies. However, in the case described below, P. Gruchawka vs. Calfire, the Calfire staff implementing the VMP did not follow the VMP plan. Calfire should consider some major environmental VMP failures noted in the P. Gruchawka vs. Calfire lawsuit. For instance:

Calfire conducted the EXPIRED VMP burn on a NO burn day resulting in dense, polluting smoke enveloping the neighbors and obscuring visibility. This was a clear environmental impact.

Calfire trespassed by burning the Gruchawka property which was not included in the VMP area. Calfire burned riparian area on the Gruchawka property. Burning riparian habitat is illegal and clearly constitutes an environmental impact. Protected habitat (riparian zones as defined by CDFW, USACE, USFWS and RWQCB) need to be protected from Calfire burn operations.

Calfire was supposed to notify neighbors about a VMP. Calfire did not notify neighbors and neighbors were impacted by falling ash and poor air quality.

17-14

Calfire stated in the VMP document that there were no fish in Pieta Creek which flows through the property where the VMP was to be conducted. To the contrary, Pieta Creek is a spawning stream for threatened steelhead and the stream surveys conducted by CDFG document this fact. A casual "I didn't see a fish" by Calfire staff is not acceptable.

The neighbor (Gruchawka) located on the contiguous property to the planned VMP property was very concerned about potential environmental harm to the watershed supporting Pieta Creek which also flows through her property. Gruchawka and the fire chief met at her house prior to the VMP. The neighbor explained to the chief that there was a history of escaped "vegetative management" burns burning up her property. She did not want the watershed on her property damaged by fire. Calfire staff in the field do not have the training nor show concern to follow protocol to protect endangered and protected species.

During the expired VMP, on a no burn day, without notifying the neighbors and without knowing where the property lines were located, the Calfire helicopter dropped accelerants on the Gruchawka property. Calfire incinerated the wildlife habitat in the watershed above Pieta Creek on the Gruchawka property. Calfire had been specifically told by Gruchawka not to burn her property and she had explained the value of the habitat for the protected and threatened steelhead. The VMP had an EIR but that document did not stop the individual Calfire unit from poor decision making. Environmental oversight of Calfire unit staff must be a part of the CalVTP study.

The CalVTP proposes burning 250,000 acres per year. CDFG, and the other qualified environmental protection agencies, do not have sufficient funding and staff to review and study each CalVTP project. Significant funding will need to be provided to those agencies

| 17-15

Calfire needs to weigh the harm caused by burning our environment and prove that benefits outweigh this harm. The document to be prepared will be useless if the scientific findings and resulting required mitigation is not strictly enforced. The document should clearly outline the funding for, and process of, enforcement for each mitigation measure.

| 17-16

Thank you for addressing these important issues.

Regards,



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Hannigan, Edith@BOF

From: Peter StClair <phstc2@gmail.com>
Sent: Friday, August 9, 2019 10:58 PM
To: CALVTP@BOF
Subject: VTPEIR comments

Warning: this message is from an external user and should be treated with caution.

VTPEIR has improved significantly in this version. For the first time, CalFire admits VT is not going to stop wind driven wildfire. The analysis of treatments in forests is better. Yet there is still no solution to managing fire risk in CSS and chaparral. VTPTEIR is in complete conflict as to how and why to treat these areas of the state.

18-1

The citizens of California were expecting CalFire to come up with plans to combat wind driven wildfire.

You have abdicated.

Instead, you fall back on a tautology: VT is about vegetation. Nothing else.

The scientific analysis with respect to grasslands, CSS and chaparral, where most people and their homes are at risk, is flawed or non-existent. It does not incorporate the other efforts being made to make our state safer from wildfire: education and enforcement of PRC 4291, efforts of public utilities to make their transmission lines less likely to cause wildfire, hardening of structures, and many others.

18-2

I am disappointed.

This seems an abdication of responsibility to discuss means and methods for improving safety for persons and property in the WUI and beyond.

On the other hand, revelations about the utility of fuel breaks and other VT aimed at protecting firefighters and improving access are welcomed.

Your Vegetation Treatment Program burns, bulldozes, chews up and sprays with herbicides our native plants. It does recognize that we have too many trees in our forests. Many dead. Many alive. It also is honest about the threats to CSS and chaparral which have experienced too much fire. It is strangely silent on how to manage grassland fire risk in the WUI.

18-3

To what end is this extraordinary and expensive effort?

To enjoy some ecological restoration distant from the WUI.
To protect firefighters with 300 ft wide fuel breaks.

18-4

While these are important and admirable goals, they fall far short of protecting life and property in the WUI. Especially from wind driven events.

Firefighters recently have come out in favor of a number of very large WUI projects in San Diego. They cite two things: 1. Large projects can "shelter in place", a concept found nowhere in VTPEIR. They can have fire resistive construction and create greenbelts that protect the community. 2. California desperately needs

affordable housing. Firefighters, policemen, teachers, health care workers all need a place to live. They are largely forced out of expensive urban development and high density infill. They were hoping CalFire would come up with solutions that protected them and their new homes. You have failed. VTPEIR is basically a rural job creation program, doing very little to protect the huge number of people living in the WUI.

18-4
cont.

That said, VTPEIR has its high points--largely increased focus on actual science, and its low points--largely the failure to recommend any treatments that will protect CSS, chaparral and grassland habitat while making life safer in the WUI.

18-5

To summarize my position, Alternative C appears to be a straw-man designed by CalFire to combat similar alternatives recommended by many respondents to the NOP and to previous drafts of VT. Why are you so opposed to people trying to help you craft a plan that will actually protect people, structures and habitat?

Alternative C plus ecological restoration plus desperately needed work in the dead and dying forests of the Southern Sierra (among other locations) would accomplish the VTP goals without the enormous risks and extremely problematic results of prescribed burning and large scale unshaded fuel break construction in CSS and chaparral.

18-6

Ecological restoration would have to be enhanced. In VTPEIR it is burning and spraying. In reality that is not going to happen on any scale in CSS and chaparral. PTEIR acknowledges that. There are other options that have worked throughout Southern California. They are not cited, analyzed or recommended.

Why was this enhanced Alternative C not analyzed?

I think its pure politics and a nearsighted vision at CalFire. But perhaps you can explain it to all those people who were hoping for a solution to the risks they face?

My specific comments on VTPEIR follow, from front to back. I am not commenting on all sections, just those that raise red flags:

1. VT excludes work done or to be done on private lands in compliance with PRC 4291 and excludes work done by public utilities along their power lines.

18-7

These acres add up quickly and help meet treatment objectives outlined in Gov. Brown's executive order, Forest Carbon Plan, etc.

Why are they excluded?

2. CalFire is mandated by law to enforce PRC 4291, which as interpreted by CalFire itself, is only a vegetation treatment effort. (I disagree with CalFire's interpretation. The actual language of PRC 4291 makes CalFire responsible for structures, not just vegetation around structures).

18-8

CalFire is narrowly interpreting its role in fire and life safety. Yet if it does its job (education and enforcement), significantly more acreage will be treated, thus reducing risks to life and property in the WUI. This additional acreage is not included in CalFire's calculations.

3. CalFire, for the first time, openly acknowledges its VT will not reduce risks from wind driven wildfire.

18-9

It acknowledges non shaded fuel breaks do not stop fire absent the active presence of firefighters.

While this is positive, it cannot be stressed how much our citizens and local government are relying on CalFire to help combat the risks of wind driven wildfire.

18-9
cont.

VT without reference to wind becomes a good program for restoring forest health and for using prescribed fire (in forests) to reduce risks. Nothing more.

In short, the revised CalFire goals fall far short of accomplishing what the public and elected officials expect.

4. Monitoring is very weak. There is no expectation that VT will actually meet its goals or any suggestion of what to do if not. (See Section 2.6.1 and disclaimers therein)

18-10

5. Section 2-8 discusses ecological restoration in the WUI yet Alternative C excludes ecological restoration altogether for no reason.

18-11

6. Non vegetative management alternatives are not discussed. While this is a VT program, its success will be significantly impacted by non-vegetative work now mandated at all levels. This includes work done by private owners under PRC 4291, state and local building code changes, utility corridor VT and safety innovations, etc. These cannot be ignored because they will radically change the environment in which VT is conducted, especially in the WUI.

18-12

7. The Treatable Landscape includes vast areas outside the WUI. This is especially true along the coast, including shrublands in the south and forest in the north. It also includes millions of acres of grassland. I do not find SPRs for grassland management. A dangerous place for prescribed fire.

18-13

8. Non Shaded Fuel Breaks (2-11). Burning on slopes exceeding 50% or 65% seems incredibly risky at the scale intended. In Southern California, within the WUI, tens of thousands of homes are located on ridge lines above terrain this steep. The PEIR has inadequate analysis of the risks and benefits.

18-14

9. More on Non Shaded Fuel Breaks (2-12)

A great deal of the treatment occurs distant from the WUI. The citation of Syphard (2011) with respect to Los Padres NF and fuel breaks leaves out the most important element of Syphard's observations: 46% of the fires stopped by fuel breaks were actively attacked by firefighters who gained access to the fire via the breaks. Breaks themselves do not necessarily help, and when so many of the breaks will be outside the WUI, it will be hard to dispatch firefighters quickly to remote areas.

18-15

10. 50% of the Treatable Area is in CSS, chaparral or grasslands. CalFire's interest and expertise is far greater in forested lands. The California Forest Carbon Plan is largely directed at forests, not scrublands. CalFire needs to develop considerably more expertise in CSS/shrubland and grassland fire protection before it proposes a program as gigantic as this with as little actual analysis.

18-16

I continue to believe VTPEIR should be separated, geographically (north and south) and by type (forest, CSS/Chaparral and grasslands).

The current VT aspirations are too large to be evaluated in one document. Nothing in the document leads me to believe that adequate analysis has been done on CSS/Chaparral and grasslands, where the majority of people at risk live, to warrant certification.

11. Section 2 observes, correctly, that WUI fires especially in Southern California, are due to human ignition sources (2-15). Therefore, VT alone is an insufficient response, and hopefully, as non VT fire safety programs

18-17

<p>become more widespread and effective, the need for the kind of destructive VT set forth in VTPEIR for CSS and Chaparral (and grassland) will diminish.</p>	<p>18-17 cont.</p>
<p>12. 2-16 statement on Ecological Restoration is superb.</p>	
<p>Yet why focus treatment on burning and bulldozing? (2-16).</p>	<p>18-18</p>
<p>Too much of the ecological restoration is programmed at great distance from the WUI, yet from our large San Diego wildfires we learned that flammable invasives and exotics in canyons, drainage and watercourses are conduits of wildfire from undeveloped areas into the WUI and even urbanized areas (Ramona, Rancho Bernardo, Escondido, Vista, Carlsbad, etc.)</p>	<p>18-18</p>
<p>Therefore, Ecological Restoration need not be driven only by burning and mastication. Large scale removal of invasives and exotics has occurred in San Diego and Orange/ Riverside, principally along Lusardi Creek and Santa Ana River, but in many other places without burning or bulldozing.</p>	<p>18-18</p>
<p>13. According to VTPEIR, prescribed burning will require clearing fuel breaks at the rate of 1 mile of break per every 100 acres to be burned. If fuel breaks are 300 ft wide, 1 mile of break will consume 36 acres of vegetation. This is landscape modification on an enormous scale and is not analyzed in the PEIR. I am not even sure the acreage devoted to fuel breaks is included in the 250,000 acre annual treatment goals.</p>	<p>18-19</p>
<p>14. 2-19. While some chaparral species do require periodic fire return in order to set seed and for seed to germinate, PEIR acknowledges that there has been far too much fire in those areas.</p>	
<p>Therefore, additional fire and bulldozing of habitat is not a solution. It will lead to more weeds, invasives, exotics and erosion. People and structures will not be safer.</p>	<p>18-20</p>
<p>The language on 2-19 is at best vague and at worst wrong.</p>	
<p>It makes it appear that VT is helping CSS and chaparral when there are no studies or facts cited in presenting the statement as a conclusion.</p>	<p>18-20</p>
<p>15. In addition, PEIR proclaims that fall burns are at best problematic in CSS/Chaparral, and acknowledges the fire return interval there is already too short. Since burning in scrublands is incredibly risky and likely to further damage the resources, what is the correct action?</p>	<p>18-21</p>
<p>Stated earlier, it is education and enforcement of PRC 4291 and removal of invasives and exotics. Not additional VT. That is not discussed in the PEIR.</p>	<p>18-22</p>
<p>16. Mechanical treatment of vegetation produces enormous quantities of flammable chipped material. PEIR acknowledges that most of this will remain on the ground. PEIR says that fire in CSS and chaparral is fueled by litter, dead and dying materials as well as dead weeds.</p>	<p>18-23</p>
<p>These two realities cannot be reconciled. (2-23. 75% of mechanically treated material is left in place). VT in CSS and chaparral is not going to achieve program goals other than pure acreage count. For those of you who lived through the Vietnam War, you will remember, "We destroyed the village to save it." A horrible situation.</p>	<p>18-23</p>
<p>17. 2-23. PEIR acknowledges that mechanical treatment is not effective where there lands are burdened by invasives and weeds. PTEIR affirms that recommended treatments spread weed seeds and makes things worse after treatment especially on private lands. (2-28) The obvious conclusion is that CalFire follow up with</p>	<p>18-24</p>

manual weed removal or wide scale spraying of herbicides. I do not object to that, yet PEIR seems to be lobbying hard for the lowest cost VT possible--prescribed burning, and in Section 6 largely abandons the idea of long-term monitoring. 18-24 cont

18. Adaptive Management 2.6.1. Adaptive management and monitoring must not be elective. Otherwise program goals can never be guaranteed and are the results of actions are not quantified or analyzed. 18-25

Please remove the 1st sentence in Paragraph 1. The rest is ok.

19. 2.7.1. Administrative SPRs

SPR AD-1

Clarify the phrase "...of the burn plan in the IAP for any prescribed burn...." That phrase should be its own sentence, otherwise it is extremely confusing for VT treatments that do not employ burning. 18-26

SPR BIO-5.

Type conversion generally occurs gradually, over time. The cumulative impact of VT must be analyzed.

SPR BIO-5. Bullet point 1. Why is this limited to "coastal chaparral"? This is the first time the idea of coastal chaparral has been introduced. I think the word "coastal" was unintended. Eliminate it.

Bullet point 3. Again refers to coastal chaparral on page 2-38.

Bullet point 5, page 2-39. 35% to 40% cover retention in CSS/chaparral is too low. The habitat will not survive. Recruitment will not occur at a significant enough rate to counter senescence. The loss of cover will encourage erosion and growth of weedy flash fuels. Analysis and citation is completely lacking. 18-27

The next sentence after Bullet point 6 contains what I hope is a typo. There is a missing word.

It should read, "These SPR requirement apply to all Treatment activities, not only the ecological restoration types."

I do not understand the need for the legal disclaimer that follows.

This is pure bureaucratic cover-your-ass bullshit. PTEIR authors could say, "Treatment may lead to type conversion." End of story.

I have previously stated my belief that Alternative C plus ecological restoration plus concerted effort to remove dead and dying trees in the Souther Sierra is the preferred VTP. 18-28

Good luck.

Peter H. StClair
2341 Whitman Street
San Diego CA 92103
619-260-1307

From: Chuck Williams <chukwil@yahoo.com>
Sent: Friday, August 9, 2019 6:51 PM
To: CALVTP@BOF
Subject: response to CalVTP

Warning: this message is from an external user and should be treated with caution.

To: California Board of Forestry
Sacramento, Ca.

Re: CalVTP response, (state clearinghouse #2019012052)
August 9, 2019 6:45pm

Dear Board of Forestry:

When Making the shaded fire breaks, a lot of brush is being burned. I would like to suggest you encourage the burners use this method of burning brush that will "Get more bang for our bucks".

Burn the brush piles to charcoal instead of to ash. That charcoal is carbon being sequestered into the soil, where it will remain for hundreds of years. Whereas if the brush pile is allowed to burn down to ash, virtually all of the carbon is released back into the atmosphere where it becomes part of the problem, instead of part of the solution to the climate crisis.

The major difference is putting the burning pile out early, about three quarters of the way through.

I (and others) have been teaching people how to do Biochar (new age word for charcoal) Burns with their backyard brush piles for several years locally. May I volunteer to teach some classes for CalFire staff and inmate crews and help find ways to do it in their various situations ? There are also some video's on the computer, one is in Skillcult.com.

Chuck Williams, 3 Betty St. Ukiah, Ca. 95482

19-1