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From: Peter St. Clair <phstc@aol.com>
Sent: Wednesday, December 4, 2019 8:40 PM
To: Public Comments@BOF; Office of the Secretary CNRA
Subject: Item 9, December 11 CalVTP

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Dr Keith Gilless, Chair
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Item 9, December 11, 2019, California Vegetation Treatment Program (CalVTP) - Concerns with VTP

Dear Chairperson Gilless and Members of the Board:

VTP has been in the works for more than a decade. It has failed repeatedly to garner support from all interested parties. I noticed in the last communication from BofF that a large number of public agencies, particularly in Southern California, were dismayed at the lack of understanding of fire issues in Chaparral and Coastal Sage Scrub. They thought VT was going to make things more dangerous for their communities.

VTP has always tried to be a "one size fits all" solution to wildfire. This is not possible.

In the most current PTEIR, CalFire admits VT is useless against wildfire driven by high winds.

That is partly true, but it is a capitulation of responsibility to deal with wildfire. That will only happen when CalFire enforces PRC 4291 and focuses on structures that must be retrofitted in order to become safe. VT is not going to save those homes. Homeowners must act to save their own homes--with guidance and perhaps financial support from the state.

The current version of VTPEIR is deficient in all the same areas for which it has been criticized for more than a decade:

1. It is one program for a gigantic state. It should be broken down by regions and major vegetation types (forest, chaparral, coastal sage scrub, grasslands, desert)
2. It is not driven by science. It appears to be driven by stories. For example, the sections on fuel breaks cite reliable research (Syphard) but fail to cite all of the research which shows that fuel breaks are effective when they are manned by firefighters. Not when they are bulldozed in a hodge podge manner throughout the state.
3. Monitoring and maintenance are virtually ignored. Fuel breaks will within one season revert to flash fuels. Unless those fuels are continuously monitored and removed, the fuel break will act as fuel for further wildfire--and those fires will be closer to habitation than ever before.

The list is virtually endless.

CalFire has again refused to incorporate any of the meaningful comments and criticisms of VT into the final document.

The choice of Alternatives is unsupportable. They are straw men created with the sole purpose of validating the VT Program.

There is no evidence given that the VT Program is the best program for vegetation management.

There is no evidence given that vegetation management is the best means to deter wildfire.

The best solutions are closer to home:

Enforcement of PRC 4291 and Defensible Space.

CalFire taking responsibility for structures, as was anticipated by the authors of PRC 4291 (Sen Christine Kehoe, San Diego). CalFire itself decided it would not get involved in structure compliance with defensible space requirements.

Yet it is structures that are burning and threatening lives and communities.

They can be hardened.

VT is not going to accomplish that.

Prescribed fire is virtually impossible in chaparral and coastal sage. CalFire VTPEIR acknowledges that these ecosystems already suffer from too much fire.

Fuel breaks are most effective when they are manned. Otherwise they become flashy fuel arrows aimed at vulnerable communities.

I understand the Legislature has given you one final chance to certify an EIR for VT.

This is not the right document. It lacks scientific validity and does not incorporate all the post-fire analysis done by scientists, fire ecologists, agencies throughout the state and insurance carriers.

It is not the right approach for Southern California and communities surrounded by chaparral.

I am at a loss as to why, after 10 years, CalFire has not realized the folly of its attempt to create one VT program for the entire state that ignores what we know about wildfire.

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