

April 8, 2013

Board of Forestry and Fire Protection
Attn: George Gentry
Executive Officer
VegetationTreatment@fire.ca.gov
Sacramento, CA 94244-2460

Re: CCI 3rd comment letter on the Draft Program EIR (PEIR) for the Vegetation Treatment Program

Dear Mr. Gentry and Board Members,

In this, our final comment letter on the PEIR, we would like to submit some questions relating to the PEIR document and the proposed Program.

A False Dichotomy

The primary question we have always asked about vegetation treatment projects in native shrubland ecosystems is why, if the science concerning the efficacy of such an approach is mixed at best, are vegetation treatments the default response to the threat of wildland fire?

This default response was illustrated in a San Diego Union-Tribune article on April 5, 2013, when it quoted Mr. Gentry as saying,

People have to expect one of two things. They're going to have to expect a large-scale fire that San Diego has already seen or they're going to have to accept some form of treatment to help mitigate those large-scale fires. That's the choices we're basically faced with.

This is a false dichotomy. When the science has clearly shown that the best way to protect lives and property from wildland fire is through a combination of fire safe community planning, fire safe structures, and appropriate defensible space, the choices offered by the Board of Forestry and the PEIR do not reflect what we know. Spending millions of dollars on clearing habitat is not an effective use of fire management

resources. The research is conclusive on the inadequacy of focusing exclusively on vegetation treatments:

“Wind-blown embers, which can travel one mile or more, were the biggest threat to homes in the Witch Creek Wildfire. **There were few, if any, reports of homes burned as a result of direct contact with flames” from wildland fuels.**

- Institute for Business and Home Safety 2008

and,

Examining data on 700,000 addresses in southern California it was found that buildings on steep slopes, in Santa Ana wind corridors, and in low-density developments intermingled with wild lands, were the most likely to have burned between 2001 and 2010. **Nearby vegetation was not a big factor in home destruction. Exotic grasses that often sprout in areas cleared of native habitat like chaparral could be more of a fire hazard than the shrubs.**

- Alexandra D. Syphard et al. 2012

and finally,

...effective fuel modification for reducing potential WUI (wildland/urban interface) fire losses need only occur within a few tens of meters from a home, not hundreds of meters or more from a home. This research indicates that **home losses can be effectively reduced by focusing mitigation efforts on the structure and its immediate surroundings.**

- Jack Cohen 1999

The Board’s assumption appears to be that the *attempted mitigation* of large-scale wildland fires through vegetation treatment is the main goal in and of itself, rather than the actual protection of life and property. The one goal out of nine in the PEIR that does address protecting life and property is stated in a way that precludes any alternatives to vegetation treatment projects.

2. Modify wildland fire behavior to help reduce catastrophic losses to life and property consistent with public expectation for fire protection.

Changing the Question

We suggest an alternative way of looking at the fire environment so that all the knowledge we have concerning wildland fire risk reduction is utilized. The Board of Forestry needs to ask itself,

**How can we protect lives and property from wildland fire,
rather than,
How can we try to stop wildland fires?**

In light of the two very different approaches these two questions can produce, we respectfully ask the Board to provide the public answers to the following as they apply to the PEIR:

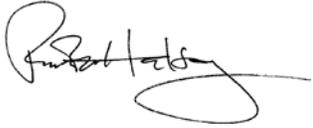
1. Why has the Board of Forestry not taken a more comprehensive approach to fire risk reduction (by including all factors known to reduce the loss of lives and property during wildland fires), and instead focused exclusively on vegetation treatment in the PEIR?
2. Considering that the Board's mandate is focused on forests, forestry, and forest fires, that the majority of the Board's members are associated with forestry, that the PEIR is a forest-based document, and that the PEIR preparers' expertise is primarily in forested ecosystems, how did the Board adjust its approach in the PEIR to reducing the threat of wildland fire in non-forested ecosystems such as chaparral where most of the damaging fires occur?
3. The Board has claimed that there will be local input into the planning of individual vegetation treatment projects. However, if the PEIR is certified, the ability of citizens to challenge a project under the California Environmental Quality Act will be eliminated. If citizens believe a project approved by the Board and/or Cal Fire will cause significant environmental damage, what recourse will citizens have to challenge such a project?
4. In light of the data presented in the three studies cited above, Institute for Business and Home Safety (2008), Syphard et al. (2012), and Cohen (1999), what scientific rationale does the Board use to focus exclusively on vegetation treatment to reduce the loss of life and property from wildland fire, especially in southern California? We could find no such rationale in the PEIR.
5. What role, if any, did the economic incentive of federal grant dollars or other monies available for vegetation treatments play in the PEIR's exclusive focus on vegetation treatment?
6. It was impossible to determine from the PEIR how much of the proposed program would be involving vegetation treatments on private ranch and farm land that would provide economic benefits to the owners of such lands. Would the Board please identify such projects if any exist?

Without changing the question as mentioned above, the Board of Forestry will continue to support a policy that has consistently failed to protect communities from wildland fire over the past one hundred years. It's time we start focusing on what we actually want to accomplish rather than supporting an approach that requires continual expenditures year after year on habitat clearance projects.

Plants grow back. In contrast, fire safe land planning and fire safe communities provide self-sustaining, long term solutions that do not require constant government expenditures to maintain.

Again, we urge the Board and the State of California to retract the current PEIR and instead deal with wildfire threats in a **collaborative**, science-based manner, involving all stakeholders and tailored to the wildly variable environments of California, that focuses on what really matters: lives, property, and the natural environment.

Sincerely,



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The California Chaparral Institute is a non-profit science and educational organization dedicated to promoting an understanding of and appreciation for California's shrubland ecosystems, helping the public and government agencies create sustainable, fire safe communities, and encouraging citizens to reconnect with and enjoy their local, natural environments. www.californiachaparral.org

Cited References

Cohen, J.D. 1999. Reducing the wildland fire threat to homes: where and how much? USDA Forest Service Gen. Tech. Report PSW-GTR-173, pp 189-195.

[Institute for Business and Home Safety. 2008. Mega Fires: The Case for Mitigation. The Witch Creek Wildfire, October 21-31, 2007.](#)

[Syphard, A.D., J.E. Keeley, A. Bar Massada, T.J. Brennan, V.C. Radeloff. 2012. Housing arrangement and location determine the likelihood of housing loss due to wildfire. PLoS ONE 7\(3\): e33954. doi: 10.1371/journal.pone.0033954.](#)