



AMERICAN FORESTS

August 4, 2019
Board of Forestry and Fire Protection
Attn: CalVTP
PO Box 944246
Sacramento, CA 94244-2460

RE: American Forest comments pertaining to California Vegetation Treatment Program filed under State Clearinghouse number 2019012052

To Whom It May Concern,

American Forests would like to commend the Board of Forestry and Fire Protection for taking this important step in increasing the pace and scale of landscape restoration on State Responsibility Area lands. Achieving 250,000 acres of vegetation treatment annually will increase wildfire resiliency, forest health, and public safety.

American Forests is the oldest national nonprofit conservation organization in the U.S. and has been a catalyst for many key milestones in national forest policy and practices, from the founding of the U.S. Forest Service and the national forest system to public education efforts. American Forests' mission is to create healthy and resilient forests from cities to wilderness, in order to deliver essential benefits to climate, people, water and wildlife. Therefore, having reviewed the CalVTP Draft Program Environmental Impact Report (PEIR) with these goals and interests in mind, American Forests would like to provide the following comments and/or recommendations:

- **American Forests supports the increase the use of prescribed fire as a treatment tool.** Prescribed fire is known to be one of the best ways to increase large landscape vegetation management and is a common tool in eastern forests. This CalVTP draft PEIR will result in up to 125,000 acres of prescribed fire to be implemented annually, a significant increase from current implementation which will restore fire as a natural process to the landscape. Prescribed fire is a lower cost alternative to manual treatment where mechanical treatment cannot be implemented due to site conditions.

Although prescribed fire has significant impacts to air quality and GHG emissions, fuel treatments can avoid the much higher costs associated with a catastrophic wildfire¹. Studies have also shown that prescribed fire has 3 times less harmful particulates than wildfire,² resulting in an overall lower air quality impact.

- **Support the expansion of use of mechanical treatments on forested lands.** As mentioned in the CalVTP draft PEIR, the current Vegetation Management Program does not include the use of mechanized treatments on forested lands. Mechanical treatments are a low-cost tool that can address large landscape restoration needs for fuel breaks and other safety measures. The expansion of mechanical treatments also allows for low cost treatment options during fire season, when burn restrictions prohibit prescribed fire utilization
- **Prioritize alternatives that increase carbon storage, forest restoration, and wildfire resiliency by achieving objectives 4 and/or 5.** Objectives 4 and 5 of the CalVTP draft PEIR most closely reflect the goals and values of American Forest’s American ReLeaf program. Furthermore, these objectives will promote not just the proximate safety of communities, but also the long-term resilience of communities and forests. The alternatives that achieve these objectives according to the PEIR are Alternatives A, D, and E. American Forest’s does not support Alternative A because the reduced acreage per year does not sufficiently increase pace and scale of restoration and as mentioned in the alternative, could slow progress in later years. Alternative D will not sufficiently address forest restoration because it does not increase the use of prescribed fire. In many areas pile and broadcast burning are the only economic ways to reduce fuel loads and dead trees, unless major investments are made into expanding woody biomass utilization opportunities.
- **Of the 6 alternatives, alternative E: No Herbicide Treatments is the environmentally superior alternative.** Compared to the other alternatives, Alternative E will result in most WUI fuel reduction, forest management, and ecological restoration. This alternative retains prescribed fire as a treatment option, which is critical for achieving landscape scale effects quickly. Furthermore, selecting this alternative will provide maximum coverage in both acreage and treatment types for streamlining environmental

¹ Mokelumne Watershed Avoided Cost Analysis, <https://sierranevada.ca.gov/mokelumne-watershed-analysis/>

² Liu et al 2017. Airborne measurements of western U.S. wildfire emissions: Comparison with prescribed burning and air quality implications. 6108–6129. Retrieved from <https://doi.org/10.1002/2016JD026315>

review processes. The inclusion of ecological restoration in this Draft PEIR will allow local and state organizations that focus on ecological restoration to implement projects through CAL FIRE, increasing collaboration and capacity throughout California. While it is unfortunate that herbicide treatment is not included as a tool, this CalVTP also does not preclude separate CEQA documents being prepared for inclusion of herbicide treatment for some specific projects.

- **American Forests would like to also voice some support for alternative C: Modified WUI Fuel Reduction and Fuel Breaks.** While alternative C does not achieve objectives 4 and 5, American Forests applauds a science-based rationale of where and when to apply prescribed fire to mitigate habitat type change in high risk areas, such as chaparral. This alternative also retains most treatment types and focuses on highest risk and protection for communities. Additionally, it allows for the use of all treatment types, including herbicide treatment. Perhaps the rationale for application of prescribed fire could be incorporated into alternative E.

In conclusion, American Forests supports the CalVTP Draft PEIR and urges the Board of Forestry and Fire Protection to adopt alternative E, in order to maximize forest restoration opportunities while reducing fire threat to communities.

Respectfully,

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California State Director

American Forests

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