

SANTA MONICA MOUNTAINS CONSERVANCY

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February 25, 2013

George Gentry, Executive Officer
Board of Forestry and Fire Protection
PO Box 944246
Sacramento, California 94244-2460

Vegetation Treatment Program and Draft Programmatic Environmental Impact Report

Dear Mr. Gentry and Board Members:

The Santa Monica Mountains Conservancy (Conservancy) provides the following comments on the Vegetation Treatment Program and Draft Programmatic Environmental Impact Report (VTPEIR). The Conservancy, in conjunction with our joint powers authority, the Mountains Recreation and Conservation Authority (MRCA), owns or is responsible for the maintenance of over 65,000 acres of parkland and public open space. To preserve the value of the substantial public investments made toward the protection of these natural areas, any fire safety and fuel modification program must be custom-tailored to these many unique and sensitive habitat areas.

The California Chaparral Institute has written a comprehensive letter dated January 25, 2013 regarding the VTPEIR. We incorporate that letter by reference in our comments.

The VTPEIR does not include any information on the specific regions or habitat areas to be included in subject program. Our agency's area of concern is included under the very general "South Coast Bioregion" shown in Figure 4.1.11. If the overly broad vegetation clearance program described in the VTPEIR were applied to the lands under our agency's jurisdiction, it would significantly degrade the habitat quality throughout this region and negate the value of multiple substantial public investments.

We urge the Board of Forestry and Fire Protection and CalFire to consult with local agencies to create an alternative fire prevention program that accurately accounts for specific, regional differences and assets at risk. Additionally, we recommend that the Alternatives section of any environmental documentation for a statewide fire program include recommendations for alternative siting and increased setbacks for homes and other developments in high risk fire areas, as part of the overall fire prevention solution.

Agenda Item 9(c)
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Should you have any questions or clarifications, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128. Thank you for your consideration and the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'IRMA MUÑOZ', with a long vertical flourish extending downwards from the end of the signature.

IRMA MUÑOZ
Chairperson