

From: THERESA ACERRO <thacerro@yahoo.com>
Sent: Saturday, May 28, 2016 7:06 PM
To: Vegetation Treatment Program@BOF
Subject: ltest plan to destroy the native plant environment.

You people need to listen to the people who actually know about the importance of not disturbing the native soil. It is a living ecosystem . It is horrifying to see pictures of the horrible destruction you have caused to native vegetation communities. this is senseless. A healthy chaparral area is resistant to diseases and to fires. It is the invasive weeds that come up after you destroy the native vegetation that cause tinder box conditions. People cause wildfires not plants. You need to follow the rules CEQUA and commonsense. Trimming vegetation in places or thinning is not mastication. Look at areas that have suffered these horrible procedures before and you see fields of weeds that are highly flammable.

I agree completely with the Chaparral Institute's very well worded and supported comments. You need to pay attention to the many people who have tried to give you good input. (Many of the productive suggestions provided to the Board of Forestry on how they could improve the draft DPEIR were ignored, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.)

Do you not remember that you work for the citizens of California and supposedly are on our side and not against us??

Theresa Acerro, a lover of our native vegetation and habitats that does not want them to be destroyed by our very own government.

Hannigan, Edith@BOF

From: Sally Adams <tizzsally@gmail.com>
Sent: Friday, May 27, 2016 9:32 AM
To: Vegetation Treatment Program@BOF
Subject: Vegetation "Treatment"

To Whom it May Concern:

The current Draft Environmental Impact Report for the proposed program fails to meet the requirements of the California Environmental Quality Act (CEQA).

It also fails to address the most effective ways to protect lives and property from wildfire.

So much has been learned about proper stewardship with our precious environment.

Please make use of the rich resource of information that the California Chaparral Institute has made available to you.

Change requires extra effort, but a balanced environment is fundamental to our very existence.

Sincerely,

*~Sally Adams, R.N., Licensed Acupuncturist
Working in partnership with nature's dynamic balance...*

www.AcupunctureEastWestHealth.com

Hannigan, Edith@BOF

From: MJ Bakove <bakovefb@gmail.com>
Sent: Tuesday, May 31, 2016 8:44 AM
To: Vegetation Treatment Program@BOF
Subject: Proposed Vegetation Treatment Program by CalFire and the CBF

Dear Ms. Hannigan and members of the Board of FFP:

I'm horrified the current plan is going forward. This is environmentally irresponsible and ignores the majority of the input received from both governmental bodies and non-profit organizations with California's best interests at heart.

We can protect property AND manage the ecosystem in a much better way. That you've all chosen to just take a rape and pillage approach is terribly disappointing. Please reconsider the recommendations received from the California Fire Science Consortium, the Dept. of Fish and Wildlife, the California Chaparral Institute and the many scientists and concerned non-profits who have weighed in on this subject.

Respectfully yours,

MJ Bakove
Santa Barbara, CA

Hannigan, Edith@BOF

From: Elinor Blake <eblake@igc.org>
Sent: Tuesday, May 31, 2016 11:37 AM
To: Vegetation Treatment Program@BOF
Subject: Comment, DPEIR

As I live a quarter mile from a large segment of the East [San Francisco] Bay Regional Parks District, and as a child long ago caught ashes in my hand from a large fire in the Hollywood Hills, I am quite supportive of fire prevention programs in our wild areas statewide. I am also a docent for the Parks District's native plant garden, and have converted much of my own garden to natives.

I've been an occasional follower of the DPEIR's progress and am dismayed to see the latest comments by the Conservation Biology Institute and the California Chaparral Institute. I urge that the DPEIR go through another draft that addresses their recommendations, and not be certified in its present state.

Thank you and the other staff members who've been working long and hard on this important document. It must be exhausting, and it will be well worth it to get it right.

Sincerely,

Elinor Blake
Richmond, CA

Hannigan, Edith@BOF

From: Bill Bretz <wbretz@uci.edu>
Sent: Tuesday, May 31, 2016 5:16 PM
To: Vegetation Treatment Program@BOF
Subject: Comments on revised Draft Programmatic Environmental Impact Report (DPEIR) of CalFire's Vegetation Treatment Program (VTP)

Please accept these hurried and brief comments.

RE: latest APRIL 2016 revised Draft Programmatic Environmental Impact Report (DPEIR) of CalFire's Vegetation Treatment Program (VTP) regarding The Proposed Vegetation Treatment Program by CalFire and the California Board of Forestry

Any EIR MUST comply with and be directed by CEQA -- not superficially, but by dint of effort to present current and valid factual evidence, to use the most current and professional science available, to present multiple and viable TRUE ALTERNATIVES (not just gradations of one version), and actual ANALYSIS.

A document that utilizes only a broad generalized and superficial approach is not an effective tool. A document that calls for less CEQA oversight not more as it assaults millions of acres of California's ecosystems is not a responsible tool. A document that results from a prolonged YEARS-LONG process that CONTINUALLY falls back on the standard canard of ground clearance as the only means of fire "control" is not a thorough tool. This must be a useful, factual and specific document that acts as an umbrella to direct policy down, not rely on individual and piecemeal smaller local projects as they come up.

There is more modern CURRENT science with studies showing a better approach than mere clearing of all vegetation to bare ground. USE IT to produce an EIR that fully complies with the true intent of CEQA. Utilize the information available, and the resources that could explain it to you, including The Chaparral Institute, the Conservation Biology Institute, the National Park Service, the California Department of Fish & Game, the various scientists who have tried to make their research and reasonable SCIENCE_BASED conclusions available to you, among other experts whose opinions vary from and modify the apparently preconceived policies and programs that the EIRs keep falling back on (essentially clearcutting millions of acres.

Focussed attention to Issues such as California's longterm drought status, the status of global climate change, and invasive species should be considered in evaluating the environmental impacts, and devising real-world updated science-based policies and programs to deal with fire prevention and control.

Please do not accept or certify the presented EIR. Unfortunately, it cannot be accepted as is, and MUST INSTEAD be further modified.

Sincerely

William L. Bretz, Ph.D. and Lesley Barling, M.S.
(degrees in Biology, experience in field & conservation biology)

Hannigan, Edith@BOF

From: pe ar <mycorrhizal@gmail.com>
Sent: Tuesday, May 31, 2016 10:17 AM
To: Vegetation Treatment Program@BOF
Subject: DPEIR for the state's proposed Vegetation Treatment Program

Dear Ms. Hannigan and Members of the Board,

I urge you as a citizen of California and as a Botanist to consider the deeply troubling issues with the proposed Vegetation Treatment Program, as outlined by the California Chaparral institute.

PLEASE do not adopt ANY plans that undermine environmental regulation processes, as this sets dangerous precedence and endangers important biological resources in our state.

Thank you, Please do the right thing and take this plan back to the drawing board

Claire Brown

Hannigan, Edith@BOF

From: Wendy Brown <wbrown1865@gmail.com>
Sent: Friday, May 27, 2016 10:32 AM
To: Vegetation Treatment Program@BOF
Cc: California Chaparral Institute
Subject: Current DPEIR for Vegetation Treatment Program

Dear Ms. Hannigan and Members of the Board,

I support Richard Halsey and the California Chaparral Institute in their efforts to make your plans for vegetation treatment be in alignment with current science and best practices. It is becoming clear that California will be subject to increasing fire danger in the coming years. Denuding our natural areas is not the answer. Please pay attention to his thoughtful critiques of the DPEIR, and make plans that will actually save homes and habitat.

Regards,

Wendy Brown

San Luis Obispo, CA

Hannigan, Edith@BOF

From: chanti@odie.be
Sent: Tuesday, May 31, 2016 3:30 AM
To: Vegetation Treatment Program@BOF
Subject: Concerning the draft environmental impact report for Cal Fire's Vegetation Treatment Program by 5PM

To :
California Board of Forestry and Fire Protection
Edith Hannigan, Board Analyst
California Natural Resources Agency
Secretary John Laird

I request the California Board of Forestry to completely rewrite the Draft Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program so that it properly evaluates all environmental impacts that may be caused by the proposed clearance of more than 1/2 million acres of habitat per decade. I also urge the Board to work with independent scientists to create a program that will properly consider the entire fire environment, reflect regional differences, allow for independent oversight, and incorporate the most up to date science.

The Board's proposal focuses entirely on clearing vegetation, despite extensive scientific research that clearly indicates the best way to protect lives, property, and the natural environment from wildfire is by addressing the entire fire environment: ignitability of structures, community and regional planning, and science-based vegetation management within and directly around communities at risk. Leave the backcountry alone. Concentrate where the actual risks are: in and around communities.

I strongly object to the way this draft EIR proposes to take away my rights as a citizen to challenge individual clearance projects under the California Environmental Quality Act.

As a planning document, the draft EIR is completely inadequate. It fails to clearly explain its environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread. The maps provided do not provide the detail needed to allow a proper evaluation. The draft EIR also fails to properly evaluate the cumulative effects of the proposal.

Please revise the Vegetation Treatment Program Draft Programmatic EIR so it addresses and includes the suggestions offered by the California Chaparral Institute. Please embrace a collaborative approach with all stakeholders in order to develop a successful and sustainable wildland fire risk reduction program.

As a basic summary:

In the latest draft,

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

Thank you for taking my comments.

Chantal Buslot
Belgium

Hannigan, Edith@BOF

From: Susan Campisi <susancampisi@gmail.com>
Sent: Tuesday, May 31, 2016 4:49 PM
To: Vegetation Treatment Program@BOF
Subject: Proposed Vegetation Treatment Program - comments

Dear Ms. Hannigan and Board,

I stand with the California Chaparral Institute in opposition to the current DPEIR and was very disappointed to learn that the latest DPEIR of the Vegetation Treatment Program did not correct many of the errors and misrepresentations contained in the last version.

It's unacceptable that if approved, the Program will exempt individual clearance projects from citizen and independent scientific oversight that would normally be required under CEQA. How can such an exemption be justified?

How can a supposedly scientific program use outdated and inadequate spatial data as the foundation for the program?

Worse yet, the document fails to provide an in-depth consideration of effects and cumulative impacts than could be accomplished at the project level. How does the DPEIR justify ignoring a thorough examination of impacts as required by CEQA?

It's absurd that the DPEIR concludes that the proposed program will not have a significant effect on the environment after claiming the Program is either too large and complex to analyze or the actual treatment areas are too small to have an impact. How can you justify such a conclusion when admitting something is too complex to analyze?

The DPEIR failures include:

1. Circumventing CEQA
2. Using sub-standard research
3. Inadequate data

The DPEIR also fails to properly address the impacts the Program may have on carbon emissions and the loss of carbon sequestration by the clearance of native habitats. Furthermore, lack of transparency remains very concerning.

I urge you to consider the comments from and follow the recommendations of the California Chaparral Institute.

Thank you.

Sincerely,
Susan Campisi
Wildlife Advocate
Altadena, California

Hannigan, Edith@BOF

From: Rebecca Canright <rebeccagroovypeace@gmail.com>
Sent: Tuesday, May 24, 2016 5:41 PM
To: Vegetation Treatment Program@BOF

Dear Ms. Hannigan and Members of the Board,

As a high-schooler who cares deeply about environmental health, I was deeply disappointed to learn that the the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program contains many of the same errors (some with the exact wording), contradictions, and failures to identify environmental impacts that were pointed out in previous versions. Many of the productive suggestions provided to the Board of Forestry on how they could improve the draft DPEIR were ignored, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.

Potential ecological impacts are dismissed by the DPEIR without support, mitigations of impacts are unenforceable and unmeasurable, the treatment of northern chaparral is justified by non sequitur reasoning, and the research of several scientists continues to be misrepresented (despite corrections being submitted). The lack of transparency remains a significant issue – using a local newspaper to inform the public about projects is no longer adequate. One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, the DPEIR ignores this rich resource and depends instead on questionable information from decades ago. As a consequence, the current DPEIR fails to meet the requirements of the California Environmental Quality Act (CEQA). The DPEIR also reveals a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

I respectfully urge you to again revise the DPEIR to take into account the health and preservation of California's iconic chaparral biome.

For more information on crucial amendments to the DPEIR, please refer to the link below:

http://www.californiachaparral.org/images/2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf

Thank you for your considerations!

Sincerely,

Rebecca Canright

Hannigan, Edith@BOF

From: Rebecca Canright <rebeccagroovypeace@gmail.com>
Sent: Tuesday, May 24, 2016 5:43 PM
To: Vegetation Treatment Program@BOF
Subject: Please re-evaluate the updated DPEIR

Dear Ms. Hannigan and Members of the Board,

As a high-schooler who cares deeply about environmental health, I was deeply disappointed to learn that the the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program contains many of the same errors (some with the exact wording), contradictions, and failures to identify environmental impacts that were pointed out in previous versions. Many of the productive suggestions provided to the Board of Forestry on how they could improve the draft DPEIR were ignored, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.

Potential ecological impacts are dismissed by the DPEIR without support, mitigations of impacts are unenforceable and unmeasurable, the treatment of northern chaparral is justified by non sequitur reasoning, and the research of several scientists continues to be misrepresented (despite corrections being submitted). The lack of transparency remains a significant issue – using a local newspaper to inform the public about projects is no longer adequate. One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, the DPEIR ignores this rich resource and depends instead on questionable information from decades ago. As a consequence, the current DPEIR fails to meet the requirements of the California Environmental Quality Act (CEQA). The DPEIR also reveals a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem. I respectfully urge you to again revise the DPEIR to take into account the health and preservation of California's iconic chaparral biome.

For more information on crucial amendments to the DPEIR, please refer to the link below:
http://www.californiachaparral.org/images/2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf

Thank you for your considerations!

Sincerely,

Rebecca Canright

Hannigan, Edith@BOF

From: Don Chartrand <don@donchartrand.com>
Sent: Tuesday, May 31, 2016 4:55 PM
To: Vegetation Treatment Program@BOF
Subject: Draft DPEIR

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst
Email: VegetationTreatment@bof.ca.gov

Dear Ms. Hannigan and Members of the Board,

I am writing to support the position of the California Chaparral Institute in challenging the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program. As an active member of several California watershed conservancies and a certified Chaparral Naturalist, I am persuaded that a Vegetation Treatment Program can emerge in a collaborative manner that reflects the well-informed feedback, prior legal battles, and negative precedent set by failures to meet requirements of environmental compliance. However, achieving this outcome will require a mental shift from a mindset of "How do we manage fuel?" to a process that focuses on "How do we protect lives and property from wildfire?" These are different questions with very different solutions.

I encourage the Board of Forestry and Fire Protection to recognize the unique habitat that is characteristic of so much of the land this program aims to protect, and to consider the productive suggestions already provided to the Board of Forestry on how they could improve the draft DPEIR, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.

Please do not approve this draft. It would do a disservice to the people and natural resources of California and needs to be substantially revised.

Sincerely,

Donald G. Chartrand
2105 Shadetree Lane
Escondido, CA 92029
858-437-2838
don@donchartrand.com

Hannigan, Edith@BOF

From: Jennifer Cochrane-Schultz <jen.schultz702@gmail.com>
Sent: Saturday, May 28, 2016 4:53 PM
To: Vegetation Treatment Program@BOF
Subject: April 2016 Draft Vegetation Treatment Program

To whom it may concern:

My name is Jennifer Cochrane-Schultz. I am a native Californian, raised by a native Californian who wished he could have been the first white man to see San Francisco Bay before, as he put it, before its natural beauty was completely destroyed by development and pollution.

I share my father's view of things. Where is "resource-rich"

California now that the loggers, farmers, ranchers, dam builders, oil drillers, and canal diggers have had their way with her? Certainly, humans have a place in this state. The question is, how much more damage will be done--especially by well-meaning agencies such as yours that propose the destruction of millions of acres of habitat, all in the name of fire safety.

I know a thing or two about fires. We survived the 2003 Cedar fire here in San Diego. And the Angora fire in South Lake Tahoe just a few years later. We were evacuated both times. Thankfully our homes were not destroyed. Many others were however, and we've listened to and reflected on a great deal of reporting and recommendations regarding the best way to protect ourselves from future fires. Everything said and done, here are my own conclusions.

- 1.

Hannigan, Edith@BOF

From: Jennifer Cochrane-Schultz <jen.schultz702@gmail.com>
Sent: Saturday, May 28, 2016 6:01 PM
To: Vegetation Treatment Program@BOF
Cc: Deanna Spehn; naturalist@californiachaparral.org
Subject: Vegetation Treatment Program

To whom it may concern:

My name is Jennifer Cochrane-Schultz. I am a native Californian, raised by a native Californian who wished he could have been the first white man to see San Francisco Bay before its natural beauty was completely destroyed by development and pollution.

I share my father's view of things. Where is "resource-rich"

California now that the loggers, farmers, ranchers, dam builders, oil drillers, and canal diggers have had their way with her? Certainly, humans have a place in this state. The question is, how much more damage will be done--especially by well-meaning agencies such as yours that propose the destruction of millions of acres of habitat, all in the name of fire safety.

I know a thing or two about fires. We survived the 2003 Cedar fire here in San Diego and the Angora fire in South Lake Tahoe just a few years later. We were evacuated both times. Thankfully our homes were not destroyed. Many others were however, and we've listened to and reflected on a great deal of reporting and recommendations regarding the best way to protect ourselves from future fires. Everything said and done, here are my own conclusions.

1. Firebreaks are ineffective. The Cedar Fire jumped across several multi-lane concrete highways as it burned its way around and about San Diego County. We drove up to a high vantage point in Tierrasanta before we evacuated. The wall of fire we observed moving across the Miramar military reservation towards SR 52 and Tierrasanta was an awesome site to behold. Given the wind conditions, there was no way that the highway would serve as a fire break.
2. People build houses made of fire-friendly materials in dangerous, fire-friendly places. A good friend of mine is a boat builder living in South Lake Tahoe. He lived at the edge of the community that was most heavily damaged by the Angora fire. He built a wood deck surrounding his home--despite building codes that prevent that sort of thing. And he stored his hand-made wooden boats underneath his neighbor's wood deck next door. No surprises there. His place and most of those surrounding him all burned down. Tierrasanta friends who lost homes at the edge of our community kept wood patio furniture and other combustible materials on their patios interfacing directly with the canyon. They lost their home, as did those directly adjacent to theirs.
3. Intentionally created fire breaks designed to block future fires result in the growth of fire-loving weeds. In San Diego we are seeing a proliferation of Russian Thistle, fountain grasses and mustard on hillsides where city brush crews have been "thinning" to protect homes from future fires. Weeds do burn--generally faster and "better" than the native brush which is fire resistant. And yes, I've also experienced brush fires, and canyon fires, and was trapped on a train (with a dome car so we could watch the whole thing transpire) in the middle of a forest fire when I was a child. The train tracks didn't stop the fire. And the fire breaks we are desperately creating here in San Diego County won't stop a wind-driven fire either. Even ice-plant--the urban canyon dweller's last line of defense--will burn as was observed during the north county fires last summer.
4. Backfires and 'controlled burns' often backfire. How many millions of acres burned in New Mexico when a backfire got out of control? Back fires were set near my home to try and stop the South Lake Tahoe Angora fire. Tahoe is famous for its afternoon lake breezes. And sure enough, the backfire quickly spread up into the trees, creating a crown fire that came within feet of entering another settlement of homes. Your agency recently started a controlled burn in a

remote area of San Diego County--ostensibly to protect Julian and surrounding communities. What happened instead is that the planned 700 acre fire quickly grew to 2700 acres, destroying some of our most precious native chaparral.

What works? Possibly nothing. I'm not sure why we have such a hard time grasping the reality of fire in our environment. We spend millions of dollars each year trying to protect ourselves from fires.

We are cutting things down, digging stuff up, and prescribe-burning what little is left of old California. True, it won't burn now. But what's the point? Might as well move to New Jersey if that's the kind of place you want to live in.

I grew up on the edge of a canyon surrounded by towering eucalyptus trees and huge oaks. I currently reside on the edge of a canyon in Tierrasanta's dedicated open space where we enjoy viewing the cottonwoods, sycamore trees, willows, toyon, sumac and all of the associated mammal, reptile and bird species with depend on that habitat. I serve on the community council and on our open space committee. We've listened to hours of reports about fire safety. The bottom line is always the same. It all goes back to how we build our homes--what we plant in our gardens--and a good exit strategy when the next fire inevitably comes.

And that's where I think your agency should be focusing its energy and budget--on educating communities and addressing building codes instead of mowing, mulching, chopping, paving and burning down what's left of California's native habitats. And if you insist on moving forward with this ill-conceived vegetation plan, then by all means take to heart the recommendations of the California Native Plant Society, the California Fish and Wildlife Agency, and the Chaparral Institute.

Every plant and animal is precious and just as much a resident of California as you all or I.

Sincerely,
Jennifer Cochrane-Schultz
6231 Calle Mariselda, Unit 612
San Diego, CA 92124
858.805.5453

Hannigan, Edith@BOF

From: David Coleman <redandcurly@sbcglobal.net>
Sent: Tuesday, May 31, 2016 5:09 PM
To: Vegetation Treatment Program@BOF
Subject: Vegetation Treatment Program

California Board of Forestry

There are many flaws in this proposal. The information supplied by the California Chaparral Institute need to be taken into account. As a forth generation Californian and having worked for CDF for four seasons and 4 years and Range Tech and Helitack foreman with the BLM please rethink this large vegetation and habitat removal plan. My family home in Lake County has survived many fire threats including the Valley on Sept 12 2015. Our home was less then a quart mile from where this started and was saved by good forest management practices. We have being doing this for more than a hundred years on the same property. Some of your ideas are good like prescribed burning and grazing.

David Coleman
7645 High Valley Rd
Cobb CA 95426.

925-470-0712

Hannigan, Edith@BOF

From: Fred DeVault <fred@fdevault.com>
Sent: Tuesday, May 31, 2016 1:04 PM
To: Vegetation Treatment Program@BOF
Subject: Public Comment re Cal Fire VTP PEIR

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
VTP Draft PEIR Comments
PO Box 944246
Sacramento, CA 94244-2460
VegetationTreatment@bof.ca.gov

31 May 2016

Re Draft PEIR, Cal Fire Vegetation Treatment Program:

Dear Ms. Hannigan:

I, a lifelong citizen of California now in my 56th year, write to you in public comment regarding Cal Fire's Vegetation Treatment Program (VTP) Preliminary Environmental Impact Report (PEIR). I urge summary rejection of the VTP PEIR, both on the specific legal grounds that Cal Fire's plan fails to meet the requirements of CEQA, and on the more general grounds that it will needlessly cause major and irrevocable environmental damage. Specifically:

1. Circumventing CEQA - impacts determined to be less than significant by the "Fallacy of Authority" (our conclusions are true because we say so – no evidence provided).
2. Substandard Research - misrepresenting cited scientific literature and dependence on anecdotal evidence.
3. Inadequate Data - outdated fire hazard analysis model/data unsuitable for project level planning.

As I believe you are aware, The California Chaparral Institute has separately commented at length regarding the details of the above claims.

California has more natural diversity, and more social conscience, than almost any other state. What the world needs now, and what California can give if it tries, is real leadership. Not just talk by activists, but actual leadership, at the agency and policy level — leadership which shows how a modern society can live in harmony with the environment. If not us, who?

The Cal Fire VTP PEIR is obviously a lazy attempt to push an anti-"brush" agenda through the required process. I do not fault Cal Fire's effort to prosecute their essential

mission of protecting suburban and rural homes from wild fire. What I fault them and their plan for is the attitude of saving homes at any cost.

We can no longer live in this world with the attitude that we can do what we want, regardless of environmental impact. That protecting suburban sprawl is worth any price. If Global Climate Change has taught us anything, it has taught us that we must stop whistling past the graveyard when it comes to environmental impact.

Do the right thing for California, for the chaparral environment, for the future, and, honestly, for Cal Fire. We need them protecting our homes — but within limits which truly respect the environment. If that requires educating suburban and rural homeowners and requiring them to accept more risk, so be it. That in itself would be real progress.

Destroying the chaparral in order to make it safe to live near it: This is no “plan” at all. Please put a stop to it.

Sincerely,

Frederic DeVault
20595 Seaboard Road
Malibu, CA 90265
fred@fdevault.com

Hannigan, Edith@BOF

From: Jan Dougall <jandougall@gmail.com>
Sent: Thursday, May 26, 2016 8:41 PM
To: Vegetation Treatment Program@BOF

Dear Edith Hannigan, Board Analyst and Members of the Board,

I fully support the views of the Chaparral Institute as written in the comment letter dated May 24, 2016 and signed by Director Richard W. Halsey.

Thank you.

Janice Dougall
27472 Country Glen Rd.
Agoura Hills, CA 91301

Hannigan, Edith@BOF

From: Diane Gage <dgage@san.rr.com>
Sent: Tuesday, May 31, 2016 10:22 AM
To: Vegetation Treatment Program@BOF
Subject: draft EIR for CalFire Vegetation Treatment Program

Dear Board of Forestry

Please take into very serious account the responses to the CalFire draft EIR that you have received from environmental organizations such as the Chaparral Institute, among others.

It is my understanding that in the latest draft,

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

The health and vitality of our ecosystem deserve the very best thinking and attention you can bring to the table. Please don't let us down by adding to the destruction instead of reducing it.

Sincerely,
Diane Gage
San Diego

Hannigan, Edith@BOF

From: angora11@roadrunner.com
Sent: Wednesday, May 25, 2016 9:48 AM
To: Vegetation Treatment Program@BOF
Subject: California Board of Forestry's Vegetation Treatment Program

Dear California Board of forestry, The current Draft Programmatic EIR fails to meet the requirements of the California Environmental Quality Act (CEQA).

In the latest draft:

- Environmental impacts of clearance operations are dismissed without support
- Clearance of northern chaparral is justified by logical fallacies
- Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

The document also reveals a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

One of the most egregious examples of the document's failure is the continued use of outdated and inadequate data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, the document ignores this resource and depends instead on questionable information from decades ago. Please use the most recent science of fire and habitat written by the CCI. Sincerely, Leah J. Gibson-Corcoran

Hannigan, Edith@BOF

From: Berkelly Gonzalez <berkelly.gonzalez@gmail.com>
Sent: Tuesday, May 31, 2016 2:37 PM
To: Vegetation Treatment Program@BOF
Subject: Latest Draft Programmatic EIR for the Vegetation Treatment Program

Dear Edith Hannigan and the Board of Forestry and Fire Prevention,

You have no doubt already read The California Chaparral Institute's Comments on the latest DPEIR. The document goes into great detail about what I, and many others that care for California's environment, find to be wrong with the current DPEIR. I wish to further stress, as resident and taxpayer in California, that I do not approve of DPEIR in its current form. It leaves many of California's delicate ecosystems vulnerable to unneeded destruction in the name of fire prevention with its vague definitions and reliance on outdated data when the benefits and efficiency of such a program when weighed against the negatives of habitat destruction are questionable to begin with. I strongly urge you not to go through with the DPEIR and instead create a new comprehensive fire protection program that focuses on actual assets at risk rather than habitat clearance, preserves the rights of citizens to object to destructive projects, incorporates the most current science and understands that all native shrubland habitat, especially chaparral, is threatened by too much fire.

Thank you for your time and consideration.

Sincerely,

Berkelly Gonzalez

A link to The California Chaparral Institute's Comments on the DPEIR:

http://www.californiachaparral.org/images/2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf

Hannigan, Edith@BOF

From: yearnforpeace@aol.com
Sent: Saturday, May 28, 2016 7:45 PM
To: Vegetation Treatment Program@BOF
Subject: DPEIR comments

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst
Email: VegetationTreatment@bof.ca.gov

Dear Ms. Hannigan,

This letter is in response to the call for comments on the April 2016 Draft Programmatic Environmental Impact Report (DPEIR). My name is Robert Kiang, and I am a concerned citizen regarding wild fire protection in Southern California. I lived through the Witch Creek fire of 2007, and am keenly aware of such devastating events.

First, let me commend your organization in making this herculean effort of drafting this 1300-page DPEIR. But I am also aware of the May 24, 2016 letter sent to you from the California Chaparral Institute. In their letter, they are able to highlight many specific criticisms about the overall strategy adopted in the DPEIR. Just to quote one example, why isn't the "from the house out" strategy be given in-depth analyses? It is inconceivable that a non-profit organization with very limited resource could map out a more practical strategy than a state funded program.

As a retired aerospace engineer doing research in my entire career, I am well aware of how one should tackle a very complicated problem. Rather than using a broad-brush approach to cover all aspects of a problem, some major, many minor, one needs to first identify the critical issues, then direct the majority of the resources to tackle those issues. "Prioritize" is the key word.

I'll be most grateful if my two-cents worth of opinion is given at least a consideration in your continuing efforts forward to make us safe and to preserve the natural environment that no one can live without.

Thanks for your attention,

Best regards,

Robert Kiang
yearnforpeace@aol.com

Hannigan, Edith@BOF

From: Wendy <wlk@sonic.net>
Sent: Thursday, May 26, 2016 8:57 PM
To: Vegetation Treatment Program@BOF
Subject: proposed Vegetation Treatment Plan

Edith Hannigan, Board Analyst
Dear Ms. Hannigan,

I'm writing to express my dismay and disapproval of the revised proposed Vegetation Treatment Plan for California.

As a native Californian who grew up surrounded by native chaparral and who experienced several major wildfires first hand, I feel that the proposed plan is in contradiction with the current science of vegetation management as well as the environmental and climate goals of the state.

I completely support and agree with the letter submitted by the Chaparral Institute on May 24, 2016, as well as their prior comments.

In particular, in the latest draft plan:

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, **the DPEIR ignores this rich resource** and depends instead on questionable information from decades ago.

As a consequence, the current EIR fails to meet the requirements of the California Environmental Quality Act (CEQA).

The DPEIR also reveals **a significant number of inconsistencies** as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

The most concerning issue, however, relates to the failure of the document to provide a key component of a programmatic EIR - providing a more exhaustive consideration of effects and cumulative impacts than could be accomplished at the project level (14 CCR § 15168).

I request that you reject this proposed plan and make a concerted effort to include the recommendations provided by both the Chaparral Institute and the Conservation Biology Institute.

Thank you for considering my comments.
Wendy Krupnick
4993 B. Occidental Rd.
Santa Rosa, 95401



Virus-free. www.avast.com

Hannigan, Edith@BOF

From: David Lingren <dlingren@comcast.net>
Sent: Tuesday, May 31, 2016 10:17 AM
To: Vegetation Treatment Program@BOF
Cc: 'Martha Booz'
Subject: Vegetation Treatment Program Draft Programmatic EIR

I strongly support the California Chaparral Institute's detailed and thoughtful analysis of the deficiencies in the current DPEIR:

http://www.californiachaparral.org/images/2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf

I encourage you to give the analysis and great weight as you work to improve and complete the EIR. As noted in the analysis, greater consideration must also be given to the productive suggestions provided to the Board of Forestry, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.

David Lingren
dlingren@comcast.net

Hannigan, Edith@BOF

From: Melissa Lucas <mlucas@chcf.org>
Sent: Tuesday, May 31, 2016 2:18 PM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report (DPEIR) of CalFire's Vegetation Treatment Program (VTP)

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst

Dear Ms. Hannigan and Members of the Board,

I am writing in support of the position of the California Chaparral Institute in their ongoing correspondence with you on this topic.

It is astonishing to me that we are going out of our way to destroy wildlife and bird habitat. After all the destruction that our human presence has brought, and the declining numbers of bird populations, we need to be going in the opposite direction.

Sincerely,

Melissa Lucas
Oakland, CA

New from CHCF: [CHCF Is Hiring](#)

We are seeking a senior program officer to join the High-Value Care team, with a particular focus on behavioral health care. Take a look and tell your colleagues.

Hannigan, Edith@BOF

From: elizabethjlutz7@gmail.com
Sent: Monday, May 30, 2016 11:18 AM
To: Vegetation Treatment Program@BOF
Subject: Please read.
Attachments: 2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf; ATT00001.htm

The current Draft Environmental Impact Report for the proposed program fails to meet the requirements of the California Environmental Quality Act (CEQA). It also fails to address the most effective ways to protect lives and property from wildfire.

Hannigan, Edith@BOF

From: Viviane <vjmarquez@sbcglobal.net>
Sent: Friday, May 27, 2016 11:05 AM
To: Vegetation Treatment Program@BOF
Subject: Do not approve plan!

You are creating a greater fire hazard with the exotic weedy species that replace cut/disturbed areas. You are also creating an expensive, annual government responsibility in perpetuity to maintain such clearing of vegetation. We can do better than this. Please refer to letters from Chaparral Institute and California Native Plant Society. We have better things to spend our money on- how about buying more land to serve as additional buffer. People should not allow to build so close to public land. The clearing should be on their land as they are the people whose homes we are protecting. Best regards, Viviane Marquez-Waller

Sent from [Mail](#) for Windows 10

Hannigan, Edith@BOF

From: Victoria Marshall <v60marshall@earthlink.net>
Sent: Sunday, May 29, 2016 8:19 AM
To: Vegetation Treatment Program@BOF
Subject: vegetation treatment

Dear Ms. Hannigan-

As a native Californian, hiker, trail-builder, habitat restorer and student of native plants and environments, it is with great concern when I read that an eco-system is going to be "treated" or "managed", or otherwise dealt with. Especially when that management "plan" is superficial and based on convenience, destructiveness, and shortsightedness.

I would urge you to consider the thoroughly studied, tried, and successful strategies of the Chaparral Institute as you formulate plans for 'managing' the few open spaces left in California. I must bring to your attention that when native plants are removed indiscriminately, wholesale, from an area, the first plants to recolonize are invasive grasses that readily burn, invasive mustard that readily burns, and many other invasive plants that are a fire danger, prone to allow erosion because they are annual plants without substantial roots, do not provide acceptable habitat for native birds and mammals, and are ugly.

Sincerely,

Victoria Marshall

v60marshall@earthlink.net

Hannigan, Edith@BOF

From: Janet Melbourne <janet6mel@gmail.com>
Sent: Tuesday, May 31, 2016 5:15 PM
To: Vegetation Treatment Program@BOF
Subject: Save 22 million acres of habitat

Please revise your plan to clear vegetation in important habitat. Take care and use the information provided to you by the California Chaparral Institute. Protect houses rather than destroy habitat.

Janet Melbourne
San Luis Obispo, CA

Hannigan, Edith@BOF

From: Stacey Miller <millerslm1@gmail.com>
Sent: Tuesday, May 31, 2016 11:01 AM
To: Vegetation Treatment Program@BOF
Subject: California's Proposed Vegetation Treatment Program

Dear Ms. Hannigan and Members of the Board,

I am deeply concerned by the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program, which includes the same errors, contradictions, and failures to identify environmental impacts that were pointed out in previous versions by Rick Halsey of the Chaparral Institute.

This DPEIR dismisses potential impacts without valid supporting evidence, while the proposed mitigations of impacts on our native vegetation are unenforceable and immeasurable as the report stands now. Please take the time to closely look at all of the documented and verifiable information that has been handed to you and mindfully and intelligently reassess this haphazard proposed vegetation treatment plan. The DPEIR's foundation is based on outdated and inadequate data, which is absolutely unacceptable for a state agency handling a project with such broad-reaching consequences and irreversible consequences. I expect much more from stewards of the environment for the state of California.

Proceeding with a well thought-out and educated plan is much preferable to having our beautiful state run over by weeds and non-native plants. Once we lose our native plants we can't get them back.

Sincerest regards,
Stacey Miller

Hannigan, Edith@BOF

From: Henry Nowakowski <hnowski@gmail.com>
Sent: Tuesday, May 24, 2016 8:04 PM
To: Vegetation Treatment Program@BOF
Subject: Vegetation Treatment Program Environmental Impact Report

Please do not allow the new program to be implemented in California at this time. The The Proposed Vegetation Treatment Program by CalFire and the California Board of Forestry appears to have been written using many unsupported, inaccurate and dated "facts". Please read the response letter written by The California Chaparral Institute. It is full of current facts, very well supported arguments and clearly explains why the plan is inadequate and just plain wrong.

Sincerely,
Henry Nowakowski

A California Citizen for over 61 years, avid hiker, backpacker and Mountain Biker.

Hannigan, Edith@BOF

From: Oren Patashnik <orenpatashnik@gmail.com>
Sent: Tuesday, May 31, 2016 4:56 PM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report

Dear Members of the California Board of Forestry and Fire Protection:

Unfortunately, the current DPEIR fails to address problems pointed out with previous versions, and doesn't properly take into account the current state of fire research.

For example, it's clear that attention to ember vulnerabilities in homes and communities is much more important than clearance of habitat that's more than 100 feet from homes.

(My credentials: I've coauthored -- with Joe Mitchell, based on our research following the 2003 Cedar Fire -- a paper at the 2007 Fire and Materials conference in San Francisco entitled "Firebrand Protection as the Key Design Element for Structure Survival during Catastrophic Wildland Fires." And I've attended all the Wildland/Urban Interface sessions at the Fire and Materials conferences since then.)

I've seen the California Chaparral Institute letter dated 24 May 2016. Addressing the objections they raise in that letter would, in my opinion, go a long way toward improving the DPEIR. I urge you to do that.

Sincerely,
Oren Patashnik

Hannigan, Edith@BOF

From: Henri Patey <hcpatey@earthlink.net>
Sent: Friday, May 27, 2016 2:15 PM
To: Vegetation Treatment Program@BOF
Subject: Opposed to The Proposed Vegetation Treatment Program by CalFire and the CBF

Please do not do it. The comments in the 41 page doc written by the California Chaparral Institute says it all.

I live in the rural area of socal and love the chaparral, it brings so many benefits.

Thanks.

Hannigan, Edith@BOF

From: Denise Patey <dspatey@earthlink.net>
Sent: Friday, May 27, 2016 10:51 AM
To: Vegetation Treatment Program@BOF
Subject: Save Chaparral

[http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report\(vtpeir\)/written_comments_received/public_comment_-_chaparral_institute_and_cnps_comments_2nd_draft_eir_vtp.pdf](http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report(vtpeir)/written_comments_received/public_comment_-_chaparral_institute_and_cnps_comments_2nd_draft_eir_vtp.pdf)

Please don't destroy the natural habitats. Thank you, Henri and Denise Patey
9609 Larenda Ln. Valley Center
Ca. 92082

703-300-7571

Hannigan, Edith@BOF

From: Don <lagoondon@gmail.com>
Sent: Friday, May 27, 2016 1:32 PM
To: Vegetation Treatment Program@BOF
Subject: Opposition Comment

I am very strongly opposed to the treatment plan. No one wants devastating fires to burn houses and threaten lives, but this is the wrong way to go about it. I am in agreement with the comment letter submitted by the California Chaparral Institute. I urge the decision-makers to reject this plan and explore a more reasonable plan based on consensus between stakeholders.

Don Rideout
Encinitas, CA

Hannigan, Edith@BOF

From: Michel Saint-Sulpice <misasu@silcom.com>
Sent: Monday, May 30, 2016 11:45 PM
To: Vegetation Treatment Program@BOF
Subject: Proposed Vegetation Treatment Program
Attachments: Comments - Chaparral Institute.pdf

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst

Dear Ms. Hannigan and Members of the Board,

This is to let you know that I support the Comments that the **Chaparral Institute** made with regards to the Proposed Vegetation Treatment Program.

I attached this document to this e-mail.

Would you be so kind as to consider the Comments and the Recommendations presented by the **Chaparral Institute**.

Thank you very much.
Michel Saint-Sulpice
Santa Barbara, CA

Hannigan, Edith@BOF

From: Nancy Schimmel <nancy@sisterschoice.com>
Sent: Wednesday, May 25, 2016 10:12 PM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report (DPEIR)

The DPEIR for the Vegetation Treatment Program needs to be corrected and updated to reflect current science and conditions. Please listen to what The California Chaparral Institute and other environmental groups are saying.

Yours

Nancy Schimmel

Lost causes are the only ones worth fighting for. --Clarence Darrow

www.sisterschoice.com

Blog at <http://www.occupella.org/blogDB.php?blogger=1>

From: Andrew Smisek <smisekak@gmail.com>
Sent: Tuesday, May 31, 2016 2:48 PM
To: Vegetation Treatment Program@BOF
Subject: Response to DPEIR

1. This Draft Programmatic Environmental Impact Report fails to uphold Californian values. The following list is taken directly from the comment letter from the Chaparral Institute. I concur with their concerns and I'm presenting this to you as a show of my support for their agenda. Please consider addressing these issues.

1. Circumventing CEQA

- - impacts determined to be less than significant by the “Fallacy of Authority” (our conclusions are true because we say so – no evidence provided)
- - lack of detail as required within a programmatic EIR
- - passing on responsibility to project managers to determine potential impacts
- - inadequate mitigation measures
- - Significance Criteria to determine impact to biological resources dismissed without support

2. Substandard Research

- - misrepresenting cited scientific literature
- - dependence on anecdotal evidence
- - contradictory statements
- - ignoring information in the record
- - cited references missing, non sequiturs

3. Inadequate Data

- - outdated fire hazard analysis model/data unsuitable for project level planning
- - utilizing coarse-scale maps that cannot provide sufficient detail for competent analysis
- - WUI assessments based on 26-year-old information
- - dependence on maps that no longer reflect current conditions

Please address these issues and consider revising the Vegetation Treatment Plan.

Thank you,

Andrew Smisek

Hannigan, Edith@BOF

From: dianna <dolcezza077@yahoo.com>
Sent: Tuesday, May 24, 2016 2:30 PM
To: Vegetation Treatment Program@BOF
Subject: To Edith Hannigan re: the Vegetation Treatment Program

It is with great disappointment that the latest draft of the Vegetation Treatment Program does not correct many of the errors and misrepresentations contained in the previous version. The latest revised Draft Programmatic Environmental Impact Report of CalFire's Vegetation Treatment Program targets approximately 22 million acres (about 1/4 of the entire state) to be burned, masticated, or sprayed with herbicides.

The Program if approved will exempt individual clearance projects from citizen and independent scientific oversight that would normally be required under the California Environmental Quality Act (CEQA).

I hope you will instead adopt the recommendations of the California Chaparral Institute, presented in their letter to you dated May 24, 2016, because the current draft will not do enough to protect life and the natural environment from wild land fire, and will instead introduce what I believe will amount to more damage than help.

~

D Stirpe

Hannigan, Edith@BOF

From: th_orchidboi@Yahoo.com
Sent: Tuesday, May 31, 2016 7:37 AM
To: Vegetation Treatment Program@BOF
Subject: CalFire's Vegetation Treatment Program

Edith Hannigan, Board Analyst:

I grew up in Southern California, Rancho Palos Verdes to be exact. I spent my childhood traipsing around the Peninsula and the entirety of California's Wild Lands. This has instilled a reverence in me for our natural world.

Nature has its own balance. A balance that has worked since well before Man. And, it is only when Man intervenes, that this balance is thrown into chaos. And that is exactly what the proposed Vegetation Treatment Program (by CalFire and the California Board of Forestry) will do.

The proposed Vegetation Treatment Program is a deplorable excuse at Fire "Management", and is more akin to ecological terrorism than curbing fire risk! Entire Ecological zones will be devastated, destroyed. Numerous Plants, Animals, Insects and Microbes (many of who's numbers are already dwindling) will be eradicated!

This holocaust will only exacerbate erosion, worse so that after fire itself. The land, opened and raw, degraded, will give rise to invasive species. Species that push-out and choke any and all native ecology.

So, I implore you to listen and work with groups like The California Chaparral Institute, to create a plan. A plan that works and that doesn't devastate the beautiful California landscape.

Sincerely,
My Californian Heart

Hannigan, Edith@BOF

From: Stephen Weitz <weitzs@earthlink.net>
Sent: Friday, May 27, 2016 12:17 PM
To: Vegetation Treatment Program@BOF
Subject: California Board of Forestry's habitat clearance plan

In my opinion, the current Draft Environmental Impact Report for the proposed program fails to meet the requirements of the California Environmental Quality Act (CEQA). It also fails to address the most effective ways to protect lives and property from wildfire.

In the latest draft:

- Environmental impacts of clearance operations are dismissed without support
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

The document also reveals a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

I think the Chaparral Institute has the right approach to wild lands management. Please listen to them and please implement their ideas. Thank you.

Stephen Weitz

Unless someone like you cares a whole lot, nothing is going to get better. It's not.
Dr. Suess

Hannigan, Edith@BOF

From: Stephen Weitz <weitzs@earthlink.net>
Sent: Tuesday, May 31, 2016 4:06 PM
To: Vegetation Treatment Program@BOF
Subject: My comments

I support 100% the position of the California Chaparral Institute regarding your plans to modify Habitat in California. I am a member of the California Native Plant Society. Please do not go forward with your current plans. Modify them to get support of the California Chaparral Institute.

thank you,
Stephen Weitz
Oakland, California, 94619

Hannigan, Edith@BOF

From: Lisa Wilson <lisa.wilson.nrm@gmail.com>
Sent: Wednesday, May 25, 2016 10:32 AM
To: Vegetation Treatment Program@BOF
Subject: NOT in support of California's latest version of a proposed Vegetation Treatment Program

Hello,

Please place my response under your "opposed" column for this latest version. Because I lack the appropriate articulation of my thoughts on this subject, I refer you to the California Chaparral Institutes VERY appropriate response to this proposed "Vegetation Treatment Program" or as many of us like to call it, "The natural habitat innihilation program." I have to wonder if all the players in this program are California "haters" from somewhere else? This is not a plan that takes all aspects and varied (unique) habitats/ecosystems into account. And you all are not with it, if you truly believe that California's landscapes are MOST of the reason why the state is SO popular and valuable!

http://www.californiachaparral.org/images/2016_Draft_VTP_CCI_comments_2_24_16_Final.pdf?utm_content=Lisa&utm_source=VerticalResponse&utm_medium=Email&utm_term=http%3A%2F%2Fwww%2Ecaliforniachaparral%2Eorg%2Fimages%2F2016_Draft_VTP_CCI_comments_2_24_16_Final%2Epdf&utm_campaign=New%20Habitat%20Clearance%20Plancontent

Thoughtfully and with consideration,
Lisa Wilson

Hannigan, Edith@BOF

From: Charles Wolfe <cawolfe@verizon.net>
Sent: Saturday, May 28, 2016 7:39 PM
To: Vegetation Treatment Program@BOF
Subject: D raft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program

Dear Ms. Hannigan and Members of the Board,

I am writing concerning the DPEIR. I find it lacking in many ways. Rather than reiterate what others have already written, I refer you to the submission from the California Chaparral Institute. Their document thoroughly represents my views on the topic.

Our knowledge of chaparral environments has come far from my days as a forestry major at Univ. of California, Berekely. It it is time to enter the 21st century with regards to chaparral environments. Your proposed EIR is not of this century.

Yours,
Charles A Wolfe, Professor - retired
13376 Dronfield Ave.
Sylmar, CA 91342
818 367-6798

Hannigan, Edith@BOF

From: J Joseph Allen <jja10r@sbcglobal.net>
Sent: Tuesday, May 31, 2016 4:34 PM
To: Vegetation Treatment Program@BOF
Subject: California Board of Forestry's proposed Vegetation Treatment Program

Dear Cal. Board of Forestry:

I am ashamed to admit that you were able to write a totally absurd Report to deal with Vegetation Treatment.

The first problem is not the vegetation, it's indefensible (to fire) homes that were built in areas where permitting should never have been allowed.

The second problem is the viewpoint of the committee that wrote this totally out of date inexcusable report.

Your should start over and not ignore the facts.

The current Draft Environmental Impact Report for the proposed program fails to meet the requirements of the California Environmental Quality Act (CEQA). It also fails to address the most effective ways to protect lives and property from wildfire.

In the latest draft:

- Environmental impacts of clearance operations are dismissed without support
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

The document also reveals **a significant number of inconsistencies** as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

Best wishes,

Joe Allen

Hannigan, Edith@BOF

From: Stephen Amy <samy97230@yahoo.com>
Sent: Tuesday, May 31, 2016 4:01 PM
To: Vegetation Treatment Program@BOF
Subject: 2016 DPEIR on the Vegetation Treatment Program

Dear Edith Hannigan, Board Analyst

I believe your recently released draft programmatic environmental impact report (DPEIR) on your vegetation treatment program (VTP) is flawed in that it doesn't have as its priority the maximum preservation of native chaparral habitat throughout the State of California. California is always expanding its urbanization and we have seen loss of the vast majority of native habitat, chaparral included. Rather than issuing a report (VTP) which quantifies a huge amount of habitat which could be subject to alteration in the hope of mitigating fire, and then saying, in the DPEIR, that impact on the environment would be minimal, it would be better to use the types of alteration as a last option, with each area where there may be a fire danger considered separately, by using the best current science for preservation of chaparral, focusing on what assets are actually at risk and coming up with the least-invasive plan to protect them, and preserving the right of citizens to object to projects which destroy native habitat, which would result in a consultation as to what is really the best option in a particular area.

Chaparral and coastal sage-scrub continue to be under threat from development. The process as is can't go on much longer if we seek to preserve native habitat and wildlife.

Respectfully,
Stephen M. Amy
Eugene, Oregon

Hannigan, Edith@BOF

From: Carolyn Barkow <itzmeeee@cox.net>
Sent: Tuesday, May 24, 2016 5:05 PM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report

Dear Ms. Hannigan and Members of the Board,

The current DPEIR for the state's proposed Vegetation Treatment Program is deeply disappointing. It contains many of the same errors, contradictions, and failures to identify environmental impacts that were pointed out in previous versions.

Productive suggestions of the California Legislature's review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups were ignored.

The current DPEIR fails to provide adequate support for concluding that the proposed program will not have a significant effect on the environment, prevent significant environmental harm, and adequately support Cal Fire's mission to protect life, property, and natural resources.

The changing climate will not be forgiving of your inability to respond adequately and consider how to protect lives and property from wildfire.

Sincerely,
Mrs. Carolyn Barkow
7844 Whelan Drive
San Diego, CA 92119-1716

Hannigan, Edith@BOF

From: Connie Beck <holisticgardener@yahoo.com>
Sent: Wednesday, May 25, 2016 6:49 AM
To: Vegetation Treatment Program@BOF
Subject: Draft EIR

In this draft many of the previous errors continue:

Impacts of clearance operations on plants and wildlife are dismissed without support
Misunderstanding or misrepresentation of several scientists continues to be incorrectly cited
Notification regarding clearance projects remains a huge issue

There are a significant number of inconsistencies as the document initially references current science only to ignore it to support the Program's objectives. There are contradictory statements, undefined terms, and legally inadequate mitigation processes. This seems to be a program that was developed to carry on the same old mistakes of the past. There is continued use of outdated and inadequate data as the basis for the entire Program. Updated data is available from Cal Fire itself, so why isn't this current information being used?

Please take this back to the drawing board and come up with something more pertaining to today's knowledge of the situation, and more in keeping with the intent of CEQA.

Very truly yours,

Connie Beck
El Cajon, CA

Connie Beck "If you have a garden and a library, you have everything you need." -- Marcus Tullius Cicero

Hannigan, Edith@BOF

From: madresierra@earthlink.net
Sent: Monday, May 30, 2016 11:44 PM
To: Vegetation Treatment Program@BOF
Subject: Comment letter

I do not believe that the Vegetative Treatment plan is workable or enforceable nor is it based on best scientific practices. You simply cannot cut back, macerate, or chemically treat chaparral to protect homes from blowing embers in a wildfire. Homes must be ember proofed and provide the necessary defensible space for safety for fire fighters and ember extinguishing. Excessive brush clearance will never work. You simply can not cut down enough brush.

Sincerely,

Caroline Brown, Sierra Madre, CA 91024

Hannigan, Edith@BOF

From: Rebecca Canright <rebeccagroovypeace@gmail.com>
Sent: Tuesday, May 31, 2016 6:34 PM
To: Vegetation Treatment Program@BOF
Subject: I oppose the current vegetation treatment plan

Dear Whom It May Concern,

As a high-schooler who cares deeply about environmental protection, I respectfully urge you to revise the current draft of the vegetation treatment program in order to preserve the iconic California chaparral biome.

In the latest draft, I am concerned that:

- Potential impacts of destroying nearly a million acres of chaparral are dismissed without support;
- Mitigations of impacts are unenforceable and unmeasurable;
- Clearance of northern chaparral is unjustified;
- Research of several scientists continues to be misrepresented (despite corrections being submitted); additionally, lack of transparency remains a significant issue.

Once again, I request that you please re-examine the negative environmental impacts of this plan upon California's chaparral. Do not allow this vastly underappreciated ecosystem to be burned and sprayed into nonexistence.

Thank you.

Sincerely,

Rebecca Canright

Hannigan, Edith@BOF

From: Lisa Ceazan <lisajonc@gmail.com>
Sent: Tuesday, May 31, 2016 1:14 PM
To: Vegetation Treatment Program@BOF
Subject: California Habitat Clearance

Dear Ms. Hannigan:

Please reconsider your proposed action to destroy native habitat. This action has no sound basis in current science and ignores the will of the citizenry who you represent. It is incomprehensible to me that you wish to destroy life in order to preserve it. Native ecosystems are important for all living creatures' health and well-being: **IT IS IMPOSSIBLE ISOLATE OURSELVES FROM NATURE, AND TO DO SO IS NO SOLUTION.** Why not reconsider mitigations that address surrounding man-made fire-prone structures? We can live in harmony with nature if we make intelligent choices. Destroying the chapparral is not intelligent, nor is it humane or compassionate.

As a native Californian, it is so painful to me that so little is left of the glorious chaparral I used to explore and enjoy as a young person. Please, please, review the scientific literature to understand that preserving nature is a much better choice than destroying it.

Sincerely,

Lisa Ceazan
Torrance, California

Hannigan, Edith@BOF

From: Lisa Ceazan <lisajonc@gmail.com>
Sent: Tuesday, May 31, 2016 4:52 PM
To: Vegetation Treatment Program@BOF
Subject: Fwd: California Habitat Clearance

----- Forwarded message -----

From: "Lisa Ceazan" <lisajonc@gmail.com>
Date: May 31, 2016 1:14 PM
Subject: California Habitat Clearance
To: <VegetationTreatment@bof.ca.gov>
Cc:

Dear Ms. Hannigan:

Please reconsider your proposed action to destroy native habitat. This action has no sound basis in current science and ignores the will of the citizenry who you represent. It is incomprehensible to me that you wish to destroy life in order to preserve it. Native ecosystems are important for all living creatures' health and well-being: IT IS IMPOSSIBLE ISOLATE OURSELVES FROM NATURE, AND TO DO SO IS NO SOLUTION. Why not reconsider mitigations that address surrounding man-made fire-prone structures? We can live in harmony with nature if we make intelligent choices. Destroying the chapparral is not intelligent, nor is it humane or compassionate.

As a native Californian, it is so painful to me that so little is left of the glorious chaparral I used to explore and enjoy as a young person. Please, please, review the scientific literature to understand that preserving nature is a much better choice than destroying it.

Sincerely,

Lisa Ceazan
Torrance, California

From: BarbC <barbc624@gmail.com>
Sent: Tuesday, May 24, 2016 3:49 PM
To: Vegetation Treatment Program@BOF
Subject: Latest Draft Version Proposed Vegetation Treatment Program by CalFire and the California Board of Forestry

he 2016 Draft PEIR: The Same Errors Over and Over Again

In the latest draft:

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, **the DPEIR ignores this rich resource** and depends instead on questionable information from decades ago.

As a consequence, the current EIR fails to meet the requirements of the California Environmental Quality Act (CEQA).

The DPEIR also reveals **a significant number of inconsistencies** as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

The most concerning issue, however, relates to the failure of the document to provide a key component of a programmatic EIR - providing a more exhaustive consideration of effects and cumulative impacts than could be accomplished at the project level (14 CCR § 15168).

Instead, volumes of repetitive text are punctuated with the unsupported claim that determining impacts is impossible, pushing it off to project managers to determine with a checklist and standard project requirements that depend on subjective judgments.

How does the DPEIR justify ignoring a thorough examination of impacts as required by CEQA? The DPEIR vacillates between claiming the Program is too large and complex to analyze, or the actual treatment areas are too small to have an impact.

As a consequence, the current DPEIR fails to provide adequate support for concluding that the proposed program will not have a significant effect on the environment.

Briefly, the reasons for these failures include:

- 1. Circumventing CEQA** - impacts determined to be less than significant by the "Fallacy of Authority" (our conclusions are true because we say so – no evidence provided)
- 2. Substandard Research** - misrepresenting cited scientific literature and dependence on anecdotal evidence
- 3. Inadequate Data** - outdated fire hazard analysis model/data unsuitable for project level planning

The DPEIR also fails to properly address the impacts the Program may have on **carbon emissions and the loss of carbon sequestration** by the clearance of native habitats.

Please do your job properly and address the problems in your latest draft so as to create a program that will not adversely affect our environment.

Regards;

Barbara Cohn

Hannigan, Edith@BOF

From: Camille <camille_fawne@hotmail.com>
Sent: Tuesday, May 24, 2016 11:37 AM
To: Vegetation Treatment Program@BOF
Subject: Please revise plan to protect homes without destroying habitat!

California Board of Forestry and Fire Protection Attn: Edith Hannigan, Board Analyst

Dear Ms. Hannigan and Members of the Board, It is with a deep sense of disappointment to find that the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program contains many of the same errors (some with the exact wording), contradictions, and failures to identify environmental impacts that were pointed out in previous versions.

From: Josan Feathers <josan.dem@cox.net>
Sent: Tuesday, May 24, 2016 10:22 PM
To: Vegetation Treatment Program@BOF
Subject: Comments

As a former CDF firefighter and a Registered Civil Engineer, I believe that the current EIR fails to meet the requirements of the California Environmental Quality Act (CEQA). The current DPEIR fails to provide adequate support for concluding that the proposed program will not have a significant effect on the environment. Briefly, the reasons for these failures include:

1. Circumventing CEQA - impacts determined to be less than significant by the “Fallacy of Authority” (our conclusions are true because we say so – no evidence provided)
2. Substandard Research - misrepresenting cited scientific literature and dependence on anecdotal evidence
3. Inadequate Data - outdated fire hazard analysis model/data unsuitable for project level planning

The DPEIR also fails to properly address the impacts the Program may have on carbon emissions and the loss of carbon sequestration by the clearance of native habitats. It fails to properly consider all the environmental impacts. It fails to properly protect our communities from fire (by focusing on habitat clearance rather than community and home flammability). Finally, it fails to properly consider the entire fire risk reduction equation.

Thank you.

Jösan Feathers, P.E.
619.660.2915

From: Josan Feathers <josan.dem@cox.net>
Sent: Tuesday, May 31, 2016 12:34 AM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic EIR for the Vegetation Treatment Program

As a former CDF Firefighter and a retired Registered Civil Engineer for California State Parks, I implore you to please revise your latest version of your proposed habitat clearance program that targets 1/4 of the state of California with herbicides, grinding machines, and unnatural fire. Instead, create a **Comprehensive Fire Protection Program** that:

- focuses on actual assets at risk rather than habitat clearance
- preserves the rights of citizens to object to destructive projects
- incorporates the most current science
- understands all native shrubland habitat, especially chaparral, is threatened by too much fire

The best way to protect lives, property, and the natural environment from wildfire is through a comprehensive approach that focuses on community and regional planning, reducing ignitability of structures, and modifying vegetation within and directly around communities at risk.

By focusing exclusively on clearing habitat, you are NOT addressing the main causes for loss of life and property from wildland fire.

About 22 million acres (1/3 of the entire state) is targetted for "masticating," spraying with herbicides, burning, or grazing. This would increase its existing habitat clearance program five times over current levels. If certified, the programmatic EIR will exempt individual habitat clearance projects from public oversight required by the California Environmental Quality Act (**CEQA**). Everything from **state parks** to private lands could be stripped bare without local notice or a chance to appeal.

Every decade we increase funding for habitat clearance operations and fire suppression activities, followed by a decade of even worse fire impacts. The Board's proposal perpetuates and expands this same approach, one that has failed to reduce cumulative wildfire damage and firefighting expenditures over the past century. As a consequence, the proposal is a **waste of tax payer money**, will cause significant **damage to the environment**, and will **fail to effectively protect Californians from wildland fire**.

Please, revise your latest version of your proposed habitat clearance program.
Thank you. Sincerely,

Jösan Feathers, Registered Civil Engineer
619.660.2915

Hannigan, Edith@BOF

From: Querido Galdo <querido@queridomundo.com>
Sent: Tuesday, May 31, 2016 4:10 PM
To: Vegetation Treatment Program@BOF
Subject: Vegetation Treatment Program

Dear Board of Forestry,

Thank you for the latest draft of Cal Fire's Vegetation Treatment Program EIR. I ask you to amend the draft to address the following issues, which have been brought to my attention by various trusted stakeholders:

- Use of outdated data (so outdated that this program fails to meet CEQA requirements). Please use the most Cal Fire recent data--this will address issues with potential impacts and their mitigation among other things.
- Many of the productive suggestions provided to the Board of Forestry on how you could improve the draft DPEIR were ignored, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.
- Improve transparency--if this process were more transparent and accessible your plan would reflect it and input would not be ignored.
- Focus on protecting lives and property from fire, not on managing fuel. Keeping the focus on protecting lives and property will give you a very different outcome.

Thank you in advance for your consideration. I hope the next draft truly reflects the extensive input you've received from stakeholders.

Respectfully,

Querido Galdo

Los Angeles CA

From: Lydia Garvey <wolfhowlmama@yahoo.com>
Sent: Saturday, May 28, 2016 8:39 PM
To: Vegetation Treatment Program@BOF
Subject: Please correct DEIR!

The current Draft Environmental Impact Report for the proposed program fails to meet the requirements of the California Environmental Quality Act (CEQA). **It also fails to address the most effective ways to protect lives and property from wildfire.**

In the latest draft:

- Environmental impacts of clearance operations are dismissed without support
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

The document also reveals **a significant number of inconsistencies** as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.



Here is the result of mechanical "mastication" where huge grinders have clearcut the native vegetation, ripped apart the ancient soil crust allowing the spread of weeds, and destroyed

valuable watershed. Painted Cave area, above Santa Barbara, 7/09.



A close up of the invasive weeds that replace the native shrubland ecosystem after slashing and goat activity. Painted Cave area, above Santa Barbara, 7/09.

Do your job-Protect our lands, waters, wildlife, health & future! You work for citizens -Not industry!
Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you
Lydia Garvey Public Health Nurse
429 S 24th st Clinton OK 73601

Hannigan, Edith@BOF

From: Roxanne Greene <roxanne@greeneassociates.org>
Sent: Tuesday, May 31, 2016 4:32 PM
To: Vegetation Treatment Program@BOF
Subject: Vegetation Treatment Program

To: Edith Hannigan, Board Analyst

Dear Ms Hannigan,

I am writing to protest the proposal to burn, masticate and poison thousands of acres of one of the most endangered habitats in the world, California's old growth chaparral.

Removing chaparral from such a wide swath of the state will invite the growth of fast burning, non-native grasses and plants which will have negative effects on air and water quality, wildlife habitat and plain old quality of life in California.

Southern California's chaparral is fire adapted, not dependent on fire. Many chaparral plants have a 30 year minimum seeding cycle where the plant litter must build up so seeds have enough moisture and substrate in which to sprout. Additionally, old growth chaparral is home to hundreds of endemic species found nowhere else in the world. Destroying this habitat will decrease biological diversity in ways that have only begun to be studied.

Denuding California's hillsides during a drought is one thing, but in a normal rain, runoff debris from masticated and burned hillsides will clog streams and drainages downhill. Furthermore, the lack of cover will not permit much needed moisture to sink into the groundwater system. Finally, in areas where herbicides are applied, runoff will contain herbicide residues and byproducts, potentially entering the groundwater system or reaching the ocean.

I object to the fact that many of the environmental protections required by CEQA are exempted under this program.

I would instead like to see a program that educates and assists homeowners and land developers living in chaparral habitat. This program could be paid for with "fire fee" funds and could include fire readiness training; low-cost fire mitigation programs for structures and the immediate areas surrounding a structure, and exterior fire suppression installation programs on affected structures.

There are many alternatives to simply destroying an ecosystem. We Americans are downright hypocritical when it comes to that. We'll protest logging in Brazil, palm oil plantations in Borneo, yet outright destruction of a fragile ecosystem for no scientifically proven benefit is tolerated.

Please do not pass this plan, for the sake of all Californians, now and in the future.

Thank you.

Roxanne L. Greene, CPA

R. Greene & Associates, Inc.
5256 S. Mission Road, Suite 205
Bonsall, CA 92003
760-726-4316 / 760-726-4329 fax



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Connect to me on Linked In:

<http://www.linkedin.com/pub/roxanne-greene/16/83b/615>

Hannigan, Edith@BOF

From: Mark Hunter <funkshn@gmail.com>
Sent: Tuesday, May 31, 2016 10:21 AM
To: Vegetation Treatment Program@BOF
Subject: The VTP is inadequate for a project with such major impact

A quarter of the entire state. The best that CalFire can come up with is to devastate the habitat across a quarter of the state in the name of preventing fire threats to people and property.

The tail is really wagging the dog, here. It's reminiscent of the famous Vietnam War statement, "We had to destroy the village in order to save it." This is an impact that can't possibly be mitigated.

If this is the level of destruction that you propose, it had better be justified by the best science and the best evidence available. And it isn't. In the criminal justice system, death penalty trials have an even more rigorous level of scrutiny and protections than other felony trials. In contrast, your scorched-earth plan justifies itself with outdated information and manipulation of scientific papers. It's inadequate and unprofessional. You have an obligation to do better.

You could trash HALF the state and still not be able to protect human habitation from wildfires. Flying embers travel huge distances. Why isn't there any emphasis on retrofitting houses so that they don't catch fire so easily? Why isn't there more emphasis on restricting development in areas where fire geography makes development unsafe? Fire protection and fuel reduction have some overlap, but they are not one and the same. Which of those is truly your mission?

You're going to scalp the state, leaving ugliness and biological damage in your wake, and you still won't accomplish your goal. Why can't you see that in advance, instead of only in hindsight?

Stating that you are compliant with CEQA doesn't mean that you actually are. Wouldn't your department's energies be better spent mending the current flaws in the plan rather than battling a legal action?

Mark Hunter
La Canada

Hannigan, Edith@BOF

From: Karlyn Lewis <Karlyn.Lewis@jimbabwe.com>
Sent: Tuesday, May 31, 2016 10:28 AM
To: Vegetation Treatment Program@BOF
Subject: Vegetation Treatment Plan proposal

Dear Ms. Hannigan and Board Members –

I could list many reasons why I am commenting on the proposed Vegetation Treatment Plan, but I'm going to fall back on just my status as a Californian whose family goes back 2 generations into the past and 2 generations into the future. I want my children and grandchildren to enjoy the wonders of California just as I, my parents, and grandparents have.

Please do not pass this Plan that will devastate so much of our state's unique chaparral and other wild areas. There are many ways to protect California homes without unnecessary destruction. For instance, my mother's house survived the 2006 Esperanza Fire completely untouched because of the planning and building materials that she had used for her home and property.

Please rely on the input of many concerned, well-informed experts and citizens and prepare an improved, revised DPEIR that focuses on how to protect human lives, property, and the environment instead of on how much fuel is available for fires. The current Environmental Impact Report is inadequate and should be rejected.

Sincerely,

Karlyn H. Lewis
Fairfield, CA 94533
klewis@jimbabwe.com

Hannigan, Edith@BOF

From: Vonis@comcast.net
Sent: Monday, May 30, 2016 10:21 PM
To: Vegetation Treatment Program@BOF
Subject: Draft Programmatic Environmental Impact Report (DPEIR) Public Comment

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst
Email: VegetationTreatment@bof.ca.gov

Dear Ms. Hannigan and Members of the Board,

It is with a deep sense of disappointment to find that the current Draft Programmatic Environmental Impact Report (DPEIR) for the state's proposed Vegetation Treatment Program contains many of the same errors (some with the exact wording), contradictions, and failures to identify environmental impacts that were pointed out in previous versions.

Many of the productive suggestions provided to the Board of Forestry on how they could improve the draft DPEIR were ignored, including those from the California Legislature's required review by the California Fire Science Consortium, the Department of Fish and Wildlife, fire scientists, and environmental groups.

Potential impacts are dismissed by the DPEIR without support, mitigations of impacts are unenforceable and unmeasurable, the treatment of northern chaparral is justified by non sequitur reasoning, and the research of several scientists continues to be misrepresented (despite corrections being submitted). The lack of transparency remains a significant issue – using a local newspaper to inform the public about projects is no longer adequate.

The current DPEIR fails to meet the requirements of the California Environmental Quality Act (CEQA).

Vonis Moore
3231 Withers Avenue
Lafayette, CA 94549

Hannigan, Edith@BOF

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Friday, May 27, 2016 5:16 PM
To: Vegetation Treatment Program@BOF
Subject: Habitat clearance plan

Please revise the Draft Environmental Impact Report for this proposed program for clearing chaparral habitat.

The current DIR fails to meet the requirements of the California Environmental Quality Act (CEQA). It also fails to address the most effective ways to protect lives and property from wildfire.

There are several specific problems in this document:

- 1) Environmental impacts of clearance operations are dismissed without support
- 2) Clearance of northern chaparral is justified by logical fallacies
- 3) Research of several scientists continues to be misrepresented (despite corrections being submitted)
- 4) Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

There are a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. Undefined terms and legally inadequate mitigation processes are other problems.

Please revise this document.

Thank you,
Pam Nelson
Warner Springs, CA

Hannigan, Edith@BOF

From: opsahlr <opsahlr@mac.com>
Sent: Tuesday, May 31, 2016 1:41 PM
To: Vegetation Treatment Program@BOF
Subject: Your latest draft of EIP re Chapparal Treatment

As people concerned with California's handling of the environment, we strongly oppose Cal Fire's recent draft Environmental Impact Plan concerning vegetation treatment, which seems to be largely a rehash of the previous draft plan which was widely opposed, and failing to incorporate many science based recommendations that would have improved it. We ask you to go back to the drawing boards (as the expression goes) and come up with a plan that is solidly rooted in science, recognizes and deals with the potential impacts of the clearing of the chaparral, and actively seeks mitigations of these impacts in ways that will adequately mitigate them and are enforceable.

Richard and Judith Opsahl
Mr and Mrs Richard Opsahl,
501 Portola Rd #8100,
Portola Valley, CA 94028

Hannigan, Edith@BOF

From: aark <aaroeschknapp@gmail.com>
Sent: Tuesday, May 31, 2016 10:43 PM
To: Vegetation Treatment Program@BOF
Subject: Brush Clearance Concern

I am concerned about the inconclusive results and time line of this proposed 22 million acreage burn or herbicide use!

"After numerous hearings and comments, the latest revised Draft Programmatic Environmental Impact Report (DPEIR) of CalFire's Vegetation Treatment Program (VTP) was released April 1, 2016. **The proposal targets approximately 22 million acres (about 1/4 of the entire state) to be burned, masticated, or sprayed with herbicides.**

The Program if approved **will exempt individual clearance projects from citizen and independent scientific oversight** that would normally be required under the California Environmental Quality Act (CEQA).

Please follow the CEQA guidelines and respond to citizen and organization concerns!

AA Roesch-Knapp

Hannigan, Edith@BOF

From: Kelly Schmoker <molybden42@gmail.com>
Sent: Tuesday, May 31, 2016 4:39 PM
To: Vegetation Treatment Program@BOF

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[Petitioning California Board of Forestry and Fire Protection Edith Hannigan, Board Analyst and 1 other](#)

Stop Plan to Target 22 Million Acres of Habitat in California for clearance

Grinding up living habitat along with small wildlife
throughout California
is not acceptable



[The California Chaparral Institute](#)

8,093

Supporters

UPDATED 5/24/2016

Please join us in calling on the California Board of Forestry to revise its latest version of its proposed habitat clearance program that targets 1/4 of the state of California with herbicides, grinding machines, and unnatural fire.

We call on them instead to create a **Comprehensive Fire Protection Program** that:

- focuses on actual assets at risk rather than habitat clearance
- preserves the rights of citizens to object to destructive projects
- incorporates the most current science
- understands all native shrubland habitat, especially chaparral, is threatened by too much fire

Specific details about the Board's proposal

What: Latest Draft Programmatic EIR for the Vegetation Treatment Program

Deadline for comments: May 31, 2016

More info: <http://www.californiachaparral.org/helpcalfireeir.html>

[View latest Draft Program EIR here.](#)

Summary of what's wrong:

Extensive scientific research clearly indicates that the best way to protect lives, property, and the natural environment from wildfire is through a comprehensive approach that focuses on community and regional planning, reducing ignitability of structures, and modifying vegetation within and directly around communities at risk. By focusing exclusively on clearing habitat, the Board is NOT addressing the main causes for loss of life and property from wildland fire.

The Board's proposal will target about 22 million acres (1/3 of the entire state) for "masticating," spraying with herbicides, burning, or grazing. This would increase its existing habitat clearance program five times over current levels. If certified, the programmatic EIR will exempt individual habitat clearance projects from public oversight required by the California Environmental Quality Act (CEQA). Everything from state parks to private lands could be stripped bare without local notice or a chance to appeal.

Every decade we increase funding for habitat clearance operations and fire suppression activities, followed by a decade of even worse fire impacts. The Board's proposal perpetuates and expands this same approach, one that has failed to reduce cumulative wildfire damage and firefighting expenditures over the past century. As a consequence, the proposal is a waste of tax payer money, will cause significant damage to the environment, and will fail to effectively protect Californians from wildland fire.

WHAT YOU CAN DO: Please go to our website to learn more about this destructive proposal, and write an informed email to the Board by 5:00 PM, May 31, 2016.

Who to send your email to:

Board of Forestry and Fire Protection
Attn: Edith Hannigan, Board Analyst
VegetationTreatment@BOF.ca.gov

Thank you!

This petition will be delivered to:

- **California Board of Forestry and Fire Protection**
Edith Hannigan, Board Analyst
- **California Natural Resources Agency**
Secretary John Laird

Read the letter

Letter to

California Board of Forestry and Fire Protection Edith Hannigan, Board Analyst

California Natural Resources Agency Secretary John Laird

I request the California Board of Forestry to completely rewrite the Draft Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program so that it properly evaluates all environmental impacts that may be caused by the proposed clearance of more than 1/2 million acres of habitat per decade. I also urge the Board to work with independent scientists to create a program that will properly consider the entire fire environment, reflect regional differences, allow for independent oversight, and incorporate the most up to date science.

The Board's proposal focuses entirely on clearing vegetation, despite extensive scientific research that clearly indicates the best way to protect lives, property, and the natural environment from wildfire is by addressing the entire fire environment: ignitability of structures, community and regional planning, and science-based vegetation management within and directly around communities at risk. Leave the backcountry alone. Concentrate where the actual risks are: in and around communities.

I strongly object to the way this draft EIR proposes to take away my rights as a citizen to challenge individual clearance projects under the California Environmental Quality Act.

As a planning document, the draft EIR is completely inadequate. It fails to clearly explain its environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread. The maps provided do not provide the detail needed to allow a proper evaluation. The draft EIR also fails to properly evaluate the cumulative effects of the proposal.

Please revise the Vegetation Treatment Program Draft Programmatic EIR so it addresses and includes the suggestions offered by the California Chaparral Institute. Please embrace a collaborative approach with all stakeholders in order to develop a successful and sustainable wildland fire risk reduction program.

From: Kelly Schmoker <molybden42@gmail.com>
Sent: Tuesday, May 31, 2016 4:50 PM
To: Vegetation Treatment Program@BOF
Subject: Fuel modification and clearance

I am requesting the California Board of Forestry to revise its latest version of its proposed habitat clearance program that targets 1/4 of the state of California with herbicides, grinding machines, and unnatural fire.

I call on you instead to create a **Comprehensive Fire Protection Program** that:

- focuses on actual assets at risk rather than habitat clearance
- preserves the rights of citizens to object to destructive projects
- incorporates the most current science
- understands all native shrubland habitat, especially chaparral, is threatened by too much fire.

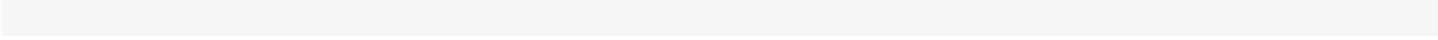
Extensive scientific research clearly indicates that the best way to protect lives, property, and the natural environment from wildfire is through a comprehensive approach that focuses on community and regional planning, reducing ignitability of structures, and modifying vegetation within and directly around communities at risk. By focusing exclusively on clearing habitat, the Board is NOT addressing the main causes for loss of life and property from wildland fire.

The Board's proposal will target about 22 million acres (1/3 of the entire state) for "masticating," spraying with herbicides, burning, or grazing. This would increase its existing habitat clearance program five times over current levels. If certified, the programmatic EIR will exempt individual habitat clearance projects from public oversight required by the California Environmental Quality Act (CEQA). Everything from state parks to private lands could be stripped bare without local notice or a chance to appeal.

Every decade we increase funding for habitat clearance operations and fire suppression activities, followed by a decade of even worse fire impacts. The Board's proposal perpetuates and expands this same approach, one that has failed to reduce cumulative wildfire damage and firefighting expenditures over the past century. As a consequence, the proposal is a waste of tax payer money, will cause significant damage to the environment, and will fail to effectively protect Californians from wildland fire.

Thank you,

Kelly Schmoker



- 1.
- 2.
- 3.
- 4.



Hannigan, Edith@BOF

From: Nina Sagheb <sagheb.nina@gmail.com>
Sent: Tuesday, May 31, 2016 10:58 AM
To: Vegetation Treatment Program@BOF
Subject: Objection to fast tracking this important chaparral issue.

Good Morning;

In the latest draft,

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

Please re consider this important decision.

Sincerely,

Nina Schulman

Hannigan, Edith@BOF

From: Nina Sagheb <sagheb.nina@gmail.com>
Sent: Tuesday, May 31, 2016 5:22 PM
To: Vegetation Treatment Program@BOF
Subject: Re. Plan for clearance of Northern Chaparral

Good Morning;

In the latest draft,

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

Please re consider this important decision.

Sincerely,

Nina Schulman

Hannigan, Edith@BOF

From: Elizabeth <thomasef53@gmail.com>
Sent: Tuesday, May 31, 2016 1:44 PM
To: Vegetation Treatment Program@BOF
Subject: Chaparral Clearance Planning

Attention: Edith Hannigan

It was brought to my attention that a sweeping program to reduce vegetation in chaparral lands has been proposed. This program has several deficits, summarized here:

- Potential impacts are dismissed without support
- Mitigation of impacts are unenforceable and there is no plan to measure them
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientist continues to be misrepresented.
- Lack of transparency remains a significant issue

PLEASE reconsider this plan. This affects 22 million acres, ONE-FOURTH of the state, that would be burned, chewed or sprayed with herbicides.

Sincerely,
Elizabeth F Thomas MD

Hannigan, Edith@BOF

From: sue.thorson@gmail.com on behalf of Sue Thorson <thorson948@comcast.net>
Sent: Monday, May 30, 2016 11:28 PM
To: Vegetation Treatment Program@BOF
Subject: Chaparal

This is what bothers me the most about the proposal:

"The Board's proposal will target about 22 million acres (1/3 of the entire state) for "masticating," spraying with herbicides, burning, or grazing. This would increase its existing habitat clearance program five times over current levels. If certified, the programmatic EIR will exempt individual habitat clearance projects from public oversight required by the California Environmental Quality Act (CEQA). Everything from state parks to private lands could be stripped bare without local notice or a chance to appeal."

This is too drastic and destructive. There must be a better way.

Sue Thorson
Fresno, CA

Hannigan, Edith@BOF

From: Stacey Vielma <vielmastacey@gmail.com>
Sent: Tuesday, May 31, 2016 5:46 PM
To: Vegetation Treatment Program@BOF
Subject: EIR for Vegetation Treatment Program

California Board of Forestry and Fire Protection Edith Hannigan, Board Analyst

California Natural Resources Agency Secretary John Laird

I request the California Board of Forestry to completely rewrite the Draft Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program so that it properly evaluates all environmental impacts that may be caused by the proposed clearance of more than 1/2 million acres of habitat per decade. I also urge the Board to work with independent scientists to create a program that will properly consider the entire fire environment, reflect regional differences, allow for independent oversight, and incorporate the most up to date science.

The Board's proposal focuses entirely on clearing vegetation, despite extensive scientific research that clearly indicates the best way to protect lives, property, and the natural environment from wildfire is by addressing the entire fire environment: ignitability of structures, community and regional planning, and science-based vegetation management within and directly around communities at risk. Leave the backcountry alone. Concentrate where the actual risks are: in and around communities.

I strongly object to the way this draft EIR proposes to take away my rights as a citizen to challenge individual clearance projects under the California Environmental Quality Act.

As a planning document, the draft EIR is completely inadequate. It fails to clearly explain its environmental impacts on wildlife, plant communities, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread. The maps provided do not provide the detail needed to allow a proper evaluation. The draft EIR also fails to properly evaluate the cumulative effects of the proposal.

Please revise the Vegetation Treatment Program Draft Programmatic EIR so it addresses and includes the suggestions offered by the California Chaparral Institute. Please embrace a collaborative approach with all stakeholders in order to develop a successful and sustainable wildland fire risk reduction program.

Thank you for taking my comments.

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Stacey Vielma
619.813.8060
vielmastacey@gmail.com

Hannigan, Edith@BOF

From: Jenny <jensoasis@aol.com>
Sent: Wednesday, May 25, 2016 6:17 AM
To: Vegetation Treatment Program@BOF

California Board of Forestry and Fire Protection,
Edith Hannigan, Board Analyst
email: VegetationTreatment@bof.ca.gov,

Dear Edith Hannigan and board members,

Fire is a natural occurrence. Converting natural habitat to help prevent fire is not natural. Clearance of chaparral has many fallacies. One is that fire suppression should be from the line of the houses out and should not begin from the chaparral wild areas.

I urge you to **not make the same errors** over and over again. Your latest draft has ignored valuable information and potential impacts are ignored without support. The draft continues to use outdated data while ignoring new data from Calfire! The draft includes research from several scientists which continues to be misrepresented. The necessary and required thorough investigation of impacts is still missing.

Clearing vegetation should never be the first choice. If it is, then why not clear all the forests and chaparral and replace them with cookie cutter communities? That is not my preference, yet with this draft it is where we are headed.

Respectfully submitted,

Jenny Wilder,
19607 Sandy Ln, Apple Valley, Ca 92308

"We plant trees not for ourselves, but for the future generations." - Caecilius Statius, 200-168 B.C.

Hannigan, Edith@BOF

From: John Williams <jnwilliams1@gmail.com>
Sent: Tuesday, May 31, 2016 3:43 PM
To: Vegetation Treatment Program@BOF
Subject: Stop Plan to Target 22 Million Acres of Habitat in California for Clearance

I request the California Board of Forestry to completely rewrite the Draft Programmatic Environmental Impact Report (EIR) for the Vegetation Treatment Program so that it properly evaluates all environmental impacts that may be caused by the proposed clearance of more than 1/2 million acres of habitat per decade. I also urge the Board to work with independent scientists to create a program that will properly consider the entire fire environment, reflect regional differences, allow for independent oversight, and incorporate the most up to date science.

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Please revise the Vegetation Treatment Program Draft Programmatic EIR so it addresses and includes the suggestions offered by the California Chaparral Institute. Please embrace a collaborative approach with all stakeholders in order to develop a successful and sustainable wildland fire risk reduction program.

Thank you for taking my comments.

Sincerely,
John N. Williams
1709 Tea Place
Davis, CA 95618

Hannigan, Edith@BOF

From: Beth Wurzburg <wurzburg.beth@gmail.com>
Sent: Tuesday, May 31, 2016 9:22 AM
To: Vegetation Treatment Program@BOF
Subject: Withdraw latest DPEIR

Dear Board of Forestry Members,

You have an enormous responsibility - not only to protect lives and property, but also to carefully consider the outstanding natural resources of California when making decisions regarding fire safety.

The DPEIR covers almost 22 million acres - 1/4 of the state of California. Shockingly, instead of focusing on the best ways to protect lives and the natural environment from wildfire, the document focuses entirely on vegetation clearing. This is an old, outdated approach that is incredibly destructive and goes against what we have learned from research on wildfire safety - namely, that the best way to protect lives, property, and the natural environment is to address the entire fire environment. That means looking at community and regional planning, working on the ignitability of structures, and using science-based vegetation management *within and directly around communities at risk*. It does *not* mean wholesale clearing and mastication of millions of acres of wildland.

With the understanding that our common goals include protecting life, property and the natural environment from damage caused by wildland fires, I must ask you to withdraw the current vegetation treatment program programmatic EIR. The document is entirely inadequate. By ignoring current fire safety science, the DPEIR actually *increases the risk to lives, property and wildlife*.

The latest DPEIR fails to address the glaring mistakes, misrepresentations, and missing information of the earlier DPEIR. Furthermore, the document ignores current science, contradicts itself, and fails to meet CEQA guidelines.

Major failures of this DPEIR include:

- (1) the continued use of *outdated and inadequate spatial data* that provides the foundation for the entire Program. Updated data is available from Cal Fire, but the DPEIR ignores this data. This failure alone means that the DPEIR does not meet the requirements of California's Environmental Quality Act.
- (2) the dismissal of potential impacts without support for this position. This is shocking since we're discussing 22 million acres of wildland.
- (3) the use of impact mitigations that are both unmeasurable and unenforceable.
- (4) failure to consider the *entire* fire environment (community developments, structures, etc.)
- (5) a lack of genuine alternatives to the proposed methods, as required under CEQA.
- (6) failure to review opposing expert opinions on the project
- (7) exempting projects from independent citizen and scientific oversight normally required under CEQA. It's hard to justify ignoring CEQA when you're discussing 1/4 of the state's land.

(8) the continued misrepresentation of scientific research, despite the fact that information was provided to correct these statements.

I don't believe you want this fire safety plan to become one of the most environmentally destructive events in California's history.

Please withdraw this DPEIR. Require a new document that: uses the best science, the most recent data, focuses on high risk areas rather than a mass clearing of habitat, includes real/measurable/enforceable mitigation, addresses opposing points of view, and allows for independent citizen and scientific oversight (required under CEQA). This project is too large and too important not to get right.

Sincerely,

Beth A. Wurzburg
2042 Leimert Blvd.
Oakland, CA 94602

Hannigan, Edith@BOF

From: Marina Zlatin <marzlatin@gmail.com>
Sent: Tuesday, May 31, 2016 8:30 AM
To: Vegetation Treatment Program@BOF
Subject: draft for vegetation clearance on 22 million acres is unreasonable

Dear Ms Hannigan:

The latest draft for vegetation clearance on 22 million acres (1/4 of California) by burning, mastication, or spraying of herbicides is unsound. I would even call it environmental crime.

It will exacerbate the drought, contaminate environment with carcinogenic pesticides, and destroy wildlife.

I hope it will be reviewed, rejected, and new plan with input from independent environmental scientists drafted instead

In the latest draft:

- Potential impacts are dismissed without support
- Mitigations of impacts are unenforceable and unmeasurable
- Clearance of northern chaparral is justified by logical fallacies
- Research of several scientists continues to be misrepresented (despite corrections being submitted)
- Lack of transparency remains a significant issue

One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, **the DPEIR ignores this rich resource** and depends instead on questionable information from decades ago.

My son is a resident of California, and he should not live, literally, on a "scorched earth", especially chemically scorched. Use of herbicides in forestry should be forbidden. I hope this unwise proposal will be cancelled

Sincerely,

Marina Zlatin, BS/MS in Environmental and Agricultural Chemistry, Moscow University, 1982

PhD in Biology, 1986

Hannigan, Edith@BOF

From: Marina <marzlatin@gmail.com>
Sent: Tuesday, May 31, 2016 3:31 PM
To: Vegetation Treatment Program@BOF
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