

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The second problem is the viewpoint of the committee that wrote this totally out of date inexcusable report.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