

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)