

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