

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How can a supposedly scientific program use outdated and inadequate spatial data as the foundation for the program?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