

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 One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program.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