

## Hannigan, Edith@BOF

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**From:** Wendy <wlk@sonic.net>  
**Sent:** Thursday, May 26, 2016 8:57 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** proposed Vegetation Treatment Plan

Edith Hannigan, Board Analyst  
Dear Ms. Hannigan,

I'm writing to express my dismay and disapproval of the revised proposed Vegetation Treatment Plan for California.

As a native Californian who grew up surrounded by native chaparral and who experienced several major wildfires first hand, I feel that the proposed plan is in contradiction with the current science of vegetation management as well as the environmental and climate goals of the state.

I completely support and agree with the letter submitted by the Chaparral Institute on May 24, 2016, as well as their prior comments.

In particular, in the latest draft plan:

- 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

One of the most egregious examples of the DPEIR's failure is the continued use of outdated and inadequate spatial data that provides the foundation for the entire Program.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

The most concerning issue, however, relates to the failure of the document to provide a key component of a programmatic EIR - providing a more exhaustive consideration of effects and cumulative impacts than could be accomplished at the project level (14 CCR § 15168).

I request that you reject this proposed plan and make a concerted effort to include the recommendations provided by both the Chaparral Institute and the Conservation Biology Institute.

Thank you for considering my comments.  
Wendy Krupnick  
4993 B. Occidental Rd.  
Santa Rosa, 95401

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