

**From:** Andrew Smisek <smisekak@gmail.com>  
**Sent:** Tuesday, May 31, 2016 2:48 PM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Response to DPEIR

1. This Draft Programmatic Environmental Impact Report fails to uphold Californian values. The following list is taken directly from the comment letter from the Chaparral Institute. I concur with their concerns and I'm presenting this to you as a show of my support for their agenda. Please consider addressing these issues.

1. Circumventing CEQA

- - impacts determined to be less than significant by the “Fallacy of Authority” (our conclusions are true because we say so – no evidence provided)
- - lack of detail as required within a programmatic EIR
- - passing on responsibility to project managers to determine potential impacts
- - inadequate mitigation measures
- - Significance Criteria to determine impact to biological resources dismissed without support

2. Substandard Research

- - misrepresenting cited scientific literature
- - dependence on anecdotal evidence
- - contradictory statements
- - ignoring information in the record
- - cited references missing, non sequiturs

3. Inadequate Data

- - outdated fire hazard analysis model/data unsuitable for project level planning
- - utilizing coarse-scale maps that cannot provide sufficient detail for competent analysis
- - WUI assessments based on 26-year-old information
- - dependence on maps that no longer reflect current conditions

Please address these issues and consider revising the Vegetation Treatment Plan.

Thank you,

Andrew Smisek