

Hannigan, Edith@BOF

From: Peter St. Clair <phstc@aol.com>
Sent: Saturday, May 28, 2016 11:36 AM
To: Vegetation Treatment Program@BOF
Subject: VTPEIR

I sent detailed comments on VTPEIR earlier in May, 2016 and in 2013.

VTPEIR is poorly researched and written.

I'd like briefly summarize the major fatal problems:

1. The PEIR lacks any fundamental environmental analysis. It is largely a description of the proposed project. PEIR presents no information about impacts. It says all impacts are mitigated by proposed SPA's for vegetation treatment. It proposes a "checklist" program for specific project analysis. The program objectives elevate new treatment over maintenance of existing treated areas. There is no analysis for any of this.
2. The PEIR fails to address obvious alternatives. The most important is PRC 4291, the defensible space act. Structures can be hardened against fire and communities made more fire safe without the extensive vegetation treatment assessed in the PEIR. There are many more existing or potential alternatives that address vegetation treatment outside areas where it is required for defensible space-areas where treatment improves natural resource quality. These are not mentioned as alternatives to vegetation treatment. They may be superior in all respects to just cutting, spraying, burning or ripping out California's native plants.
3. The PEIR fails to incorporate CalFire's own scientific research and data on vegetation types throughout the state. Its "science" is outdated and many of its conclusions from citations are disputed by the very authors of the studies.

The PEIR fails to achieve the minimal levels of accuracy and analysis required by CEQA.

4. The vegetation treatment program virtually eliminates public input. It dismisses post-treatment analysis and review, preferring to adopt something called active adaptive management, which is just a simple way of saying, "If CalFire did it, it was right."

Peter H. St. Clair
2341Whitman Street
San Diego CA 92103
619-260-1307