

## Hannigan, Edith@BOF

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**From:** Beth Wurzburg <wurzburg.beth@gmail.com>  
**Sent:** Tuesday, May 31, 2016 9:22 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** Withdraw latest DPEIR

Dear Board of Forestry Members,

You have an enormous responsibility - not only to protect lives and property, but also to carefully consider the outstanding natural resources of California when making decisions regarding fire safety.

The DPEIR covers almost 22 million acres - 1/4 of the state of California. Shockingly, instead of focusing on the best ways to protect lives and the natural environment from wildfire, the document focuses entirely on vegetation clearing. This is an old, outdated approach that is incredibly destructive and goes against what we have learned from research on wildfire safety - namely, that the best way to protect lives, property, and the natural environment is to address the entire fire environment. That means looking at community and regional planning, working on the ignitability of structures, and using science-based vegetation management *within and directly around communities at risk*. It does *not* mean wholesale clearing and mastication of millions of acres of wildland.

With the understanding that our common goals include protecting life, property and the natural environment from damage caused by wildland fires, I must ask you to withdraw the current vegetation treatment program programmatic EIR. The document is entirely inadequate. By ignoring current fire safety science, the DPEIR actually *increases the risk to lives, property and wildlife*.

The latest DPEIR fails to address the glaring mistakes, misrepresentations, and missing information of the earlier DPEIR. Furthermore, the document ignores current science, contradicts itself, and fails to meet CEQA guidelines.

Major failures of this DPEIR include:

- (1) the continued use of *outdated and inadequate spatial data* that provides the foundation for the entire Program. Updated data is available from Cal Fire, but the DPEIR ignores this data. This failure alone means that the DPEIR does not meet the requirements of California's Environmental Quality Act.
- (2) the dismissal of potential impacts without support for this position. This is shocking since we're discussing 22 million acres of wildland.
- (3) the use of impact mitigations that are both unmeasurable and unenforceable.
- (4) failure to consider the *entire* fire environment (community developments, structures, etc.)
- (5) a lack of genuine alternatives to the proposed methods, as required under CEQA.
- (6) failure to review opposing expert opinions on the project
- (7) exempting projects from independent citizen and scientific oversight normally required under CEQA. It's hard to justify ignoring CEQA when you're discussing 1/4 of the state's land.

(8) the continued misrepresentation of scientific research, despite the fact that information was provided to correct these statements.

I don't believe you want this fire safety plan to become one of the most environmentally destructive events in California's history.

Please withdraw this DPEIR. Require a new document that: uses the best science, the most recent data, focuses on high risk areas rather than a mass clearing of habitat, includes real/measurable/enforceable mitigation, addresses opposing points of view, and allows for independent citizen and scientific oversight (required under CEQA). This project is too large and too important not to get right.

Sincerely,

Beth A. Wurzburg  
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