



Southwest Wetlands Interpretive Association

700 Seacoast Drive, Suite 108

Imperial Beach, CA 91932

12 January 2018

Edith Hannigan, Board Analyst
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
VegetationTreatment@bof.ca.gov

(submitted 12 January 2018 via email to VegetationTreatment@bof.ca.gov)

Subject: Vegetation Treatment Program Recirculated Revised Draft Program Environmental Impact Report

Dear Ms. Hannigan:

The Southwest Wetlands Interpretive Association (SWIA) is a non-profit organization dedicated to helping preserve and enhance wetlands and their watersheds throughout southern California – and particularly in the Tijuana River watershed and South San Diego Bay. Historical losses of wetlands and vegetation conversions and outright losses of habitat in many watersheds threaten downstream wetlands and coastal wetlands. In addition, climate change poses a spectrum of direct (temperature and rainfall) and indirect (competition with non-native species and pest infestations) impacts.

SWIA has reviewed the VTP and EIR and concurs with the letter submitted by the Endangered Habitats League (EHL) and co-signing organizations: “After carefully reviewing the VTP DEIR, we have concluded that it fails to comply with the requirements of the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 *et seq.* (“CEQA”). As described below, the DEIR violates CEQA because it: (1) fails to adequately describe the VTP; (2) fails to properly analyze the Program’s environmental impacts; (3) relies on ineffective and unenforceable mitigation to conclude that the VTP’s impacts would be reduced to levels that are less than significant; and (4) fails to undertake a legally sufficient study of alternatives to the Program. Such fundamental errors undermine the integrity of the DEIR.”

We request that our comments be added to the project’s administrative record.

Please contact Bill Tippetts (billtippetts@gmail.com) regarding these comments.

Sincerely,

Handwritten signature of Michael R. McCoy in blue ink.

Mike McCoy
President

Handwritten signature of William E. Tippetts in blue ink.

Bill Tippetts
Board Member

Cc: SWIA Board