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Sent: Tuesday, May 24, 2016 10:22 PM
To: Vegetation Treatment Program@BOF
Subject: Comments

As a former CDF firefighter and a Registered Civil Engineer, I believe that the current EIR fails to meet the requirements of the California Environmental Quality Act (CEQA). The current DPEIR fails to provide adequate support for concluding that the proposed program will not have a significant effect on the environment. Briefly, the reasons for these failures include:

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)
2. Substandard Research - misrepresenting cited scientific literature and dependence on anecdotal evidence
3. Inadequate Data - outdated fire hazard analysis model/data unsuitable for project level planning

The DPEIR also fails to properly address the impacts the Program may have on carbon emissions and the loss of carbon sequestration by the clearance of native habitats. It fails to properly consider all the environmental impacts. It fails to properly protect our communities from fire (by focusing on habitat clearance rather than community and home flammability). Finally, it fails to properly consider the entire fire risk reduction equation.

Thank you.

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