

## Hannigan, Edith@BOF

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**From:** angora11@roadrunner.com  
**Sent:** Wednesday, May 25, 2016 9:48 AM  
**To:** Vegetation Treatment Program@BOF  
**Subject:** California Board of Forestry's Vegetation Treatment Program

Dear California Board of forestry, The current Draft Programmatic EIR fails to meet the requirements of the California Environmental Quality Act (CEQA).

In the latest draft:

- Environmental impacts of clearance operations are dismissed without support
- Clearance of northern chaparral is justified by logical fallacies
- Lack of transparency concerning public involvement and notification regarding clearance projects remains a significant issue

The document also reveals a significant number of inconsistencies as the document initially references current science to only qualify or ignore it later in order to support the Program's objectives. By using contradictory statements, undefined terms, and legally inadequate mitigation processes, the document is a testament in ambiguity. It appears to be a program in search of confirming data rather than one developed from examining the actual problem.

One of the most egregious examples of the document's failure is the continued use of outdated and inadequate data that provides the foundation for the entire Program. Although updated data is available from Cal Fire itself, the document ignores this resource and depends instead on questionable information from decades ago. Please use the most recent science of fire and habitat written by the CCI. Sincerely, Leah J. Gibson-Corcoran