



September 24, 2015

J. Keith Gilles, Chair
Board of Forestry and Fire Protection
ATTN: Matt Dias
PO Box 944246
Sacramento, CA 94244-2460

**RE: Item 12, Sept 29, 2015: Draft Vegetation Treatment Program EIR
Workshop/Consultation Summary**

Dear Chairperson Gilles and Members of the Board:

Endangered Habitats League (EHL) appreciates the opportunity to provide input on whether to publish a Notice of Preparation for the Draft Vegetation Treatment Program EIR (PEIR). EHL continues to have serious concerns with moving forward and advises taking additional time for outside scientific review. A summary of our concerns (previously submitted for the August 26, 2015 meeting) is enclosed for your reference. In several ways, the program is too open ended and inefficient in achieving its goals.

Additional scientific review could occur informally with a scientists group that EHL would be happy to convene, or more formally via facilitation by the California Landscape Conservation Cooperative.

We strongly believe that the Draft PDEIR before you is not ready for public review, being deficient both scientifically and legally. The most time and cost effective way to produce a better program is *early* consultation. It is our nearly universal experience that once a draft EIR is issued, the lead agency becomes locked into its program. Change becomes increasingly difficult over time. Indeed, we believe that your leadership *right now* is necessary to catalyze change.

We value our relationship with CAL FIRE and are optimistic that the program can be improved through collaboration and treatment regimes made more specific. In doing so, it can continue to satisfy fire safety goals. There is no harm in taking this opportunity.

Yours truly,

Dan Silver
Executive Director

Enclosure