December 5, 2019

Matt Dias, Executive Officer
Board of Forestry
1416 9th Street, Room 1506-16
Sacramento, CA

RE: Request to Reschedule the Public Hearing of the Vegetation Treatment Program and Program Environmental Impact Report

Mr. Dias:

On behalf of our respective organizations, we respectfully urge the Board of Forestry to reschedule the public hearing of the Vegetation Treatment Program and Program Environmental Impact Report (CalVTP PEIR) for the January Board meeting.

In response to the CalVTP PEIR Draft, the Board received comments from 30 agencies, 12 elected officials, 37 organizations and 9 individuals. After four months, the Board released the final CalVTP PEIR on the Wednesday before Thanksgiving, simultaneously issuing its December agenda, which indicated that the Board would consider the Program and PEIR at their December 11 board meeting, and could approve the PEIR that same day.

The hearing of this item at the December 11 board meeting is not just for the Board to consider the PEIR, it is supposed to provide an opportunity for the public to provide input in response to the proposed PEIR, as required by CEQA, so that the Board may be fully informed regarding the changes made to the previous draft. However, given the timing of the release and announcement, and the incredibly short time period for public review, it is impossible for the public to provide the Board with adequate input on December 11.

Thanksgiving and the following Friday were likely not workdays for the majority of stakeholders engaged in the CalVTP process. If the Board holds a vote to approve the CalVTP PEIR on December 11, stakeholders will only have seven business days to review the extensive document along with equally extensive responses to comments. Seven days is an insufficient amount of time to conduct an adequate review and develop meaningful input for the Board.

Further, the presentation of the final CalVTP PEIR on the Board’s website is confusing and has inadvertently impeded the public’s awareness of the document and curtailed the time available to review it. The Board’s website features language suggesting that the CalVTP PEIR is still in draft form. Unless a user clicks the “California Vegetation Treatment Program (CalVTP)-Online Viewer” link without being prompted to do so, there is no way of knowing that the final version
is available. If a stakeholder is not checking the CalVTP online viewer link regularly, locating the final document is unnecessarily and dishearteningly difficult.

We recognize that this Program is more than 15 years in the making and that the Board hopes to approve it before the end of the year. However, adhering to an arbitrary deadline is not as important as guaranteeing meaningful stakeholder engagement.

We respectfully request that the Board reschedule for its January meeting the hearing of the CalVTP PEIR to provide time for the public to be made aware of the final document and given a chance to review it, so that the Board can be fully informed when they consider the PEIR. In the meantime, we ask the Board to revise its website to increase the document’s visibility.

Sincerely,

Daniel Barad
Sierra Club California

Richard Halsey
California Chaparral Institute

Brian Nowicki
Center for Biological Diversity

Dan Silver
Endangered Habitats League