

September 2, 2014

To: Karen Ross, Secretary and Michele Dias, General Counsel
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
via e-mail: secretary.ross@cdfa.ca.gov, michele.dias@cdfa.ca.gov

From: The 15 undersigned organizations

Re: Request for extension of public review period for Statewide Plant Pest Prevention Programmatic Environmental Impact Report

Dear Secretary Ross and Ms. Dias:

The 15 undersigned organizations request an extension of the public review period for the Statewide Plant Pest Prevention Programmatic Environmental Impact Report to at least 90 days.

Our reasons for requesting this extension are:

The California Department of Food and Agriculture (CDFA) spent three years preparing this document, which comprises more than 3,500 pages of text plus data files. It is not possible for the working public to read adequately analyze, and prepare meaningful comments on such a lengthy document in a 45-day period.

We anticipated this concern. In our meetings with you and other CDFA staff when the PEIR was first proposed, we specifically noted that a document of such sweeping scope, covering the entire state and all of CDFA's existing pest programs plus other future programs, could not be adequately reviewed within the legal minimum 45-day California Environmental Quality Act (CEQA) review period. CDFA's response was that a public comment period "above and beyond" what is legally required would be scheduled as part of CDFA's commitment to public participation. Despite those assurances, the comment period being provided by CDFA for this document is the bare minimum.

Undersecretary Schubert, in her comments on the informational call about the PEIR on Aug. 25, acknowledged that she had not read all of the document because of its length. We have devoted as much time as feasible to reading it during the past week and find that it is not possible to progress at a pace that would allow us to complete it, let alone analyze it and formulate comments in 45 days.

Moreover, the PEIR risk assessment data Dashboard cannot be viewed by members of the public who use Macintosh computers. Given the size of the risk assessment files – approximately 500MB – and the repeated disclaimers in the PEIR that the data must be viewed and understood in the context of the 1,800-plus pages of the risk assessment appendix, it is essential that the Dashboard be available for the full public review period and in a format that allows interested members of the public sufficient time and opportunity to read and analyze all of the related material together. We ask that, in addition to extending the public review period to allow for adequate review of the risk assessment text and data, the data be made available in a format accessible to users of the second-most-common computer operating system in the U.S., as is standard practice for most programs and documents today, in fulfillment of CDFA's stated commitment to public participation.

According to the CEQA guidelines, section 15201 "Public participation is an essential part of the CEQA process." The public cannot participate meaningfully in reviewing this draft in only 45 days; we therefore request an extension of the public comment period to a minimum of 90 days, and a response from you within 2 business days to enable us to plan accordingly.

Sincerely,

Action Now
Mitzi Shpak, Executive Director
Altadena CA

Better Urban Green Strategies (BUGS)
Samantha McCarthy
Davis CA

California Environmental Health Initiative
Nan Wishner, Board Member
Oakland CA

Californians for Pesticide Reform
Tracey Brieger, Sarah Aird, Co-Directors
San Francisco CA

California Sportfishing Protection Alliance
Bill Jennings, Executive Director
Stockton CA

Center for Environmental Health
Caroline Cox, Research Director
Oakland CA

Gayle McLaughlin, Mayor, City of Richmond, California

MOMS Advocating Sustainability
Debbie Friedman, Chairperson
Mill Valley CA

Northcoast Environmental Center
Dan Ehresman, Executive Director
Arcata CA

Physicians for Social Responsibility, San Francisco Bay Area Chapter
Robert Gould, MD, President

Raptors Are The Solution (RATS)
Lisa Owens-Viani, Founder
Berkeley CA

San Francisco Baykeeper
Sejal Choksi, Program Director
San Francisco CA

Save the Frogs!
Kerry Kriger, PhD., Founder, Executive Director, Ecologist
Santa Cruz CA

TEDX (The Endocrine Disruption Exchange)
Lynn Carroll, Senior Scientist
Paonia CO

Topanga Creek Watershed Committee
Ben Allanoff, Carrie L. Carrier, Rabyn Blake, Gail McDonald-Tune,
and Bill Bowling - Board Members
Topanga CA