

11/30/2009 2:05 PM

From: Leslie Mink leslie@plumascounty.org
To: ForestPlan_Comments@waterboards.ca.gov
Subject: Comment from Watershed Restoration Group

Hi, I work with the Feather River Coordinated Resource Management Group and work on numerous watershed restoration projects that incorporate both NF and private lands. I appreciate your efforts to avoid duplication of effort. I have run across such duplication numerous times, and it is frustrating to see scarce restoration dollars go to unnecessary duplicated environmental review. I see the basic problem being a lack of trust that one agency will cover what the other deems important, and that every agency fears being sued, and so begins the ever-increasing effort to cover everyone's "back end." Efficient government requires an effort to resist that tendency.

1) So, PLEASE, if a NEPA document is required for a project, please don't also require a CEQA document. I think that CEQA should allow a NF deciding official to also make the call on private land, because the call is really only on whether or not all environmental review has been properly completed.

2) But, OK, if that's too much, how about that if state money is being used to implement a project that is SOLELY on National Forest land, then NEPA is the ONLY environmental review that is needed. How about that? It makes sense to me. What doesn't make sense is that I am in the process of finally completing the EA for a project on National Forest land. I have heard that as soon as bond funds are available, the state money will be available for implementation, as we were awarded the grant funds through the competitive process. We are planning implementation in 2010. We still have to go through the CEQA process though, which will involve the same announcements in the same papers, and specific scoping to the same individuals. Quite frankly, I am embarrassed to have to do this. If I were the individual being scoped twice for this, I would be disgusted at the waste of taxpayer money. But since the agency with the purse strings told us to do it, we will. We complained about the unnecessary duplication of effort, and were told that yes, they agreed it didn't make sense, but we have to do it anyway. So is there some way to change this rule? (Or is there even such a rule, and the grant managers were just assuming that the use of state money on federal land requires CEQA?) Please let me know how this issue will be addressed in the WQMP. Thank you. -Leslie Mink