November 21, 2024

Daron McDaniel Chair, Golden State Finance Authority 1215 K Street, Suite 1650 Sacramento, CA 95814

Dear Mr. McDaniel,

On behalf of the undersigned organizations, we hereby request **GSFA offer public hearings** on the draft environmental impact report (DEIR) for Golden State Natural Resources' (GSNR) Forest Resiliency Demonstration Project (the project) in consideration of providing interested members of the public with an opportunity to review and analyze the voluminous DEIR and meaningfully participate in GSNR public hearings held by GSFA. While we appreciate GSFA's 30-day comment period extension, public hearings are needed to allow members of the public the opportunity to comment orally on the project and have their comments become part of the public record.

GSFA held public meetings on October 28, October 30, and November 4. At these meetings, community members were instructed to "make comments relevant to the DEIR," but the ability to make thoughtful comments responding to the content of the document was practically impossible. These meetings occurred six, eight, and thirteen days after the partial release of the DEIR on October 22nd. Even if the 22nd had marked the full release of the document, this schedule would have been woefully insufficient: giving members of the public less than two weeks to review the voluminous documents, two weeks that coincided with the November election, in which many community-based organizations were spending time on voter turnout. But the 22nd notably was not the final release date: the appendices weren't available until October 24th and translations of the executive summary in Spanish and Tagalog weren't available until November 4th, the day of the final meeting. Furthermore, these meetings served as information sessions, even though several members of the public were under the impression that they served as their opportunity to make public comments on the record about the DEIR. Public hearings must be scheduled to allow for community members who do not have the ability to make a written comment give their comment orally and have it submitted into the public record.

There is significant public concern about the potential environmental and health impacts of this project. Over 140 organizations, including groups based in the communities that will be directly impacted, submitted detailed comments on the scope of the project in response to the December 2022 and June 2023 notices of preparation. Furthermore, on October 18, 2024, a subset of our coalition asked GSFA to delay the public meeting schedule. That letter went unanswered. Finally, on October 25, a subset of our coalition asked GSFA to delay the public meeting schedule again. GSFA has also yet to answer that aspect of the letter.

A public hearing schedule with dates closer to the end of the DEIR review period are warranted in view of the project's substantial potential impacts on neighboring communities and the environment, the technical nature of the project's processes, and the importance of public review under CEQA. The DEIR contains extensive environmental analyses and complex modeling data. Undertaking the detailed review and consultation with scientists and communities needed to provide substantive feedback for GSFA is not a small task. After taking nearly two years following the first Notice of Preparation and repeatedly delaying the preparation and release of the DEIR, GSFA must provide adequate time for members of the public to review the project details, understand the project's impacts, and provide reasoned, detailed, and responsive comments at public hearings that will assist GSFA and the other responsible agencies for this project in their review.

The impacted residents and communities deserve ample time and opportunity to review and respond to the DEIR. In consideration of the significant interest in this project by members of the public, **GSFA must provide an appropriate public hearing schedule in response to the DEIR.**

We therefore repeat our request that GSFA add public hearings on the DEIR to more closely align with the amended end of the DEIR review period of January 20, 2025.

Sincerely,

Rita Vaughan Frost Forest Advocate Natural Resources Defense Council

Gloria Alonso Cruz Environmental Justice Advocacy Coordinator Little Manila Rising

Matt Holmes North Valley Project Coordinator Valley Improvement Projects

Ector Olivares Program Manager, Environmental Justice Catholic Charities of Stockton

Kimberly Tablit Climate Action Initiative Coordinator Stockton Service Corps

Shaye Wolf Climate Science Director Center for Biological Diversity Marily Woodhouse Director Battle Creek Alliance and Defiance Canyon Raptor Rescue

Gary Hughes Co-Director / Americas Program Coordinator Biofuelwatch

Nick Joslin Forest and Watershed Watch Manager Mount Shasta Bioregional Ecology Center

Paul Hughes Executive Director Forests Forever

Maya Khosla Sonoma County Climate Activist Network

Larry Glass President Safe Alternatives for our Forest Environment (SAFE) Julie Dunning Board President Tree Stockton Foundation

Perry Metzger President Ebbetts Pass Forest Watch

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