

BOARD OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460
Website: www.bof.fire.ca.gov
(916) 653-8007



November 7, 2017

Re: Notice of Availability of Recirculated Revised Draft Program Environmental Impact Report Regarding the Proposed Statewide Vegetation Treatment Program

To Interested Parties:

NOTICE IS HEREBY GIVEN that the California Board of Forestry and Fire Protection (Board), as lead agency under the California Environmental Quality Act (CEQA), has added significant new information to the previously circulated Draft Program Environmental Impact Report (PEIR) for the Board's Vegetation Treatment Program (VTP). The Board prepared this PEIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed VTP.

Since the public comment period in 2016, the Board has revised the VTP PEIR to include additional data and significant clarifying information. This revised VTP PEIR was prepared in compliance with CEQA and the CEQA Guidelines. (California Code of Regulations, title 14 (CEQA Guidelines), section 15000, et seq.) The Board is now recirculating the revised VTP PEIR and invites public comments on the adequacy and completeness of the environmental analysis in the document.

IMPORTANT NOTICE: Pursuant to CEQA Guideline 15088.5, subdivision (f)(1), commenters are required to submit new comments, exclusively pertaining to this recirculated revised VTP PEIR, during this new public comment/recirculation period. The Board will only respond to comments exclusively pertaining to this recirculated revised VTP PEIR, submitted during this recirculation period (e.g., the Board will not respond to any comments pertaining to prior versions of the PEIR, including comments that were previously submitted during earlier circulations). (CEQA Guideline 15088.5, sub. (f)(1).) Although previous comments submitted during the VTP PEIR's prior recirculation periods will be part of the administrative record, those comments do not require a written response in the final EIR. (*Id.*)

PROGRAM LOCATION: The mission of the Board includes developing policies and programs that implement a fire protection system that protects the people of California. To accomplish this mission, the Board proposes the implementation of the VTP to reduce the wildland fuel threat on State Responsibility Area (SRA) lands and restore economically and environmentally sustainable range landscapes.

The SRA is the land in California where the state has the financial responsibility for the prevention and suppression of wildfires. (Pub. Resources Code, §§ 4102, 4125.) The SRA landscape consists of approximately 31 million acres across California that include lands covered wholly or in part by forests or are principally used for range or forage purposes. (Pub. Resources Code, § 4126.) The VTP provides a process for the implementation of specific vegetation treatment activities at appropriate locations and scales in the SRA to meet the VTP's objectives for fire prevention, fire protection, and/or ecological restoration. Proposed VTP subsequent activities are limited to approximately 22 million acres in the SRA. Vegetation treatment activities will be implemented primarily on privately owned land within the SRA, and only on a voluntary basis.

It is anticipated that subsequent activities under the proposed VTP will take place on approximately 60,000 acres per year, less than 2% of the SRA landscape. Because this program depends on willing landowners, available funding, and available treatment days, it is expected that subsequent activities will take place on fewer than 60,000 acres and that number each year will vary. Those limiting factors also make it impossible to determine in advance exactly where in the state subsequent activities will take place. However, this PEIR utilizes historical

The Board's mission is to lead California in developing policies and programs that serve the public interest in environmentally, economically, and socially sustainable management of forest and rangelands, and a fire protection system that protects and serves the people of the state.

vegetation treatment data and other attributes to estimate subsequent activity acres implemented by bioregion (see Table 1). This PEIR analyzes the potential environmental impacts that may occur from undertaking the VTP at this scale, and identifies project level limitations and mitigation measures that will minimize any impacts.

PROJECT DESCRIPTION AND ENVIRONMENTAL REVIEW: A combination of manmade and natural factors has led to a situation where wildfire acreage, fire suppression cost, and losses of residential structures have increased dramatically in the past three decades. A problem of this magnitude goes beyond jurisdictional boundaries and requires a statewide strategy. An overarching goal of vegetation treatments is to alter fire behavior and reduce harmful effects of wildfire. However, California displays astonishing diversity in plant, animal, and social systems, and without proper design, the statewide planning and implementation of vegetation treatments can potentially come with significant costs. To this end, the VTP PEIR provides a framework for prioritizing, planning, implementing, and monitoring fuel treatments across the SRA.

To attain the objectives of the VTP at a statewide scale, the VTP PEIR organizes subsequent activities into three general types:

- Wildland-Urban Interface (WUI): treatments will be focused in WUI-designated areas, and generally consist of fuel reduction to prevent the spread of fire between wildlands and structures, or vice versa.
- Fuel Breaks: strategically placed vegetation treatments that actively support fire control activities.
- Ecological Restoration: projects will generally occur outside the WUI in areas that have departed from the natural fire regime as a result of fire exclusion. Ecological restoration treatments will focus on restoring ecosystem resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition and structure, including cultural landscapes.

Possible treatment activities under the VTP include prescribed fire, manual activities (i.e., hand crew work), mechanical activities, prescribed herbivory (targeted beneficial grazing), and targeted ground application of herbicides. These activities will be used singularly or in combination depending upon the treatment type (i.e., WUI, fuel break, or ecological restoration) and environmental considerations.

Similar projects are currently undertaken by the Department of Forestry and Fire Protection (CAL FIRE) as part of the existing Vegetation Management Program (VMP), the Fire Prevention Program, and the California Forest Improvement Program (CFIP). Each of these statewide programs are ongoing and implemented through a separate CEQA process. The VTP is part of this comprehensive fire prevention strategy from the Board that is implemented by CAL FIRE. This program intends to lower the risk of damaging wildfires on nonfederal lands by managing vegetation to modify and/or reduce hazardous fuels. The key objectives of this program are to prevent loss of lives and property, reduce fire suppression costs, and protect natural resources from damaging wildfire through the use of appropriate vegetation treatments. It is important to acknowledge that the VTP is not meant to resolve all hazardous fuel conditions, but rather provide a tool to address them on a voluntary basis for all stakeholders within and associated with the SRA.

This PEIR contains both programmatic and project-level analysis and would govern decision making under the VTP, including when CAL FIRE decides whether to approve subsequent activities as proposed or with specific mitigation measures. This PEIR provides Standard Project Requirements (SPRs) and mitigation measures using the most current technology and scientific information to avoid significant environmental impacts. The PEIR provides CAL FIRE with a consistent implementation process, including public participation, to develop

Table 1. Approximate annual acres treated in each bioregion. See Chapter 2.

Bioregion	Approximate Annual Acreage Treated
Bay Area/Delta	6,276
Central Coast	7,159
Colorado Desert	1,003
Klamath/North Coast	14,685
Modoc	7,265
Mojave	2,630
Sacramento Valley	2,328
San Joaquin Valley	1,348
Sierra Nevada	12,405
South Coast	4,902
Total:	60,000

subsequent activities that best meet the objectives of the VTP while avoiding significant environmental impacts and ensures CEQA compliance.

The below Table 2 summarizes the environmental impacts from the proposed VTP. With the application of SPRs and mitigation measures, the proposed VTP demonstrates no significant environmental impacts. The environmental analysis is in Chapter 4 and the cumulative effects analysis is in Chapter 5.

Table 2. Impact Summary Analysis and Reference Locations. See Chapter 4.

Resource of Concern	Significant and Unavoidable	Less than Significant with Mitigation Measures	Less Than Significant	Significance & Threshold Criteria	Mitigation
Aesthetics and Visual Resources			X	4.2.2.1	NM*
Air Quality		X		4.3.2.1	4.3.3
Archeological, Cultural & Historic Resources		X		4.4.2.1	4.4.3
Biological Resources		X		4.5.2.1	4.5.3
Climate Change/Greenhouse Gas		X		4.6.2.1	4.6.3
Geology, Hydrology, Minerals and Soils		X		4.7.2.1	4.7.3 5.5.6
Hazardous Material, Public Health and Safety		X		4.8.2.1	4.8.3
Noise		X		4.9.2.1	4.9.3
Population, Employment, Housing, & Socio-Economic Well-Being			X	4.10.2.1	NM*
Recreation			X	4.11.2.1	NM*
Transportation and Traffic		X		4.12.2.1	4.12.3
Utilities and Energy			X	4.13.2.1	NM*
Water Quality		X		4.14.2.1	4.14.3

DOCUMENT AVAILABILITY: The revised VTP PEIR is available for download from the Board’s website: [http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_\(vtpeir\)/](http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_(vtpeir)/)

Hard copies of the revised VTP PEIR can be reviewed at the Board’s office in Sacramento (address below). To arrange to view documents at Board offices during business hours, call (916) 862-0120. The document can also be reviewed at libraries throughout the state; for a full list of locations, refer to the VTP website. CDs or printed copies are available at cost on request by phoning (916) 862-0120 or emailing VegetationTreatment@bof.ca.gov. Copies will also be available for review only at any regularly scheduled Board meeting where the VTP PEIR is on the noticed agenda.

PUBLIC REVIEW PERIOD: The revised VTP PEIR is available for a 60-day public review and comment period, which begins November 13, 2017 and ends at 5pm on January 12, 2018. **Please send comments on the PEIR at the earliest possible date, but postmarked no later than 5pm on January 12, 2018 in order for your comments to be considered.**

Written comments are preferred via email and may be submitted to VegetationTreatment@bof.ca.gov. Emailed comments should include your name, address, and daytime telephone number so a representative of the Board can contact you if clarifications regarding your comments are required.

Comments may also be mailed to the following address:

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
VTP Draft PEIR Comments
PO Box 944246
Sacramento, CA 94244-2460

All comments received, including names and addresses, will become part of the official public record. A Final VTP PEIR will be prepared which will only include responses to comments received during this public review period for this revised VTP PEIR.

Sincerely,



Matt Dias
Executive Officer, Board of Forestry & Fire Protection

Locations where the recirculated revised VTP PEIR can be reviewed:

Online:

http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_vtpeir/

California Board of Forestry and Fire Protection, 1416 9th Street, Sacramento, CA 95816 (by appointment during normal business hours; please call (916) 862-0120 in advance)

Libraries throughout the state; see VTP PEIR website for a list of locations

http://bofdata.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_vtpeir/