VTP EIR – Preliminary Draft Updates

Revisions from Jan 26-27 Board of Forestry and Fire Protection Meeting

Executive Summary Revisions

- Added rangeland discussion including the term "cultural landscapes"
- Provided revisions in text to section E.1, E.3-E.10
- Added E-11, Summary

vegetation formations, expected fire behavior, values at risk, and treatment types. Further discussion of the VTP's conceptual basis is contained in Chapter 2.

Objective five promotes a consistent and collaborative process for identifying projects that meet the objectives of the VTP while avoiding significant impacts to the environment. An example of this would include working with private landowners of rangeland to meet the objectives of fuel hazard reduction while simultaneously improving forage production. This objective also supports integrating the VTP with broader, multi-jurisdictional fuel reduction efforts. Finally, it recognizes that project planning and implementation is best served through open communication with stakeholders and the public.

E.4 VEGETATION TREATMENT PROGRAM

The VTP allows for the implementation of specific vegetation treatment projects at

E.10 AREAS OF KNOWN CONTROVERSY

Section 15123(b) of the State CEQA Guidelines requires that an EIR identify areas of controversy known to the lead agency, including issues raised by agencies and the public. The following are areas of controversy known to CAL FIRE:

- Air quality impacts from prescribed burning
- Cumulative impacts to chaparral communities from program treatments and wildfires
- Impacts to water quality, biological resources, and human health
- Impacts to geological features and soil erosion
- Inclusion of herbicide applications as a Program activity
- Introduction or spread of invasive plants
- Potential for loss of life, property, and resource values due to escaped prescribed fire
- Impact to climate change and greenhouse gases Ability to address the ecological and social complexities of the state in a single Program
- Impacts to cultural resources

These areas of known controversy will be addressed through the implementation of the SPRs, PSRs, and mitigation measures outlined in Chapters 2 and 4.

E.11 SUMMARY

The Board recognizes the necessity for CAL FIRE to implement a robust program of vegetation treatments to fulfill its mission to safeguard the people and protect the property and resources of California. The VTP provides a framework for prioritizing, planning, implementing, and monitoring fuel treatments across the SRA. This Program EIR discloses to interested parties the scope of the VTP, potential foreseeable environmental impacts from implementing the VTP, and the proposed project limitations and mitigations designed to lessen or avoid environmental impacts. Through project monitoring and participation in adaptive management processes, it is anticipated that the VTP will be able to incorporate emerging science and the changing needs of the State as the Program matures.

Review Glossary for additional terms

- Added **Cultural Landscape**
  - A geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. (National Park Service)
- Added **Project Coordinator**
  - The individual who coordinates and supervises the project during the planning, implementation, and completion phases. This position is responsible for the overall project including the project scale analysis development, coordination of activities, resources, equipment and reporting information as required through contract with CAL FIRE. The project coordinator shall retain the responsibility and accountability to meet all contract needs.

Review for a consistent reference to the "Objectives"

- Objective references and citing appear to be consistent.

Address ADM-6 reference to 20% for clarity

- **ADM-6:** The project coordinator or designee shall consult with the USFS, CAL FIRE, or other public agencies as appropriate to develop a list of past, current, and reasonably foreseeable probable future projects within the planning watershed of the proposed project. If the total combined acreage disturbed in the planning watershed exceeds **20% in a 10-year period, compliance with HYD-16 must be met prior** to any ground disturbing operations. Projects that may combine with VTP projects to create the potential for significant effects include, but are not limited to, controlled burning, fuel reduction, and commercial timber harvesting.

K. HYD-16 PROCEDURES FOR COMPLYING

Compliance with HYD-16 requires that the combined acreage of fuel treatments and logging activities be calculated for the Calwater Planning Watershed where VTP projects are proposed. Since the potential for disturbance from different fuel treatment activities and logging systems vary due to disturbance intensity, disturbance coefficients will be assigned for each specific activity (Table K-1) and percent disturbance will be calculated using equation K-1. Additional hydrologic analysis will be performed when the percent watershed disturbance exceeds 20 percent.

K.1

Percent Watershed Disturbance = [(Acres TreatedA1 x Disturbance CoefficientA1)+(Acres TreatedA2 x Disturbance CoefficientA2)+ .....] ÷ (Calwater Planning Watershed Acres)

Where A1, A2, ... represent specific activities.

Table K-1. Disturbance coefficients to be used for HYD-16.

General Activity	Specific Activity	Per Acre Disturbance Coefficient
Fuel Treatment	Prescribed Fire	0.16
Fuel Treatment	Burn Piles	0.08
Fuel Treatment	Mechanical	0.5
Fuel Treatment	Hand Treatment	0.08
Fuel Treatment	Herbivory	0.08
Fuel Treatment	Herbicide	0.08
Logging	Clearcut	1
Logging	Shelterwood/Overstory Removal	0.75
Logging	Selection	0.5
Logging	Commercial Thinning	0.5

Examine use of "crown fire flame size"

- "crown fire" was removed.

Case Study Examples – Throughout the remaining chapter there are nine case studies examining vegetation treatments that were used to help control the impacts of wildfires. There are two additional case studies that discuss the utilization of pre-planning and community involvement as a wildland firefighting strategies and their impacts.

2.2.2.2.1 Wildland-Urban Interface (WUI)

The WUI is the geographical overlap of two diverse systems, wildland and structures. At this interface, the buildings and vegetation are sufficiently close that a wildland fire could spread to a structure or a structure fire could ignite wildland vegetation. WUI treatments would focus on modifying fire behavior by breaking up the horizontal and vertical continuity of fuels while also considering flame size, ignition sources, potential spread rate, and public and firefighter safety.

Geospatially, the WUI was identified through a complex modeling process undertaken by FRAP and the California Fire Alliance in 2001 and was completed in 2003. The modeling process consisted of three main components: ranking fuel hazard, assessing the probability of wildfire, and defining areas of suitable housing density that lead to Wildland-Urban Interface protection strategy situations (FRAP 2003). Further discussion

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Modify BIO-4

BIO-4: The project coordinator shall ensure that a CAL FIRE Environmental Coordinator analyze impacts to any species identified in a CNDDB or BIOS search and shall submit the summary and preliminary analysis to the CDFW, USFWS, and [if applicable] NOAA Fisheries for consultation. The preliminary analysis shall be accompanied with a standard letter containing the following:

- A written description of the project location and boundaries.
- Brief narrative of the project objectives.
- A description of the types of activities used in the project (e.g., prescribed burning; mastication) and associated acreages.
- A project and general location map. Project map shall be of sufficient scale to indicate the spatial extent of activities within the project area.
- The output from the CNDDB run, including a map of any special status species located during the field review, and the SPRs that will be implemented to minimize impacts on the identified special status species.
- A request for information regarding the presence and absence of special status species, including any applicable HCPs, in the project vicinity, and potential take avoidance measures to be implemented as PSRs.
- An offer to schedule a day to visit the project area with the project coordinator.

Special Status Species

A plant or animal species that is listed as rare, threatened, or endangered under Federal law; or as rare, threatened, endangered, candidate, or fully protected under State law; or as sensitive species by the California Board of Forestry and Fire Protection.

Remove NSE-1

- Completed. All other NSE-? were renumbered.

Revise PRC 4291 discussion, page 1-16

be permitted to a depth of 3 inches

Figure 1.7-1 Defensible Space Zones

The exact number of acres treated under PRC 4291 is variable from year to year however some assumptions about acreages can be made knowing that over 700,000 habitable structures are billed for the Fire Prevention Fee in the State Responsibility Areas each year. Assuming no overlapping defensible space, no property boundary restrictions, and a median habitable structure footprint of 2100 sq. ft.[1] in a perfect square, each habitable structure under the identified assumptions would treat approximate 1 acre or about

[1] 2010 Median and Average Square Feet of Floor Area in new Single-Family Houses, US Census

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Questions?