

VTP PEIR
November 2017 Recirculation Attachment
(Pursuant to CEQA Guideline 15088.5)

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.*)

2017 Revised VTP PEIR Summary of Changes

Chapter 1

- 1.1 Purpose
 - First paragraph revised: “This program intends to...” sentence deleted; “The implementation of this program...” and following sentence revised for greater clarity regarding the applicability of CEQA to this proposed program.
 - References to CEQA statute and regulations from 1.3 moved to this section.
- 1.1.1 Need for Vegetation Treatment Program
 - First two paragraphs (now three) content retained but reorganized.
- 1.2 Decisions Subject to CEQA and 1.3 Purpose of this Program Environmental Impact Report
 - Deleted. It was determined this general information about CEQA and EIRs was redundant. Following sections renumbered as needed.
 - Relevant references to CEQA statute and regulations from 1.3 moved to 1.1 Purpose.
- 1.2 Use of a Program Environmental Impact Report

- Redundant or unclear information regarding the application of the CEQA process to the proposed program deleted.
 - Figure 1.2-1 revised.
- 1.3 Responsible and Trustee Agencies
 - Material about the *2010 Strategic Fire Plan* deleted; irrelevant to this section and discussed in 1.5.1 Statewide Strategic Planning.
- 1.4 Regulatory Setting
 - Editorial changes to provide additional clarity regarding a CEQA project versus subsequent activity.
 - Paragraph about programs under the Office of the State Marshal added.
- 1.5.1 Statewide Strategic Planning
 - Editorial changes to provide additional clarity regarding a CEQA project versus subsequent activity.
- 1.6 Wildland Fire Prevention in California
 - Section name changed.
 - New information added - some existing language from previous 1.8 subsections is included but overall this section has been vastly added to and revised to provide more information and context for the program.
- 1.6.1 Existing CAL FIRE Programs
 - New information added regarding existing wildland fire prevention programs in California.
 - Previously existing information in this section reorganized and edited for clarity and consistency with new information added.
- 1.6.2 The Proposed Vegetation Treatment Program
 - Editorial changes to provide additional clarity regarding a CEQA project versus subsequent activity.
- 1.6.3 Private Landowner Fire Prevention through 1.6.7 Non-Governmental Organization Fire Prevention
 - These sections are entirely new information.

Chapter 2

- 2.1 Overview of the VTP
 - Last two paragraphs deleted – some of this material added to Objective 5 in 2.2.1 Objectives of the VTP.
- 2.2 Conceptual Framework of the VTP
 - Irrelevant and/or redundant material about the implementation of the proposed program deleted, this material is covered in 2.4.1.
 - Some material from here added to Objective 5 in 2.2.1 Objectives of the VTP.
- 2.2.1 Objectives of the VTP
 - Introductory language deleted, objectives moved out of boxes into numbered list.

- Objectives 1 and 2 editorial revisions.
- Objective 3 previous paragraphs 2 and 3 (now 2) combined and shortened.
- Objective 4 paragraph 3 edited and moved into paragraph 4 (now 3).
- Objective 5 information from 2.1 and 2.2 added.
- 2.2.2 Treatable Landscape
 - Specific information about modeling data layers moved to Appendix A.
 - Information was added to more clearly explain how “treatable acreage” was determined as well as the difference between “treatable acreage” (23.2 million) and number of acres actually anticipated to undergo a subsequent activity (60,000 annually).
 - Figure 2.2-5 (page 2-13 in June 2017 version) deleted; it did not effectively communicate information and was leading to confusion and misinterpretations.
 - Table 2.2-1 moved from 2.2.2.1 Vegetation Formations into 2.2.2 Treatable Landscape.
- 2.2.2.2 Program Treatments
 - New introductory paragraph added.
 - Redundant information about the implementation of the program deleted.
- 2.2.2.2.1 Wildland-Urban Interface
 - Revised for clarity, particularly regarding difference between “treatable acres” (10 million) versus acres proposed to be treated and analyzed in this program (60,000).
 - Modeling language revised for clarity.
 - WUI activity objectives revised.
 - Figure 2.2-10 revised to use streets base layer in map inset.
- 2.2.2.2.2 Fuel Breaks
 - Detailed information about the tactical use of fuel breaks by firefighters deleted.
 - Revised for clarity regarding treatable acres (4 million) versus acres proposed to be treated and analyzed (60,000).
 - Added information to and/or refined discussion of fuel break effectiveness in scientific studies and case studies/individual fire experience.
 - Modeling language revised for clarity.
 - Activity objectives revised.
 - Figure 2.2-11 revised to use streets base layer in map inset.
- 2.2.2.2.3 Ecological Restoration
 - Editorial revisions to sentence structure(s) for clarity.
 - Revised for clarity regarding treatable acres (9 million) versus acres proposed to be treated and analyzed (60,000).
 - Activity objectives revised.
 - Figure 2.2-13 revised to use streets base layer in map inset.
- 2.2.3 Program Activities

- Editorial revisions for additional clarity.
- “The type of treatment activity or activities would be selected based on...” list narrowed down for brevity.
- Paragraph regarding retreatment deleted. The processes for implementing possible retreatment/maintenance are too varied to try to summarize in this document.
- 2.3 Scope of the VTP
 - First two sentences deleted and last two sentences deleted.
- 2.3.1 Scale of Past Treatments and Future Capacity Estimates
 - Section re-named and editorial changes for additional clarity.
- 2.3.2 Projected Scale of the VTP
 - Editorial revisions for additional clarity and to eliminate redundant information.
- 2.4.1 Implementation Process
 - Combined with 2.4.2 Subsequent Review Under the VTP to eliminate redundancy and more clearly communicate implementation process.
 - Restructured section to improve clarity regarding VTP implementation.
 - Figure 2.4-2 revised for clarity and terminology consistency.
- 2.4.2 Monitoring and Development of an Adaptive Management Framework
 - Section name changed and renumbered.
 - Required elements of monitoring program clarified.
 - Editorial revisions to sentence structure(s) for additional clarity.
- 2.4.3 Funding
 - Deleted. This deleted section did not discuss mitigation implementation or monitoring funding. That information is in 2.4.2 Monitoring and Development of an Adaptive Management Framework and Appendix I Monitoring and Communication.
- 2.5 Project Requirements
 - Editorial errors fixed; no changes to the required standards in SPRs.
- 2.6 Areas of Controversy
 - Editorial error fixed and last sentence deleted.

Chapter 3

- 3.1 Alternatives Analysis Introduction
 - Shortened - the more vague, broader material was deleted and specific material regarding the alternatives analyzed in the VTP PEIR retained.
- 3.2 Alternatives Evaluated in this Program EIR
 - Revised for clarity and consistency throughout document. No changes to the attributes of the alternatives.
- 3.3 No Project
 - Revised for clarity regarding existing programs.

- Shortened, cross-reference to 1.6 Wildland Fire Prevention in California added to reduce duplicating information.
- Editorial revisions to sentence structure(s) for additional clarity.
- 3.4 Proposed Program through 3.11 Preferred Alternative
 - Editorial revisions throughout for clarity and to reduce redundant information.

Chapter 4

- 4.1 Introduction and Impact Analysis
 - Editorial changes for greater clarity regarding program description.
- 4.1.1 Analysis Overview
 - Revised to more accurately reflect analysis thresholds and how they were determined.
- 4.1.2 Land Management Regulation
 - Editorial changes to sentence structure(s) for greater clarity.
- 4.1.3 Rangeland Management
 - Title changed.
 - Data updated to reflect 2012 Agriculture Census.
 - Subsection headers deleted for ease of reading.
- 4.1.3.1 Environmental Factors on Rangeland
 - Subsection headers deleted for ease of reading.
 - Irrelevant information deleted (notably under the previous subsections “Hardwood Range Condition Changes” and “Economic Importance”).
 - Editorial revisions to sentence structure(s) for greater clarity.
- 4.1.4 Major Tree, Brush, & Grass Vegetation Formation Review
 - Editorial revisions to sentence structure(s) for greater clarity.
- 4.1.4.1 through 4.1.4.3 Life History Features for Tree, Brush, Grass-Dominated Subtypes
 - Size 12 bold headers added for greater clarity to point the reader to each subtype discussed.
 - Editorial revisions for additional clarity.
- 4.1.5 Program Treatments
 - Treatment types reordered/renumbered to reflect the order they are presented in the rest of the document.
 - Editorial revisions for greater clarity.
- 4.1.5.1.1 Spatial Modeling
 - Revisions, particularly in introduction, to provide more information on the WUI modeling process to determine the WUI Treatable Acreages.
 - Graphic revised for more information regarding intersection of Fire Threat, Human Asset Exposure, and Proximity.

- Figures 4.1-3 and 4.1-4 renamed for clarity.
- 4.1.5.1.1 Wildland Urban Interface Zone of Influence
 - Deleted as an individual section; existing language revised and moved to bottom of 4.1.5.1.1.
- 4.1.5.1.2 WUI Treatments Within the VTP
 - “Potential objectives” deleted – it was redundant language from Chapter 2.
 - Revisions regarding the scope of the treatable landscape, particularly providing more information about the difference between the treatable landscape (10 million acres) and analyzed acres treated per year (60,000).
 - Figure 4.1-7 inset map changed; base layer is now topo map rather than streets.
- 4.1.5.2 Fuel Break
 - Previously Ecological Restoration section; Ecological Restoration moved to 4.1.5.3 for consistency throughout the document.
 - Unnecessary language regarding construction and tactical use of fuel breaks by firefighters deleted.
 - 4.1.5.2.1 Spatial Modeling section revised to provide more information regarding calculation of treatable acreage.
 - Additional citations and discussion regarding efficacy of fuel breaks added throughout.
 - “Potential objectives” deleted – it was redundant language from Chapter 2.
 - Table 4.1-11 Fuel Break acres by bioregion and vegetation type added
 - Figure 4.1-12 inset map changed; base layer is now topo map rather than streets.
- 4.1.5.3 Ecological Restoration
 - Additional citation and discussion regarding fire regimes added throughout.
 - 4.1.5.3.1 Spatial Modeling section revised to provide more information regarding calculation of treatable acreage.
 - “Potential objectives” deleted – it was redundant language from Chapter 2.
 - Figure 4.1-15 inset map changed; base layer is now topo map rather than streets.
- 4.1.5.4 Summary of Program Treatments within the VTP
 - More information added regarding treatable acreage versus proposed acres analyzed.
 - Table 4.1-16 title changed to “VTP Treatable Landscape by Treatment Type” to more clearly communicate the difference between the landscape on which a subsequent activity may be implemented (“treatable

landscape”) versus the actual treatment acres anticipated to take place (60,000).

- 4.1.6 Activity Considerations at the Project Level
 - Introductory sentence revised.
- 4.1.6.1 Prescribed Fire Activities
 - Irrelevant or redundant language deleted, for example, descriptions of types of burns deleted because they were already in the Glossary.
 - Additional citations and discussions regarding the use of prescribed fire added.
 - Language going into detail regarding specific prescribed fire operations deleted. Section reframed to primarily discuss the parameters under which prescribed fire might be successful and factors to keep in mind while deciding where and when to use prescribed fire.
 - Figure 4.1-18 deleted. It was decided to limit example photographs to one each for each treatment type.
- 4.1.6.2 Mechanical Activities
 - Editorial revisions to improve clarity.
 - Irrelevant or redundant language deleted.
 - Language going into detail regarding specific mechanical treatment operations deleted. Section reframed to primarily discuss the parameters under which mechanical treatments might be successful and factors to keep in mind while deciding where and when to use mechanical treatments.
 - Table 4.1-17 deleted, these terms were already in the Glossary.
 - Figure 4.1-22 deleted. It was decided to limit example photographs to one each for each treatment type.
- 4.1.6.3 Manual Activities
 - Irrelevant or redundant language deleted.
 - Language going into detail regarding specific manual treatment operations deleted. Section reframed to primarily discuss the parameters under which manual treatments might be successful and factors to keep in mind while deciding where and when to use manual treatments.
 - Paragraphs about Conservation Camp program deleted.
- 4.1.6.4 Prescribed Herbivory Activities
 - Editorial revisions to improve clarity. Language going into detail regarding specific herbivore characteristics deleted.
- 4.1.6.5 Herbicide Activities
 - Redundant language reflecting requirements outlined in SPRs and MMs deleted.

- New information regarding how new herbicides might fall under this EIR added.
- 4.1.6.6 Activity Combinations
 - Project example deleted. Readers instead directed to Project Scale Analysis.
- 4.1.6.7 Activity Maintenance
 - Specific information about vegetation type re-treatment time periods deleted. It was determined to be too prescriptive and did not accurately reflect California's biodiversity.
 - New information added for a more nuanced discussion of the varied need for retreatment, barriers to retreatment, and implementing retreatment was added; citations added to this end.
 - Detailed information about CEQA requirements for potential future subsequent activity maintenance treatments deleted. Because of the variety of retreatment needs and options for subsequent activities, it was decided such specific detail would be confusing in the future during VTP implementation.
- 4.1.7 Distribution of Projects
 - First two paragraphs revised for clarity regarding number of subsequent activities likely to be implemented under the VTP.
 - Redundant information regarding subsequent activity distribution by bioregion deleted.
 - Table 4.1-18 bottom row adding together 87 tree-dominated subsequent activities, 54 shrub, and 90 grass subsequent activities (total 231) deleted. No change to the data contained in the table.
- 4.1.8 Bioregion Overview
 - This section presented redundant information from Chapter 2 and was deleted.
- 4.2 Aesthetics and Visual Resources
 - Editorial changes to provide additional clarity regarding a CEQA project versus subsequent activity.
 - Table 4.2-3 title revised to accurately reflect that these are scenic viewshed acres within the treatable landscape, not scenic viewshed acres that definitively will be impacted by the proposed program.
 - New section 4.2.2.3 Similar Effects Described Elsewhere added.
- 4.3 Air Quality
 - New section 4.3.2.6 Similar Effects Described Elsewhere added.
- 4.4 Archaeological, Cultural and Historic Resources

- 4.4.2.6 Determination of Significance revised to include relevant mitigation measures and analyze the significant impacts after mitigation on the proposed projects and alternatives.
- New section 4.4.2.7 Similar Effects Described Elsewhere added.
- 4.5 Biological Resources
 - Editorial changes to provide additional clarity regarding a CEQA project versus subsequent activity.
 - Further section dividers added under 4.5.1.1 Regulatory Framework to separated California laws and regulations from Federal law (content unchanged).
 - Under 4.5.1.2 Biological Setting and Concerns by Bioregion, bioregion headers turned into numbered sections for ease of reading (content unchanged).
 - 4.5.1.3 Ecology of Fire-Prone Forests in California: New information from scientific studies and citations added to third paragraph regarding anthropogenic changes in fire regimes and severity. Scientific study and discussion on the limitations on implementing prescribed high severity fires added to fourth paragraph. Eighth paragraph added with scientific studies examining type conversion due to changes in fire intervals and vegetation treatment applications.
 - 4.5.2 Effects introductory paragraph revised for clarity.
 - 4.5.2.2 Data, Assumptions, and Approach to Bioregional Analysis introductory paragraph revised to add sentence to assist in clarifying the existing CNDDDB description. Sentence added to further explain Standard Project Requirements. ADM 5 and 6 added to this section and HYD-1 moved to after BIO-1 for alphabetical consistency.
 - 4.5.2.3 Impacts Analysis new information added to the introductory paragraph to more clearly describe the context and purpose of the analysis choices in this document.
 - Headers changed to section numbers throughout for ease of reading (i.e., VEGETATION is now 4.5.2.3.1 Vegetation).
 - 4.5.2.3.1 Vegetation: second paragraph revised and moved to below the third; new second paragraph has citation added regarded pre-planning to avoid impacts to threatened and endangered species; introductory language to impact analysis describing the analysis added.
 - Headers added for each treatment activity and their impacts (i.e., “Prescribed Fire Activity Impacts to Vegetation,” etc.) in bold for ease of reading; section generally re-organized along these lines (mimics construction of section 4.6).
 - Page 4-190 potential positive impacts from prescribed fire added.

- 4.5.2.3.2 Wildlife, 4.5.2.3.3 Invasive Species similarly revised as 4.5.2.3.1 Vegetation. Content under “Aquatic” header added to Wildlife.
 - New section 4.5.2.5 Similar Effects Described Elsewhere added.
 - MM FBE-1 added to 4.5.3 Mitigation Measures.
 - MM HYD-6, -7, -8 deleted from this section.
- 4.6 Climate Change/Greenhouse Gas
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.
 - 4.6.2.2 Impact Analysis Methods: redundant information regarding the proposing and planning of subsequent activities deleted. Material already contained in Chapter 2.
 - New section 4.6.2.5 Similar Effects Described Elsewhere added.
- 4.7 Geology, Hydrology, Minerals, and Soils
 - 4.7.1.2.1 Geomorphic Provinces – individual province headers turned into numbered sections for ease of reading; other headers changed into number sections as needed.
 - New section 4.7.2.5 Similar Effects Described Elsewhere added.
- 4.8 Hazardous Materials, Public Health and Safety
 - 4.8.1.3 Environmental Setting: redundant information from Chapter 2 deleted, reader is referred to appropriate section in that chapter.
 - Page 4-330, Impact 4: Increase the Risk of Wildland Fire Hazards: third paragraph, redundant information regarding how prescribed fire is implemented deleted.
 - 4.8.2.5 An Expected Benefit of the Proposed VTP section deleted; following sections renumbered accordingly.
 - New section 4.8.2.6 Similar Effects Described Elsewhere added.
- 4.9 Noise
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.
- 4.10 Population, Employment, Housing, Land Use, and Socio-Economic Wellbeing
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.
 - 4.10.2.4 Similar Effects Described Elsewhere section added.
 - Typo in Figure 4.10-1 caption fixed to reflect that the table data goes through 2060, not 2050.
- 4.11 Recreation
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.

- Page 4-364 redundant paragraph before “Impacts Due to Implementing Any of the Alternatives” deleted.
- 4.12 Transportation and Traffic
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.
- 4.13 Utilities and Energy
 - Editorial changes to more clearly distinguish between the proposed project, subsequent activities, treatment type, etc.
- 4.14 Water Quality
 - New section 4.14.2.2 Similar Effects Described Elsewhere added.
 - Headers changed to numbered sections as needed for ease of reading.
 - Figure 4.14-5 caption changed for language consistency regarding “treatable acreage.”

Chapter 5

- Changes throughout to acronyms (notably Program EIR to “PEIR”).
- Deletion of the term “catastrophic” when used to modify “wildfire.”
- In all resources sections (Aesthetics, Biological Resources, Hydrology, etc.), descriptions of project alternatives and cumulative impacts therein revised. Revisions also made for consistency with Chapters 2, 3, and 4.
- In all resources sections, changes made for consistency in editorial organization (headers added/deleted, significant effects impacts bolded, etc.).
- 1.1 Introduction
 - Editorial changes to further emphasize distinction between project, subsequent activity, etc.
 - Revisions to more clearly establish context for cumulative impacts.
- 5.2.3 Framework for Evaluating Cumulative Effects
 - VTP Objectives moved out of chart into numbered text.
- 5.3.1.2 Related Past Projects
 - National Cohesive Wildland Fire Management Strategy description revised.
 - *Human Development (PRC 4291 100’ Defensible Space)* section revised for greater accuracy with the cited statute.
 - *Grazing on Rangeland* and subsequent sections revised.
 - Data updated to reflect most recent Agriculture Census and FRAP Assessment.
 - Irrelevant or redundant information from Chapter 4 deleted.
 - *Forage Types* header deleted, information retained.
 - *Forage Use on Public Land* section deleted.
- 5.3.2 Current Projects
 - *Forage Use* header deleted but material in that section retained.
 - Table 5.3-4 deleted – it contained outdated and redundant data.
 - Figures 5.3-2 and 5.3-3 deleted – outdated and irrelevant data.

- 5.5.4.2 Determination of Significance (Biological Resources)
 - Page 5-35 to 5-36, last bullet point: sentences regarding re-treatment of different vegetation types removed. It was determined those sentences did not accurately reflect the variation within those vegetation types for retreatment purposes.
- Changes to 5.6 Mandatory Findings of Significance for greater editorial clarity.

Chapter 6

- Header “Significant Irreversible Environmental Changes” changed to “6.2 Significant Irreversible Environmental Changes” and following sections re-numbered accordingly.
- Editorial errors fixed in last two paragraphs.

Chapter 7

- 7.2.2 PSA Attachment B- Project Priority Ranking graphic revised.
- Editorial changes and corrections made throughout.

Appendix A

- Table of Contents added.
- A.1.1 Abstract changed to A.1.1 Overview and significantly revised for clarity and to reduce redundancy.
- A.1.2 State of California Responsibility Areas rewritten. Specific quoted language from the statutes defining State and Local Responsibility Areas included, reference to the regulations implementing those statutes added.
- A.1.3 Vegetation Formations first paragraph rewritten to cross reference relevant discussions in Chapters 2 and 4 and to set a clearer context for the following paragraphs. Information from 2.2.2 Treatable Landscape.
- A.1.4 Treatments renamed to A.1.4 Program Treatment Types and rewritten for clarity regarding treatable landscape versus analyzed subsequent activity acreage; Table A.1-1 unchanged; Figure A.1-3 renamed.
- A.1.4.1 through A.1.4.5 rewritten for consistency with Chapters 2, 3, and 4, written clarity, and improved distinction between treatable landscape and analyzed subsequent activity acreage; Table A.1-2 and Figure A.1-4 revised
- A.1.5 Alternatives – all subsections rewritten for consistency with Chapters 3 and 4.
- A.1.6 Treatable Acres in the VTP: new section added to reinforce how the treatable landscape was arrived at for greater clarity and to cross-reference new maps in A.3.
- A.2 Bioregion Overview – editorial changes throughout.
- A.3 Treatable Acreage by Bioregion – new section added for maps that show treatable acreage at the bioregion scale, intended to be printed at Architecture E size.

Appendix D

- Editorial changes

Appendix E

- Header changed to numbered section.

Appendix F

- Editorial changes for improved clarity.

Appendix G

- Editorial changes for improved clarity.
- Table G.2-2 revised to reflect recreational land as percentages of treatable acreage rather than overall SRA acres.

Appendix I

- I.1 Introduction
 - Bullet points introducing contents of Monitoring and Communication Plan revised to accurately reflect MCP in document.
- I.2.3 Mitigation Monitoring
 - Formerly named Implementation Monitoring.
 - Revisions to content to accurately capture distinction between implementation and mitigation monitoring.
- I.2.5 Post-Incident Effectiveness Monitoring
 - Two options outlined for CAL FIRE staff to report on the use of or effectiveness of VTP subsequent activities during a firefight.
- I.3 Future Monitoring Components
 - Editorial changes.
- I.3.1 VTP Monitoring Working Group
 - Section moved from I.4.5.
 - Section expanded to further include group responsibilities and key themes to address.
 - Information regarding the formation of the Effectiveness Monitoring Committee, which is similar in structure and goals to the proposed VTP Monitoring Working Group, added.
- I.4.1 Project Identification and I.4.2 Project Notification and Public Meetings in Southern California Counties
 - Deleted; following sections renumbered accordingly.
- I.4.1 Implementation Notification for Prescribed Burns
 - Section title renamed.
- I.5 Attachments
 - Editorial changes as necessary.
 - SPRs and MMs deleted in Attachment A to reduce redundancy.
 - Attachment B editorial revisions.

Appendix K

- “Project” changed to “subsequent activity” as necessary.

- Formatting revised.