Executive Summary

Introduction

This section presents a summary of the California State Board of Forestry and Fire Protection (BOF) proposal to initiate the California Statewide Vegetation Treatment Program (VTP). The proposed program is intended to lower the risk of catastrophic wildfires on nonfederal lands by reducing hazardous fuels. Such fires can result in substantial loss of life and property as well as multi-million dollar suppression costs. Other VTP goals include control of unwanted vegetation, including invasive species, improvement of rangeland for livestock grazing, improvement of fish and wildlife habitat, enhancement and protection of riparian areas and wetlands, and improvement of water quality in priority watersheds. The initiation of this program is a project, subject to California Environmental Quality Act (CEQA). As the CEQA lead agency, the BOF will provide policy direction for implementation of the VTP to the California Department of Forestry and Fire Protection (CAL FIRE), which administers a wide range of vegetation management programs.

Purpose of the PEIR

CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. The purpose of this PEIR is to analyze the environmental effects of the VTP, to indicate ways to reduce or avoid potential environmental damage resulting from the program, and to identify alternatives to the proposed program. CEQA requires that each public agency mitigate or avoid the significant environmental effects of projects it approves or implements, whenever feasible.

Purpose of a Program EIR

A program-level EIR is prepared for an agency program or series of actions that are closely related projects that have not been defined, but are considered under CEQA as one collectively large project with similar environmental effects. CAL FIRE will serve as the lead agency under CEQA for implementation of the VTP. This PEIR was prepared to eliminate the need for separate EIRs for each project. This approach streamlines the administrative process for subsequent projects by assessing the cumulative impacts of the larger program and developing program-wide policies, guidelines, and mitigation measures that should not have to be reconsidered for individual projects. (State CEQA Guidelines Section 15168.)

Purpose and Need for the Program

The purpose of the VTP (the Program) is to modify vegetation on wildlands to reduce the costs and losses associated with wildfires and to enhance the condition of forests, rangelands, and watersheds.

The need for the Program is based on the fact that the wildlands of California are naturally fire prone. Past land and fire management practices have had the effect of increasing the intensity, rate of spread, as well as the annual acreage burned on these lands (BOF, 1996). Although the citizens of California expect these lands to provide a wide range of sustainable economic and non-economic benefits, the state's expanding population increases the risk of arson or unintentional fire starts that jeopardize these expectations. The natural communities of plants and animals on these lands are at risk from catastrophic wildfire. Also at risk are the communities that interface with these wildlands, including those within wildland-urban interface (WUI) and rural areas. Strategic management and control of wildland vegetation is essential to the safety, health, recreational, and economic well-being of California's citizens.

In recent years, the severity and intensity of wildfires in the West has increased dramatically from levels in the 1970s and 1980s; currently, a million or more acres across the west burn annually. Changes in vegetation have resulted in increases in hazardous fuels and increased threat. Much of this change in threat can be attributed to fire exclusion policies instituted over the past 100 years (Bureau of Land Management, 2005).

Wildfires are becoming more intense and severe (University of California, Davis 1996) and, as more people move to rural areas, the potential for the loss of property and life continues to increase. For example, on the west slope of the Sierra Nevada, projections of risk from wildfire occurrence are highest in oak woodlands, chaparral, and low-elevation conifer forests (University of California, Davis 1996). The number of people living in these areas is projected to increase from 600,000 in 1990 to two million people in 2040.

Wildland fire is pervasive throughout California. The average annual acreage burned (by wildfires greater than 300 acres in size) between 1985 and 1994 was about 325,000 acres (FRAP 2006). Between 1995 and 2004, the average annual acreage burned statewide increased to about 471,000 acres, representing a 45% increase. Between 2004 and 2010 the average increased dramatically (due to the extreme fire year in 2008) to 600,000 acres, yet the last few years have been relatively low at around 230,000 acres. Excluding the extreme fire year of 2003, when 5,394 structures were burned, the average number of structures burned between 2000 and 2005 is 458 structures/year, with average structural damage of $109 million per year. Between 2005 and 2010 the average number of structures burned on all lands in California was 1,166 with damages estimated at $207 million per year. ([http://bof.fire.ca.gov/incidents/ incidents_statsevents#2010] large fire statistics.pdf). In 2005 CAL FIRE suppression costs were $105.3 million; while costs in real

dollars doubled in the latter half of the 1990-2005 period, increasing from a yearly average of $83.6 million to $160.1 million (in 2005 dollars) (CAL FIRE, 2011).

While the cause and degree is controversial, climate change may already be influencing trends in wildland fire acreage burned. Scientists at the USDA Forest Service Pacific Northwest Forest and Range Experiment Station have modeled the effects of global warming on vegetation and fire weather in California. Current forecast models indicate that there will be an increase in grasslands, an increase and shift to the east and upslope of mixed evergreen hardwood forests, a decrease and shift to the east and upslope of conifer forests, and a decrease in oak woodlands and shrublands (Lenihan, 2003). Some scientists project average air temperatures to increase significantly, perhaps 4-6° F over the next century. Precipitation will either increase or decrease, depending on the scenario modeled. Under wetter conditions, fuels will build up to such an extent that during drier summers, fires will burn with great intensity. More area will be burned than at present, but at irregular intervals. Under drier conditions the fire season will lengthen and fires will burn more frequently. Again, the area burned by wildfires will increase. Also under these projections, snow packs at higher elevations are expected to decrease, with resulting in earlier snowmelts, which will decrease streamflows earlier in the year.

Goals of Program

The Program has multiple goals which can be summarized below:

1. Maintain and enhance forest and range land resources including forest health to benefit present and future generations.
2. Modify wildland fire behavior to help reduce catastrophic losses to life and property consistent with public expectation for fire protection.
3. Reduce the severity and associated suppression costs of wildland fires by altering the volume and continuity of wildland fuels.
4. Reduce the risk of large, high intensity fires by restoring a natural range of fire-adapted plant communities through periodic low intensity vegetation treatments.
5. Maintain or improve long term air quality through vegetation treatments that reduce the severity of large, uncontrolled fires that release air pollutants and greenhouse gases.
6. Vary the spatial and temporal distribution of vegetation treatments within and across watersheds to reduce the detrimental effects of wildland fire on watershed health.
7. Reduce noxious weeds and non-native invasive plants to increase desirable plant species and improve browse for wildlife and domestic stock.
8. Improve wildlife habitat by spatially and temporally altering vegetation structure and composition, creating a mosaic of successional stages within various vegetation types.
9. Provide a CEQA-compliant programmatic review document process/mechanism for other state or local agencies, which have a vegetation management program/project consistent with the VTP, to utilize this guiding document to implement their vegetation treatment programs/project.

Location

The 38,000,000 acres that might be treated under the Proposed Program are comprised of about 34,958,000 acres that are either privately owned or State owned lands (e.g., Department of Parks and Recreation lands) that are designated as State Responsibility Area (SRA) and about 3,000,000 acres of federal Direct Protection Area lands (DPA - lands that would normally receive fire protection services from CAL FIRE; however, due to efficiency of operations these lands receive fire protection from federal agencies according to written agreements with CAL FIRE).

Proposed Program

The Vegetation Treatment Program proposes to treat vegetation in order to meet the purposes established above. Vegetation management activities include the removal, rearrangement, or conversion of vegetation using various treatments. Treatment methods include prescribed fire, mechanical, manual, prescribed herbivory (see Glossary), and herbicide. Vegetative treatments may be applied singly or in any combination needed for a particular vegetation type to meet specific resource management objectives. The method or methods used will be those that are most likely to achieve the desired objectives while protecting natural resource values.

The general suite of treatments likely to be initiated under the Proposed Program in any decade would comprise about 2.16 million acres and would include:

- Prescribed fire (underburn, jackpot burn, broadcast burn, pile burn, establishment of control lines) – about 53% of treatments,
- Mechanical (chaining, tilling, mowing, roller chopping, masticating, brushraking, skidding and removal, chipping, piling, pile burning) – about 18% of treatments,
- Manual (hand pull and grub, thin, prune, hand pile, lop and scatter, hand plant, pile burn) – about 10% of treatments,
- Prescribed herbivory (targeted grazing or browsing by cattle, horses, sheep, or goats) – about 10% of treatments,
- Herbicides (ground applications only, such as backpack spray, hypohatchet, pellet dispersal, etc.) – about 9% of treatments.

The Proposed Program would be limited by five landscape constraints that describe <u>where</u> the Program could be applied, and by 15 minimum management requirements that limit <u>how</u> Program practices would be modified to reduce impacts.

Alternatives

In accordance with Section 15126 of the CEQA Guidelines, a draft EIR must analyze a range of reasonable alternatives to the proposed project that could feasibly attain the objectives of the project. The CEQA Guidelines provide the following direction for analysis of the alternatives:

- Describe a range of reasonable and feasible alternatives to the project, or to the location of the project.
- Evaluate the comparative merits of the alternatives.
- If there is a specific proposed project, explain why other alternatives were rejected in favor of the proposal.
- Focus on alternatives capable of avoiding or substantially lessening significant adverse environmental effects or reducing them to a level of less than significant, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

Given the CEQA Guidelines above, the following alternatives were developed:

- Alternative 1 – Status Quo. This alternative represents the "No Project" alternative required by CEQA. If CAL FIRE took no further action, existing vegetation treatment programs, such as the VMP and California Forest Improvement Program (CFIP), would continue to operate using previously approved EIRs and departmental procedures. The guidance documents for each of the CAL FIRE programs would apply to an existing landscape that is somewhat smaller than the Proposed Program or Alternatives 2.
- Alternative 2 – No Herbicide Treatments. In this alternative no herbicides would be prescriptively applied and procedures would be put into place that would preclude the department from funding vegetative treatment projects where the project applicant had applied herbicides at any time up to 1 year prior to the proposed project or intended to apply herbicides within 3 years after the proposed project.
- Alternative 3 – Treatments that Minimize Potential Impacts to Water Quality. This alternative addresses potentially significant effects associated with impacts to water quality and to threatened and endangered wildlife, plants, and fish, by restricting the landscape across which certain vegetative treatments could be applied. Some of the minimum landscape constraints and minimum management requirements noted below would be enhanced to reduce impacts to water quality and to special status wildlife, plants, and fish. Overall, a smaller landscape would be considered for treatment. Also, there would be fewer mechanical and herbicide treatments and more hand treatments.
- Alternative 4 – Treatments that Minimize Potential Impacts to Air Quality. This alternative addresses potentially significant effects associated with impacts to air quality, particularly in

Air Quality Management Districts where air quality goals for particulate matter that is 10 microns in size (PM10), particulate matter that is 2.5 microns (PM2.5) and ozone have not been attained. In this alternative, substantially fewer acres would be treated with prescribed fire and as a result, substantially fewer acres would be treated under this alternative as a whole due to the higher costs of other treatments.

Alternatives would be limited to landscape constraints and minimum management requirements similar to the Proposed Program, but tailored to meet the overall goal of the alternative.

Comparison of Alternatives

Table ES.1 (from Table 3.10) summarizes the Proposed Program and Alternative's acreage treated and the landscape on which the treatments would occur. Table ES.2 (from Table 3.11) summarizes the environmental impacts from the Proposed Program and the Alternatives.

Table ES.1
Comparison Of Proposed Program and Alternatives

Element	Proposed Program	Alternative 1 Status Quo	Alternative 2 No Herbicide Treatments	Alternative 3 Minimize Water Quality Impacts	Alternative 4 Minimize Air Quality Impacts
Approx. Total Landscape	37,958,400 ac	34,824,500 ac	37,958,400	37,958,400ac	37,958,400ac
Landscape Treatable with Prescribed Fire	12,234,800 ac	11,224,700 ac	12,234,800	9,569,300 ac	1,593,000 ac
Landscape Treatable with Mechanical Treatments	10,211,600 ac	9,368,500 ac	10,211,600 ac	4,262,300 ac	10,211,600 ac
Landscape Treatable with Hand Treatments	37,958,400 ac	34,824,500 ac	37,958,400 ac	37,958,400 ac	37,958,400 ac
Landscape Treatable with Herbicides	21,053,500 ac	19,315,300 ac	0	21,053,500 ac	21,053,500 ac
Landscape Treatable with Herbivory	37,958,400 ac	0 ac	37,958,400 ac	37,958,400 ac	37,958,400 ac
Yearly Acreage Treated	216,910 ac	47,000 ac	216,910 ac	216,910 ac	93,000 ac
Projected 10 Year Treatment Acreage	~ 2.17 MM ac	~ 470 M ac	~ 2.17 MM ac	~ 2.17 MM ac	~ 930 M ac
Percent Prescribed Fire	53%	63%	56%	56%	8%
Percent Hand Treatments	18%	21%	22%	19%	25%
Percent Mechanical	10%	12%	12%	11%	38%
Percent Herbicides	9%	4%	0%	4%	5%
Percent Rx Herbivory	10%	0%	10%	10%	24%

(M = 1000 acres, MM = 1,000,000 acres)

The Proposed Program treats almost five times as many acres (2.16 million acres/decade) as the Status Quo (470,000 acres/decade). Because the Proposed Program treats so many more acres than the Status Quo it is likely to reduce impacts from wildland fire compared to the Status Quo due to previously treated areas, particularly surface fire regimes, burning at lower severity in the case of wildfire. In addition, wildfire extent is likely to be slightly reduced after the first decade of treatments, as a small number of watersheds statewide (mostly in the South Coast, Sierra and San

Joaquin bioregions) have 35% or more of their watershed area treated. From a wildlife standpoint, effects are expected to be slightly to moderately beneficial, particularly to non-listed species such as deer, quail, etc. On the other hand, the Proposed Program would have a negligible to moderate adverse effect to some special status wildlife species due to prescribed fire and mechanical treatments disrupting habitat of such species at a greater rate than would be "saved" due to reduced wildland fire intensity. Because of the need to treat invasives, the Proposed Program would have a slightly adverse to slightly beneficial impact on invasives, since treatments designed to extirpate invasives can also introduce invasive species to areas free of noxious weeds. From a soils standpoint, Program treatments are expected to have slightly to moderately adverse effects as these treatments occur on more acres per decade than the number of treated acres that burn due to wildfire at a lower severity level. The Proposed Program would have its biggest effect on air quality where the scope of the prescribed fire program (~ 115,000 acres burned annually) would produce significantly more emissions than would be "saved" by treated areas burning at lower severity during wildfire. The reason for this is that only about 16% of treated areas are expected to be burned by wildfire in any decade, and while fire severity is expected to drop from severe to low in surface fire regimes, it is not expected to drop to less than moderate in crown fire regimes. Also, treated crown fire ecosystems burning under severe fire weather conditions (e.g., Santa Ana fire weather conditions) are not expected to have significantly less emissions than untreated areas. Finally, from a climate change perspective, the Proposed Program would initially have a slightly adverse effect on CO_2 levels, as a combination of increased use of prescribed fire does not offset reduced wildfire intensity. However, over time, increased mechanical and hand treatments are expected to increase tree growth somewhat, sequestering more CO_2 and leading to a slight reduction in total carbon emissions after 30 years of treatments.

Table ES.2
Comparison of the Environmental Impacts to Resources of Implementing the Proposed Program or the Alternatives 1/

Element	Program	Alternative 1	Alternative 2	Alternative 3	Alternative 4
	Summary of Resource Impacts				
Wildfire Intensity/Occurrence	MB	NA/NB	MB	NB/MB	NA/NB
Climate Change	NA	NA/NB	NA	NA	NA
Aquatic Resources	NA	NA	NA	NB	NA
Wildlife Resources	NB/MB	NB	MB	MB	NB/MB
Vegetative Resources	NA/NB	NA/NB	MA	NA/NB	NA/NB
Invasives	NA/NB	MA	MA	NA/NB	NA/NB
Air Quality	SA	NA/NB	SA	SA	MA
Water Quality	NA	NA	NA	NB	NA
Cultural, Archaeological	NA	NA	NA	NA	NA
Population and Housing	NA/NB	NA/NB	NA/NB	NA/NB	NA/NB
Transportation/Traffic	NA	NA	NA	NA	NA
Utilities and Energy	NA/NB	NA/NB	NA/NB	NA/NB	NA/NB
Noise	NA/MA	NA	NA/MA	NA/MA	NA
Visual/Aesthetic	NA	NA	NA	NA	NA
Recreation	NA	NA	NA	NA	NA
Geology/Soils	NA/MA	NA	NA/MA	NA	NA
Hazardous Materials	NA	NA	NA	NA	NA
Herbicides					
Wildlife Resources	MA/MB	NA/NB	NA 2/	MA/MB	MA/MB
Vegetative Resources	NA/NB	NA/NB	NA	NA/NB	NA/NB
Air Quality	NA/MA	NA	NA	MA	MA
Water Quality	MA	NA/MA	NA	MA	NA/MA
Recreation	MA	NA/MA	NA	MA	NA/MA
Geology/Soils	NA/NB	NA/NB	NA	NA/NB	NA/NB
Human Health	NA/MA	NA	NA	NA/MA	NA

1/ Key to effects: adverse effects are those effects which degrade the diversity, structure, size, integrity, abundance or number of; or are outside the natural range of variability, for the resource at issue. Beneficial effects are those effects that improve the diversity, structure, size, integrity, abundance or number of; or are within the natural range of variability, for the resource at issue. SA/SB – significant adverse or beneficial effects are those effects that are substantial, highly noticeable, at the watershed scale; and often irreversible. MA/MB - moderately adverse or beneficial effects - those effects that can be detected beyond the affected area, but are transitory and usually reversible. NA/NB - negligible adverse or beneficial effects - those effects that are imperceptible or undetectable.

2/ A rating of NA is assigned to the No Herbicide alternative to account for the likely off program use of herbicides.

Table ES.3 (from Table 3.12) summarizes how well the Proposed Program and the Alternatives meet the goals established for the VTP. The Proposed Program would likely meet the goals established for the VTP in Section 1.7 to a greater degree than the Alternatives and the Status Quo. Again, Alternative 3 would come almost as close to meeting the goals for the VTP as the Proposed Program. However Alternative 3 would not meet the goals of the VTP to the same degree as the Program since the overall number of acres that Alternative 3 would treat during the life of the VTP would be quite a bit less than the Program.

Table ES.3
Goal Achievement Due to Implementing the Proposed Program or the Alternatives 1/

Goal 2/	Summary of Goal Achievement				
	Program	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Goal 1 – enhance forest health	+ +	0	+	+ +	+
Goal 2 – modify wildfire behavior	+ +	0	+ +	+	+
Goal 3 – reduce suppression costs	+ +	0	+ +	+	+
Goal 4 – restore natural range of plants	+ +	0	-	+ +	+
Goal 5 – maintain/improve air quality	-	0	-	-	0
Goal 6 – reduce watershed effects	+	0	+	++	0
Goal 7 – reduce non-native plants	++	0	-	++	+
Goal 8 – improve wildlife habitat	++	0	+	++	+
Goal 9 – provide a CEQA process	+	0	+	+	+

1/ Key to ratings, "+ +" strongly meets goal, "+" moderately meets goal, "0" neutral towards goal accomplishment, "-" moderately adverse towards goal accomplishment, " - -" strongly adverse to goal accomplishment.

2/Goals of the VTP (from Section 1.7)

1. Maintain and enhance forest and range land resources including forest health to benefit present and future generations.
2. Modify wildland fire behavior to help reduce catastrophic losses to life and property consistent with public expectation for fire protection.
3. Reduce the severity and associated suppression costs of wildland fires by altering the volume and continuity of wildland fuels.
4. Reduce the risk of large, high intensity fires by restoring a natural range of fire-adapted plant communities through periodic low intensity vegetation treatments.
5. Maintain or improve long term air quality through vegetation treatments that reduce the severity of large, uncontrolled fires that release air pollutants and greenhouse gases.
6. Vary the spatial and temporal distribution of vegetation treatments within and across watersheds to reduce the detrimental effects of wildland fire on watershed health.
7. Reduce noxious weeds and non-native invasive plants to increase desirable plant species and improve browse for wildlife and domestic stock.

8. Improve wildlife habitat by spatially and temporally altering vegetation structure and composition, creating a mosaic of successional stages within various vegetation types.
9. Provide a CEQA-compliant programmatic review document process/mechanism for other state or local agencies, which have a vegetation management program/project consistent with the VTP, to utilize this guiding document to implement their vegetation treatment programs/project.

Cumulative Impacts

The CEQA Guidelines require that an EIR provide a discussion of cumulative effects, which is a change in the environment that results from adding the effect of the project to those effects of closely related past, present and probable future projects. CEQA guidelines define cumulative effects as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects (CEQA Guidelines § 15355). The effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative effects can result from individually minor but collectively significant effects (CEQA Guidelines § 15355). In a CEQA evaluation, the proposed action must be considered along with the combined effects of the cumulative actions in a single analysis. The effects from multiple projects may be additive or synergistic. Table 6.12 summarizes the cumulative impacts from the VTP at project or bioregional scales of assessment.

Significant and Unavoidable Impacts

Analysis in the VTP indicates that any significant negative impacts resulting from Program implementation can be mitigated to a less than significant level; therefore no significant and unavoidable impacts have been identified. (Although some of the alternatives analyzed in the PEIR are predicted to result in significant negative impacts to various resources, no mitigation measures have been developed for the alternatives. However, if instead of the Proposed Program the decision maker adopted one of the alternatives, applicable mitigation measures would be developed and implemented.)

Some of the more critical resources and their mitigation measures are summarized below:

- **Air Quality**

Implementation of the Proposed Program and Alternatives could potentially result in significant and unavoidable impacts to air quality because five of the six criteria pollutants could exceed California's Ambient Air Quality Standards (Section 5.6). However, two Mitigation Measures, 5.6-1 and 5.6-2, have been developed, which when implemented are expected to reduce impacts to air quality to less than significant, as documented in Section 5.6.

- **Biological Resources**

The Proposed Program and Alternatives 1 through 4 could potentially cause indirect or direct substantial adverse effects to sensitive species. However, most of these potential effects can be avoided or minimized through adherence to the checklist and MMRs. Direct effects, by definition, are virtually never positive; however, appropriate avoidance measures, including surveys where necessary, implemented at the project level will eliminate negative direct effects on special-status wildlife.

As discussed in Section 5.5.2, implementation of the Proposed Program could cause substantial adverse impacts to several special status species. In every such case, however, mitigation measures have been developed that, when implemented, will reduce this impact to a level of less than significant, as shown in Table ES.4 below. These species and the purposes of the mitigation measures are discussed in detail in Section 5.5.2.

Table ES.4
Special Status Species and Mitigation Measures That Will be Implemented to Reduce Impacts from the Program to Less Than Significant

Species	Mitigation Measure
Northern Spotted Owl	5.5.2-1
Valley Elderberry Longhorn Beetle	5.5.2-3
San Joaquin Kit Fox	5.5.2-4
California Tiger Salamander	5.5.2-5
California Red-Legged Frog	5.5.2-7
Burrow-Dwelling Special Status Taxa	5.5.2-8
Various Special Status Taxa	5.5.2-10
Smith's Blue (butterfly)	5.5.2-11
Black Legless Lizard	5.5.2-12

- **Noise**

Implementation of the Proposed Program and alternatives could have significant and unavoidable short-term impacts to schools, churches, hospitals and other sensitive receptor sites due to noise generated by heavy equipment and chainsaws. However, Mitigation Measures 5.12-1, 2, 3, and 4 have been developed which, when implemented, will reduce these impacts to a level of less than significant.

Growth Inducement

Certain projects, such as freeway interchanges, housing developments, wastewater treatment plants, etc., clearly result in secondary growth inducing impacts that must be analyzed. The

proposed program will not have any growth-inducing impacts because it will not foster growth or result in new housing or construction of facilities. Based on the above conclusion, no reasonably foreseeable growth-inducing impacts have been identified that would result from implementation of the Proposed Program or the Alternatives to the Program. (CEQA Guidelines § 15126[f]).

Irreversible Environmental Change

For some projects, the environmental impacts caused by implementing the project may result in the irreversible or irretrievable commitment of environmental resources (CCR §15126.2c). EIR's are required by CEQA to describe any significant irreversible environmental changes that would result from the proposed action. As discussed above, all potentially irreversible and irretrievable commitments of environmental resources have been reduced to a less than significant level by the implementation of mitigation measures specific to particular resources.

Known Areas of 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. Several effects of implementing the Proposed Program are expected to be controversial, including the following:

- Impacts to air quality in certain air basins due to smoke from prescribed fire treatments.
- Potential impacts to water quality, biological resources and human health from application of herbicides as a prescribed treatment funded under the Proposed Program.
- Potential impacts to water quality, biological resources and human health from application of herbicides not prescribed or funded under the Proposed Program, as a before or after treatment.
- Potential unintended effects of the application of herbicides.
- Potential spread of invasive plants due to treatments.
- Potential for loss of life, property and resource values due to escaped prescribed fire.