

1 INTRODUCTION

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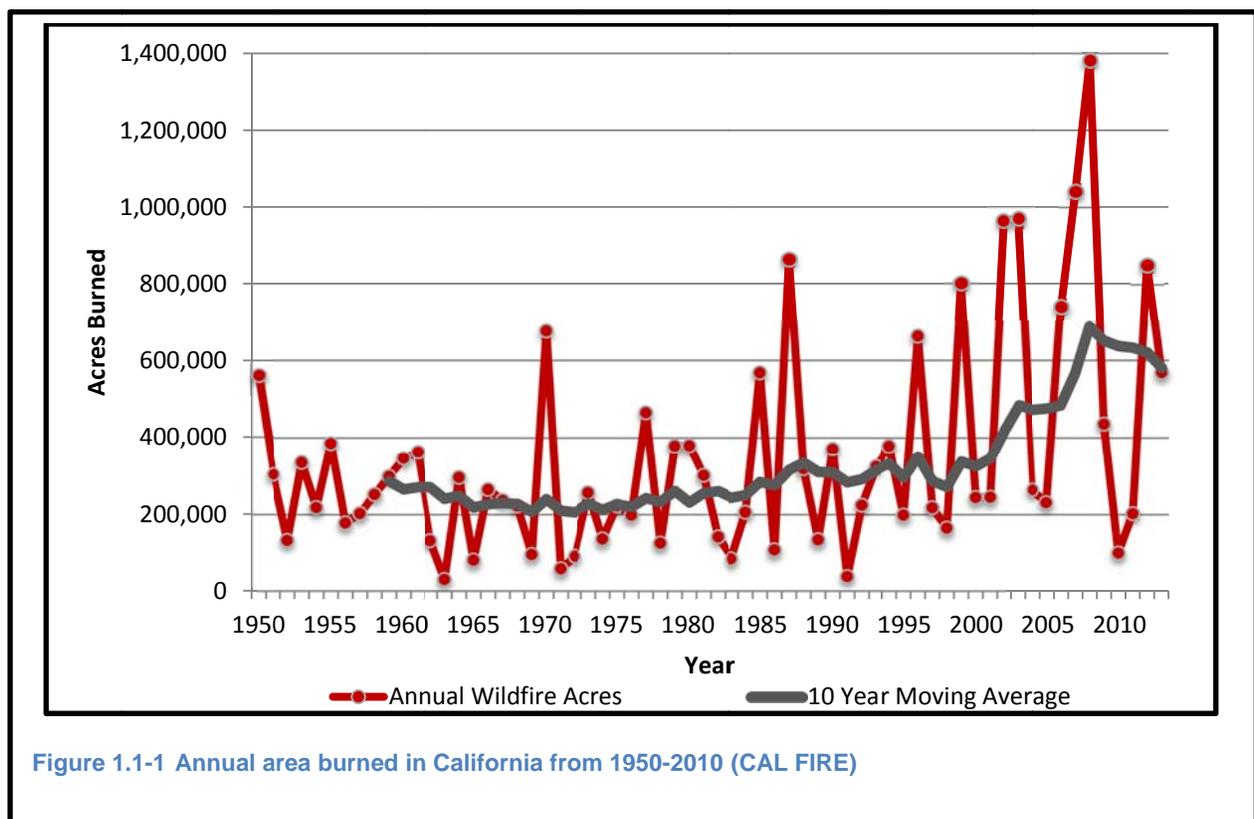
1.1 PURPOSE

The California State Board of Forestry and Fire Protection (Board) is proposing to initiate the Vegetation Treatment Program (VTP). The VTP is part of a comprehensive fire prevention strategy from the Board (Board, 2010) that is implemented by the Department of Forestry and Fire Protection (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. The implementation of this program would be a discretionary action by CAL FIRE and would govern project-scale decision making. Therefore, approval of the VTP by the Board would be a “project” under the California Environmental Quality Act (CEQA), as defined in CEQA Guidelines Section 15378.

1.1.1 THE NEED FOR A VEGETATION TREATMENT PROGRAM

Fire is a natural process on the California landscape. Despite this, fire regimes in many California ecosystems have been altered by land use and other anthropogenic factors (Van de Water and Safford, 2011; Stephens, Martin & Clinton, 2007). It is estimated that approximately 4.45 million acres burned annually in California before the 1800s (Stephens, Martin & Clinton, 2007). Fire suppression and land use conversions have resulted in a buildup of fuels in some coniferous forest types (McKelvey et al., 1996; Miller et al., 2009). Unfortunately, human activities have increased ignitions and fire frequency in some chaparral vegetation types (Keeley and Fotheringham, 2003; Syphard et al., 2007). These types of anthropogenic alterations are some of the reasons why wildfire frequency in Northern California has increased 18 percent in the period from 1970 to 2003 (Westerling et al., 2006), and wildfire acreage in California has been steadily increasing since the mid-1990s (Figure 1.1-1). In a national-scale assessment, California was found to have three times the magnitude of wildfire-related risk for the most highly valued human and ecological resources (e.g., moderate/high density housing and municipal watersheds) than the next highest geographic area (Thompson et al., 2011). Risk due to wildfire is most acute in the wildland-urban interface (WUI), where housing losses have increased significantly during the past three decades (Figure 1.1-2; Stephens et al., 2009b). This problem is expected to grow, as modeling scenarios suggest that housing within the highest wildfire hazard severity zone (i.e., very high) will increase from 640,000 to 1.2 million units by the year 2050 (Mann et al., 2014).

Climate change is another mechanism that has been predicted to increase the size, timing, and severity of fires into the future (Lenihan et al., 2003; Fried et al., 2004; Westerling et al., 2008). Projected temperatures in California between 2000 and 2100 are expected to rise 1.7 to 3.0 degrees Celsius ($^{\circ}\text{C}$) in the lower range of projected warmings, 3.1 to 4.3 $^{\circ}\text{C}$ in the medium range, and 4.4 to 5.8 $^{\circ}\text{C}$ in the high range (Cayan et al., 2008). Most of the projected temperature increases will occur during the summer months (Cayan et al., 2008). Due to these temperature increases, predictive models forecast anywhere from a 12 to 53 percent increase in large fires between 2070 to 2099 (i.e., greater than approximately 500 acres) (Westerling et al., 2008), and a median increase of 41 to 69 percent for burned area by 2085 (Westerling et al., 2011). Large fire risk may increase or decrease in Southern California depending upon the change in precipitation magnitude, however, large fire risk increases in Northern California regardless of whether precipitation increases or decreases (Westerling et al., 2008). Regardless of the modeled scenario, the predicted trend is one of increasing fire season and fire size at the statewide scale. There is also considerable uncertainty about how climate change would affect vegetation composition and structure across the state (Lenihan et al., 2003). Aside from mitigating the probability (risk) of wildfire, and general threat to the environment from catastrophic wildfire, this VTP is intended to be utilized to increase fire resiliency and adaptation to climate change.



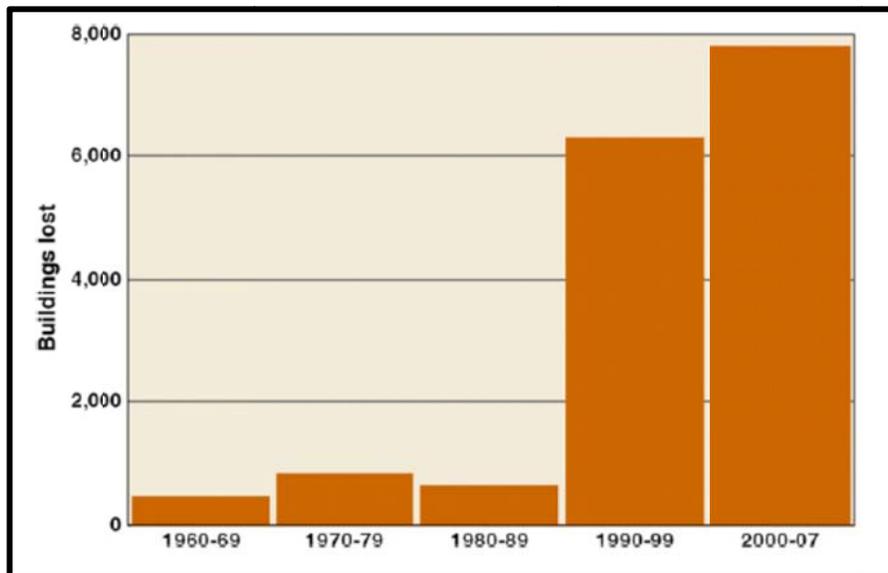


Figure 1.1-2 Number of buildings lost from the 25 most destructive WUI fires in California history from 1960-2007 (taken from Stephens et al., 2009).

Despite the uncertainties in future wildfire activity, what is known is that fire behavior in the wildland environment is influenced by the interaction between weather, topography, and fuels (Figure 1.1-3; Countryman, 1972). Of the three variables, fuels are the only one that can be feasibly manipulated through human activities. Vegetation treatments can influence fire behavior through the manipulation of the amount and arrangement of fuels. Properly implemented vegetation treatments have been shown to reduce fire severity and help to protect assets in the WUI (Safford et al., 2009). Vegetation

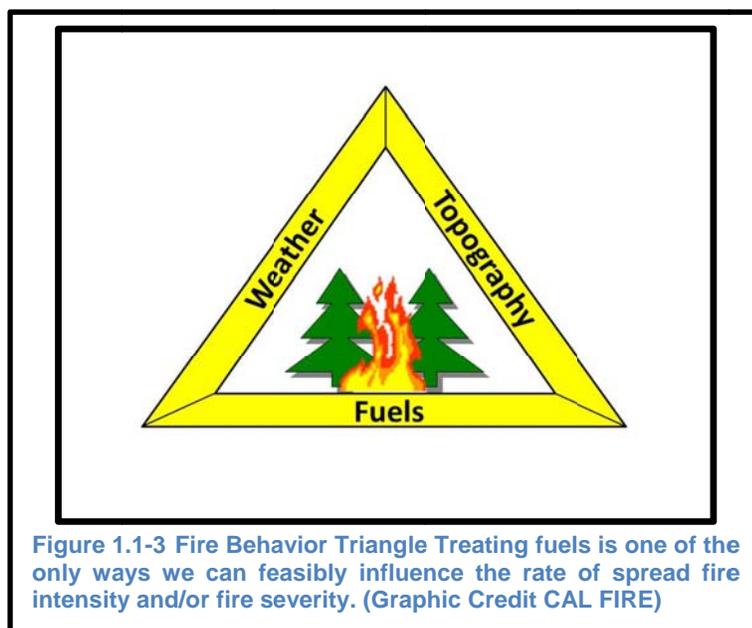


Figure 1.1-3 Fire Behavior Triangle Treating fuels is one of the only ways we can feasibly influence the rate of spread fire intensity and/or fire severity. (Graphic Credit CAL FIRE)

treatments can improve the resistance and resiliency of some vegetation types to high-severity fire (Stephens et al., 2012), and strategically placed fuel breaks can help aid in fire suppression efforts (Syphard et al., 2011).

Regardless of the noted benefits, fuels treatments are not appropriate in all locations (Keeley, 2002), and can cause environmental impacts if not designed for site-specific conditions (Elliot et al., 2010). As

such, the Board and CAL FIRE require a systematic process that guides the

prioritization, selection, assessment, and mitigation of appropriate vegetation treatments in the diverse environments of California. The VTP would provide the framework that allows for the implementation of appropriate fuels treatments across nonfederal lands in California.

1.2 DECISIONS SUBJECT TO CEQA

CEQA applies only to discretionary projects by public agencies. A “project” is defined as a whole of an action which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment. (State CEQA Guidelines Section 15378[a]; Public Resources Code [PRC] 21065).

A “project” under CEQA is considered to be an activity directly undertaken by a public agency, an activity that is supported, in whole or in part, through public agency contracts, grants, subsidies, loans, or other assistance from a public agency, or an activity involving the public agency issuance of a lease, permit, license, certificate, or other entitlement for use by a public agency. An agency is generally not permitted to treat each separate permit or approval under a program, such as the VTP, as a separate project segment, if the effect is to avoid full disclosure of environmental impacts. However, CEQA does encourage the application of a programmatic approach where a group or series of projects are similar in activities and impacts and where potential impacts can be avoided or mitigated in a similar manner. Section 1.3 describes the relationship between discretionary projects and the CEQA requirements for the VTP.

1.3 PURPOSE OF THIS PROGRAM ENVIRONMENTAL IMPACT REPORT

This Program Environmental Impact Report (Program EIR) has been prepared to evaluate the potential environmental effects of implementing the VTP. This Program EIR has been prepared in compliance with CEQA and the State CEQA Guidelines. CEQA requires that state and local government agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects. CEQA requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant environmental effects of projects it approves or implements. The purpose of an EIR, under CEQA, is “to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or

avoided” (PRC Section 21002.1 [a]). If a project would result in significant and unavoidable environmental impacts that cannot be feasibly mitigated to less-than-significant levels, the project can still be approved, but the lead agency’s decision-maker (i.e., Board) must issue a “statement of overriding consideration” explaining, in writing, the specific economic, social, or other considerations that they believe make those significant effects acceptable (PRC Section 21002; 14 CCR 15093).

The Board is the Lead Agency for this Program EIR, as defined by CEQA and will provide policy direction and guidance to CAL FIRE in its implementation of the VTP. Other public agencies with jurisdiction over the project areas evaluated under the VTP are described below in Section 1.5 Responsible and Trustee Agencies.

The purpose, content, and procedures of a Program EIR are described in State CEQA Guidelines Section 15168 and summarized below. The relevant statute and resolution guiding the preparation of the Program EIR are:

- PRC Section 21000 et seq., the California Environmental Quality Act
- California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq., the State CEQA Guidelines

1.4 USE OF A PROGRAM ENVIRONMENTAL IMPACT REPORT

According to Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The VTP meets these criteria for use of a Program EIR.

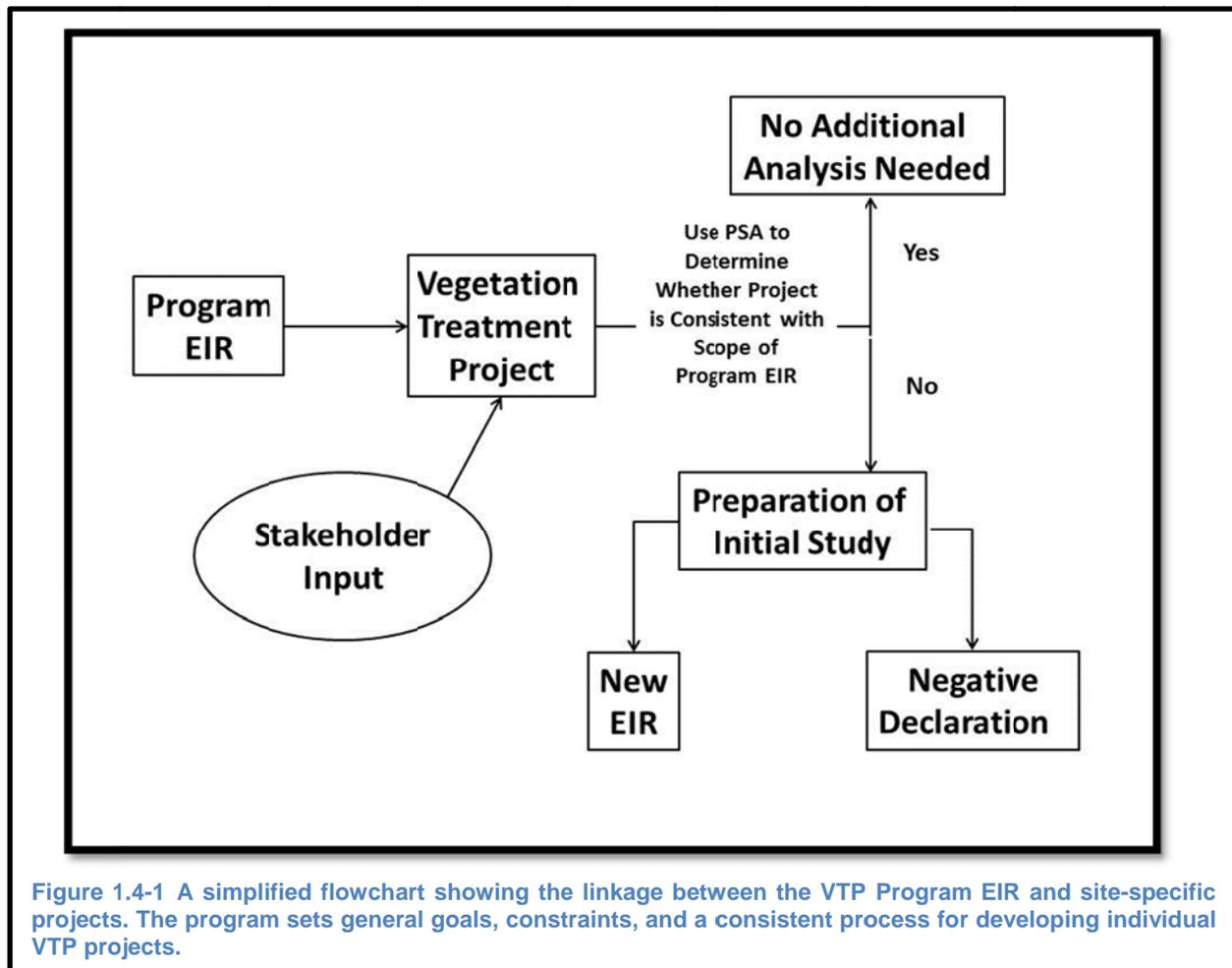
Preparing a Program EIR allows for a more exhaustive consideration of effects than would be practical in separate EIRs on individual actions, and ensures consideration of cumulative impacts that might be missed on a case-by-case basis. It also avoids duplicative consideration of basic policy and program-wide mitigation measures.

As noted in Section 15168(c) of the State CEQA Guidelines, subsequent proposed projects that are consistent with the VTP (i.e., proposed treatment activities within units of CAL FIRE) would be examined in light of the information in this Program EIR to determine whether an additional environmental document must be prepared. This allows an opportunity for the public to provide comment on a project at an early stage of the CEQA process. If CAL FIRE finds that, pursuant to Section 15162 of the State

CEQA Guidelines, no new effects would occur or no new mitigation measures would be required on a subsequent project, the project can be considered as being “within the scope” this Program EIR, and no new EIR or negative declaration would be required. CAL FIRE would use this EIR for the project’s CEQA compliance and file a notice of determination (NOD) when the project is approved. Under this approach, CAL FIRE must incorporate all project requirements relevant to the proposed treatment activity and all feasible mitigation measures from this Program EIR into the project, as needed, to address significant or potentially significant effects on the environment.

If a proposed project would have effects that were not examined in this Program EIR, an initial study would be needed to be prepared to determine the appropriate environmental document. If another environmental document is needed, whether it is a notice of exemption, negative declaration, mitigated negative declaration, or Supplemental EIR, the Program EIR can be used to simplify the task of preparing the subsequent environmental document, as indicated in Section 15168(d) of the State CEQA Guidelines. For instance, regional influences, secondary effects, cumulative impacts, and broad alternatives that apply to the overall Process can be incorporated by reference, allowing the later environmental document to focus solely on the new effects that had not been previously considered. Any project-specific impacts that are too speculative to define at the program level would be resolved during CEQA review of individual projects. A detailed description of the implementation process is discussed in Chapter 2.1.1.

For the purposes of the VTP, the Program EIR offers the ability to factor State-level goals, values, and objectives into a framework for fuels management (Board, 2010; CAL FIRE, 2012). One of the goals of the 2010 Strategic Fire Plan is to develop a method to integrate fire and fuels management practices with landowner priorities and multiple jurisdictional efforts within local, state, and federal responsibility areas (Board, 2010). The Board supports the use of a programmatic approach to achieve this goal in a way that assists and streamlines the regulatory processes for site-specific projects, visualized below in Figure 1.4-1(Board, 2010).



Utilization of a Program EIR for the VTP does not avoid site-specific environmental impact analysis, nor does it avoid public input into individual vegetation treatment projects. The VTP Program EIR sets forth the basic principles to prioritize, select, and analyze impacts and mitigate ecologically-appropriate vegetation treatments in a way that satisfies the goals of the VTP. These principles also provide the foundation for Project Scale Analysis (PSA). Through the implementation of the VTP communications plan, stakeholder input will be considered for various treatments during project scoping and relevant information will be used for site-specific analysis in preparing the PSA (See Figure 1.4-1).

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

Responsible and trustee agencies are consulted by the Lead Agency to ensure they have the opportunity for input during the environmental review process. Under CEQA, a responsible agency is a public agency other than the lead agency that has legal

responsibility for carrying out or approving a project or elements of a project (PRC 21069). Although other state and local agencies may have approval authority on individual vegetation treatment activities, these agencies do not have approval authority over implementing the VTP analyzed in this Program EIR, so there are no responsible agencies. However, CAL FIRE is interested in receiving comments and feedback on the VTP from other state and local agencies.

Under CEQA, a trustee agency is a state agency that has jurisdiction by law over the natural resources that are held in trust for the people of the State of California (PRC 21070). The California Department of Fish and Wildlife (CDFW) is a trustee agency with jurisdiction over fish and wildlife and their habitats that may be affected by the VTP. Other trustee agencies may have resources held in trust that are affected by future individual treatment activities.

The *2010 Strategic Fire Plan for California* and the California Department of Forestry & Fire Protection *2012 Strategic Fire Plan* identify the goals of cultivating and strengthening relationships with stakeholders, governing bodies, cooperators and the public (Board, 2010 & CAL FIRE, 2012). To further the goals of those plans, the Board and CAL FIRE have coordinated with a variety of stakeholders, including but not limited to federal, state and local government agencies and non-governmental organizations, to acknowledge the benefits of vegetation treatments. The proposed VTP will help to bridge the ground work and provide the ecological role of vegetation treatment on SRA land within future cooperating efforts.

1.6 REGULATORY SETTING

CAL FIRE is responsible for preventing and extinguishing wildland fires in State Responsibility Areas (SRA) (PRC Sections 4113 and 4125). The SRA is land that provides forest or range products, watersheds not owned or managed by the federal government or within the boundaries of incorporated cities, and where CAL FIRE has the primary financial responsibility for preventing and suppressing fires (Figure 1.6-1). Local Responsibility Areas (LRAs) are lands where local agencies have the primary financial responsibility for preventing and suppressing fires. Lands where federal agencies are responsible for preventing and suppressing wildland fires are called Federal Responsibility Areas (FRAs).

The Board is responsible for identifying very high fire hazard severity zones (VHFHSZ) in the SRA and areas protected by local fire agencies (LRAs). Local agencies are required to designate, by ordinance, VHFHSZ and to require landowners to reduce fire hazards adjacent to occupied buildings (Government Code Section 51179). The intent of identifying areas with very high fire hazards is to allow CAL FIRE and local agencies

to develop and implement measures that would reduce the loss of life and property from uncontrolled wildfires (Government Code Section 51176).

PRC Sections 4114 and 4130 authorize the Board to establish a fire plan, which, among other things, establishes the levels of statewide fire protection services for SRA lands. The *2010 Strategic Fire Plan for California* (Board, 2010) was developed around the idea that there are certain central policies that are critical to reducing and preventing the impacts of fire, which revolve around both suppression efforts and fire prevention efforts. Major policy components of the plan are:

- Land use planning that ensures increased fire safety for new development
- Creation of defensible space for survivability of established homes and neighborhoods
- Improving fire resistance of homes and other constructed assets
- Fuel hazard reduction that creates resilient landscapes and protects the wildland and natural resource values
- Adequate and appropriate levels of wildland fire suppression and related services
- Commitment by individuals and communities to wildfire prevention and protection through local fire planning

CAL FIRE implements vegetation treatments under PRC Sections 4475 through 4495. PRC Sections 4461 through 4471 and 4491 through 4494 authorize CAL FIRE to implement its existing Chaparral Management Program (CMP) (CAL FIRE, 1981), now known as the Vegetation Management Program (VMP), and to enter into contracts with landowners or other persons to conduct vegetation treatments within defined vegetation types. In addition, with the 2005 passage of SB 1084 introduced by Senator Kehoe, the Legislature modified and in some cases added language to PRC Sections 4475 through 4480 which:

- Broadened CAL FIRE's range of vegetation treatment practices beyond those described for the existing VMP
- Added a definition of "hazardous fuel reduction,"
- Made other changes to the major statutory provisions guiding CAL FIRE's vegetation treatment authorities

PRC Sections 4790 through 4799.04 provides the regulatory authority for CAL FIRE to administer the California Forest Improvement Program (CFIP).

PRC Section 4562 mandates that the Board adopt fire protection zones where specific protection measures are to be identified, including vegetation treatments within and adjacent to timber operations.

Government Code Section 65302.5 gives the Board the regulatory authority to evaluate General Plan Safety Elements for their land use policies in SRA and VHFHSZs as well

as methods and strategies for wildland fire risk reduction and prevention in those areas, which includes projects potentially covered by this Program EIR.

Finally, PRC Section 4291 give CAL FIRE the authority to enforce 100 feet of defensible space around all buildings and structures on non-federal SRA lands (PRC Section 4290); or non-federal forest-covered lands, brush-covered lands, grass-covered lands, or any land that is covered with flammable material (PRC Section 4291).

On October 30, 2015 Governor Jerry Brown proclaimed a State of Emergency related to the extensive tree mortality throughout the State of California. Governor Brown cited the current severe drought conditions, the susceptibility of forests to epidemic infestations of native bark beetles due to the lack of precipitation, and the unprecedented tree die-off in modern history as reasons for the proclamation. Under the proclamation Governor Brown directed specific tasks to CAL FIRE, while also acknowledging the partnerships that other agencies must have with CAL FIRE to achieve the goals set forth:

- The Department of Forestry and Fire Protection, the California Natural Resources Agency, and the California Department of Transportation, and the California Energy Commission shall immediately identify areas of the State that represent high hazard zones for wildfire and falling trees using best available science and geospatial data.
- State agencies, utilities, and local government, to the extent required by their existing responsibilities to protect the public health and safety, shall undertake efforts to remove dead or dying trees in these high hazard zones that threaten power lines, roads and other evacuation corridors, critical community infrastructure, and other existing structures. Incidental vegetation such as shrubs that restrict access for safe and efficient removal of dead and dying trees also may be removed. The Department of Forestry and Fire Protection shall issue emergency guidelines setting forth the relevant criteria, and the California Conservation Corps shall assist government entities in implementing this directive to the extent feasible.
- The California Air Resources Board and the California Department of Forestry and Fire Protection shall work together and with federal land managers and the United States Environmental Protection Agency to expand the practice of prescribed burns, which reduce fire risk and avoid significant pollution from major wildfires, and increase the number of allowable days on a temporary basis to burn tree waste that has been removed in high hazard areas.

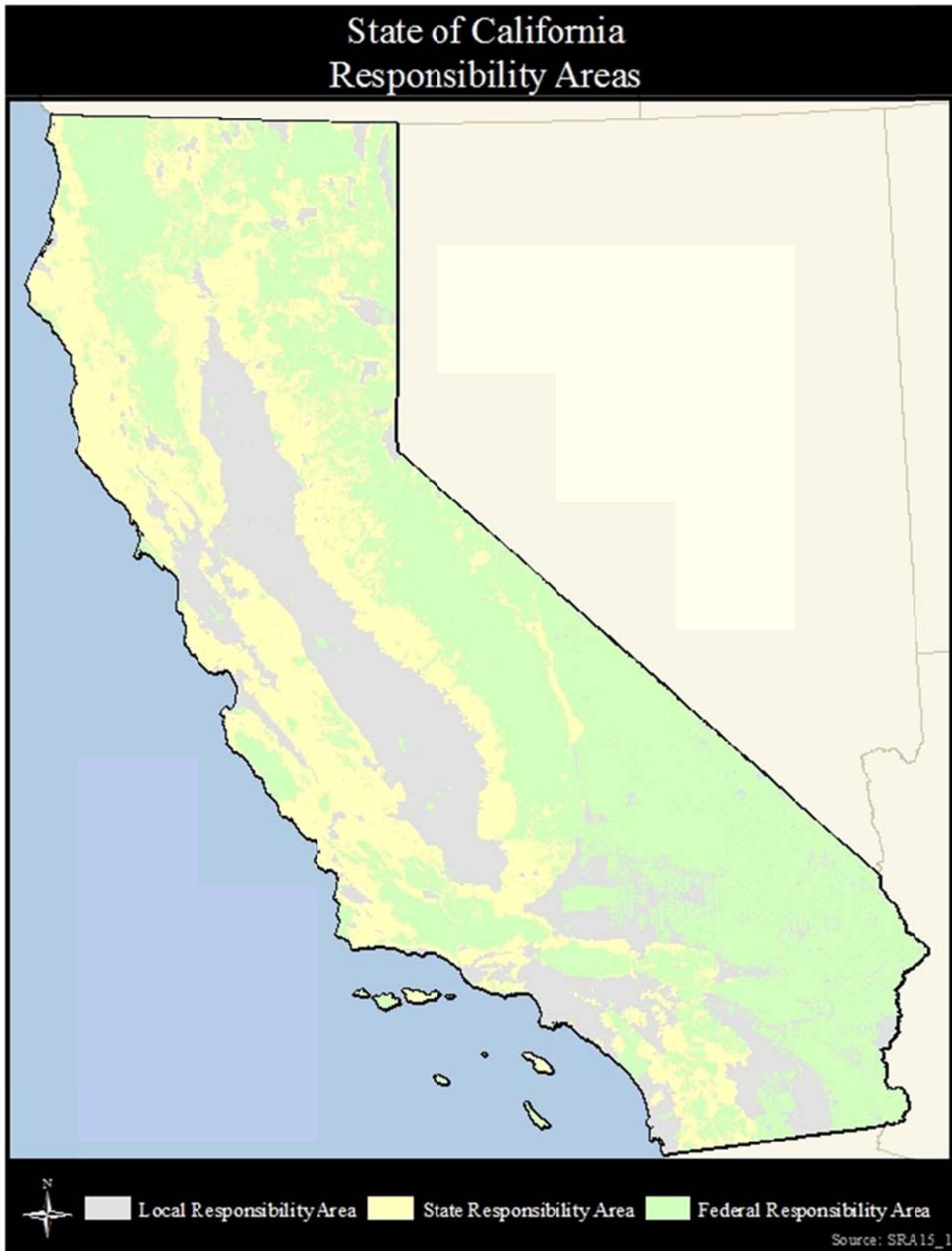


Figure 1.6-1: Responsibility Areas of California

1.7 CURRENT VEGETATION TREATMENT METHODS

1.7.1 OVERVIEW

CAL FIRE currently implements vegetation treatments through various programs including: the VMP, CAL FIRE's Fire Prevention Program, and the CFIP. In addition, CAL FIRE is involved with programs that support the *2010 Strategic Fire Plan for California* goals including:

- Land use planning: including projects such as general plans, new development, and existing developments
- Facilitating a shared vision among communities and the multiple fire protection jurisdictions, including the creation of county-based plans and community-based plans such as Community Wildfire Protection Plans (CWPP)
- Establishing fire resistance in assets at risk such as homes and neighborhoods (Board, 2010)

In 2004, CAL FIRE implemented a Fuels Reduction Program, funded by Proposition 40, the *California Clean Water, Clean Air, Safe Neighborhood Parks, and Coastal Protection Act of 2002*. The goal of the Fuels Reduction Program, which ended in 2012, was to reduce wildland fuels that posed a threat to watershed resources and water quality on nonfederal lands in areas with high or moderate levels of watershed assets at risk within the fifteen Sierra Nevada counties. The program was implemented by partnering with non-profit organizations, such as Fire Safe Councils, and with non-federal government agencies, such as California State Parks and local Resource Conservation Districts, through funding under the Community Assistance Grants Program and CFIP.

Existing fuel management programs are briefly described below (see also Table 1.7-1). In addition, CAL FIRE regulates commercial timber harvesting on private lands, which manipulates fuel composition and arrangement. The timber harvest program is administered through a CEQA environmental review process that is separate from the proposed VTP.

1.7.2 CHAPPARAL MANAGEMENT PROGRAM (CMP) & VEGETATION MANAGEMENT PROGRAM (VMP)

In the early 1980s, the California State Legislature recognized that there had been an increase in the number of uncontrolled fires on wildlands of the state resulting in destruction of important natural resources, loss of recreation opportunities, and an unacceptable level of hazards to public safety. The California State Legislature subsequently passed Senate Bill (SB) 1704 (Keene) which was signed into law by the

Governor in 1980 and became effective in July 1981. The bill enabled the state to enter into a contract for prescribed burning with the owner or any other person who has legal control of any property which is included within any land classified by the state as "wildland."

In SB 1704, the California State Legislature established a program of fuel management to achieve the prevention of high-intensity wildland fires. The program allows CAL FIRE to enter into contracts with landowners for prescribed burning to prevent high-intensity wildland fires, and manage watersheds, rangeland, vegetation, forests, and wildlife habitat. Under SB 1704, the state may assume up to 90% of the costs of conducting a project, assume liability for the project, and suppress escaped fires.

CAL FIRE, in cooperation with federal, state, and county resource agencies and private landowners initiated the Chaparral Management Program (CMP) in 1981 to reduce the risk of wildfire and avoid negative impacts on humans, property, and the environment. CAL FIRE completed a programmatic environmental impact report (EIR) on the Chaparral Management Program in 1981. The intent of that program EIR was to implement SB 1704 and identify environmental effects, provide mitigation for potential adverse effects that could occur from management activities, and provide an environmental checklist for project-level actions. The CMP Programmatic EIR focused on assessing potential impacts of conducting prescribed burning on shrub lands. The CMP later became known as the Vegetation Management Program (VMP).

The current VMP reduces the potential for large wildfires and enhances natural resources by treating the following vegetation types primarily on SRA lands where CAL FIRE is responsible for fire protection:

- Coastal scrub habitat south of San Luis Obispo County
- Montane hardwood-conifer habitat north of Monterey County
- Mixed chaparral, montane chaparral, chemise-redshank, and valley foothill hardwood habitats throughout their range
- Annual and perennial grasslands that occur within the above vegetation types
- With the addition of a Negative Declaration, mixed conifer forests such as those found in the Coast Range, Sierra Nevada, and Cascade mountains are now included in the VMP

The VMP employs multiple mechanisms to treat vegetation, similar to the proposed VTP (prescribed fire, mechanical, manual, herbivory etc.), but the acreage treated with prescribed fire has decreased significantly since the program began in the 1980's. There are a number of reasons for this decrease, including an emphasis away from large range management burns to wildland urban interface projects that are smaller and less likely to use prescribed fire to obtain fuel reduction goals, increased air quality restrictions or restrictions for other environmental resources that limit the days available

to conduct burning operations, budget and personnel constraints, and the re-tasking of VMP personnel to non-VMP work.

Although the VMP emphasizes treatment of rangelands, it also meets a wide variety of other objectives, including protecting human life and property, reducing fire suppression costs, enhancing wildlife habitat, improving commodity production (e.g., livestock grazing and water yield), and reducing the potential for long-term detrimental effects of wildfire (e.g., impacts from flooding, air and water quality, soil productivity). Approximately 10.9 million acres are available for treatment under the VMP and the VMP is authorized to treat a maximum of 120,000 acres annually (CAL FIRE, 1981). Because of funding limitations and other factors, (i.e., lack of suitable burn day conditions, cost and time to meet environmental review requirements, surveying for and mitigating treatment effects to threatened and endangered species, three year effective period for a VMP project, etc.), treatment has averaged less than 30,000 acres per year. Assistance for project funding is dependent on the availability of funds, staff, and consistency with the objectives of the VMP.

1.7.3 FIRE PREVENTION

CAL FIRE's Fire Prevention Program consists of multiple activities, including wildland pre-fire engineering, vegetation treatments, fire planning, education, and law enforcement. Common projects include fire break construction and other hazardous fuel reduction activities that lessen the risk of wildfire to communities. This may include brush clearance around communities, roadways, and evacuation routes. Other important activities include emergency evacuation planning, fire prevention education, fire hazard severity mapping, implementation of the State Fire Plan, fire-related law enforcement activities (such as investigations to determine fire cause and origin, as well as arson cases), and support for local government fire safe planning in the SRA .

CAL FIRE's fire prevention activities also include the education and enforcement of PRC 4291, commonly referred to as Defensible Space. PRC 4291 directs the creation and maintenance of 100 feet of defensible space around all buildings and structures on forest, brush, and grass-covered lands or any land that is covered with flammable material. The legislation also allows insurance companies, state law, and local ordinances, rules or regulations to require homeowners to maintain defensible space greater than 100 feet. PRC 4291 does not allow landowners to manage defensible space outside their property boundaries. The legislation also outlines the consequences for those found in violation of the requirements set forth by PRC 4291. PRC 4291 is implemented and made specific in regulation in CCR Title 14 Section § 1299.01 et seq.

Under PRC 4291 CAL FIRE is also directed to provide guidance for homeowners on how to manage their defensible space most efficiently. Therefore CAL FIRE provides

guidelines to homeowners about their defensible space through readyforwildfire.org. Under these guidelines CAL FIRE advises that within the 30 feet nearest the structure, referred to as Zone 1, that homeowners:

- Remove all dead plants, grass and weeds (vegetation)
- Remove dead or dry leaves and pine needles from the yard, roof and rain gutters
- Trim trees regularly to keep branches a minimum of 10 feet from other trees
- Remove branches that hang over the roof and keep dead branches 10 feet away from your chimney
- Relocate wood piles into Zone 2
- Remove or prune flammable plants and shrubs near windows
- Remove vegetation and items that could catch fire from around and under decks
- Create a separation between trees, shrubs and items that could catch fire, such as patio furniture, wood piles, swing sets, etc

CAL FIRE then advises that within Zone 2, the whole defensible space area, homeowners:

- Cut or mow annual grass down to a maximum height of 4 inches
- Create horizontal spacing between shrubs and trees
- Create vertical spacing between grass, shrubs and trees
- Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 3 inches

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

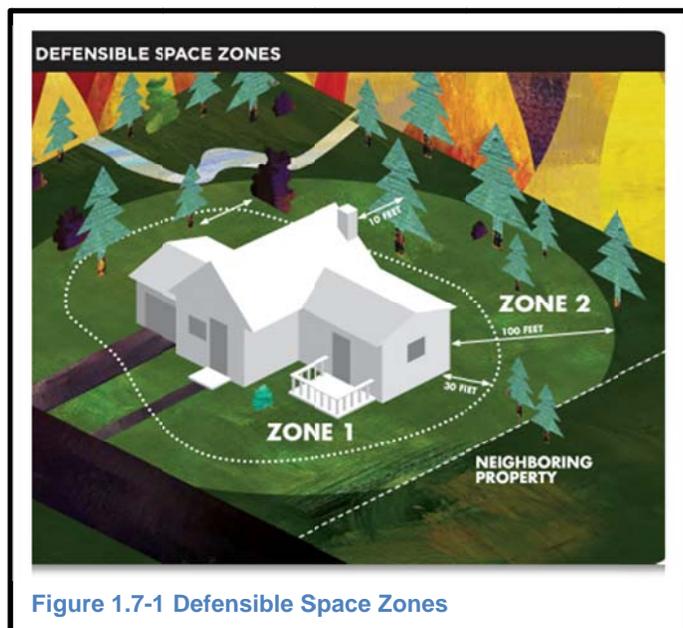


Figure 1.7-1 Defensible Space Zones

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

700,000 acres of vegetation statewide. However, many structures in rural areas do not have such large footprints, many habitable structures in the urban areas of the wildland urban interface are not one acre parcels, and many 100 foot zones overlap between parcels/homes. In addition, not all structures in the SRA require defensible space. Therefore it can be assumed that the vegetation modified under PRC 4291 is less than 700,000 acres.

1.7.4 CALIFORNIA FOREST IMPROVEMENT PROGRAM (CFIP)

CFIP is a cost-share program aimed at improving the economic value and environmental quality of private forestlands. The purpose of the program is to work cooperatively with private landowners, particularly smaller, non-industrial landowners, to upgrade the management of their lands and improve both the productivity of the land and the degree of protection and enhancement of the forest resource system as a whole. Fundable practices include:

- Preparation of forestland management plans
- Site preparation
- Planting and costs of seeds and seedlings
- Release from brush competition
- Young-growth stand improvement
- Forest land conservation measures
- Fish and wildlife habitat improvement
- Follow-up work

CFIP is a voluntary program that can fund up to 75 percent of an approved project or 90 percent of catastrophically-damaged lands. It applies to private landowners owning between 20 and 5,000 acres of commercial forest land. Forest landowners who own less than 20 acres can apply as part of a group. There is a 10-year requirement for maintenance of the land as timber, compatible with funded work.

Table 1.7-1 CAL FIRE Vegetation Treatment Program documents that guide the existing vegetation treatment programs carried out by CAL FIRE.

PROGRAM	RELEVANT DOCUMENTATION
Vegetation Management Program	Vegetation Management Program Handbook and Field Guide. June 16, 2001. California Department of Forestry and Fire Protection. Sacramento. 135p. Chaparral Management Program Final Environmental Impact Report. May 18, 1981. California Department of Forestry and Fire Protection, Sacramento.
Fire Prevention	<ul style="list-style-type: none"> • Defensible Space, http://www.readyforwildfire.org/, • Fire Planning http://osfm.fire.ca.gov/fireplan/fireplanning.php • Fire Engineering http://CAL FIREdata.fire.ca.gov/fire_er/fpp_engineering • Fire Safety Education http://calfire.ca.gov/communications/communications_firesafety.php • Law Enforcement http://calfire.ca.gov/communications/communications_firesafety.php • Office of the State Fire Marshall http://osfm.fire.ca.gov/ • Wildland Hazard & Building Codes http://calfire.ca.gov/fire_prevention/fire_prevention_wildland.php • Fire Engineering http://osfm.fire.ca.gov/strucfireengineer/strucfireengineer.php • SRA Fee http://www.firepreventionfee.org/
California Forest Improvement Program	<p>California Forest Improvement Program User's Guide 2015 Edition, Vol 1. http://calfire.ca.gov/resource_mgt/downloads/CFIP/CFIP_User's_Guide_2015.pdf</p> <p>Procedural Guide for CAL FIRE Greenhouse Gas Reduction Fund Forest Management Projects CFIP Fuels Reduction Using the California Forest Improvement Program, For Carbon Sequestration Authorized by AB32 California Global Warming Solutions Act of 2006 http://calfire.ca.gov/resource_mgt/downloads/ProceduralGuide_FuelsReduction_GGRF_CFIP.pdf</p> <p>Final Environmental Impact Report for Proposed Administrative Regulations for the California Forest Improvement Program to be Adopted by the Director of Forestry and Approved by the Board of Forestry. June 1979. California Department of Forestry and Fire Protection, Sacramento.</p> <p>California Forest Improvement Program Environmental Impact Report: Supplement to the Final PEIR; State Clearinghouse #79050318. June 1990. California Department of Forestry and Fire Protection, Sacramento</p>

1.7.5 THE PROPOSED VEGETATION TREATMENT PROGRAM

The California State Board of Forestry & Fire Protection (Board) and the California State Fish and Game Commission (FGC) initiated a review of the Departments VMP following the major wildfires in Southern California in the fall of 1993. Subsequently, a working group was formed in the spring of 1994 to recommend to the Board and FGC ways to improve the VMP to provide additional fire protection while meeting the concerns and needs of other agencies and the general public. These recommendations included:

- Expand the program and EIR to include all vegetation fuel types in California
- Expand the EIR to include all fuel management techniques that are currently available
- Include a more detailed discussion of the no action alternative in the EIR
- Modify the project-level environmental checklist
- Expand authorization for VMP projects from state responsibility areas to all hazardous areas

In 1996, the Board and the Department issued a new California Fire Plan, which placed an increased emphasis on “prefire” projects, such as vegetation treatment activities, to help reduce wildland fuels and thereby reduce the costs and losses associated with large, damaging wildfires, and the Department increased its activities in this area.

In June of 2000, CAL FIRE completed and certified a new programmatic EIR for the Department's Vegetation Management Program. In January of 2002, the Superior Court of San Francisco County ordered that the EIR be decertified for failure to adequately address the potential environmental impacts of the program. Herbicide use in association with VMP projects was specifically cited as inadequate (e.g., herbicides used as either a precursor step or a follow-up maintenance step to a VMP project).

In 2005, the Legislature passed and the Governor signed into law SB 1084 (Kehoe), which broadened the range of vegetation treatment practices specifically enumerated in the Public Resources Code, added a definition of “hazardous fuel reduction,” and made other changes to the major statutory provisions guiding the Department's vegetation treatment authorities. See Public Resources Code Sections 4461 through 4494.

In 2006 the Board and Department began preparation of a draft Vegetation Treatment Program EIR that would address the issues raised by the court in the decertification of the 2000 EIR and also address the legislative modification to the Public Resources code. This effort lacked funding and staff support for completion of a Draft VTPEIR.

2010 brought a renewed effort by the Board and Department to complete a draft VTPEIR and circulate it to the public. A Draft VTP EIR was circulated in late 2012 and early 2013. The Board received extensive public comment on the draft EIR, particularly focused on the Program's treatment of chaparral landscapes in Southern California. In 2013, the Board hosted a meeting and field tour in Ventura County to further examine this issue. The Board and Department then engaged stakeholders, scientists, and policymakers in several field tours in Southern California to discuss the current chaparral fuel conditions and stakeholders' ecological concerns. As a result of these tours and discussions, the Board requested a critical scientific review of the Draft VTP EIR by specialists at the California Fire Science Consortium (CFSC).

The CFSC review was completed in fall 2014, and the Board and Department developed an internal workgroup to examine the review and the existing Draft VTP EIR and edit the document to reflect recommendations from the public and CFSC. This administrative draft of the revised VTP EIR was presented to the Board in mid-2015 and is currently in review and discussion by the Board.

1.8 BOARD OF FORESTRY AND CAL FIRE STRATEGIES

This VTP Program EIR is one component of an overall land use strategy by the Board. The goal of the VTP Program EIR is to conduct an environmental analysis of vegetation management tools that can be utilized to reduce the risk of damaging wildfires and any potential environmental impacts they may have. This goal is further outlined by the objectives detailed in Chapter 2.1.

1.8.1 STATEWIDE STRATEGIC PLANNING

There are three major strategic planning documents that establish the vision, goals, and objectives of the Board and CAL FIRE: 2010 Strategic Fire Plan for California, the 2012 Strategic Plan, and the Unit Fire Management Plans (See Figure 1.8-1). These three documents build upon one another and work in concert to improve the natural and built environment's resilience and resistance to wildfire.



Figure 1.8-1 The three major strategic planning documents that establish the vision, goals, and objectives.

The *2010 Strategic Fire Plan for California* lays out central goals for reducing and preventing the impacts of fire in the state. This Program EIR provides a framework for CAL FIRE Units to achieve the goals outlined in the 2010 Strategic Fire Plan via implementation of a variety of vegetation treatment projects. The goals of the 2010 Strategic Fire Plan are:

1. Identify and evaluate wildland fire hazards and recognize life, property, and natural resource assets at risk, including watershed, habitat, social, and other values of functioning ecosystems. Facilitate the sharing of all analyses and data collection across all ownerships for consistency in type and kind.
2. Articulate and promote the concept of land use planning as it relates to fire risk and individual landowner objectives and responsibilities.
3. Support and participate in the collaborative development and implementation of wildland fire protection plans and other local, county, and regional plans that address fire protection and landowner objectives.
4. Increase awareness, knowledge, and actions implemented by individuals and communities to reduce human loss and property damage from wildland fires, such as defensible space and other fuels reductions activities, fire prevention, and fire safe building standards.
5. Develop a method to integrate fire and fuels management practices with landowner priorities and multiple jurisdictional efforts within local, state, and federal responsibility areas.
6. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
7. Address post-fire responsibilities for natural resource recovery, including watershed protection, reforestation, and ecosystem restoration.

The goals articulated above are meant to establish a natural environment that is more resilient and human-made assets which are more resistant to the occurrence and effects of wildland fire through local, state, federal, and private partnerships. The VTP is one such strategy CAL FIRE and the Board employ to achieve those goals and vision.

The *2010 Strategic Fire Plan for California* considers the question “How do we utilize and live with [the] risk of wildfire?” and outlines a vision, goals, and objectives that lead to an answer to that question. CAL FIRE built upon the 2010 Plan and developed the 2012 Strategic Plan to identify and communicate CAL FIRE’s specific strategic goals and objectives through 2017 to meet their mission of serving and safeguarding the people and protecting the property and resources of California. Developing a Program EIR for the VTP, rather than project-level EIR’s for each fuel modification project, is a strategy by CAL FIRE to assist local Units in accomplishing the following four goals from the *2012 Strategic Plan*:

- Effectively communicate the Department’s mission and vision to employees, partners, and stakeholders
- Adapt and scale to changing budgetary, fiscal, and regulatory conditions

- Seek to improve operational efficiency and effectiveness by shaping, enhancing, and adapting to changing circumstances
- Cultivate and strengthen relationships with stakeholders, governing bodies, cooperators, and the public

This Program EIR sets a framework for local-level VTP projects to achieve these goals efficiently and successfully. The 2010 Strategic Fire Plan set forth the broad goals to improve resiliency and resistance to wildfire and the 2012 Strategic Plan helps establish Department-level goals to achieve such resiliency. Consequently, this Program EIR establishes a set of tools for VTP project managers within CAL FIRE Units to achieve these goals in their local area to create a fire resistant landscape across California.

The third major strategic document is the individual Unit Fire Plan. Updated yearly, Unit Fire Plans identify wildfire protection areas, initial attack success, assets, and infrastructure at risk, pre-fire management strategies, and accountability within their Unit's geographical boundaries. The Unit Fire Plan identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work locally. The plans include contributions from local collaborators and stakeholders and are aligned with other plans for the area such as CWPPs. This Program EIR helps Unit staff evaluate the potential projects in their communities and establish those projects to include in a Unit Fire Plan, which is a vital step to planning, funding, and implementing VTP projects on the ground.

1.8.2 LOCAL LAND USE PLANNING

In addition to the strategic documents mentioned above, there are other plans and programs that play a role in the Board's and CAL FIRE's protection of the SRA.

Local Fire Safe Councils and other nonprofits may decide to develop CWPPs. A CWPP helps a community use collaborative, coordinated community planning in order to refine its priorities for the protection of life, property, and critical infrastructure in the WUI. A CWPP helps a community identify its life, property, and critical infrastructure priorities and discuss land, watershed, and vegetation management options. It is required to have three components: 1) collaboration, 2) prioritized fuel reduction, and 3) treatment of structural ignitability. Many Unit Plans function as CWPPs or can assist as a baseline plan to establish the assets at risk, community vulnerabilities, and protection priorities. Fire Safe Councils are important partners in implementing projects under this Program EIR, because they help identify areas of high value and high risk in communities and can assist in finding funding and in-kind support for vegetation management projects.

In addition to CWPPs and Fire Safe Councils, Board and CAL FIRE review of General Plan Safety Elements is another tool to promote fire safe planning in the state. Under Government Code Section 65302.5, the Board is obligated to review Safety Elements

for counties and cities with SRA or VHFHSZ designated areas for the following information:

- A detailed history of fire activity in the planning area, as well as fire hazard severity zone maps
- The planned land uses in VHFHSZ and SRA land
- Goals, policies, and objectives to protect the community from the unreasonable risk of wildfire
- Feasible implementation measures to carry out those goals, policies, and objectives

The Board and CAL FIRE maintain databases of information to assist in developing vegetation management projects, Unit Fire Plans, CWPPs, and other strategic fire planning documents. This data is utilized together with information from this Program EIR to establish, fund, and implement priority projects. It includes fire hazard severity zones; historic fire perimeters; land cover types and changes; LRA, SRA, and FRA; and priority landscapes throughout the state. By making this data available online through CAL MAPPER and the CAL FIRE website, the Board and CAL FIRE can provide data and analytical support to communities and organizations as they outline plans for vegetation projects and other fire protection planning strategies.

All of the above plans, data, and partnerships are tools utilized by the Board and CAL FIRE to reduce the risk of wildfire to landscapes across the state. They do not necessarily fall under this VTP Program EIR, but together create a suite of programs that implement the overall land use and fire protection strategies outlined in the *2010 Strategic Fire Plan for California* and the *2012 Strategic Plan*.

1.9 ORGANIZATIONAL STRUCTURE OF THE PROGRAM EIR

The content and format of this Program EIR is designed to meet the requirements of CEQA and the State CEQA Guidelines. The report is organized into the following chapters:

- Executive Summary summarizes the need for the program, the program objectives, the Proposed Program and the Alternatives, conclusions regarding impacts of the Proposed Program, and issues of concern.
- Chapter 1 describes the purpose of the Program EIR.
- Chapter 2 describes the proposed program description.
- Chapter 3 describes the alternatives to the proposed program.
- Chapter 4 describes the affected environment, effects, and mitigation.
- Chapter 5 contains the cumulative effects analysis.
- Chapter 6 describes the significant effects and growth-inducing impacts.

- Chapter 7 has the Project Scale Analysis documents.
- Chapter 8 lists the individuals involved in preparation of the Program EIR.
- Chapter 9 lists the works cited.