

Notice of Preparation

To: Distribution List
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Subject: Notice of Preparation of a Program Environmental Impact Report for the California Vegetation Treatment Program

Introduction:

The California Board of Forestry and Fire Protection (Board) is preparing a Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP), described below. Under the CalVTP, the California Department of Forestry and Fire Protection (CAL FIRE) would implement vegetation treatments to reduce wildfire risks and avoid or diminish the harmful effects of wildfire on the people, property, and natural resources in the State of California. To counteract decades of fire suppression, vegetation treatment activities would be designed to reduce fire fuels, improve protection from wildfire through strategically located fuel breaks, and mimic a natural fire regime using prescribed burning. In addition, ecosystem restoration activities would be designed to approximate natural habitat conditions, processes, and values to those occurring prior to the period of fire suppression. The PEIR will analyze the potential environmental effects of the proposed CalVTP.

In response to these changing environmental conditions and the increased risk to California's citizens, Governor Brown issued Executive Order (EO) B-52-18, which mandates an increase in the pace and scale of fire fuel treatment programs to reduce wildfire risk. The proposed CalVTP is one tool intended to address Governor Brown's mandate to increase the pace and scale of fire fuel reduction efforts across the state.

Under Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, a PEIR 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.

An initial study was not prepared, because the Board determined that an EIR is required for the project. (CEQA Guidelines, Section 15063.) All applicable environmental topics will be addressed in the PEIR.

The Board is the lead agency and will prepare the PEIR for the proposed CalVTP. The Board is circulating this Notice of Preparation (NOP) for the PEIR to seek input from responsible and trustee agencies and other interested parties regarding the scope and content of the environmental information to be included in the PEIR.

Since a previous draft PEIR for the Vegetation Treatment Program (VTP) was released in 2017, substantial increases in wildfire size, intensity, and destructiveness to California's residents have occurred and are projected to continue to occur. As a result, the description and magnitude of treatment activities in the 2017 VTP have been modified and expanded to meet the worsening wildfire conditions being experienced. The Board is preparing a new draft PEIR for CalVTP that will supersede and replace the 2017 VTP draft PEIR. After the scoping process initiated by this NOP, the CalVTP Draft PEIR will evaluate potential environmental impacts, considering recent changes in wildfire conditions and the substantial expansion of proposed vegetation treatments in the CalVTP. As explained under Program Necessity below, there is an urgent need, supported by a mandate from the Governor per Executive Order (EO) B-52-18, to increase the pace and scale of vegetation treatments across California to reduce wildfire

risk. This NOP is issued to solicit comments on the scope and content of a new PEIR that will analyze the impacts of the proposed CalVTP. Additional information regarding the necessity, scope, and design of the proposed CalVTP is included below.

Discretionary Action and Proposed Implementation Activities:

The Board is mandated to regulate forestry activities throughout the state and to develop policies and regulations that contribute to fire prevention and recovery efforts (Public Resources Code [PRC] Section 740). The Board is also charged with identifying State Responsibility Area (SRA) land and developing rules and regulations that enable CAL FIRE to prevent, respond to, and control fire events in those regions (PRC Sections 4130 and 4137). The Board's proposed discretionary action is approval of the CalVTP. After approval, implementation of the CalVTP will involve a proposed array of vegetation treatment activities carried out by CAL FIRE.

The CalVTP Draft PEIR, for which this NOP is being issued, will address the following:

- Expansion and modification of CAL FIRE's activities to implement the CalVTP, as described below. The proposed total treatment acreage target is 250,000 acres of nonfederal land per year to contribute to the achievement of EO B-52-18, which is a substantial increase compared to the 2017 VTP Draft PEIR.
- Development and use of a project-specific approach for a streamlined CEQA review of site-specific, later vegetation treatment projects. The streamlined CEQA review approach will document how a project's environmental effects are covered and which feasible mitigation measures from the CalVTP PEIR are incorporated. This will include evaluation of whether later activities and impacts of site-specific vegetation treatment projects are within the scope of the CalVTP and the PEIR. A "within the scope" finding for later activities would facilitate an increase in the pace and scale of project approvals in a manner that includes environmental protections. Where later activities do not qualify for a "within the scope" finding, site-specific mitigated negative declarations or EIRs will be prepared.

Program Necessity:

Wildfires are a significant threat in California, particularly in recent years as the landscape responds to climate change and decades of fire suppression. Over 75 percent of forested areas and other woody vegetation types are burning less frequently than historic averages, and fire sizes have increased significantly over the last 17 years.¹ Drought conditions, low snow pack accumulation, and extreme temperature highs have also been prevalent in the last decade and are expected to worsen as climate change continues to alter landscapes and local climates.^{2,3}

These conditions have resulted in the largest, most destructive, and deadliest wildfires on record in California history, all occurring in 2018. Fifteen of the state's 20 largest wildfires have occurred since 2002. The 2018 Mendocino Complex, the state's largest wildfire, burned 1.5 times as many acres as the next largest fire.⁴ Fourteen of the state's 20 most destructive wildfires have occurred since 2003; the 2018 Camp Fire destroyed more than three times as many structures as the next most destructive fire.⁵ Ten of

¹ California's Forests and Rangelands: 2017 Assessment. Report. Fire Resource and Assessment Program (FRAP), California Department of Forestry and Fire Protection.

<http://frap.fire.ca.gov/assessment2017/FinalAssessment2017/Assessment2017.pdf>

² NOAA National Centers for Environmental Information, State of the Climate: National Climate Report for June 2018, published online July 2018, retrieved on December 6, 2018 from <https://www.ncdc.noaa.gov/sotc/national/201806>.

³ Special Report: Global Warming of 1.5 Degrees Celcius. Report no. 2018. Intergovernmental Panel on Climate Change. https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf.

⁴ "Top 20 Largest California Wildfires." Chart. California Department of Forestry and Fire Protection Incident Information. http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Acres.pdf.

⁵ "Top 20 Most Destructive California Wildfires." Chart. California Department of Forestry and Fire Protection

the state's 20 deadliest wildfires have occurred since 2003, and the 2018 Camp Fire resulted in more than twice as many deaths as the next deadliest fire.⁶ Historically, California's wildfires were less severe, burning fewer acres and destroying fewer structures by factors of two and three, respectively, when compared with modern fire statistics.⁷ Additionally, fire seasons have been extending further into the winter months since 2000. The fire sieges in October and December of 2017 serve as prime examples of the expanding fire season.⁸ As environmental conditions become more conducive to larger and more severe wildfires, development in the wildland-urban interface (WUI) is also on the rise. A 2018 study indicates that the number of houses in the WUI increased nationwide by 41 percent between 1990 and 2010.⁹ In response to these changing environmental conditions and the increased risk to California's citizens, Governor Brown issued EO B-52-18, which mandates an increase in the pace and scale of fire fuel treatment programs to reduce wildfire risk. The proposed CalVTP is one tool intended to address Governor Brown's mandate to increase the pace and scale of fire fuel reduction efforts across the state.

Program Description:

Various vegetation types serve as fuel for wildfires and can result in hotter and larger fires if left unmanaged.¹⁰ The Board recognizes the link between fuels management and fire protection across the SRA, and has the statutory responsibility to establish policy for wildland resources in the SRA. CAL FIRE has the responsibility for implementation of Board policy, and would implement the CalVTP, as evaluated in the upcoming PEIR. Responsible and trustee agencies will need to use the PEIR when considering permit issuance or other approvals for individual vegetation treatment projects conducted under the CalVTP PEIR.

Certain types of vegetation treatments can alter fire behavior and mitigate the risks of larger, more severe wildfires throughout California. The CalVTP includes three general types of treatments:

- (1) Wildland-Urban Interface (WUI) fuel reduction, which is focused in WUI-designated areas and generally consist of treatments to reduce fuel loads and slow or prevent the spread of fire between wildlands and structures, and vice versa;
- (2) Fuel breaks, which are strategically placed vegetation treatment areas that actively support fire-control activities; and
- (3) Ecological restoration projects, which would generally occur outside the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, and would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

Within these three general treatment types, treatment activities may include: prescribed fire, manual activities, mechanical activities, prescribed herbivory (beneficial grazing or browsing), and targeted ground application of herbicides. These activities are proposed to be used singularly or in combination, depending upon the treatment type and environmental considerations. The upcoming PEIR will study the potential environmental effects of the proposed CalVTP's strategic treatment of wildland vegetation with the overarching goal of wildland fire risk reduction.

http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Destruction.pdf.

⁶ "Top 20 Deadliest California Wildfires." Chart. California Department of Forestry and Fire Protection http://calfire.ca.gov/communications/downloads/fact_sheets/Top20_Deadliest.pdf.

⁷ "CAL FIRE Jurisdiction Fires, Acres, Dollar Damage, and Structures Destroyed." California Department of Forestry and Fire Protection Incident Information.

http://cdfdata.fire.ca.gov/pub/cdf/images/incidentstatsevents_270.pdf.

⁸ "Fire Seasons by Year." California Department of Forestry and Fire Protection Incident Information.

http://cdfdata.fire.ca.gov/incidents/incidents_seasondeclarations?year=2018.

⁹ Radeloff, Volker C. et al. 2018. Rapid growth of the US wildland-urban interface raises wildfire risk. *Proceedings of the National Academy of Sciences*. 115(13): 3314-3319.

<https://doi.org/10.1073/pnas.1718850115>.

¹⁰ Husari, Sue, H. Thomas Nichols, Neil G. Sugihara, and Scott L. Stephens. "Fire and Fuel Management." *Fire in Californias Ecosystems*, 2006, 444-65. doi:10.1525/california/9780520246058.003.0019.

Program Area:

CAL FIRE has financial responsibility for fire protection and prevention in the SRA and would implement the CalVTP. The CalVTP would comprehensively direct the treatment of fire fuel to prevent wildfire in the SRA, which consists of more than 31 million acres of private and public land throughout the state. However, the not all areas within the SRA are be suitable for treatments. The portion of the SRA considered suitable for vegetation treatments under the CalVTP consists of 20.3 million acres referred to as the “treatable landscape.” The treatable landscape is illustrated in Figure 1. WUI protection is a high priority for CAL FIRE, particularly following events such as the Tubbs Fire (2017), which began in wildlands and grew to burn much of suburban Santa Rosa, ultimately destroying 5,636 structures; the Carr Fire (2018), which traveled from wildlands into the developed neighborhoods of Redding; and the Camp Fire (2018), which destroyed most of the Town of Paradise. All three of these recent fires, and several others, have reinforced the importance of fuels management and fire prevention to reduce wildfire risk in and adjacent to the WUI. Much of the land surrounding the WUI falls in SRA, demonstrating the urgent need for the proposed CalVTP.

Probable Environmental Effects:

The PEIR for the CalVTP will present an analysis of the potential environmental impacts of the proposed CalVTP, including direct, indirect, and cumulative effects. The PEIR will identify potentially feasible alternatives to the proposed CalVTP and provide a comparative analysis of their potential impacts. The PEIR will also identify mitigation measures to reduce potentially significant impacts to the extent feasible. The EIR will address all the environmental topic areas identified in Appendix G of the State CEQA Guidelines. These topic areas will include, but may not be limited to:

- Aesthetics and Visual resources
- Agriculture and Forestry Resources
- Air Quality
- Archeological, Historic, and Tribal Cultural Resources
- Biological Resources
- Geology, Soils, and Mineral Resources
- Greenhouse Gas Emissions
- Energy Resources
- Hazardous Materials, Public Health and Safety
- Hydrology and Water Quality
- Land Use and Planning, Population and Housing
- Noise
- Recreation
- Transportation
- Public Services, Utilities and Service Systems
- Wildfire

Potential environmental effects may be probable in any of these topic areas. The PEIR will address all the topics. The Board is not yet able to determine with specificity the individualized effects within these environmental topic areas, or whether such effects will be less than significant, less than significant with mitigation, or significant and unavoidable.

CEQA Scoping:

Public and Agency Scoping Meetings: Because the proposed CalVTP is a project of statewide, regional, or areawide significance, the Board will hold scoping meetings, in accordance with PRC Section 21083.9(b)(2) and CEQA Guidelines Section 15206. Invitees include the following: responsible agencies; “public agencies with jurisdiction by law with respect to the project” (including trustee agencies); any “public agency, organization or individual who has filed a written request for the notice;” and potentially affected cities and counties.

Because of the statewide scale of the proposed CalVTP, the Board is conducting three scoping meetings, with one in Northern California, one in Sacramento, and one in the Los Angeles region. The scoping meetings will be web-broadcast over the internet. The meetings will occur as follows:

Monday, February 11, 2019, 1-3pm
Natural Resources Building Auditorium
1416 9th Street
Sacramento, California
Webinar information: <https://attendee.gotowebinar.com/register/1182936368317342977>

Wednesday, February 13, 2019, 10am-12pm
Shasta County Board of Supervisors
1450 Court Street
Redding, California
Webinar information: <https://attendee.gotowebinar.com/register/1891381396907387905>

Tuesday, February 19, 2019, 12-2pm
California Fire Safe Council Ontario Office Meeting Room
3200 Inland Empire Boulevard
Ontario, California
Webinar Information: <https://attendee.gotowebinar.com/register/5611350291531610626>

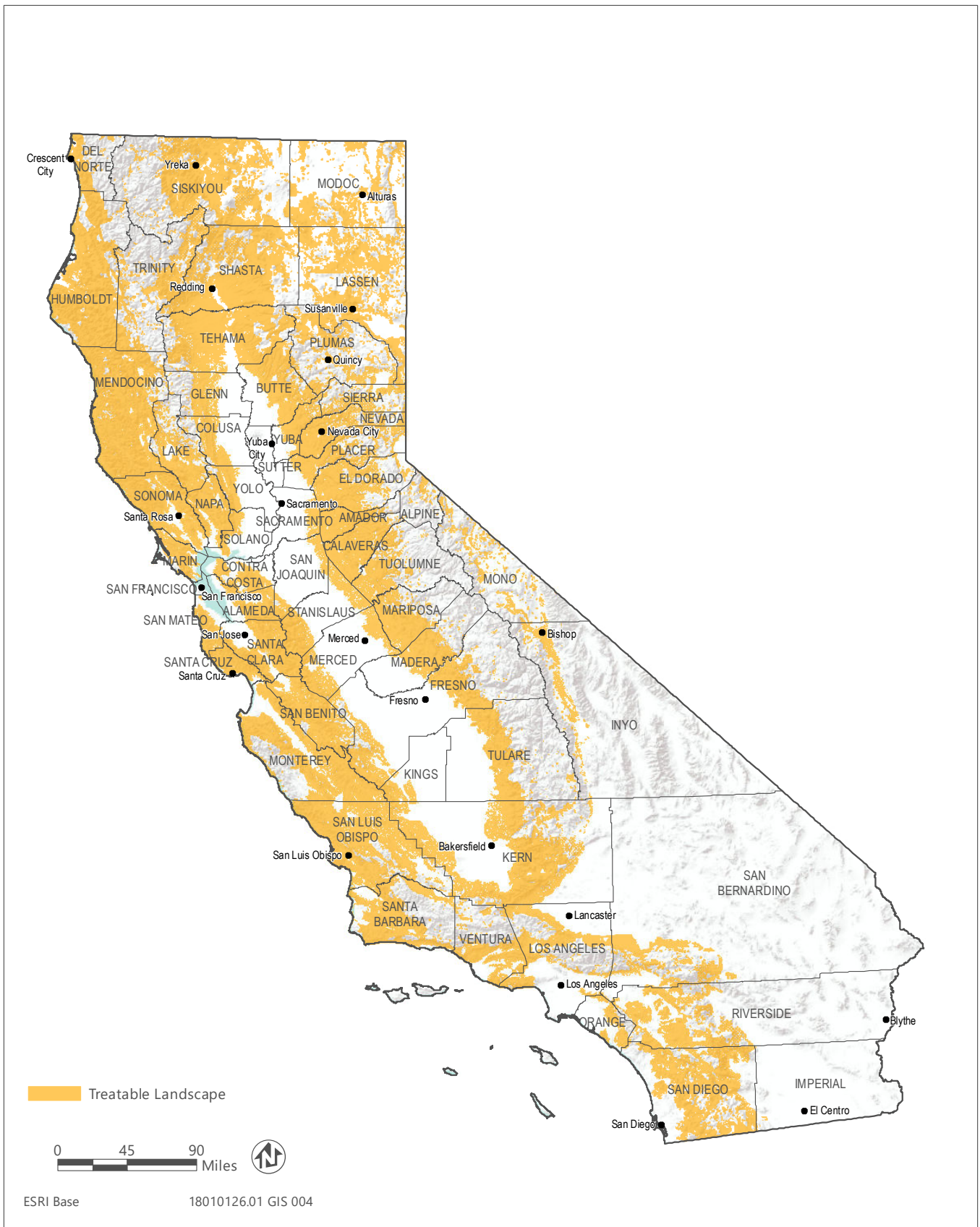
Special Agency Scoping Meetings: Pursuant to PRC Section 21080.4(b), responsible and trustee agencies have the right to request a meeting to determine the scope and content of the environmental information required. Please contact the Board at the addresses below to request such a meeting. Responsible and trustee agencies are also invited to attend the Public and Agency Scoping Meetings required by PRC Section 21083.9.

Submittal of Comments:

Due to the time limits mandated by State law, any comments on this NOP must be submitted no later than 30 days from the date of this notice. To be considered in development of the CalVTP PEIR, comments must be received by March 1, 2019. Comments may be submitted by mail or email at the addresses below. Please include the name of a designated contact person for your agency or organization.

California Board of Forestry and Fire Protection
Attn: Edith Hannigan, Land Use Planning Program Manager
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The Board will also accept verbal comments from those physically attending the scoping meetings, but the Board will not accept comments submitted over the webinar during the meetings. The Board will also collect written comments at the scoping meetings. Because this is a new Program Environmental Impact Report, the Board will not be considering comments on other Draft PEIRs.



Source: Data received from the Department of Forestry and Fire Protection in 2019

1/14/2019

Treatable Landscape

Figure 1