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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
1	Wade	Overall	Program Scope	The scope of the project, treating 2% of 24 million acres over a ten-year period, is simply too low to be effective. Setting this amount of treatment as the basis of the analysis undermines the initiative. Setting a figure of 110% as the limit before exceeding the range of the VTPEIR likewise undermines its utility.	The 110% was a threshold that had to be set for analysis and was part of the basis for the overall review of the environmental impacts. This is illustrated in SPR ADM-8 and discussed on in section 4.3.		Major question/theme from the board is: how will CAL FIRE deal with "legacy" projects? Eventually units will have a "portfolio" of projects that will need regular retreatment and the 60,000 acres will be composed of retreatment exclusively.	Section 2.2.3 and Maintenance in chapter 4.1 had additional language regarding maintenance. Willingness of landowners and DGS contracting will provide limits on this interest as is currently the case with the VMP. DGS letter dated 4/30/13 Approval Number 4.10 sets the current limitations on time. The current structure of how CAL FIRE will handle this most likely be built upon the current VMP. As stated in ADM-8 the Sac Program Manger will be responsible for tracking this information. As projects are resubmitted for maintenance, if they require the VTP for approval, then they would count for that year's allocation of acres towards the Programs 60,000 acre limit. It is important to note that this will not be the only option for landowners to conduct legacy or maintenance work. There are other CEQA avenues that could be used when the maintenance work doesn't fit the VTP analysis. In addition, through the monitoring and adaptive management, this information will be collect ted, evaluated to address any changes in the Program.
2	Miles	Overall	Objectives	Is maintenance of rangeland for the purpose of domestic grazing and wildlife forage is also an objective of VTPEIR?	Yes. Members of the Rangeland community will be pursued for additional input in regards to the language in Chapters 2 and 4	Kevin	Would like additional verbiage added.	Edith is working with Marc Horney (CRM, PhD, Cal Poly) and CeCi Dale-Cesmet (CRM, NRCS) to help review the Rangeland discussions. The Team's hope is to have additional language added to Chapter 2 under the discussions for Objective 4 and carried through Chapters 2 & 4.
~~3~~	~~Miles~~	~~Overall~~	~~Rangeland~~	~~Can the 1981 VMP can continue to be used if VTPEIR is adopted? If not, how will projects designed to benefit rangelands be programmatically covered or will they no longer be?~~	~~VTP will encompass the VMP. All new projects that meet the objects of the VTP will be conducted on the VTP EIR moving forward. Language has been added to 2-33~~			
~~4~~	Miles	Overall	Public Participation	Is there an actual public comment period for individual FUEL BREAK and ECOLOGICAL RESTORATION projects following PSA development or is the forum/workshop the scheduled extent of public review/comment?	After the close of public comment and the approval of the VTP EIR, public workshops will be offered for projects outside of the WUI. Please see Chapter 7 PSA for more detail.		Chapter 2 page 56 chart. Clarify local public notice for true stakeholder input. If there's real listening going on, the PSA wouldn't be completed before public input, but the Unit/project proponent should have an idea of how a completed PSA would look.	Additional language has been provided in "Subsequent Review Under the VTP" in Chapter 2. Added Bubble is included in the flow chart on page 56 for clarity.
5	Miles	Overall	Overall	What is the potential active life of a VTP Project? For example, can a VTP Fuel Break project provide for indefinite maintenance of the Fuel Break?	Board direction needed		How to address 3 year timeline requirement. Related to #1.	Please see response to Item 1 above. There will be a time where maintenance may be accomplished through other means such a Exemption of a THP or anther CEQA process. Not all maintenance may require this document to continue. In one way, the VTP provides the heavy lifting to make the changes necessary, follow-up activity may not be warrant this process for continued maintenance.
6	Miles	Overall	Project Scope	It needs to be clearer in the document the fact that *approved and contracted* Projects may need to be revisited/re-opened if their implementation is to occur at a point in time in which >110% of the projected treatment acres in their bio-region have been treated for that year; or the project may need to be postponed until a later date	Under the VTP EIR any acreage over 110% within a bioregion would have to be further analyzed. Projects could move forward under other EIR documents.	Drew	Confirm there is clarifying language about that the 110% being a ten year average.	The Team is reviewing the content where the 110% is being used.

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7	Miles	Overall	Overall	Will CAL FIRE will maintain a readily available list of projects (submitted and approved by Unit) including acres and anticipated implementation year, for each bio-region?	The Team believe this is outside the scope of the EI and would be best if it were developed under the actual program administered by CAL FIRE.		Provide this as a direction to CAL FIRE in developing the program.	The intent is to utilize the same information model as already existing through the VMP. However, this will be best suited or addressed at the Program direction when the PEIR is approved.
~~8~~	~~Miles~~	~~Overall~~	~~Project Prioritization~~	~~Can CAL FIRE can consider and plan in advance, through cumulative assessment, for the allowance of greater than 110% treatment acres in any given year? For example, if CAL FIRE knows it has greater than 110% acres of planned, submitted, and approved projects for the coming year, can the Department make a collective allowance for greater than 110%; or is the approach to simply prioritize and implement the first 110% acres, and then analyze each project individually after that? Does approval of additional acres (>110%) and any additional mitigation, lie solely with the discretion of the Sacramento CEQA Coordinator? (E5)~~	~~Under the VTP EIR any acreage over 110% within a bioregion would have to be further analyzed. Projects could move forward under other EIR documents.~~			
~~9~~	~~Miles~~	~~SPRs~~	~~SPRs~~	~~Consider adding "red flag warning" to glossary~~	~~Red Flag Warning and Fire Weather Watch added to Glossary.~~			
10	Miles	SPRs	SPRs	ADM-6: Is this based off of Casper Creek? If so, might be applicable for fuel breaks, but seems like a low trigger for shaded fuel breaks and ecological restoration projects. Did CAL FIRE model potential scenarios to arrive at 20% trigger or just rely upon Casper Creek conclusion relative to clearcutting a watershed?	In review		Still interested in this response	ADM-6 was based off a meta-analysis of paired watershed studies by Grant et al., (2008), which includes data from Caspar Creek. ADM-6 will be revised to area-weight program activities by an appropriate disturbance coefficient. Coefficients are based off of values from the USFS Region 5 Equivalent Roaded Area (ERA) model. These disturbance coefficients recognize that potential impacts vary by program activity (e.g., hand treatments are less impactful than mechanical treatments). Additional analysis will be added to Chapter 4 and 5 to reflect these changes.
11	Miles	SPRs	SPRs	ADM-7: What if the project is being conducted by a private or NGO entity per contractual agreement…? Is this speaking to CAL FIRE implementation of a project or # of projects in general?	ADM-7 has been moved to AIR-12. It is the max number of projects that can occur in a specific air district to stay within the thresholds of significance.		In general the Board is concerned with the restrictions imposed by Air Quality.	These restrictions are not at the direction of CAL FIRE, they are a result of reducing the overall impacts of Air Quality to less than significant levels. Air Quality is difficult to model for the VTP because of the diversity of the activities within the program. Most CEQA documents utilize construction emission models for air quality and do not adequately address all the activities proposed within this program. Additional Air Quality modeling discussion is attached in this spreadsheet for clarification. **AIR-12 now reads: A CAL FIRE Unit shall not conduct more than five simultaneous VTP activities on any day within an air district when multiple units reside within the same air district boundary. When a single CAL FIRE Unit resides within an air district boundary, one day total activity emission estimates will not exceed the current air district's Threshold of Significance. No more than one of these projects shall be a prescribed burn, unless additional prescribed burns have been approved by the local air district having authority over the project area.**

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~~12~~	~~Miles~~	~~SPRs~~	~~SPRs~~	~~ADM-8: This assumes projects are submitted and implemented the same year… what about projects previously approved… may need to reword… in effect any treatments (additional projects) resulting in excess of 110% treatment will need to either be held off until following year or subject to additional review and potential modification~~	~~ADM-8 Sacramento program manager will provide the oversight and review of multi-year projects.~~			
13	Miles	SPRs	SPRs	AIR-6: Seems a little bit of overkill considering AIR-5 requirement	AIR-6 is a recommendation from Ascent Environmental to avoid exceeding air quality thresholds.		Would like clarification about rocked roads.	The California Air Resources Board specifically states "unpaved surface" in their recommended guidelines, however with the implementation of AIR-5 it is believed that AIR-6 can read in the following manner without achieving significant impacts: AIR-6: The speed of activity-related trucks, vehicles, and equipment traveling on **dirt areas** shall be limited to 15 miles per hour (mph) to reduce fugitive dust emissions.
~~14~~	~~Miles~~	~~SPRs~~	~~SPRs~~	~~AIR-7: Excessive~~	~~AIR-7 is a recommendation from Ascent Environmental to avoid exceeding air quality thresholds. This restriction is not as the direction of CAL FIRE, they are a result of reducing the overall impacts to Air Quality to less than significant levels.~~			
~~15~~	~~Miles~~	~~SPRs~~	~~SPRs~~	~~AIR-8: What constitutes transport… is there a specific distance or other clarifier for this?~~	~~AIR-8 has been clarified to state visible dust transport outside the project boundary.~~			
16	Rickert	Overall	Program Scope	The objectives are broad based and infer they would like to have a much larger impact than the actual number of acres indicated. In order to reach the stated objectives, there needs to be a larger number of acres considered for treatment in order to be productive and effective. (The Executive Summary states that the "available landscape to treat would be approximately 12 million acres in the SRA, but the projected average annual treatment acreage would be 60,000 acres.)	The objectives have been reworded to better reflect the smaller acreage that will be treated under the VTP. **The VTP is not meant to fix the problem but instead provide a mechanism to start the process. The success of the VTP over time can lead to more acres treated through additional analysis that is provided through monitoring and adaptive management.**		Board suggests putting bold text in document.	Please see response to Item 71. Additional language has been added in several locations within Chapter1, 2 and the ES. Chapter 2 for clarification. Chapter 1.1 Purpose- 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 stakeholder within and associated with the SRA. 2.2.1- Although the proposed annual acres of treatment may not impact all the potential landscape fuels, the Program is still a valuable tool to allow landowners and stakeholders the opportunity to do so. 2.3- It should also be noted that the VTP is not proposed as the solution to California's vegetation management needs. Although the proposed annual acres of treatment may not impact all the potential landscape fuels, the Program is still a valuable tool to allow landowners and stakeholders the opportunity to do so.
~~17~~	~~Sept Workshop~~			~~Discussion of Landowner vs Stakeholder~~	~~Definitions have been added.~~			

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~~18~~	~~Rickert~~	~~Executive Summary~~	~~Project Prioritization~~	~~Given the extreme tree mortality in various bioregions of California there may need to be a more clearly defined mechanism established to address higher risk areas as a higher priority? Could this be more specifically addressed in Alternative C – Very High Fire Hazard Severity Zone? With the extensive tree mortality in the state, will 60,000 acres be adequate to mitigate the extreme fire danger we presently are facing? How would this connect to fuel rank methodology?~~	~~The extreme mortality that is being witnessed in various bioregions would not be able to be treated under many of the Alternatives. Alternative C, specifically, does not provide the best option for combating tree mortality overall because its footprint is significantly constricted and would only allow treatments within in VHFHSZs. The fuel rank methodology was removed and refocused on Condition Classes. Condition Classes allow the program to focus on areas where the vegetation has deviated from the natural fire regime, vegetation composition and fire behavior. 60,000 acres does not attempt to fix the problem, but instead is meant to start the process in returning California to it's natural fire regimes.~~			
~~19~~	~~Husari~~	~~Chapter 1 Overall~~	~~Editorial~~	~~Could be shortened, lots of distracting information~~	~~Without additional detail, no changes have been made.~~			
~~20~~	~~Husari~~	~~Section 1.4 Use of a Program EIR/Page 1-7~~	~~Editorial~~	~~Figure 1.3-1 either missing or mislabeled~~	~~Mislabeling in the text corrected.~~			
21	Rickert	Section 1.5	Written Clarity	Should there be mention of other "federal, state and local agencies and non-profits" that can be partners in vegetation treatment projects that could help in leveraging dollars to expand the ultimate impact of the VTP?	Section 1.5 follows the CEQA guidelines for the discussion. Discussion of how projects could be funded is not appropriate in that section under CEQA.		Would like to ensure that the discussion is present in the appropriate area.	The following language has been added: Chapter 1.5- 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). As a result, there have been coordinating efforts to acknowledge the benefits of vegetation treatments with a variety of stakeholders including but not limited to federal, state and local government agencies and non-governmental organizations. Consequently, the VTP may be a perfect addition to help bridge the ground work and provide the ecological role of vegetation treatment on SRA land within future cooperating efforts. This has also been carried over to 2.4.4
~~22~~	~~Husari~~	~~Section 1.6 Regulatory Setting/Page 1-9~~	~~Editorial~~	~~Figure 1.4-1 either missing or mislabeled~~	~~Mislabeling in the text corrected.~~			
23	Sept Workshop	Section 1.7	Additional Information	Additional description language regarding the transition from 1981 CMP to this document. Particularly discus "rangeland" terminology and influence through this time frame.	Tony and Edith will look into providing a history of the evolution.	Edith - In progress	Board would still like to see this completed.	Edith made some changes and submitted this section to Marc and CeCi for their further input.

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24	Husari	Section 1.7.2 Vegetation Management Program/Page 1-12	Project Prioritization	Regarding "other objectives" mentioned in the first sentence of the last paragraph on this page: need to explain somewhere why the VTP does not include some of these objectives, particularly improving commodity production	No changes proposed to the PEIR. The discussion on the VMP appears appropriate and all the objectives listed in this section are covered by the VTP. Although the Objectives are written differently, the document does discuss the same values throughout the text. These objectives are folded into the VTP's objectives.	Kevin/Edith	Work in progress. By "commodity production" Husari meant rangeland, specifically.	Edith made some changes and submitted this section to Marc and CeCi for their further input.
~~25~~	~~Husari~~	~~Section 1.7.3 Fire Prevention/Page 1-13~~	~~Data~~	~~Add language regarding funding of this program (SRA fees and other) and what percent is dedicated to vegetation management~~	~~No changes proposed for the PEIR, funding can not be guaranteed and is outside of the scope of the EIR. EIR does not come with funding but is a method to complete a project that has funding. Breaking down the % of funding dedicated to vegetation management through the SRA or other programs is completely variable and dependent partially on Legislative direction and specific purpose of other BCP or grant requirements.~~			
~~26~~	~~Husari~~	~~Section 1.7.4 CFIP/Page 1-13~~	~~Editorial~~	~~Recommend removing this section~~	~~No changes proposed for the PEIR, CFIP is a vegetation treatment method within Cal Fire.~~			
~~27~~	~~Husari~~	~~Section 1.8.1 Statewide Strategic Planning/Page 1-15~~	~~Editorial~~	~~Reorganize and simplify this section~~	~~No changes proposed for the PEIR, section can not be reorganized or simplified any further.~~			
~~28~~	~~Farber~~	~~Chapter 2 Overall~~	~~Overall~~	~~Overall, it is well constructed and flows well. Case studies are helpful in understanding background to proposal.~~	~~No changes proposed for the PEIR, statement only. Positive feedback is always welcome and helps support Team moral.~~			
29	Husari	Section 2.1 Overview of the VTP - Objective 2/Page 2-6	Data	Include information about amount of watershed that must be treated to realize a reduction in fire impacts - see Finney literature and Sapsis (FRAP)	No changes proposed to the PEIR. Discussion occurs with the alternatives not analyzed section.	Drew	Requesting that this information be provided in more detail somewhere in the document.	Additional discussion regarding Finney's simulation work will be added, including the assumptions used in the modeling work that may or may not apply to the strategy outlined in the PEIR. For example some of Finney's work (Finney et al., 2007) assumes a lack of fire suppression, and does not consider the kind of targeted treatments (e.g., WUI) that are in the PEIR.
~~30~~	~~Husari~~	~~Section 2.1 Overview of the VTP - Objective 2/Page 2-7~~	~~Written Clarity~~	~~Remove Figure 2.2-4, does not relate to paragraph~~	~~Figure 2.2-4 remains but clarification on what it is describing has been added.~~			
31	Husari	Section 2.1 Overview of the VTP - Objective 4/Page 2-9	Chaparral	Include information about ecosystems where fire frequency is too often due to human ignitions and invasive grasses for a balanced discussion. Could cite California fire ecology book or other references.	Eric will look into available data to address this request.		Board is still interested in a response	Added text to Section 2.1 to acknowledge human ignition and invasive grass.
~~32~~	~~Husari~~	~~Section 2.1 Overview of the VTP - Objective 5/Page 2-9~~	~~Public Participation~~	~~Additional text on outreach to NGOs and private landowners.~~	~~Language put forth by Member Husari accepted into the document.~~			

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~~33~~	~~Rickert~~	~~Section 2.2.1~~	~~Editorial~~	~~Under the Vegetation Treatment Program-Objectives. Possible changes to wording to read: 3. "Potentially reduce the size…." 5. "….vegetation treatment monitoring that is…"~~	~~Objective 3 and 5 changed to reflect the board discussion during the workshop of the objective wording. See Objective 3 and 5 below.~~			
34	Wade	Section 2.2.1 Objectives of the VTP/Page 2-4 Objective 1	Project Prioritization	A broad category of commodity values, such as timber, are not included in "values at risk". "Structures" are included, as are ecosystem services. On what is this value system based?	Timber is now included in the list in Objective 1.		Would like the natural resources element expanded to include rangeland and any other natural resources.	Additional verbiage including rangeland and other natural resources has been included but the team would caution an approach to list all values at risk since the list may be exhaustive. There could be a lot of different ways to identify "values at risk". Local project scale implementation of a project may identify certain "values at risk" that another community may not. Ultimately, the local Unit/Contract County will have to support the project through the Unit Fire Plan or Contract County Strategic Fire Plan.
~~35~~	~~Wade~~	~~Section 2.2.1 Objectives of the VTP/Pages 2-4 and 2-5 Objective 1 and Objective 3~~	~~Written Clarity~~	~~The descriptions provided here do not provide clarity as to their differences. For example, one must infer from Table 3.10-1 on Page 3-38 (also included in the Executive Summary as Table ES-9 on Page E-9) that Objective 3 is achieved through the installation of Fuel Breaks.~~	~~Language has been added to clarify.~~			
~~36~~	~~Sept Workshop~~	~~Section 2.2.1 Objective 3~~	~~Clarifying Language~~	~~"Overall" and "individual" was added to Objective 3.~~	~~Objective 3 now states: Reduce the potential size and **overall** associated suppression costs of **individual** wildland fires by altering the continuity of wildland fuels.~~			
~~37~~	~~Sept Workshop~~	~~Section 2.2.1 Objective 3~~	~~Written Clarity~~	~~Members not comfortable with the use of some of the references cited. Specifically Martinson and Omni in relation to the tree mortality discussion about costs.~~	~~References reevaluated, clarifying language added to support the change to the wording in Objective 3.~~			
~~38~~	~~Sept Workshop~~	~~Section 2.2.1 Objective 5~~	~~Written Clarity~~	~~Added the word monitoring to the Objective.~~	~~Objective 5 now states: Provide a consistent, accountable, and transparent process for vegetation treatment **monitoring** that is responsive to the objectives, priorities, and concerns of landowners; local, state, and federal governments; and other stakeholders.~~			
39	Husari	Section 2.2.2 Major Vegetation Formations/page 2-10 & 2-11	Written Clarity	Additional text indicating variability among fire regimes within the 3 vegetation types	No changes proposed to the PEIR. This information can be located in Chapter 4.	Eric	Member Husari still feels this is a very generalized discussion. Needs further work - more clarifying language either here or later in document. Chapter 4 would be the focus.	Additional fire regime discussion for vegetation groups was added to Chapter 2.2.2.1.
~~40~~	~~Farber~~	~~Section 2.2.2 Major Vegetation Formations/Page 2-13~~	~~Program Scope~~	~~Table 2.2-2 is very helpful in understanding the number of treatable acres.~~	~~No changes proposed to the PEIR., statement only and we really appreciate positive feedback.~~			
~~41~~	~~Farber~~	~~Section 2.2.2 Major Vegetation Formations/Page 2-14~~	~~Written Clarity~~	~~Figure 2.2-5 adds up to 28,002,170 acres. Based on text on page 2-12 and previous Table 2.2-2 it seems like this Figure should be linked to the "treatable" acres which would be 24 to 25 million acres? If this was not the intent, we may want to clarify the acres in Figure 2.2-5.~~	~~Section 2.2.2 introduction clarified the 31 million, 28 million, and final 24 million acre discussions.~~			
~~42~~	~~Wade~~	~~Section 2.2.2.1 Fire Behavior/Page 2-16~~	~~Project Prioritization~~	~~The discussion of fuel rank and of condition class is not placed in the context of the process of prioritization of projects. It was not clear why these concepts were being described until later examining Figure 2.4-1 on Page 2-48.~~	~~Fuel Rank and Condition Class detailed discussion moved to Chapter 4.~~			
~~43~~	~~Husari~~	~~Section 2.2.2.1 Fire Behavior/Page 2-17~~	~~Program Scope~~	~~Clarify whether areas not classified as high or very high were excluded from the totals of WUI available for treatment in each bioregion.~~	~~Clarification provided in section 2.2.2.2.1 Wildland-Urban Interface (WUI).~~			

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44	Husari	Section 2.2.2.1 Fire Behavior/Page 2-17	Written Clarity	"we can infer general relationships between the vegetation formation, fire behavior, and the likelihood of successful fire suppression activities." - This inference does not make sense because of the amount of variability in the WHRs.	No changes proposed to the PEIR. Information is discussed in Chapter 4.	Eric		The CFSC recommended the use of WHRs and provided a crosswalk between vegetation groups and WHRs which was included in the PEIIR.
~~45~~	~~Husari~~	~~Section 2.2.2.2 Departure from Fire Regime/Page 2-20~~	~~Project Prioritization~~	~~See comments in Chapter 4 regarding condition classes~~	~~No changes proposed to the PEIR. Statement only.~~			
~~46~~	~~Rickert~~	~~Table 2.2-5~~	~~Editorial~~	~~Under "prescribed herbivory", I question the inclusion of horses as a method of an application for grazing. Horses are not typically used for grazing purposes.~~	~~Horses removed from the list under prescribed herbivory.~~			
~~47~~	~~Husari~~	~~Section 2.2.3 Program Treatments (Fuel Breaks)/page 2-32~~	~~Project Prioritization~~	~~Question about use of condition class language - should that read "fuel rank" instead?~~	~~Condition class is utilized in the discussion of Fuel Breaks, clarifying language has been added to section 4.1.~~			
~~48~~	~~Husari~~	~~Section 2.2.3 Program Treatments (Fuel Breaks)/page 2-32~~	~~Written Clarity~~	~~Figure 2.2-12 does not illustrate fuel break concept~~	~~Removed from this section. Clarifying the discussion is about the break in continuity of fuels in Chapter 4.~~			
~~49~~	~~Husari~~	~~Section 2.2.3 Program Treatments (WUI Treatments)/page 2-22~~	~~Project Prioritization~~	~~Explain how the priority system relates to figure 2.2-9 and whether the fuel rank system has the categories in the figure or whether there are just very high, high and moderate as shown in the map labeled as 2.2-7. Confusing. Also does the map of WUI and the acreages exclude anything in WUI with a rank less than Very High.~~	~~Fuel Rank discussion removed from the chapter.~~			
~~50~~	~~Wade~~	~~Section 2.2.3 Program Treatments/Page 2-19~~	~~Written Clarity~~	~~The word "treatments" is confusing, as it connotes what we are terming "activities." "Project Types" seems to be a less confusing descriptor with respect to projects in the WUI, Fuel Breaks, or Ecological Restoration projects. The descriptions here describe where the varying projects will take place and their purpose.~~	~~Clarifying language was added. Activities and Treatments are no longer used interchangeably in Section 2.2.3.~~			
51	Husari	Section 2.2.3 Program Treatments/page 2-21	Public Participation	Case studies should be looked at again	No changes proposed to the PEIR. We believe the comment is based on a previous draft.		Looking into case studies from the Butte Fire. Take Poppet Flatt case study out due to sensitivity concerns.	Case study removed.
~~52~~	~~Husari~~	~~Section 2.2.3 Program Treatments/page 2-21~~	~~Project Prioritization~~	~~See WUI analysis comments in Chapter 4~~	~~No changes proposed to the PEIR, statement only.~~			

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~~53~~	~~Wade~~	~~Section 2.2.3 Program Treatments/Page 2-23~~	~~Project Prioritization~~	~~The paragraph pertaining to firefighter deployment and safety seems out of place. How does this differ from a fuel break "treatment". Perhaps firefighter safety needs to made an objective? The details about nomex and etc. seem out of place.~~	~~Discussion is removed from Chapter 2.~~			
~~54~~	~~Wade~~	~~Section 2.2.3 Program Treatments/Page 2-26 Ecological Restoration, and Page 2-31 re: Fuel breaks~~	~~Public Participation~~	~~Does the language regarding inclusion of a treatment in a local fire plan need to be repeated verbatim for each of the three treatments being described? I am skeptical about the amount of public feedback that would be solicited for the Unit Fire Plan. How many actually do serve as a county-wide CWPP?~~	~~Unit Fire Plan language moved to Program Treatments Introduction, not repeated in each treatment subsection.~~			
55	Husari	Section 2.2.3 Scale of Past Treatments/page 2-43	Data	Add acreage that is treated in SRA by landowners under 100 foot requirement. Explain that this is the responsibility of the landowner and not funded by CALFIRE.	No changes proposed to the PEIR. No language added because we do not clearly know how much acreage is treated under the 100ft requirement and are uncomfortable with putting forth a figure that could be extremely inaccurate in reality. FRAP doesn't calculate this a information at this time.		A discussion of the PRC should be added near CFIP in chapter one, because it is a landscape treatment. It was agreed that an acreage value did not need to be included, as an accurate number can not currently be provided.	This language has been added.
56	Husari	Section 2.2.3 Scale of Past Treatments/page 2-44	Data	CWPPS should be looked at to see what those documents estimate for conducting vegetation treatment activities	In most cases CWPP are similar to Unit Fire Plans in that they list potential projects, but they do not necessarily identify which ones are prioritized by year. As funding becomes available, and dependent on restrictions tied to the funding, projects will be implement on the greatest need at that time. No changes proposed to the PEIR.		Add to monitoring?	Still not sure how to respond to this. The interest as the Team understands the request is to evaluate the acres and priorities of projects proposed by CWPPs and FSCs to help illustrate the potential treatments for a given year. There is not a central place to retrieve this information and in most cases CWPPs provide projects types but not a priority of who's community will be treated first since there are other political variables at play.
~~57~~	~~Wade~~	~~Section 2.2.4 Program Activities/Page 2-36, Table 2.2.5~~	~~Written Clarity~~	~~Mechanical Activities should include a feller-buncher in the column "Methods of Application".~~	~~No changes proposed to the PEIR. Feller-buncher is not appropriate to add into the column. Out of context. This is a list of activities not equipment.~~			
~~58~~	~~Wade~~	~~Section 2.2.4 Program Activities/Page 2-37, 2-38~~	~~Written Clarity~~	~~The term "vegetation activities" is used several times to refer to what had been labeled "VTP Activities" or "Program Activities". As a matter of precision in the language it might be well to refer to VTP Activities throughout, as "vegetation activities" is not a clear term outside the context of this section.~~	~~Clarifying language was added. Activities and Treatments are no longer used interchangeably in Section 2.2.4~~			
~~59~~	~~Husari~~	~~Section 2.2.4 Projected Scale of VTP/page 2-44~~	~~Data~~	~~See comments on Chapter 3. FRAP and CAL FIRE have the capability to complete an analysis of how much fuels treatment is needed to meet program objectives 1-4. This is a fundamental and needed component of the analysis rather than relying on past program history and CAL FIRE capacity and funding levels. More stakeholder scoping is needed of what the public expectations are, in terms of outcomes from the program.~~	~~No changes proposed to the PEIR. The analysis of how much needs to be done is outside the scope of the document. In discussions with FRAP, this information is not available.~~			
~~60~~	~~Husari~~	~~Section 2.2.4 Projected Scale of VTP/page 2-44~~	~~Public Participation~~	~~More stakeholder scoping is needed of what the public expectations are, in terms of outcomes from the program.~~	~~Public expectations will be identified during public comment.~~			

Green: VTP Team changes made
Strikethrough: No further consideration
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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
~~61~~	~~Wade~~	~~Section 2.2/Page 2-2 last paragraph~~	~~Project Prioritization~~	~~This describes prioritization of projects based on values at risk, fuel conditions, strategic necessity, and departure from the natural fire regime. It then refers to Figure 2.4-2, which is on Page 2-56. I would like to see a broader discussion of this prioritization process here, as subsequent discussions about fuel rank and condition class are without context. I found Figure 2.4-1, which is not presented until Page 2-40, to be very valuable in finally understanding why all these topics were being discussed.~~	~~Section 2.2 reorganized to better address the disconnect between topics covered and program direction.~~			
~~62~~	~~Rickert~~	~~Section 2.3~~	~~Editorial~~	~~Scope of the VTP – Is it "2,301" or "23,010"~~ ~~Looks like the 0 needs to be deleted.~~	~~Corrected to 2,301.~~			
~~63~~	~~Wade~~	~~Section 2.3 Scope of the VTP/ Page 2-38, first paragraph~~	~~Program Scope~~	~~It's my opinion that the scope of the work is much too conservative. Two percent of the total acres would be treated over a 10-year period is not adequate to address the problem, and if we are making the effort to prepare this EIR we need to aim toward levels of treatment that will actually effect a reduction in risk. In light of the additional funding from various policy initiatives that may be available, many more acres could potentially be treated than what is anticipated in this document. It also may not recognize that within a ten year horizon we need to anticipate that there will be repeat acres, that is, the same acre is treated two or more times, we may be seriously undermining our ability to treat an adequate number of acres.~~	~~No changes proposed to the PEIR, statement only.~~			
~~64~~	~~Wade~~	~~Section 2.3 Scope of the VTP/Page 2-39 Table 2.3-1~~	~~Program Scope~~	~~It seems that the "land cover type" and "Vegetative Type" column heading in this table should easily correlate with the "Vegetative Subtypes by Dominant Vegetation Formation" itemized in Table 2.2-1 on Page 2-10. With this table we introduce another vegetative classification, and I'm not sure how this relates to SRA or treatable area under the VTP. In this table the private lands in wildland type total over 32 million acres, and so is not easy to correlate with SRA.~~	~~Table removed.~~			
~~65~~	~~Wade~~	~~Section 2.3 Scope of the VTP/Page 2-39, first full paragraph~~	~~Written Clarity~~	~~Regarding the reference to 80 million acres in California. As there are over 100 million total acres in California, it's evident that the 80 MM acre figure is referring to the sub classifications itemized in Table 2.3-1 on the same page. There should be an explanation as to what constitutes 80 MM acres.~~	~~Discussion removed from Chapter 2.~~			
~~66~~	~~Farber~~	~~Section 2.3.1 Geographic Extent of the VTP/Page 2-39~~	~~Written Clarity~~	~~Text in 2nd paragraph references 31 million acres, however the Table 2.3-1 directly below text describes 32,150,000 acres. We may want to further explain the difference and review the reference to Table 2.1-1 in text when the number is Table 2.3-1.~~	~~Table removed.~~			

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~~67~~	~~Wade~~	~~Section 2.3.2 Treatable Area~~	~~Program Scope~~	~~There is no clear explanation in this section why SRA lands available for treatment are narrowed to 24 million from 31 million. This is referred to in passing on Page 2-12 in the third paragraph, and apparently presented qualitatively in Table 2.2.2 on Page2-13. A sentence explaining that some 7 million acres of SRA was in the types described in Table 2.2.2 as "untreatable" would be helpful here.~~	~~Section 2.2.2 introduction clarified the 31 million, 28 million, and final 24 million acre discussions.~~			
~~68~~	~~Wade~~	~~Section 2.3.2 Treatable Area/Page 2-40~~	~~Program Scope~~	~~How do the figures in Table 2.3-2 relate to the acreage for vegetation subtypes presented in Figure 2.2-5 on Page 2-14? That pie chart totals 28 million acres.~~	~~Section 2.2.2 introduction clarified the 31 million, 28 million, and final 24 million acre discussions.~~			
~~69~~	~~Wade~~	~~Section 2.3.3 Scale of Past Treatments/Page 2-42~~	~~Written Clarity~~	~~Is there any issue with the conclusion here that 23,000 acres have been treated on average, as opposed to the 30,000 acres previously stated?~~	~~We do not think this is an issue. The rounding criteria was to act as a conservative approach. Page 1-11 states "less than 30,000 acres". Page 2-34 is changed to reflect 23,000 acres for consistency. However, this same page illustrates that a average was also used to create 30,000 acres.~~			
~~70~~	~~Wade~~	~~Section 2.3.3 Scale of Past Treatments/Page 2-43~~	~~Data~~	~~That only 9 of 27 Unit or County representatives responded, and that the data is in such poor shape, is unfortunate. This creates a weakness in the document. Can there be a better effort made to shore up these numbers by re-contacting the 18 Units or Counties that did not respond?~~	~~Clarifying language added that it is only a sample.~~			
71	Farber	Section 2.3.4 Projected Scale of the VTP/Page 2-44	Program Scope	On several occasions the Board has heard testimony from both private and public sectors that the current pace and scale of vegetation treatment isn't adequate to address the current vegetation conditions, let alone the continued growth of vegetation. Approximately 60,000 acres a year represents treating approximately 2.4% per decade, is this amount of treatment going to address the existing vegetation issues and continued growth of vegetation? A discussion of how this amount is adequate should be discussed in this Chapter or an Appendix. If this amount of treatment is not going to achieve the pace and scale necessary, then we need to disclose this to the public.	With the changes to the objectives, we believe this has been cleared up. The scale of treatment proposed within this analysis is based on the reasonable amount of acres that can be treated . Pages 2-4 and 2-32 have added language to address this concern.	Drew- Need to add to the ES	Would like a statement that the program does not intend to solve pace and scale.	This is the same request from Item 16 and in several other areas, language being added by team to address this.
~~72~~	~~Wade~~	~~Section 2.3.4 Projected Scale of the VTP/Page 2-43~~	~~Program Scope~~	~~Is it the intent that projects under existing VMPs continue outside of the VTP? This section alludes to covering activities not currently covered under a VMP, but I know of at least a few VMPs that are in forests. If activities on existing VMPs would continue outside of the umbrella of the VTP, does this not affect the entire environmental analysis?~~	~~VTP will encompass the VMP. All new projects that meet the objects of the VTP will be conducted on the VTP EIR moving forward. Language has been added to 2-33~~			

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~~73~~	~~Wade~~	~~Section 2.3.4 Projected Scale of the VTP/Page 2-44 Table 2.3-7~~	~~Written Clarity~~	~~Some explanation of this table is necessary. The text above the table states that "The spatial distribution of projects is likely to follow a pattern similar to the historic distribution of vegetation treatment projects". The table has a constant .24% in the column "% of Treatable Landscape Treated per Decade", so does not attempt to reflect the historic spatial distribution of projects. This should be explained.~~	~~Clarifying language added to how the projects are spatial distributed.~~			
74	Wade	Section 2.3.4 Projected Scale of the VTP/Page 2-45	Program Scope	The relative distribution of projects is based on "trends from the available recorded data", and the expectation is presented. However, the projected scale of the VTP as described on Page 2-43 has explained why historical data is not particularly applicable, having excluded forested landscapes, mechanical mastication, and herbicide treatment were not accounted for under the VMP statistics. Therefore the premise for the analysis is flawed.	The relative distribution doesn't mean we are stuck to them. However they do provide the baseline that is required for us to complete the analysis. The monitoring aspect of the VTP will continuously improve this data over time. The VTP Team disagrees with the closing statement. No changes proposed to the PEIR.		Board would like the following or something similar added to the text - The relative distribution doesn't mean we are stuck to them. However they do provide the baseline that is required for us to complete the analysis. The monitoring aspect of the VTP will continuously improve this data over time.	The following language has been added "Consequently, the percent distribution is not a threshold that the Program must maintain. This is expected to change over time as interest in each activity adapts to environmental and political needs. "
75	Wade	Section 2.3.4 Projected Scale of the VTP/Page 2-45	Herbicides	What I find perplexing is the projection that the level of prescribed herbivory is expected to be equal to the level of herbicide treatment. This seems impractical, in that the ease and effectiveness of herbicide treatment would seem to lend itself to far more application than herbivory. This would seem to be either a serious weakness in the analysis (if herbicide use would constitute substantially more than 10% of the treatments), or a serious flaw in the strategy of the VMP (that prescribed herbivory is equally applicable and efficient *vis a vis* herbicide treatment).	No changes proposed to the PEIR, statement only. See comment in item 74.		Requesting that language be added that 10% herbivory or herbicide is not set in stone, but is used for the analysis.	The following language has been added "Consequently, the percent distribution is not a threshold that the Program must maintain. This is expected to change over time as interest in each activity adapts to environmental and political needs. "
~~76~~	~~Wade~~	~~Section 2.3.4 Projected Scale of the VTP/Table 2.3-8~~	~~Editorial~~	~~It would be awesome to provide totals for rows and columns of data in tables such as 2.3-8 so readers do not have to do the math.~~	~~Tables updated to include Totals.~~			
77	Wade	Section 2.4.1 Implementation Process/Page 2-46	Public Participation	In the second paragraph, it is stated "During the project planning phase, the project proponent will provide a public meeting for projects outside of the WUI. Why the distinction? How would public input differ for projects within the WUI ?	No changes proposed to the PEIR. The purpose here was not to tie up we appears to be in everyone's agreement that WUI projects are the top priority. In almost all examples of current WUI projects, they are in the backyard of residential homes and along the edge of communities. These activities are going to have consistent input from the landowners and the community (that most likely proposed the design of the project) that they are developed around. As a bridge to other public interest groups the concept of a public forum was added to projects that may be deeper in a watershed (designed to still benefit a community through rangeland management or establishing native vegetation or provide fuel breaks) that a local community may not recognize. This aspect was designed to increase the transparency of the program.			The Team was not clear on any direction. Consequently no changes have been made. Please see responses to Items 1 and 5 above. Are these sufficient to answer the concern?

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~~78~~	~~Wade~~	~~Section 2.4.1 Implementation Process/Page 2-48 Figure 2.4-1~~	~~Written Clarity~~	~~This is a valuable diagram, explaining the use of fuel hazard and condition class. It should perhaps be referred to in the prior discussion of these rating systems, and given more prominence in the document.~~	~~Figure 2.4-1 and -2 can not be moved into the prior discussion because they are the foundation of Implementation Framework. However Section 2.2 has been revised to enhance the readers understanding of why condition class is important.~~			
~~79~~	~~Wade~~	~~Section 2.4.1 Implementation Process/Page 2-60~~	~~SPRs~~	~~AIR-8: This restriction would insert a great deal of uncertainty into any project involving heavy equipment activity. Would it be possible to qualify this restriction by stipulating that the dust transport must be in exceedance of local air quality standards?~~	~~AIR-8 has been clarified to state visible dust transport outside the project boundary.~~			
~~80~~	~~Wade~~	~~Section 2.4.1 Implementation Process/Page 2-61~~	~~SPRs~~	~~AIR-10: This is quite restrictive, and makes no distinction whether the ambient air quality is good or bad, or the location of the project with respect to its effects on a local population. This could be qualified by restricting it to "bad air" days as defined by the local air quality management district.~~	~~Language was clarified, to state operation of **each** large diesel or gasoline-powered activity equipment . . . This standard is not impacted by good or bad air days but instead the overall emissions that are produced by the equipment.~~			
81	Wade	Section 2.4.1 Implementation Process/Page 2-61	SPRs	BIO-3: The term "special status species" needs to be defined in the glossary. It is quite distinct from "rare, threatened, or endangered".	Patrick will work on this.		Board still interested.	"Special Status Species" definition added to glossary
82	Wade	Section 2.4.1 Implementation Process/Page 2-62	SPRs	BIO-4: A different term, "CNDDB Species", is now being used. Is this equivalent to "special status species"? Neither of these necessarily connotes that a species reaches a threshold of CEQA significance.	Patrick will work on this.		Board still interested.	Changed to "species identified in CNDDB search"
83	Wade	Section 2.4.1 Implementation Process/Page 2-63	SPRs	BIO-7: A strict minimum buffer may not be appropriate for plant species that are favored by disturbance. Bio-4 outlines the request for specific information from expert sources regarding "special status" species. This information should be used to guide activities in the vicinity of these plants.	Patrick will look into this		Board still interested.	Bio 7 updated to reflect the fact that strict minimum buffer applies unless otherwise directed by CDFW.
84	Wade	Section 2.4.1 Implementation Process/Page 2-69	SPRs	HYD-3: This restriction seriously undermines the efficacy of vegetative treatments and should be discarded or modified. Simply allowing prescribed fire to be the exception belies that without prior treatment of the area prescribed fire is typically not practical, and would not be implemented in most cases. Why would hand treatments not be practical and with minimal potential environmental effect?	No changes proposed to the PEIR. This SPR is vital to avoid a large number of concerns with operating within, removing the canopy and potentially altering the bed and bank of watercourse for habitat values and potential degrading of water quality.		Angora Fire and Ponderosa Fire. Forest Practice Rules Option V, ASP rules	HYD-3 was included because the weight of evidence suggests that minimally disturbed riparian buffers are effective in preventing a variety of water quality impacts. While the concept of preferential fire spread through riparian zones has been documented for some fires, the evidence is largely anecdotal. Riparian treatments could potentially be included for forest vegetation formations, but due to the stand replacing nature of treatments within grass and shrub formations, it becomes more difficult to avoid significant impacts when vegetation treatments occurs within riparians zones for these vegetation types. The Department intends to staff treated areas during suppression operations, and the presence of minimally disturbed buffers does not preclude the construction of fireline through these areas during a wildfire incident.

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85	Wade	Section 2.4.1 Implementation Process/Page 2-71	SPRs	HYD-15: I presume this is to protect soils, but 100 square feet as the maximum? Is this limit supportable as a threshold for a significant effect on the environment? Piles this small are not practical under several treatment scenarios, particularly when mechanically piling fuels, and increase the difficulty in burning them.	No changes proposed to the PEIR. The 100 feet is outside of landing area. The expectation is that the landings would be the primary areas where material is collected for burning. Similar to current logging practices.		Is this realistic operationally?	This SPR does not apply to piles on landings on roads, which have no size limitation. The SPR could be modified to allow for larger piles on contour (i.e., windrows), as this could minimize potential hydrogeomorphic impacts. Also, the dimensions of the piles could be adjusted upwards. However, it is still necessary to limit the size of piles to prevent large areas of the hillslope from having high soil burn severity with resulting increases in runoff and sediment production..
86	Farber	Section 2.4.3 Monitoring and Adaptive Management Plan/Page 2-53	Monitoring	We should consider an annual report or presentation to the Board, specifically addressing items described in Section 2.4.3 and Section 2.3.4 regarding pace and scale of vegetation treatment activities. Also, it would be helpful to receive annual updates on the monitoring proposed in Appendix I and how well this monitoring approach is working.	No changes proposed to the PEIR, outside of the scope of the EIR. However, we agree and should be part of the Department's program (not a PEIR function).		Add in "and the Board" as a recipient of monitoring reports, etc., already identified in program	Language has been added.
87	Miles	Section 2.4.4 Funding	Program Scope	The VTP does not include projects that would cut or remove timber or other solid wood products from timberlands for commercial purposes (as defined by PRC 4527). Is it correct to believe that VTP projects can generate bio-fuels, soil amendments, etc. for sale provided they originate from trees and/or brush less than 16" dbh? Would only fuels or other non-lumber products generated from within 'an urban wild land interface community at high risk of wildfire as defined…' be available for sale? I am curious about this in the context of potential for existing and emerging markets that may utilize VTP project by-products; will they be able to or no.	The current design of the PEIR is to exclude commercial timber operations. Under the 2.4.4 Funding in Chapter 4 addresses this. "The VTP does not include projects that would cut or remove timber or other solid wood products from timberlands for commercial purposes (as defined by PRC 4527). These projects require a timber harvesting plan (THP), non-industrial timber management plan (NTMP), or other program timber harvesting plan (PTHP)."			
88	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-59	SPRs	ADM-2: RPF not necessary for this	BOARD DIRECTION NEEDED. This impacts areas of the state that may not have participating foresters. The current design of the PSA is set up to go either way; require a RPF to fill out and/or require that a CAL FIRE RPF sign off on.			
89	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-60	SPRs	ADM-7: This sounds like a capacity issue – what if contractors are doing the work. Why would not RX fire or prep work be limited, especially if the landowner is doing the work	This SPR has been moved to the Air Quality section for clarity on it's purpose. This, and similar AIR SPR restrictions are derived from reducing the overall impacts on Air Quality. Looking at this issue through the lens of modeling there are several components that need to be evaluated; Emissions of Criteria for Pollutants and Precursors, Fugitive Dust, Naturally Occurring Asbestos (NOA), Toxic Air Contaminant (TAC) Emissions and Objectionable Odors. Due to the diversity of the activities under the PEIR, two project types emerge for modeling air quality emission standard thresholds - Construction and Prescribe Fire. The last sentence of 15 prescribed fire has been removed. This was a non-PEIR model limit) More information is provided in the Air Quality Summary by Rachael.		Although the Board had not covered this specific Item, this was a topic of concern through previous comments.	See the comments in #11.

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90	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-61	SPRs	AIR-2: Note this is a requirement of smoke management plans already	The smoke management plan is only required on Prescribed Fire Projects. AIR-2 covers the emission of all other projects. Please see the detailed discussion in 4.12			
91	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-62	SPRs	AIR-12: Redundant	Agreed. AIR-12 removed and language condensed into AIR-3.			
92	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-62	SPRs	Mitigation Measure AIR-1 What about PFIRS?	PFIRS is only appropriate for prescribed fire projects, we are referring to all projects in this Mitigation Measure. Special local air board requirements are not accounted for in the statewide analysis, as they could change often.			
93	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-63	SPRs	BIO-5: Define "critical." What about houses?	Definition added to glossary			
94	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-65	SPRs	CC-1: FOFEM not an appropriate tool	FOFEM is the standard for which Cal Fire currently operates under. Clarifying language was added to include "add/or other GHG-emission models as appropriate to the treatment activity"			
95	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-68	SPRs	HAZ-6 & 7: Why is there a discussion of pesticide use in the VTP. It is not one of the treatment methods.	No changes proposed to the PEIR, the Team believes the terms herbicide and pesticide are used within the right context.			
96	Rickert	Page 2-72	SPRs	HYD 17- “electric fence” should be included whenever fencing is mentioned throughout the report.	HYD 17 - includes electric fence, with the statement "(i.e. fixed or portable)". The Team's original efforts have been to identify criteria in categories when providing a specific list of items may prove to cumbersome and potentially exclude the PEIR to adapt over time.			
97	Husari	Section 2.5.1 Standard Project Requirements and Mitigations/page 2-73	SPRs	NSE-7: Except as needed for public safety such as mop up for prescribed burns which occur outside those hours. Does this mean no prescribed burns on weekend?	Language changed to: "shall be limited to the hours of 0700 to 1900 unless public safety is of concern."			

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98	Wade	Section 3.7.3 Regarding the Achievement of Basic Project Objectives for Alternative D/Pages 3-31 and 3-32	Prescribed Fire	This narrative makes statements that are difficult to support; for example, "Prescribed fire is the only logical treatment option to treat large areas in need of fuel reduction". What's "logical" depends on many factors, particularly on the ground conditions. Further, the reference to fire as the only way to restore the ecological balance for fire-adapted communities is overly broad. After all, we are treating only a few percent of the SRA landscape under the preferred alternative, so the overall ecological health of wildland ecosystems will be generally unaffected by this program, in whatever form it is implemented.	Wording has been changed.			
99	Sept Workshop	Section 3.2.1	Clarifying Language	Review the context of mastication on page 3-4.	Under the No Project Alternative, mastication would not be included as the 1981 CMP did not include mastication. Reference to mastication under 3.2.1 was removed.	Eric/Patrick		
100	Wade	Section 3.9 Alternatives Considered but Eliminated	Alternatives Analysis	A general comment here is that a higher acreage alternative, broadly applied to all treatment areas would've been a logical alternative to consider. I think we need to question whether an alternative to treat 5% or 10% of the available landscape is not appropriate to consider under the extreme circumstances that we're facing. The level of activity proposed under this document is inadequate to address the problem.	The Department does not have the capacity to treat that many acres regardless of funding (1.3 million to 3 million acres a year) nor have we at any point in Department history. According to the CEQA Guidelines, an EIR must describe a reasonable range of alternatives to the proposed project that attain most of the basic objectives of the project in a feasible manner, but avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines §15126.6(d)). A higher acreage alternative would appear to be in conflict with this requirement.			
101	Wade	Section 3.10 Preferred Alternative/Page 3-38, Table 3.10-1	Objectives	This highlights that Objective 3 really needs elaboration, in order to further distinguish it from Objective 1. From this summary table the objective of reducing fire size and associated cost (of fire suppression) may only be achieved through the Fuel Break treatment.	Summary table 3.10-1 over-simplified comparisons between Alternatives and thus, led to confusing conclusions. Table was removed.	Eric/Patrick		

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102	Husari	Overall	Program Scope	1. Rationale for acres/treated per year. Program size (max 61K per year and min 30K per year • CALFIRE capacity to oversee planning of projects – seems to rely heavily on current VMP and CEQA staffing • CALFIRE capacity to implement projects such as prescribed fire prep and implementation • Interest of private landowners in projects • Current funding distribution for VMP program and for SRA grants. • Past history of project implementation. All these are understandable reasons to hold the program size to twice historical average, but there are many ways to increase program size to treat more acres: greater outreach, larger grant program, increase in staffing.	The Team is not sure how to respond. Appears to be a statement only.			
103	Husari	Overall	Objectives	2. Analysis of programmatic objectives. • There is no quantitative analysis of how the program or the alternatives will meet objectives 1 to 4 at a program scale. The narratives in Chapter 3 say that the objectives will be met, but contrast them based on the amount and distribution of treatments by WUI, fuel break and ecological restoration category. • The only objective that can be met at the program scale is 5, because of the improvements to the planning process. • It is more reasonable that objective 1-4 can be met at the individual project scale • Table that contrasts alternatives with pluses and minuses is unconvincing and not particularly logical. Can explain why: All individual projects are likely to meet each objective to some extent because they only vary in location and use the same methods in a different arrangement. • FRAP has the ability to do a spatial analysis of fire distribution and past fuel treatment distribution because it has complete database. Using the wildfire distribution, a more quantitative analysis of how much fuel treatment and retreatment is needed to meet objectives 1-4	Agree. Objectives 1-4 will be met at an individual project scale. Objectives help the Lead Agency develop a reasonable range of alternatives to evaluate the EIR and as an aid in preparing findings or a statement of overriding considerations, if necessary. A qualitative analysis sufficiently demonstrates how the program and alternatives meet the objectives. FRAP is currently working on collecting fuel treatment information on a statewide basis through the continued development of CalMAPPER, however the information is not currently available for analysis purposes.”	Eric\Rachael		

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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
104	Husari	Overall	Alternatives Analysis	3. Ability of the alternatives to meet objectives 1-3 Again, the program objectives can be met on an individual project basis. An ignition that occurs in a treated area can be more easily controlled. An ignition that occurs in a structure adjacent to a treated area or in the WUI can be more easily controlled and increase firefighter safety, and risk to life, property and resources. A fire that starts in or burns into a treated area can be controlled at much less cost. Maximum number of projects per year: 231 at 260 acres per project. Average number of fires per year in SRA: 3965 2003-2012 The chance of a fire occurring or burning into a treated area is low even after 10 years of treatment because the number of treated areas are small, the treatments are widely distributed over a very large landscape and the number of projects are small compared to the number of projects, even after 10 years. The chance of a large fire being influenced by a treated area is low, because once fires are large, small fires that are widely distributed do not change the overall fire behavior, although they can reduce severity within the treated area. The requirement to retreat every 2-3 years to maintain effectiveness also reduces the area that can meet objectives. Most acres are burned by 5 percent of the fires. Large areas have to be treated to influence, risk to WUI, fire suppression costs and overall acres burned.	CEQA Section 15126.6(a) requires that an EIR include reasonable alternatives to a proposed project in order to assess whether any alternatives would result in fewer significant impacts while allowing most of the basic objectives of the project to be met. The evaluation of the alternatives uses the same environmental analysis methodology as the analysis of the proposed project. Environmental issue areas such as noise, traffic and air quality are evaluated to determine whether the alternative would result in a greater or lesser impact than the proposed project which is included in Chapter 4. The evaluation of the alternatives is quantitative with respect to those issues for which quantitative analysis is possible and meaningful, but is qualitative for many other issue areas.	Eric		
105	Husari	Overall	Program Scope	4. Avoidance of significant impacts: There is no category in Chapter 4 that indicates that significant impacts would occur if acreage treated were increased. This is especially true if a good case is made that increasing fuel treatment will decrease wildfires. Overall: the alternatives cannot meet objectives 1-4 at a programmatic scale. The benefits of this small amount of treatment are overstated. It is still useful and worthwhile to do fuel treatment because of the benefits within the treated areas. The Board should take a realistic look at how much treatment is needed to make a difference and make the public aware of this.	Changes have been made from the previous Board meetings to address the objectives. The scale is not an attempt to resolve the vegetation conditions of the State but rather to provide a tool to address them on a voluntary basis. Items 16 and 71 also address this concern.			
106	Sept Workshop	Section 3.9 Alternatives Considered but Eliminated	Clarifying Language	Would like a clear statement on why they are not feasible/reasonable within the scope of CEQA	Language has been added. None of them meet the objectives of the Program and they are not consistent with the 2010 or 2012 Strategic Fire Plans.			
107	Sept Workshop		Clarifying Language	Relabel table on 3-38 and insure that the information that is "summarized" is discussed.	As a result of the Boards concerns regarding the value of this table and the difficulty in the tables design to provide an adequate summary, this table was removed.			

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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
108	Wade	Chapter 4	Editorial	A diagram or outline of the detailed structure of this Section would be very helpful. Frankly, I became bogged down in the first 40 or 50 pages.	This has been added to the start of each chapter.			
109	Sept Workshop	Fuel Breaks	Clarifying Language	Remove the reference of Fuel Breaks as safety zones.	Language removed.			
110	Sept Workshop	Ecological Restoration Definition	Clarifying Language	Add the word "integrity" to the definition.	Integrity added to the definition of Ecological Restoration.			
111	Husari	Overall	Environmental Analysis	Effects: There is a lack of consistency in whether the treatment levels affect wildfire scale and cost and impacts. Some sections assume this based on the subjective analysis of the alternatives in Chapter 2. Some sections don't. The board should discuss whether the overall VTP program will affect wildfire given the small scale of treatment and the dispersed nature of treatment.	Changes have been made from the previous Board meetings to address the objectives. The scale is not an attempt to resolve the vegetation conditions of the State but rather to provide a tool to address them on a voluntary basis. Items 16, 71 & 105 also address this concern. For consideration, the Alternatives were reviewed by CAL FIRE legal staff and based upon their analysis, were determined to sufficiently address the intent of CEQA. The proposed annual acres reflects Department capacity, public tolerance, and external limitations beyond our control (i.e.. air and water quality).			
112	Husari	Overall	Environmental Analysis	The use of different ways of parsing the CA landscape makes some of the sections difficult to compare to the bioregion analysis.	No changes proposed to the PEIR. It is important to note that the "bioregion" approach was one stratification to help break the State into logical areas for additional analysis. Other stratifications were also use depending upon the resources of concern (hydro, WQ, air quality, etc.)			
113	Husari	Overall	Environmental Analysis	The section on biological resources is very good.	No action, and the positive feedback is appreciated.			

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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
114	Husari	Overall	Environmental Analysis	Effects on some of the components really cannot be analyzed effectively at the statewide scale.	Statement only? No changes proposed to the PEIR at this time. The team is concerned about the impression that "effectively" represents. Does the PSA requirements help address this concern?			
115	Wade	Section 4.1 Introduction and Impact Analysis/Page 4-1	Written Clarity	An explanation should be offered as to why the total on Table 4.1-1 equals 80 million acres.	Table removed.			
116	Husari	Section 4.1.1 Land Management Regulation/page 4-2	Data	Include USFS 470,000 acres of refuge, most with FMPs, in Table 4.1-2 (see contact information in document)	USFWS added to the discussion Table 4.1-2 removed.			
117	Husari	Section 4.1.1 Land Management Regulation/page 4-3	Data	Update number of National Park Service areas in state	NPS number updated to 27.			
118	Wade	Section 4.1.1 Land Management Regulation/Page 4-5 Table 4.1-2	Written Clarity	It doesn't seem consistent to list the Sierra Nevada Conservancy as the "manager" of 25,000,000 acres. It clearly does not.	Table removed.			
119	Wade	Section 4.1.2 Analysis Introduction/Page 4–7 Table 4.1-3	Project Prioritization	"Example of Project Goals within Each Bioregion" I find this table to be very odd and not useful. It does not seem practical to generalize by bioregion, particularly when all have ample acreages of the three treatment areas, WUI, Fuel Break, and Ecological Restoration. The purpose of this table is not at all clear.	Table removed. This was just an example of what a particular area may focus on. It was designed to allow the public or any other stakeholder to help see how the PEIR may pay in varying bioregions.			
120	Rickert	Page 4-7 Table 4.1-3	Rangeland	Example of Project Goals within each Bioregion. Reduction of noxious weeds should be included in all Bioregions. For grazing purposes, noxious weeds can be an issue throughout the state.	This table has been removed at the request of other members.			
121	Husari	Section 4.1.2 Analysis Introduction/Table 4.1-3	Project Prioritization	This table needs more explanation. It implies that some goals are better addressed in some bioregions than others. Not sure why the table is here, but if it is retained its purpose should be explained.	Table removed. See Item 119.			

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122	Husari	Section 4.1.3 Major Tree, Brush, and Grass Vegetation Formation Review	Written Clarity	This section needs major revision. It is not consistent with the later section 4.2 (Biological Resources) and introduces information about the affected environment, effects and mitigations that should be placed in that section. The treatment of grass and timber is brief and not helpful and often inaccurate. The section on southern California chaparral should be shortened, checked for consistency with the biological resources section and the various citations should be presented together in a balanced way.	The discussion has been revised and should eliminate any inconsistency with Section 4.2. 2) Section 4.1.3.3.4 has been removed. This simply restated the requirements of BIO-5 that is already contained in Section 4.2.3 and removes any discussion of mitigations from this section. 3) The discussion of tree, shrub, and grass dominated vegetation subtypes have been expand to address all identified WHR types individually. (Also see Item 124, 125, and 126). This change should remove any inaccuracies and provides consistency between the discussion of each vegetation subtype. 4.) Sections 4.1.3.3.1, 4.1.3.3.2, and 4.1.3.3.3 have been move to new section 4.2.1.3 where this discussion flows better.	Patrick		
123	Husari	Section 4.1.3 Major Tree, Brush, and Grass Vegetation Formation Review	Chaparral	The biological resources section has a much better section on sagebrush, and also affects on chaparral in non southern California settings. The mitigations should be moved to the biological resources section.	Section 4.1.3.3.4 has been removed. This section was a restatement of BIO-5 which is included in 4.2.3.	Patrick		
124	Husari	Section 4.1.3.1 Life History Features for Tree-dominated Subtypes/Page 4-8	Written Clarity	The discussion in the biological resources is much more accurate and nuanced regarding long-need conifer subtypes.	Updated Life History Features for all CWHR vegetation types to include a short discussion on habitat, structure, composition, and methods of disturbance.			
125	Husari	Section 4.1.3.1 Life History Features for Tree-dominated Subtypes/Page 4-9	Data	Re: paragraph on short needle conifer subtype: Generally not true of many lodgepole stands in California, less cone serotiny, fire behavior more like other conifer stands. Could substitute closed cone pine as an example of short needled pines that exhibit strong serotiny and burn with infrequent high severity fire – bishop pine and Monterey pine for example.	Expanded The discussion of short-needled conifer subtype has been expanded. In addition, the "high-severity" fire regarding lodgepole pine has been changed to "mixed-severity.			
126	Husari	Section 4.1.3.1 Life History Features for Tree-dominated Subtypes/Table 4.1-4	Data	The montane hardwood type contains the majority of acres but its description is inaccurate. Most of the acres in the WHR type are canyon live oak and interior live oak, except for the acres in the Klamath/North coast which are madrone, tanoak and one deciduous species, Oregon white oak. This section could easily receive a longer discussion. The median FRI for montane hardwood is probably incorrect.	The median FRI came directly from the Fire Science Consortium and is assumed to be a credible value. The Team did not develop our own FRIs. However, language has been added to revised montane hardwood description to emphasize the species diversity.			
127	Husari	Section 4.1.3.3.1-4 (Chaparral and Fire)/Page 4-12 through 4-16	Written Clarity	Move to biological resources section, and reconcile with information in that section. Use common names.	This section has been moved to Section 4.2.1.3 and common names have been added to improve the readability of this discussion.	Patrick		
128	Husari	Section 4.1.3.3.4 Guidelines for Projects Located Outside the WUI…./Page 4-16	Chaparral	Define "old growth chaparral"	While old-growth forest has been well-defined, old-growth chaparral has not been defined as a commonly approved reference. Consequently, the reference to old-growth chaparral on page 4-14 has been removed.	Patrick		

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Item	Member	Section/Page	Category	Comment	Initial Response	10/6 Meeting Team Members Assigned	Oct 27 Notes	Oct 27 Response
129	Husari	Section 4.1.3.4 Rangeland Base and Ownership/Page 4-17	Rangeland	I am puzzled by this section. It seems out of place. It should be rewritten and should discuss the affected environment, the effects and the mitigations associated with the ranching community. A discussion of how private rangelands fit into the CMP and the VMP programs and how the concerns and management needs of ranchers will be addressed by the new VTP preferred alternative is lacking. There are no mitigations in this section. I would like to see a table that discusses the amount of SRA that is private rangeland and how much of it is available for treatment under the preferred alternative. This section could also be cross referenced to the section in biological resources on grazing and to the discussions of prescribed herbivory.	Please see Items 2, 21 and 34. More information is pending regarding rangeland including ranchers.	Kevin		
130	Husari	Section 4.1.3.4 Rangeland Base and Ownership/Page 4-17	Public Participation	The whole document is strangely silent on the role of landowners, and particularly on the role of ranchers in managing their own land.	Please see Items 2, 21 and 34. More information is pending regarding rangeland including ranchers.	Edith/Kevin		
131	Husari	Section 4.1.3.4 Rangeland Base and Ownership/Page 4-17	Public Participation	Stakeholders, as a general term, seems to be, in large part a term for people who don't have land ownership, but want to be involved in setting standards for people who do.	Agreed. Definitions have been added to the glossary regarding "Landowners" and "Stakeholders"			
132	Rickert	Page 4-20	Rangeland	Condition of Non-Federal Annual Grasslands. I question the sentence "Early assessments …… California's annual rangeland to be in "poor" condition." How long ago was this assessment completed and how was this conclusion drawn? I would question if this is an accurate statement. NRCS could confirm or contradict this statement with up to date information.	The early assessments where completed in the 90s. The Renewable Resources Planning Act and Soil and Water Resource Conservation Act both provided reports to Congress that California's annual rangelands to be in "poor" condition. This section is to help provide context and background; it is not stating that it is the current state of California rangeland.	Kevin		
133	Rickert	Page 4-22	Rangeland	References "downward pressure on prices…." Until most recently, cattle prices have been at an all time high. Research beef prices and this section may not be reflective of today's beef markets. There are two distinct markets in beef cattle. Number one is lean meat suitable for hamburger and the second is grain fed markets. Most of the imported beef is used for hamburger type products. The increased demand has been for grain fed beef. Grain fed beef will likely increase in demand and price due to the recent changes in tariff policies in Pacific Rim countries. The majority of California's beef is grain fed and of high quality. (Perhaps contact California Cattlemen's Association or the California Department of Food and Ag for a more accurate analysis of the California beef markets.)	Will update to more current information. Information provided was in reference to 2009 and prior.	Kevin		

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134	Husari	Section 4.1.4.1 Fuel Rank Potential Fire Behavior/Page 4-23	Project Prioritization	It is unclear to me how fuel rank was used in the analysis. The only thing I can gather from this discussion is that fuel treatments will be used in areas ranked moderate, high and very high in the WUI. A discussion of fuel rank determination and how it relates to the development of alternatives and acreage estimates for effects is needed.	This has been clarified in Section 4.1.			
135	Wade	Section 4.1.4.1 Fuel Rank Potential Fire Behavior/Page 4-23 and 4-24	Editorial	This is the first of a series of duplicative language from previous sections, as much of this section is verbatim from Section 2.2.2.1. Perhaps this is unavoidable; that the content of Sections 2 and 4 are so aligned that it's appropriate it should be the same. That said I would hope that we can make the time to review these and other areas where we've relied on duplicative language. In this case, perhaps it's the level of detail that is necessary to provide in Section 2 that can be reduced, and still serve the purpose.	Duplicative language removed for the most part. Some specific sentences are repeated.			
136	Husari	Section 4.1.4.1 Fuel Rank Potential Fire Behavior/Page 4-27, Table 4.1-12	Data	Very confusing table, and I think I know what it is about. Not sure how this relates to the topic.	Table has been removed.			
137	Husari	Section 4.1.4.2 Wildland Urban Interface/page 4-29	Written Clarity	Regarding "cost-distance function" used to create WUI buffer: This needs a much better explanation. Cost distance analysis. The changes in WUI buffers result in very large differences in what is available for treatment in different bioregions – It looks like the 1.5 buffer is used in the Klamath/North Coast and the Sierra/Cascade bioregions. More explanation of how this translates to next table where WUI acreage is displayed by bioregion is needed, and how the adjustment of buffers affects total acreage by bioregion is needed.	More detailed discussion of how the WUI was created is now present.			
138	Husari	Section 4.1.4.2.1 Wildland Urban Interface Zone of Influence/Figure 4.1-4	Written Clarity	This figure seems unnecessary. After all the complicated tables it seems overly simplistic. The concept that fire moves from WUI or into WUI from wildlands makes sense.	This section has been reorganized and the figure was retained. The connection to the context should be better.			
139	Husari	Section 4.1.4.3.1 Condition Class/page 4-36	Project Prioritization	It is very important here that we define condition class and discuss how ecosystems with too frequent fire were classified by FRAP during the mapping exercise.	Condition class is defined in the revision of Chapter 4 under Section 4.1.4.2.1.1 Condition Class. The VTP does not advocate that all areas in condition class 2 or 3 should be treated with prescribed fire. Condition Class 2 or 3 simply identifies that the area has deviated from the natural fire regime, be it positive or negative.			

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140	Husari	Section 4.1.4.3.1 Condition Class/page 4-36	Chaparral	Sagebrush in the Modoc Plateau – loss of the shrub component due to invasion of cheat grass and other annual grasses which allows more frequent fire than characteristic. And Southern California chaparral where human ignitions, habitat fragmentation and exotic annuals also have increased the fire frequency and degraded habitats, causing loss of important wildlife habitat, larger fires and threats to species that depend on these ecological types.	There is support indicating that Southern California shrublands fires are largely due to fire suppression policies leading to a lack of an appropriate distribution of shrublands age classes throughout the landscape. Shrublands fuel beds have evolved from a dispersed patchwork of varying age classes, which were resistant to fire spread, to landscape scale homogenous even-aged brush stands. Follow information is highlighted or added: The Modoc region, dominated by sagebrush steppe and the pervasive influence of exotic annual grasses, has largely lost its basic ecological integrity and future fires only exacerbate the problem. Similarly, the forested area of the Klamath/North Coast and Sierra regions are at risk due to unnaturally severe fires, where post-fire succession may result in loss of forested cover for decades without active reforestation efforts. Condition class does not distinguish between a negative and positive deviation but instead that there is a deviation. Therefore a local evaluation of the current conditions of the project area needs to be conducted to establish the most appropriate action for moving forward on a project level basis.			
141	Husari	Section 4.1.4.3.1 Condition Class/page 4-36	Project Prioritization	The section is vague and confusing on how condition class was actually translated into the FRAP layers and how this influenced the acres available for ecological restoration by bioregion.	More detailed discussion of Ecological restoration in relation to Condition Class is now presented.			
142	Husari	Section 4.1.4.3.1 Condition Class/page 4-38	Written Clarity	Both Table 4.1-17 and Figure 4.1.9 seems to imply, from the legend, that the map only covers condition class in forests. Not sure what is happening with non forest rangeland? Very confusing about what was mapped as what.	Clarifying language added to how condition class was utilized in creating the footprint.			
143	Husari	Section 4.1.4.4 Fuel Break/Figure 4.1-11	Written Clarity	I do not understand what the figure below has to do with fuel breaks. If you check Agee's book, this figure had nothing to do with fuel breaks. There are much better diagrams of shaded fuel breaks and how they affect fire dynamics that show how shaded fuel breaks affect fire behavior.	This was included to represent a value in a "shaded fuel break" concept. i.e. removal of understory vegetation has a benefit in ground fire effects and ladder fuel impacts. Context has been changes..			
144	Wade	Section 4.1.4.4 Fuel Break/Page 4-41	Editorial	The first paragraph states includes the sentence "The wide fuel breaks…are expected to assure successfully holding of firelines in most situations…" I would replace the word "assure" with "increase the chances of".	Language has been replaced.			

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145	Husari	Section 4.1.4.4 Fuel Break/Page 4-41	Project Prioritization	This section needs a rewrite. It is disorganized. It jumps around and has a long confusing section about whether fuel breaks work or not that is unnecessary. It should be linked to the section in the affected environment. The modeling is based on topography, but in general fuel breaks are rarely put in place except in areas where roads exist. It is important that the ESRI modeling be more clearly described. – Did suitable areas include both the existence of a road and a ridgeline or either/or? I would like to see a clear discussion of how the acres available for fuel breaks by bioregion were derived. Also link this to the discussion of the pros and cons of fuel breaks in the affected environment rather that speculating about it in the section on fuel breaks.	Section 4.1.4.3 now discusses Fuel Break modeling in detail.			
146	Husari	Section 4.1.4.4 Fuel Break/Page 4-41	Data	Need to include a section on spot fires when spotting distance exceeds the width of fuel breaks. This is not discussed and is generally, in my experience the reason that wildfires move across fuel breaks.	No changes to the PEIR are recommended by the Team. This appears to jump outside the scope of the PEIR and rest within wildfire tactics. Through the PEIR analysis and the requirements within the PSA and SPRs , burning condition are regulated on when conditions are best suited to have a prescribed fire burning window.			
147	Husari	Section 4.1.4.4 Fuel Break/Page 4-46	Project Prioritization	Lopping and scattering is generally not used in creation of fuel breaks. Add underburning, remove lopping and scattering. A better explanation of the ESRI modeling is needed. A discussion of how existing fuel breaks that need maintenance and how they were considered in the modeling is needed. A discussion of whether the modeling only used areas along roads is needed. How much connectivity between fuel break sections is implied in the modeling. The figure (4.1-14) makes the fuel breaks look very disconnected.	Section 4.1.4.3 now discusses Fuel Break modeling in detail.			
148	Husari	Section 4.1.5.1 Prescribed Burning/Page 4-49	Written Clarity	Very southern California centric. Review terminology and definitions for consistency with nationally accepted definitions. See the definition of "underburn" as an example. Broadcast burns are not defined. Jackpot burning – there are better definitions. This section is all over the place. Needs to be reorganized. A clear discussion of burn objectives and the methods used to meet burn objectives at both the landscape and project specific levels is needed. The effects section and mitigations section of the biological resources section does a better job of talking about the pros and cons of prescribed burning.	Portion of this request has been re-addressed. Burn objectives will be very dependent on the project scale needs. Describing them in additional detail here may mislead the public that there are only one set of standards for burn objectives and this may not provide the flexibility for local communities to build projects that support their needs.			
149	Husari	Section 4.1.5.1 Prescribed Burning/Page 4-51	Data	Check prescribed burning costs - seem low	Costs provided are for grasslands and shrublands, not forest treatments.			
150	Husari	Section 4.1.5.1 Prescribed Burning/Page 4-52	Written Clarity	Expand on information in required burn plans	Clarifying language added and references to section 4.12 for additional information added.			

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151	Husari	Section 4.1.5.2 Mechanical Treatments/Page 4-53	Written Clarity	Eliminate this discussion [of herbicides + mechanical treatment combinations]. How old it that chaining picture? Some of these photos are ancient and do not reflect current techniques – may be disturbing to many readers. I would substitute some more current photos which do not show this kind of damage and impacts. The photo of the feller buncher is good and it should be pointed out that it is being used over the snow to limit the impacts to soils. However, the use of feller bunchers is generally associated with commercial operations and would not be covered by the VTP.	Multiple statements. Ironically those are all recent photos. Some were provided in very poor quality. Several pictures have been swapped out.			
152	Husari	Section 4.1.5.3 Manual Treatments/Page 4-57	Written Clarity	This section seems to be more about weed control than manual fuel modification	In several locations the term weed was replaced with vegetation.			
153	Husari	Section 4.1.5.3 Manual Treatments/Page 4-58	Data	Revise [section on costs]. Discuss widespread use of CDC crews to do manual fuels work on Northern California.	Language has been added to this section however there is difficulty is detailing the amount of acres treated by crews on fuel reduction projects or any other since crew time is calculated by hours and not ground distance.			
154	Husari	Section 4.1.5.4 Herbicide Treatments/Page 4-60	Herbicides	I think the board should have a discussion regarding whether herbicide use should be covered by the programmatic document. It is controversial with much of the public in many areas of the state. I would much prefer seeing it analyzed using either a bioregion or project level CEQA document.	No proposed changes to the PEIR. This is a current tool available and used in many areas through out the State. If a local ordinance doesn't approve of Herbicide use then herbicides will not be a option for a project in that area. This is built into the PSA.		Board Chairman identified that this document shouldn't place itself in the middle of the herbicide debate that is politically charged at this time.	
155	Husari	Section 4.1.7 Analysis Summary/Page 4-64	Written Clarity	I am not sure what the purpose of this section is, except to allow the quantification of effects in future sections. It does not appear that the information was used to do that in most of the sections except the air quality section. Clarify that these estimates were created so that the effects sections could be created. The explanation is long and clunky.	No proposed changes to the PEIR. This was just a closing summary of 4.1 before we go into the break out of each CEQA item.			
156	Husari	Section 4.1.7 Analysis Summary/Page 4-66	Project Prioritization	I think that dividing the grassland treatments into low intensity treatments and high intensity treatments is very confusing. The distinction is that in the low intensity you are talking about underburning oaks and in grasslands without an overstory the burning is just grass. The intensity is not much different whether you are burning annual grass under oaks or annual grassland. The only difference is that you might use a different firing pattern in oak stands to reduce impacts on the trees.	Discussion mistake in the summary table generated on page 4-64. Removed "High Intensity" division for Grass.			

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157	Wade	Section 4.2.2.1 Significance Criteria/Page 4-100	Written Clarity	The prior-stated concern about the use of the term "special status species" arises again here. Depending on its definition, the sentence in the second-to-last paragraph reading "Under the Federal Endangered Species Act, activities may not result in the take, direct or indirect, of a special status species" may not be correct. This phrase as used on Page 4-101 is clearly not a species that is rare, threatened, or endangered, under FESA or CESA. The term is further used throughout the discussion of biologic resources.	"Special Status Species" definition added to glossary			
158	Wade	Section 4.2.2.1 Significance Criteria/Page 4-104	Written Clarity	In the first paragraph under the heading "Aquatic", the statement is made that 60,000 acres is .2% of the total acreage of California. This does highlight a recurring issue with adequately explaining whatever baseline or reference acreages for the topic being discussed. This is most likely total acres of SRA, since it computes to a total of 30 million acres. As California is over 100 million acres, this needs modification.	Sentenced clarified to include: 0.2 percent of the total acreage of SRA in California			
159	Husari	Section 4.3 Hydrology, Geology, and Soils	Environmental Analysis	Long section. I read it and it seemed logical. Not my area of expertise, but concerns are well described. Would be interested in comments from Board Members with hydrology background.	No proposed changes to the PEIR.			
160	Husari	Section 4.3 Hydrology, Geology, and Soils/Page 4-204	Environmental Analysis	Wondering why the section on biological resources discussed the impacts of more wildfire when fuel treatment is not done, but this section only considers the impacts of the fuel treatments.	Will revise this section to include the hydrogeomorphic impacts of high and moderate severity wildfire relative to those of fuel treatments.	Drew		
161	Husari	Section 4.3 Hydrology, Geology, and Soils/Page 4-208	SPRs	HYD-8: Kind of defeats the purpose of fuel treatment	Ground cover is still required to minimize the impacts of erosion from the projects proposed under this program. Particularly erosion that has immediate delivery to a watercourse. Onsite "mulched" material is native, local and provides that erosion control benefit.			

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162	Husari	Section 4.4 Air Quality	Data	The modeling in this section could be much improved. Discussion of creation of emissions from treatment should be modeled over the proposed season in which the projects will be implemented. The assumption that prescribed fires will reduce wildfire acres is not supported by modeling and is unlikely to occur from the very small amount of treatment that will occur. I don't think that this section will withstand any rigorous review. That being said it is nearly impossible to analyze program affects on a statewide scale.	Additional language has been added to the appendix section discussing the modeling. As previously stated above, the VTP is not meant to fix the problem but instead provide a mechanism to start the process. It is important to identify that the model is not saying prescribed fire will reduce wildfire acres. It is saying that emissions from a wildfire that burn with completely consumed fuels will differ from prescribed fires where there are constraints on burning conditions and thus fuels are not completely consumed.			
163	Husari	Section 4.4 Air Quality/Page 4-356	Data	Table 4.12-3 should also have a summary of attainment by air district.	A summary attainment table by air district is on pg. 4-357.			
164	Husari	Section 4.4 Air Quality/Page 4-368	Data	More explanation of how CONSUME was used to do this. CONSUME is intended for use for estimating emissions from discrete projects. Not generally used for programmatic estimates of emissions from prescribed fire.	More discussion added, along with the clarification to see Appendix H.			
165	Husari	Section 4.4 Air Quality/Page 4-376	Program Scope	Given the small scale of the proposed VTP program and the dispersed nature of the treatments I really think it is not likely that the fuel treatments would impact wildfire emissions on a significant scale.	Changes have been made regarding this reference. Please see Items 16, 71 and 105.			
166	Husari	Overall	Overall	I struggled with understanding the analysis methods when reading the text, both Chapters 2 and 4. It would be helpful to expand this section and go deeper to clearly define how the WUI layer was created. A section on condition class would be useful. And I am still not clear how/when fuel rank was used. A section on how WHR was converted and recombined to create the shrub, grass and forest categories would also be useful. As it is this is one of the better written sections. It needs expansion so the reader can understand the creation of the underlying geospatial layers.	Chapter 4, Section 4.1.4 has been expanded with a more detailed analysis of the modeling. Appendix A also has more information included on the analysis process.			
167	Farber	Page A-1	Written Clarity	The number of acres reported as treatable is 28 million, similar to chart on page 2-14, we need to clarify in Chapter 2 or Appendix A the number of treatable acres which is typically described as 24 to 25 million acres.	Section 2.2.2 introduction clarified the 31 million, 28 million, and final 24 million acre discussions.			

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168	Farber	Overall	Overall	Overall, the Appendix is well written and justifies the monitoring approach. As described on Page I-12, each project will have a monitoring checklist completed for the planning, implementation and completion phase. I think it would be helpful to add either compliance or implementation monitoring (and a brief description) to the list of monitoring types on Page I-2.	Language has been added.			
169	Husari	Overall	Overall	The glossary is an incomplete list of terms used in the document. Terms are somewhat randomly included. Many of the definitions in the glossary are different from the interagency NWCG glossary of fire terminology (October 2014). Definitions specific to relationships between agencies defined in agreements should be used. For example, the definition of DPA in the glossary does not agree with the definition in the 2015 CFMA, signed by CAL FIRE.	Definitions have been modified to reflect common terminology.			