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# Introduction

This Program Environmental Impact Report (PEIR) evaluates the environmental impacts of the proposed California Vegetation Treatment Program (CalVTP). It has been prepared according to the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.) under the direction of the California Board of Forestry and Fire Protection (Board) and in cooperation with the California Department of Forestry and Fire Protection (CAL FIRE). The Board is the CEQA lead agency. CAL FIRE, a CEQA responsible agency for implementing the CalVTP, has the primary responsibility for preventing and suppressing fires within the State Responsibility Area (SRA) (PRC Sections 4113 and 4125). Additionally, there are many local, regional, and state agencies with land ownership or land management responsibilities in the SRA that could also help implement proposed CalVTP vegetation treatments.

The proposed CalVTP defines the vegetation treatment activities and associated environmental protections that would occur within the SRA (Figure 1-1) to reduce wildfire risks as one component of the range of actions being implemented by the state to respond to California’s wildfire crisis. The state’s approach to the crisis includes an array of strategies, such as cost-effective home hardening, expanded evacuation capacity, comprehensive emergency planning, and improved land use practices, as well as investment in new suppression and response equipment and resources, use of technology tools, and establishment of strong utility oversight. Although an important part of the state’s approach, the increase in the pace and scale of vegetation treatment to reduce wildfire risk, as proposed under the CalVTP, is not a singular solution to the complex problem of resolving wildfire hazards.

## Purpose of The CalVTP

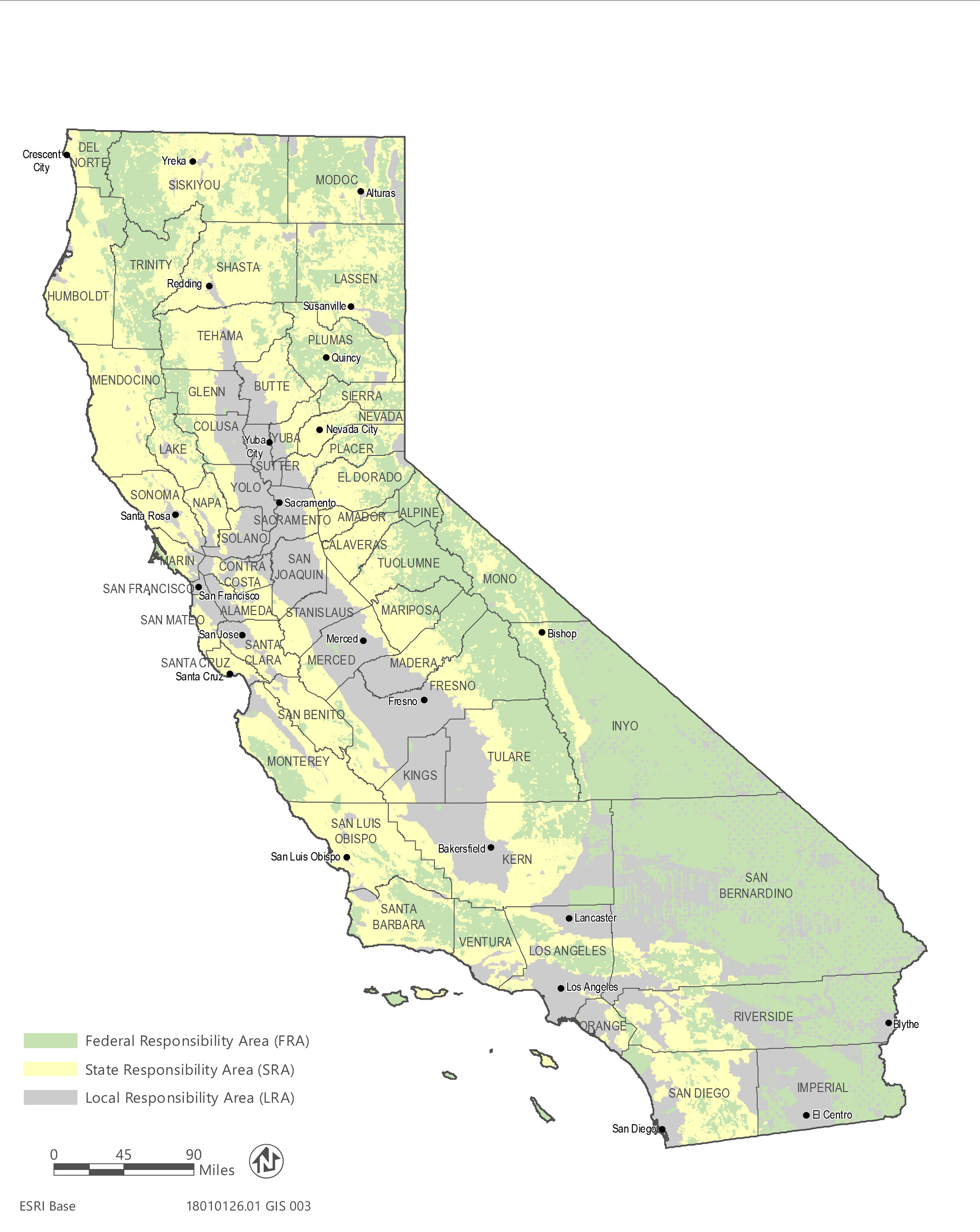
California is experiencing a wildfire crisis. As noted in a report of the Governor’s Wildfire Strike Force (2019):

**Climate change has created a new wildfire reality for California.** The state’s fire season is now almost year round. More than 25 million acres of California wildlands are classified as under very high or extreme fire threat. Approximately 25 percent of the state’s population—11 million people—lives in that high-risk area.

The effects of climate change and decades of fire suppression have been manifested on the landscape. Wildfire risk levels have been exacerbated by the location of developed land uses and communities in the high-hazard areas. In the last several decades, more than 75 percent of forested areas and other woody vegetation types burned less frequently than historic averages, resulting in the buildup of fire fuel (CAL FIRE 2017). Drought conditions, low snowpack accumulation, and extreme temperature highs have also been prevalent in the last decade and are expected to worsen as climate change continues to alter landscapes and local climates (NOAA 2018; IPCC 2018). Numerous communities are located within very high fire hazard severity zones (VHFHSZs). A survey by media firm McClatchy, overlaying the hazard zone maps onto 2010 census data, identified 75 towns and cities with populations over 1,000 that were entirely or almost entirely (at least 90 percent) within VHFHSZs (Reese 2019).

These conditions have resulted in the largest, most destructive, and deadliest wildfires on record in California history, all occurring in 2018. Fifteen of the state’s 20 largest wildfires have occurred since 2002. The 2018 Mendocino Complex, the state’s largest wildfire, burned 1.5 times as many acres as the next largest fire (CAL FIRE 2019a). Fifteen of the state’s 20 most destructive wildfires have occurred since 2003 (CAL FIRE 2019b). Ten of the state’s 20 deadliest wildfires have occurred since 2003, and the 2018 Camp Fire resulted in more than twice as many deaths as the next deadliest fire (CAL FIRE 2019c).

In addition to trends in the most severe fires, the total number and acreage of wildfires are important to recognize. Since 2010, the number of wildfires occurring annually has been increasing, as has the number of acres burned. Much of this increase in acreage, especially in 2017 and 2018, is the result of record-setting fires primarily driven by wind, such as the Thomas and Northern California wildfires (2017) and the Camp and the Mendocino Complex fires (2018).



Source: Data downloaded from CAL FIRE in 2018

Figure 1-1 Responsibility Areas

However, destructive fires primarily driven by wind are a small proportion of the thousands of fires that occur every year that do not reach catastrophic levels. Fires driven by topography and those that move more slowly through the landscape, as well as primarily wind-driven fires that have slowed, are those that might be further slowed or stopped entirely by a vegetation treatment implemented under the CalVTP.

Historically, California’s wildfires were less severe, burning fewer acres and destroying fewer structures by factors of two and three, respectively, when compared with modern fire statistics (CAL FIRE 2018a). Since 2000, the fire season has started sooner and extended further into the winter months. The fire sieges in October and December of 2017 serve as prime examples of the expanding fire season (CAL FIRE 2018b).

As environmental conditions become more conducive to larger and more severe wildfires, development in the wildland-urban interface (WUI) is also on the rise. A 2018 study indicates that the number of houses in the WUI increased nationwide by 41 percent between 1990 and 2010 (Radeloff et al. 2018), and it is estimated that approximately 25 percent of the state’s population (more than 11 million people) live in high fire-risk areas, including the WUI (Leventhal Center for Advanced Urbanism 2018). In response to these changing environmental conditions and the increased risk to California’s citizens, former Governor Brown issued Executive Order (EO) B-52-18, which mandates a substantial increase in the pace and scale of vegetation treatments in California to reduce wildfire risk. In addition, as discussed in Section 1.2, below, Governor Newsom has directed a strike force to develop a comprehensive strategy to address the wildfire crisis, including reducing the severity of wildfires through continued investments in fire mitigation, vegetation management, and other strategies to reduce fuels (Governor Newsom’s Strike Force 2019).

PRC Section 4125 requires the Board to classify all lands within the state for the purposes of determining areas where the state has the primary financial responsibility for preventing and suppressing wildfires, known as the SRA. PRC Section 4130 requires the Board to classify the land within the SRA based on land cover and develop a plan for the adequate protection of the SRA where all land cover types are assigned the same levels of protection. Later in this same article (PRC Division 4, Part 2, Chapter 1, Article 3, “Responsibility for Fire Protection”), PRC Section 4137 defines “fire prevention activities” as, among other activities, hazardous fuel and vegetation management and fire prevention engineering.

The proposed CalVTP directs the implementation of vegetation treatments to reduce wildfire risks and avoid or diminish the harmful effects of wildfire on the people, property, and natural resources as well as other assets at risk in the state of California. To counteract decades of fire suppression and mitigate the effects of climate change, vegetation treatments would be designed to reduce hazardous vegetative fuels, improve protection from wildfire through strategically located fuel breaks, and mimic a natural fire regime using prescribed burning. In addition, ecosystem restoration activities would be designed to approximate natural habitat conditions, processes, and values to those occurring prior to the period of fire suppression. The proposed CalVTP is one of the tools intended to achieve the mandated increase in the pace and scale of fire fuel reduction efforts across the state and respond to the wildfire crisis.

Vegetation treatment at the landscape scale is focused on reducing the likelihood of a ground fire increasing in intensity and helping fire responders more easily contain a fire. Certain wind and weather conditions lead to high-intensity, fast-moving, wind-driven wildfires. Although the most individually destructive, these extreme fires represent a small number of the total fires that occur each year. While vegetation treatments under the CalVTP may not be able to slow or halt the extreme fires, most fires that occur within the state are not highly wind driven, and the proposed vegetation treatments can help slow and suppress them. Vegetation treatments can also play a valuable role in containing the more extreme fires, when weather conditions shift, wind subsides, and fire intensity decreases.

The Board acknowledges that vegetation treatments, alone, will not solve the wildfire crisis. The proposed CalVTP is one element of the comprehensive response by federal, state, and local agencies, as well as community organizations and private citizens, to address wildfire risk statewide. Additionally, it would serve as the primary vegetation management component of the range of actions underway throughout the state to reduce risks to life, property, and natural resources as well as other assets at risk. Section 1.2 “Regulatory Framework,” Section 1.3, “Strategic Planning for Wildfire Risk Reduction,” and Section 1.4, “Existing Wildfire Risk Reduction Activities in California,” describe the broad regulatory and planning context within which the CalVTP would be implemented, and through which the Board, CAL FIRE, and others implement complementary programs to improve wildfire prevention, protection and resiliency in California. The following regulations, programs, and activities are described below:

###### Regulatory Framework

* Governing Regulations – PRC, Government Code, Health and Safety Code
* Executive Orders
* Governor Newsom’s Strike Force

###### Strategic Planning for Wildfire Risk Reduction

* *2018 Strategic Fire Plan for California*
* Forest Management Task Force
* Unit Fire Management Plans
* Community Wildfire Protection Planning

###### Existing Wildfire Risk Reduction Activities in California

* Vegetation Management Program
* California Forest Improvement Program
* Office of the State Fire Marshal programs
* CAL FIRE Land Use Planning Program
* CAL FIRE demonstration forests
* Fire and Resource Assessment Program
* federal agency fire prevention
* other state agency fire prevention
* local government fire prevention
* non-governmental organization fire prevention
* private landowner fire prevention

### Relationship to the Vegetation Treatment Program Draft PEIR

In November 2017, the Board released the Draft PEIR for the VTP. Since then, as described above, substantial increases in wildfire size, intensity, and destructiveness have occurred and are projected to continue. Additionally, legislation has been enacted and policy directives have been adopted to address the wildfire crisis through vegetation treatments that would require CEQA review. In response, the scale of acres proposed to be treated annually in the 2017 VTP Draft EIR has been increased in the proposed CalVTP PEIR. This CalVTP PEIR supersedes and replaces any prior version of the VTP PEIR, including the 2017 VTP Draft EIR. A Notice of Preparation (NOP) was distributed on January 30, 2019, to initiate a new CEQA process for the CalVTP PEIR, which was assigned a new State Clearinghouse number at the time the NOP was filed.

## Regulatory Framework

### Governing Regulations

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

The Board is also responsible for identifying VHFHSZs in the SRA and LRA. FHSZs within the SRA are shown in Figure 1-2. Local agencies are required to designate, by ordinance, VHFHSZs and to require landowners to reduce fire hazards adjacent to occupied buildings within these zones (Government Code Sections 51179 and 51182). The intent of identifying areas with very high fire hazards is to allow CAL FIRE and local agencies to develop and implement measures that would reduce the loss of life and property from uncontrolled wildfires (Government Code Section 51176).

PRC Sections 4114 and 4130 authorize the Board to establish a fire plan that, among other things, determines the levels of statewide fire protection services for SRA lands. The primary goals of the 2018 Strategic Fire Plan for California (Board and CAL FIRE 2018), described in Section 1.3.1, below, include both suppression efforts and fire prevention efforts.

PRC Section 4290 authorizes the Board to establish minimum fire safety standards for development in the SRA. These standards provide for defensible space relating to road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and standards for fuel breaks and greenbelts.

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

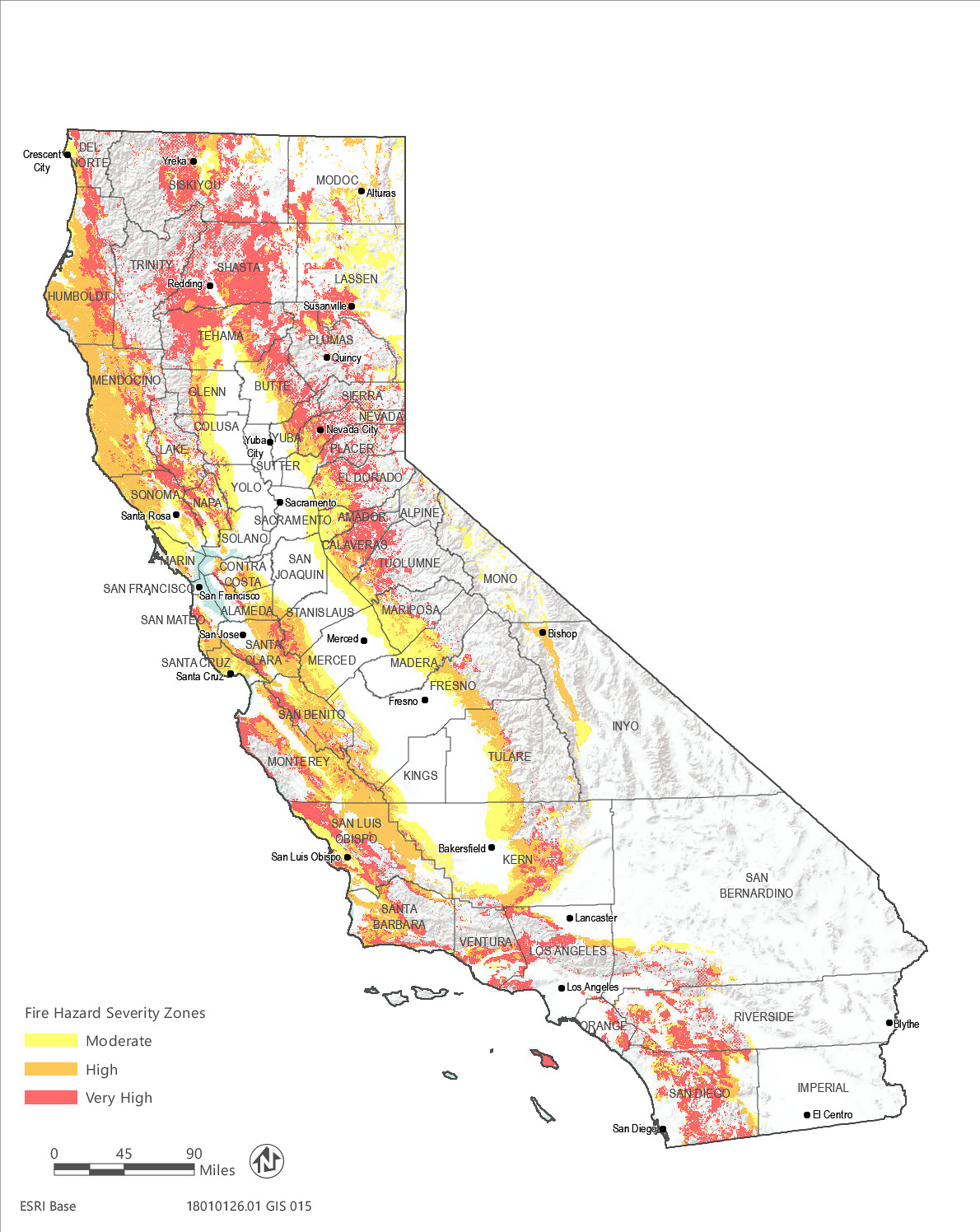
CAL FIRE implements vegetation treatments under PRC Sections 4475–4495. PRC Sections 4461–4471 and 4491–4494 authorize CAL FIRE to implement its existing Chaparral Management Program (CMP) (CAL FIRE 1981), now known, in part, as the Vegetation Management Program (VMP). In addition, with the 2005 passage of Senate Bill (SB) 1084, the Legislature modified and, in some cases, added language to PRC Sections 4475–4480 that:

* broadened CAL FIRE’s range of vegetation treatment practices beyond those described for the existing CMP and VMP,
* added a definition of “hazardous fuel reduction,” and
* made other changes to the major statutory provisions guiding CAL FIRE’s vegetation treatment authorities.

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

Government Code Section 65302.5 gives the Board the regulatory authority to evaluate General Plan Safety Elements for their land use policies in the SRA and VHFHSZs, as well as methods and strategies for wildland fire risk reduction and prevention in those areas, which includes projects potentially covered by this PEIR.

The Office of the State Fire Marshal is responsible for proposing fire prevention building standards (Health and Safety Code Section 13108.5) for roofs; exterior walls; structure projections, including, but not limited to, porches, decks, balconies, and eaves; and structure openings, including, but not limited to, attic and eave vents and windows, of buildings located in the Wildland Urban Interface Fire Areas as defined by California Fire Code Section 702A.



Source: Data received from CAL FIRE in 2019

Figure 1-2 Fire Hazards Severity Zones in State Responsibility Area

### Executive Orders

Former Governor Jerry Brown proclaimed a State of Emergency on October 30, 2015, related to the occurrence of extensive tree mortality throughout the state. Under this proclamation, Governor Brown directed CAL FIRE to complete specific tasks and acknowledged the partnerships that other agencies must have with CAL FIRE to achieve the goals set forth, as follows:

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

On September 1, 2017, Governor Brown issued EO B-42-17 to bolster the state’s response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state, by allowing Licensed Timber Operators to perform tree removal that previously required a tree service contractor’s license.

In response to the changing environmental conditions and the increased wildfire risk to California’s citizens, Governor Brown issued EO B-52-18 on May 10, 2018, for improving forest management and restoration, providing regulatory relief, reducing barriers for prescribed fire, boosting education and outreach to landowners, and supporting wood product innovation to reduce wildfire risk. Those directives especially pertinent to the CalVTP relate to improving forest management and restoration, providing regulatory relief, and reducing barriers for prescribed fire. They are excerpted as follows:

###### Improving Forest Management and Restoration

* CAL FIRE shall work with all relevant federal, state, and local agencies, California Native American tribes, and other affected parties to implement the forest practices called for in the Forest Carbon Plan.
* CNRA shall take all necessary steps to double the total statewide rate of forest treatments within 5 years to at least 500,000 acres per year. To accomplish this goal, the agency will work with CAL FIRE, the California Department of Parks and Recreation, the California Department of Fish and Wildlife (CDFW), the State Water Resources Control Board, state conservancies, and all other relevant agencies.
* CAL FIRE shall increase new landowner agreements and memoranda of understanding, such as Good Neighbor Authority agreements, to accelerate forest restoration thinning and prescribed fire projects across jurisdictions and shall integrate fire prevention activities into landscape forest restoration efforts in and near WUI areas.
* CDFW shall integrate the goals of EO B-52-18 in its restoration programs, mitigation-related land conservation, and conservation planning.

###### Providing Regulatory Relief

* CNRA, CAL FIRE, the State Water Resources Control Board and regional water quality control boards, CDFW, and CARB shall reduce barriers to entry for forest health and fuels reduction projects, including working with the California Coastal Commission to facilitate permitting in the coastal zone, reducing liability exposure for landowners, and providing financial and permitting assistance for landowners of under 5,000 acres.
* All relevant state agencies shall make cultural and biological resources data readily accessible online to accelerate the implementation and environmental review of fuels reduction projects.

###### Reducing Barriers for Prescribed Fire

* CARB, with assistance from local air districts and CAL FIRE, shall increase the opportunities for prescribed fire projects through coordinating staff and equipment availability, accelerate prescribed fire projects that are permit-ready, identify weather conditions suitable for prescribed fire, and institute a real-time air quality and smoke monitoring program for prescribed and wildland fires.
* CAL FIRE and CARB shall develop a publicly available online clearinghouse for permitting of prescribed fire projects on all non-federal lands, which shall include an automated system for prescribed fire project permit submission and approval.

In addition, on February 15, 2018, Governor Brown signed into law SB 1260, which improves California forest management practices to reduce the risk of wildfires in light of the changing climate, including provisions for this PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA.

On January 9, 2019, Governor Newsom issued EO N-05-19, directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires. With an emphasis on taking immediate actions to protect vulnerable populations, and recognizing a backlog in fuels management, the EO called for a strategic approach to focus actions on California’s most vulnerable communities to realize the greatest returns on reducing risk to life and property in the most fire-prone areas of the state.

Governor Newsom also proclaimed a State of Emergency on March 22, 2019, related to protecting the state’s most vulnerable communities from wildfire. Under this proclamation, Governor Newsom provides time-saving waivers of administrative and regulatory requirements to protect public safety and allow for action to be taken to begin to systematically address community vulnerability and wildfire fuel buildup through the rapid deployment of forest management resources. Thirty-five priority projects that were identified in response to EO N-05-19 were identified by geographic areas with populations that are particularly at risk during natural disasters. This proclamation directs CAL FIRE to immediately move forward with implementation of these priority projects.

### Governor Newsom’s Strike Force

In his State of the State Address, Governor Newsom established a strike force to develop a comprehensive strategy to address the destabilizing effect of catastrophic wildfires on the state’s electric utilities. The strike force was tasked with evaluating technology for ensuring safe and reliable power for the state, improving utility safety and accountability, improving wildfire response, and pursuing the state’s clean energy goals. An objective of this comprehensive strategy is also to reduce the severity of wildfires through continued investments in fire mitigation, vegetation management, and other strategies to reduce fuels. In April 2019, the strike force released a report entitled *Wildfires and Climate Change: California’s Energy Future* that provides a roadmap for addressing catastrophic wildfires. This roadmap includes recommendations for catastrophic wildfire prevention and emergency response, mitigation of climate change through clean energy policies, improved forest and vegetation management, acceleration of fuel reduction projects on both public and private land, fair allocation of catastrophic wildfire damages, a more effective California Public Utilities Commission (CPUC) with the tools to manage a changing utility market, and accountability for Pacific Gas and Electric Company to operate a utility that prioritizes safety (Governor Newsom’s Strike Force 2019).

## Strategic Planning for Wildfire Risk Reduction

As described above, the proposed CalVTP is one component of the overall strategy for reducing wildfire risk in California. Information on the strategic planning documents that guide wildfire risk reduction throughout the state is provided below.

### Statewide Strategic Planning

The major strategic planning documents that establish the vision, goals, and objectives of the Board and CAL FIRE are the *2018 Strategic Fire Plan for California* and Fire Management Plans/Strategic Fire Plans (Unit Fire Plans). These documents build upon one another and work together to improve the natural and built environment’s resilience and resistance to wildfire.

The *2018 Strategic Fire Plan for California* lays out central goals for reducing and preventing the impacts of fire in the state. This PEIR provides a framework for CAL FIRE to achieve the goals outlined in the *2018 Strategic Fire Plan* via implementation of a variety of vegetation treatment projects. The *2018 Strategic Fire Plan* includes the following goals:

* Improve the availability and use of consistent, shared information on hazard and risk assessment.
* Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities.
* Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans, such as Community Wildfire Protection Plans.
* Increase awareness and actions to improve fire resistance of human-made assets at risk and fire resilience of wildland environments through natural resource management.
* Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers.
* Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services.
* Implement needed assessments and actions for postfire protection and recovery.

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

The other major strategic document that establishes a set of tools for each CAL FIRE Unit or Contract County to achieve in its local area is the individual Unit Fire Plans. Updated yearly, Unit Fire Plans identify wildfire protection areas, initial attack success, assets and infrastructure at risk, prefire management strategies, and accountability within their unit’s geographical boundaries. The Unit Fire Plan identifies strategic areas for prefire planning and fuel treatment as defined by the people who live and work locally, which may or may not be projects eligible for CEQA coverage under the proposed CalVTP. The plans include contributions from local collaborators and stakeholders and are aligned with other plans for the area. Unit Fire Plans also function as Community Wildfire Protection Plans (CWPPs) and may contain all or some of the treatments outlined in individual CWPPs prepared by fire districts, other fire departments within the CAL FIRE Unit or Contract County, fire safe councils, or other entities. CWPPs are described in more detail below. Identification of CalVTP treatment activities in Unit Fire Plans is one way in which treatment activities would be implemented and linked to the comprehensively planned fire prevention activities within the CAL FIRE Unit or Contract County’s jurisdiction.

### Forest Management Task Force

The Forest Management Task Force (FMTF) was formed to increase the rate of forest treatments and expand state wood product markets through innovation, assistance, and investment furthering the goals of the California Forest Carbon Plan. The FMTF includes the following goals:

* Implement the Governor’s EO B-52-18 and the recommendations of the California Forest Carbon Plan.
* Strategically coordinate the state’s investments in forest health.
* Expand and improve forest management to enhance forest health and resiliency.
* Minimize regulatory barriers for prescribed fire, forest health, and fuels reduction projects.
* Expand the use of prescribed fire across public and private ownerships.
* Increase public education and awareness of the importance of forest health and resiliency to achieving California’s long-term climate, watershed, wildlife, economic, and public health goals.
* Encourage capacity building in forested communities to support implementation.
* Incentivize innovations in the forest product and building industries to use material from forest health and fuel reduction projects.

Several working groups implement activities under the FMTF, including Forest Management & Restoration, Regulations, Prescribed Fire, Landowner Education & Outreach, Wood Utilization, Tree Mortality, and Science Advisory Panel. Members of the FMTF include federal, state, and local agencies and tribes that have land management, funding, and/or permitting responsibilities for forestlands in the state, and CAL FIRE plays a key role in the FMTF (FMTF 2019). The CalVTP PEIR may be a tool to implement some of the recommendations and practices identified by the FMTF to achieve its stated goals.

### Community Wildfire Protection Planning

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

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

In addition to CWPPs and Fire Safe Councils, Board and CAL FIRE review of General Plan Safety Elements is another tool to promote fire safe planning in the state. As discussed above, the Board is obligated to review Safety Elements for counties and cities with SRA- or VHFHSZ-designated areas for the following information:

* a detailed history of fire activity in the planning area, as well as fire hazard severity zone maps;
* the planned land uses in VHFHSZs and SRA land;
* goals, policies, and objectives to protect the community from the unreasonable risk of wildfire; and
* feasible implementation measures to carry out those goals, policies, and objectives.

## Existing Wildfire Risk Reduction Activities in California

Wildland fire prevention can generally be categorized as some combination of hazardous fuel reduction projects, fire prevention planning, and fire prevention education. Wildland fire prevention in the SRA relies on a complex partnership between private landowners; homeowners; non-governmental organizations; and local, state, and federal agencies. Each partner has a unique and important role in the overall wildland fire prevention of California’s communities. These actions working in concert with one another provide the infrastructure that wildland fire suppression personnel may use to safeguard the people and protect the property and resources of California during a wildfire.

This section identifies the roles and responsibilities of CAL FIRE, private landowners, local governments, other state agencies, federal agencies, and non-governmental organizations.

### Existing CAL FIRE Programs

#### Vegetation Management Program

In the 1980s, the California State Legislature recognized that there had been an increase in the number of uncontrolled fires on wildlands in the state, resulting in destruction of important natural resources, loss of recreation opportunities, and an unacceptable level of hazards to public safety. The California State Legislature subsequently passed SB 1704, which established a fuel management program called the Chaparral Management Program (CMP). Portions of the CMP have since become the VMP, which is guided by the statutes created in SB 1704.

The current CMP reduces wildfire risk and enhances natural resources by treating the following vegetation types primarily on SRA lands where CAL FIRE is responsible for fire protection:

* coastal scrub habitat south of San Luis Obispo County;
* montane hardwood-conifer habitat north of Monterey County;
* mixed chaparral, montane chaparral, chamise-redshank, and valley foothill hardwood habitats throughout their range;
* annual and perennial grasslands intermixed with the above vegetation types; and
* mixed conifer forests and other timber types, such as those found in the Coast Ranges, Sierra Nevada, and Cascade Range (with additional CEQA review).

The CMP employs multiple mechanisms to treat vegetation, similar to the proposed CalVTP (e.g., prescribed fire, mechanical, manual). However, the CMP does not include the use of herbicides or mechanical mastication or treatments on forested lands, which are included in the proposed CalVTP.

Approximately 10.9 million acres are available for treatment under the CMP, and the CMP is authorized to treat a maximum of 120,000 acres annually (CAL FIRE 1981). Because of funding limitations and other factors (e.g., lack of suitable burn day conditions, cost and time to meet environmental review requirements, surveying for and mitigating treatment effects to threatened and endangered species, 3-year effective period for a CMP project), treatment has averaged approximately 7,000 acres per year. Upon certification, this CalVTP PEIR would support and supplement CAL FIRE’s existing CMP, so the acres treated through the existing CMP are encompassed in the projected treated acres of the CalVTP.

#### Public Resources Code Section 4291—Defensible Space

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

#### Other Fire Prevention Programs

As described below, CAL FIRE, the Board, and the Office of the State Fire Marshal provide wildfire prevention services to the state through various other programs, including State Demonstration Forest management, land use planning, public information, fire planning, risk analysis, and law enforcement:

* The Office of the State Fire Marshal provides support through a wide variety of fire safety responsibilities, including regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and reviewing regulations and building standards; and providing training and education in fire protection methods and responsibilities.
* Assembly Bill (AB) 2911 requires the Office of the State Fire Marshal, no later than January 31, 2020, in consultation with the Director of CAL FIRE and Director of Housing and Community Development, to recommend updated building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading, as specified, based on lessons learned from the wildfires of 2017 and to develop a list of low-cost retrofits that provide for comprehensive site and structure fire risk reduction, as provided.
* The CAL FIRE Land Use Planning Program engages with county and city planning and development departments to improve their comprehensive fire hazard planning in the General Plan Safety Element and other plans.
* CAL FIRE manages eight demonstration forests covering approximately 71,000 acres. Hazardous fuel reduction projects are regularly conducted either through timber management activities or with the use of hand crews.
* CAL FIRE conducts a robust suite of fire prevention public information campaigns through social media, school programs, fair exhibits, posters, flyers, and thousands of other printed materials, radio, television, and internet communications, community meetings, and one-on-one contacts with those who live, work, and recreate in wildland area.
* The Fire and Resource Assessment Program (FRAP) and local prefire engineers support wildland fire risk analysis with GIS products to spatially evaluate the wildland fire hazards in relation to resources at risk. These include fire hazard severity mapping, emergency evacuation planning, and historical fire data.

CAL FIRE uses trained peace officers to enforce state forest and fire laws. The enforcement responsibilities within the prevention program include fire investigations, criminal, and civil case management citations. CAL FIRE’s Civil Cost Recovery Program recovers fire suppression costs when a fire investigation reveals that a party caused the fire negligently or in violation of law. This serves the state in two ways: It assigns fire suppression costs to culpable parties rather than the taxpayers at large, and it serves as a deterrent to carelessness that can result in destructive fires.

### Federal Agency Fire Prevention

The U.S. Forest Service, U.S. Bureau of Land Management, National Park Service, and U.S. Fish and Wildlife Service manage lands in California. Some of these lands fall within State Direct Protection Areas, federal lands that the state has assumed primary fire protection services for efficiency of operations or are directly adjacent to SRA lands. These agencies are all active land managers and provide wildland fire prevention education to recreational visitors, conduct fire hazard reduction activities, and have regulations and enforcement staff to limit wildland fire starts (e.g., seasonal fire restrictions and spark arrestor requirements). These agencies may also administer grant programs for other organizations to conduct wildfire prevention activities.

### Other State Agency Fire Prevention

Other state agencies that own or manage large land areas within the SRA and are responsible for maintaining lands and treating hazardous vegetative fuels include California Department of Parks and Recreation or California State Parks (CSP), CDFW, Caltrans, Office of Emergency Services, California Department of Natural Resources, California Conservation Corps (CCC), California State Lands Commission, University of California system, California Department of Water Resources, and California State University system.

CSP manages 280 park units, many of which are in the SRA. These parks provide recreational activities for millions of Californians and other visitors each year. Recreation in wildland areas increases the risk of wildfire ignitions. CSP has visitor education campaigns and enforcement, such as fire restrictions and spark arrester requirements on off-highway vehicles, to reduce the incidence of fire starts. CSP also regularly maintains the vegetation around areas of highly concentrated recreation, such as campgrounds, to reduce wildland fire risks.

CDFW manages more than 600,000 acres of forest and rangeland in the state. Each property is managed for specific wildlife conservation goals and objectives identified within Land Management Plans that are periodically revised. Identified activities within these plans to accomplish conservation goals may include timber harvesting, hazardous fuel reduction, prescribed burning, or grazing. Fire prevention is a co-benefit of many of these activities.

Caltrans is responsible for construction and maintenance of the state’s highway system, which is commonly where wildland fire starts. These roads are generally wider than local roads and offer safe opportunities for fire suppression personnel to stage equipment and anchor suppression activities. Treatment of roadside vegetation to improve safety such as sight lines or useable road shoulders also provide fire prevention benefits by reducing the incidence of roadside fire starts.

The Governor’s Office of Emergency Services helps Californians prepare for disasters, including wildfire, through education and planning. They have also been tasked with preparation of the California Emergency Plan, which outlines statewide strategies to support local government efforts during large-scale emergencies.

Several conservancies within the California Natural Resources Agency protect lands and further the state’s conservation goals. In general, conservancies acquire lands of high conservation value or easements to these lands. They also administer grants or other incentive programs for landowners to provide conservation benefits within the conservancies’ defined geographic boundaries. Fire prevention may be a byproduct of the active land management for conservation, such as thinning for forest health by the Sierra Nevada Conservancy or using prescribed fire for noxious weed management by the Santa Monica Mountains Conservancy. Conservancies can also further the state’s public education about wildfire prevention through their websites or signage at recreational sites.

The CCC generally performs labor-intensive projects with hand and power tools for state, local, and federal agencies and for non-profit organizations to conserve or enhance the state’s natural resources. Some of the common fire prevention activities undertaken by the CCC include fire hazard reduction and roadside chipping.

### Local Government Fire Prevention

Local governments are responsible for land use planning and entitlement decisions, including permitting structures to be built in the SRA or LRA VHFHSZ. Building codes, including those requiring fire resistant materials and design, and the Fire Safe Regulations (PRC Section 4290) are enforced by local building inspectors. The California Building Standards Commission set forth a suite of regulations, known as Chapter 7A to the California Building Code, that set strict rules for roofing materials, siding, windows, decks and other elements of a home built in 2008 or later. In urban areas that have their own fire departments, the code is generally used only in areas designated by CAL FIRE as VHFHSZs. However, local governments have the discretion of rejecting the CAL FIRE designation.

Local agencies, such as Fire Protection Districts, may also participate in fire prevention education or be actively engaged in identifying and mitigating wildland fire hazards through development and implementation of CWPPs. Local governments may also help fund fire prevention activities of their local Resource Conservation Districts or Fire Safe Councils.

County road departments are responsible for much of the road systems in the SRA that provide for safe egress of residents and ingress for emergency responders. As part of general road maintenance activities, it is not uncommon for roadside vegetation to be controlled either mechanically (i.e., mower, masticator, or hand) or chemically. This can limit the spread of noxious weeds, reduce the receptive fuel bed for fire ignitions, and provide small firebreaks for suppression efforts. Counties may also manage county or regional park systems for recreation opportunity or open space protection. Wildland fire prevention is usually a general consideration within the overall management plans for these public lands.

### Non-Governmental Organization Fire Prevention

Federal, state, and local agencies are assisted in their fire prevention activities by other non-governmental organizations such as homeowner associations (HOAs), Fire Safe Councils, tribal governments, utility companies, and railroads.

HOAs may include fire safe landscaping requirements within their covenants, conditions, and restrictions, and may maintain community roads or green space areas for their residents. Fire Safe Councils may be state, county, or community organizations involved with wildland fire prevention education, planning, and project implementation. Their work is generally carried out with a combination of grant funding and community volunteers.

Tribal governments are responsible for land use decisions within the boundaries of their reservations. They may also manage their lands for resource outputs (e.g., timber harvesting, grazing) or for traditional resource needs (e.g., plant, fish, or wildlife habitat).

Utility companies that generate and distribute water, gas, and electricity maintain a vast network of facilities throughout the state. These utilities generally undertake regular vegetation management to reduce the risks of damage to their facilities from wildland fire. Vegetation management along electrical transmission lines is especially critical as the lines themselves are a source of wildland fires. PRC Sections 4292 and 4293 establish minimum required fuel breaks surrounding utility poles and power lines. Both requirements are enforced by CAL FIRE in SRAs during the fire season. CPUC General Order 95 establishes additional year-round clearance requirements below powerlines. CPUC Resolution ESRB-4 directs utilities to take additional measures to reduce the risk of fire, including increasing vegetation inspections; removing hazardous, dead, and sick trees and other vegetation near electric power lines and poles; sharing resources with CAL FIRE to staff lookouts adjacent to the utilities’ property; and clearing access roads under power lines for fire truck access. At the federal level, the North American Electric Reliability Corporation enforces Standard FAC 003-4, which mandates vegetation clearance near high-voltage transmission lines.

### Private Landowner Fire Prevention

As described above, homeowners have a statutory obligation to create defensible space within 100 feet of their home (PRC Section 4291) and to construct new homes, or remodel existing homes, in compliance with the fire-resistant standards found in the California Building Code (24 CCR). Homeowners also affect the wildland fire environment through improvements to their property, such as installation of landscaping, gardens, orchards, driveways, and outbuildings.

Larger private landowners can either reduce or increase the wildland fire hazards on their land through their land management activities. Activities such as timber management, grazing, and irrigated agriculture alter the composition, distribution, and abundance of vegetation on the landscape. The maintenance of roads to support these land management activities may provide access to fire suppression personnel during wildland fires. This diversity of ownership objectives and management activities provide opportunities for CAL FIRE to find willing landowners to conduct activities consistent with the objectives of the CalVTP.

## Purpose and Intended Uses of This PEIR

According to the State CEQA Guidelines (Section 15064[f][1]), preparation of an EIR is required whenever a project may result in a significant environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

CEQA requires that state and local agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less‐than‐significant levels, wherever feasible, the significant environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts that cannot be feasibly mitigated to less‐than‐significant levels, the project can still be approved, but the lead agency’s decision makers must prepare findings and issue a “statement of overriding considerations” explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Sections 21002 and 15093).

This document also functions as a Program EIR in accordance with State CEQA Guidelines Section 15168(c) for streamlining later activities. According to Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority, and having generally similar environmental effects that can be mitigated in similar ways. CAL FIRE or other project proponents (see definition in Section 1.5.2) must evaluate the later activities associated with each vegetation treatment project to determine whether such activities have been analyzed in this PEIR. Such evaluations must ascertain whether these future vegetation treatment projects are consistent with the activities contained in the CalVTP and would have effects that were analyzed in the PEIR. If the project proponent finds that the impacts were analyzed in the PEIR and no new or substantially more severe significant effects could occur or no new mitigation measures would be required for a subsequent treatment project, the project can be found to be within the scope of this PEIR. In this circumstance, no additional CEQA documentation would need to be prepared or publicly circulated (State CEQA Guidelines Section 15168[c][2] and [4]). The documentation used to substantiate the “within the scope” finding would provide the substantial evidence required to reach that conclusion. For the CalVTP, this documentation would be completion of the Project Specific Analysis checklist and provision of supporting studies (see Appendix PD-3 of this PEIR). The project proponent may act on the proposed later activity using this documentation and the PEIR for CEQA compliance purposes. If the later activity is approved, the project proponent would file a Notice of Determination.

Under this CEQA compliance approach, a project proponent must incorporate all standard project requirements relevant to the proposed activity and all feasible mitigation measures from the PEIR into the later activity, as needed, to address significant or potentially significant effects on the environment. A “within the scope” finding for later activities would facilitate an increase in the pace and scale of project approvals in a manner that includes environmental protections. If a proposed project is not within the scope of this CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance or in the conduct of a separate, independent CEQA review and documentation process. If a later EIR is prepared, it could be limited in its scope to the new or substantially more severe significant impact and could require additional CEQA documentation, as directed by State CEQA Guidelines Sections 15162. 15163, and 15168. Pursuant to State CEQA Guidelines Section 15168(d), a later negative declaration could be prepared if the new impact would be less than significant, or mitigated negative declaration could be prepared if the new impact could be clearly mitigated to less than significant. If a new or substantially more severe significant effect could not be clearly mitigated to less than significant, an EIR would be prepared that would focus on the new or substantially more severe significant impact(s).

### Lead Agency

As defined in State CEQA Guidelines Section 15367, a lead agency is the public agency that has principal responsibility for carrying out or approving a project. The Board is mandated, in part, to develop policies and regulations that contribute to fire prevention and recovery efforts throughout the state (PRC Section 740). The Board is also charged with identifying SRA land and developing rules and regulations that enable CAL FIRE to prevent, respond to, and control fire events in those regions (PRC Sections 4130 and 4137). The Board’s proposed discretionary action is approval of the CalVTP. After approval, implementation of the CalVTP would comprise planning and executing vegetation treatment projects within the treatable landscape. The treatable landscape within the SRA primarily encompasses private land (approximately 92 percent), on which CAL FIRE or counties under contract with CAL FIRE would implement vegetation treatments in coordination with the landowner accordance with their jurisdiction (PRC Sections 4113 and 4125).

### Responsible and Trustee Agencies

Under CEQA, responsible agencies are state and local public agencies other than the lead agency that have the authority to carry out or approve a project or that are required to approve a portion of the project for which a lead agency is preparing or has prepared an EIR.

There are many local, regional, and state agencies with land ownership or land management responsibilities on public land the treatable landscape that seek to reduce wildfire risk and would carry out vegetation treatments under the CalVTP. In this PEIR, a responsible agency is also referred to as a “project proponent,” which, for the purposes of this PEIR, is a public agency providing funding~~ed~~ for vegetation treatment ~~by CAL FIRE grants~~ or with land ownership, land ~~/~~management, or other regulatory responsibility~~responsibilities~~ in the treatable landscape and seeking to implement vegetation treatments consistent with this PEIR for CEQA compliance. The CalVTP PEIR will be available for the responsible agencies to use for CEQA compliance when they are seeking to approve treatment projects that are consistent with the CalVTP.

Agencies that own large portions of land within the SRA or may approve or issue permits for implementation of treatment activities under the CalVTP and are considered responsible agencies pursuant to CEQA and possible project proponents, are listed below. Other types of agencies that own or manage lands within the SRA that could act as responsible agencies (project proponents) under the CalVTP include state agencies, cities, counties, water and irrigation districts, conservation districts, park and open space districts, conservation agencies, community service districts, utility districts, flood control districts, water agencies, transportation authorities, cemetery districts, and airport districts.

Trustee agencies are state agencies with legal jurisdiction over natural resources affected by a project that are held in trust for the people of the state of California. Trustee agencies under the CalVTP include CSP, CDFW, the University of California, and the California State Lands Commission.

State and local agencies that may seek to approve or issue permits for implementation of treatment activities under the proposed CalVTP include but are not limited to the following.

#### State

* Baldwin Hills Conservancy
* CARB
* California Coastal Commission
* California Department of Conservation
* State Parks
* California Department of Pesticide Regulation
* California Department of Water Resources
* California Environmental Protection Agency
* CNRA
* California State Lands Commission
* California State University
* California Tahoe Conservancy
* California Wildlife Conservation Board
* Caltrans
* CDFW
* Central Coast Regional Water Quality Control Board (RWQCB)
* Central Valley RWQCB
* Coachella Valley Mountains Conservancy
* Colorado River RWQCB
* Lahontan RWQCB
* Los Angeles RWQCB
* North Coast RWQCB
* Sacramento-San Joaquin Delta Conservancy
* San Diego RWQCB
* San Diego River Conservancy
* San Francisco RWQCB
* San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy
* San Joaquin River Conservancy
* Santa Ana RWQCB
* Santa Monica Mountains Conservancy
* Sierra Nevada Conservancy
* State Coastal Conservancy
* State Water Resources Control Board
* University of California

#### Local

* Amador County Air Pollution Control District (APCD)
* Antelope Valley Air Quality Management District (AQMD)
* Bay Area AQMD
* Butte County AQMD
* Calaveras County APCD
* City and County of San Francisco - Public Utilities Commission
* City of Chula Vista
* City of Escondido
* City of Los Angeles Department of Water and Power
* City of Napa
* City of San Diego
* City of San Luis Obispo
* City of Santa Barbara
* City of Santa Clarita
* City of Santa Cruz
* City of Vallejo
* Colusa County APCD
* Contra Costa Water District
* County of Lake
* County of Lassen
* County of Los Angeles
* County of Monterey
* County of Orange
* County of Placer
* County of Riverside
* County of San Diego
* County of San Luis Obispo
* County of Santa Barbara
* County of Stanislaus
* County of Ventura
* East Bay Municipal Utility District
* East Bay Regional Park District
* Eastern Kern APCD
* El Dorado County AQMD
* Feather River AQMD
* Glenn County APCD
* Great Basin Unified APCD
* Helix Water District
* Imperial County APCD
* Kaweah Delta Water Conservation District
* Lake County AQMD
* Lassen County APCD
* Mariposa County APCD
* Mendocino County AQMD
* Midpeninsula Regional Open Space District
* Modoc County APCD
* Mojave Desert AQMD
* Monterey Bay Unified APCD
* Monterey County Water Resources Agency
* Monterey Peninsula Regional Park District
* Mountains Recreation and Conservation Authority
* Napa County Regional Park and Open Space District
* North Coast Unified AQMD
* Northern Sierra AQMD
* Northern Sonoma County APCD
* Placer County APCD
* Puente Hills Habitat Preservation Authority (Habitat Authority)
* Rancho Simi Recreation and Park District
* Riverside County Habitat Conservation Agency
* Riverside County Regional Park and Open Space District
* Sacramento Metropolitan AQMD
* San Diego County APCD
* San Dieguito River Park Joint Powers Authority
* San Joaquin Valley APCD
* San Lorenzo Valley Water District
* San Luis Obispo County APCD
* San Mateo County Parks and Recreation Department
* Santa Barbara County APCD
* Santa Clara County Parks and Recreation Department
* Santa Clara Valley Open Space Authority
* Santa Clara Valley Water District
* Santa Clarita Watershed Recreation and Conservation Authority
* Shasta County AQMD
* Siskiyou County APCD
* South Coast AQMD
* Sweetwater Authority
* Tehama County APCD
* Truckee Tahoe Airport District
* Tuolumne County APCD
* Ventura County APCD
* Vista Irrigation District
* Western Riverside County Regional Conservation Authority
* Yolo-Solano AQMD
* Yuba County Water Agency
* Yuima Municipal Water District

## CEQA Public Review Process

### Notice of Preparation

A NOP was distributed on January 30, 2019, to responsible agencies, trustee agencies, interested parties and organizations, and individuals that could have interest in the program, including public agency landowners owning 1,000 acres or more within the treatable landscape.

The NOP was available online at https://bof.fire.ca.gov/projects-and-programs/calvtp/. The Board held public scoping meetings on February 11 and 19 and on March 18, 2019, to provide information on the proposed CalVTP and solicit public input on the scope and content of the PEIR. Because of the statewide scale of the CalVTP, the scoping meetings were held in three locations throughout the state: Redding, Sacramento, and Ontario. All comments on environmental issues received during the NOP public comment period and at the scoping meetings are considered and addressed in this PEIR. The NOP and responses to the NOP are included in Appendix A of this PEIR.

### Draft PEIR

~~This~~The Draft PEIR ~~is being~~ was circulated for public review and comment for a period of 45 days from June 24, 2019, through August 9, 2019.

During the public review period, comments from the public, organizations, and agencies on environmental issues ~~may be~~ were submitted to the Board. Written comments ~~may be~~ were provided by email or mail carrier to the following address:

California Board of Forestry and Fire Protection  
Attn: Edith Hannigan, Land Use Planning Program Manager  
Email: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)  
Mail: P.O. Box 944246  
Sacramento, CA 94244-2460

### Final PEIR

Upon completion of the public review and comment period, ~~a~~ this Final PEIR ~~will be~~ was prepared that ~~will~~ includes ~~both~~ written ~~and oral~~comments on the PEIR received during the public review period, responses to those comments, and any revisions to the Draft PEIR warranted in response to public comments. ~~The Draft and Final PEIR will make up the PEIR for the CalVTP~~.

Before adopting the CalVTP, the lead agency, the Board, is required to certify that the PEIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the PEIR, and that the PEIR reflects the independent judgment of the lead agency.

## Organizational Structure of This PEIR

This PEIR is organized as follows:

**Chapter 1, “Introduction”:** This chapter provides a description of the purpose and background of the CalVTP, the regulatory framework and existing fire prevention activities in California, the purpose and intended uses of this PEIR, the CEQA public review process, and organization of this PEIR.

**Chapter 2, “Program Description”:** This chapter describes the program objectives and geographic scope and provides a description of treatment types and activities proposed under the CalVTP.

**Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures”:** The resource sections within this chapter evaluate the potential environmental impacts that could result from implementation of the proposed CalVTP. Within each section of Chapter 3, the existing environmental conditions (environmental setting), existing relevant regulations (regulatory setting), thresholds of significance, and analysis methodology and assumptions are described. The anticipated changes to the existing environmental conditions from implementation of the CalVTP are then evaluated for each resource. For any potentially significant impact that could result from program implementation, mitigation measures are presented, and the significance is determined with implementation of mitigation measures.

**Chapter 4, “Cumulative Effects”:** This chapter presents an analysis of the potential cumulative impacts that would result from implementation of the proposed CalVTP together with other past, present, and probable future projects.

**Chapter 5, “Significant Effects and Growth-Inducing Impacts”:** This chapter identifies the potentially significant and unavoidable impacts, significant and irreversible commitment of resources, and growth-inducing impacts that could result from implementation of the CalVTP.

**Chapter 6, “Alternatives”:** This chapter describes alternatives to the proposed CalVTP, including the No Program Alternative; identifies alternatives eliminated from detailed consideration; and identifies the environmentally superior alternative.

**Chapter 7, “List of Preparers”:** This chapter lists the preparers of this PEIR.

**Chapter 8, “References”:** This chapter identifies the references used as sources of information in this PEIR.