

Appendix A

Notice of Preparation and
NOP Comments

Notice of Preparation

To: Distribution List
From: Edith Hannigan, Land Use Planning Program Manager
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Subject: Notice of Preparation of a Program Environmental Impact Report for the California Vegetation Treatment Program

Introduction:

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

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

Under Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, a PEIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority, and having generally similar environmental effects that can be mitigated in similar ways.

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

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

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

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

Discretionary Action and Proposed Implementation Activities:

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

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

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

Program Necessity:

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

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

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

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

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

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

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

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

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

Program Description:

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

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

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

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

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

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

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

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

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

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

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

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

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

Program Area:

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

Probable Environmental Effects:

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

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

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

CEQA Scoping:

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

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

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

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

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

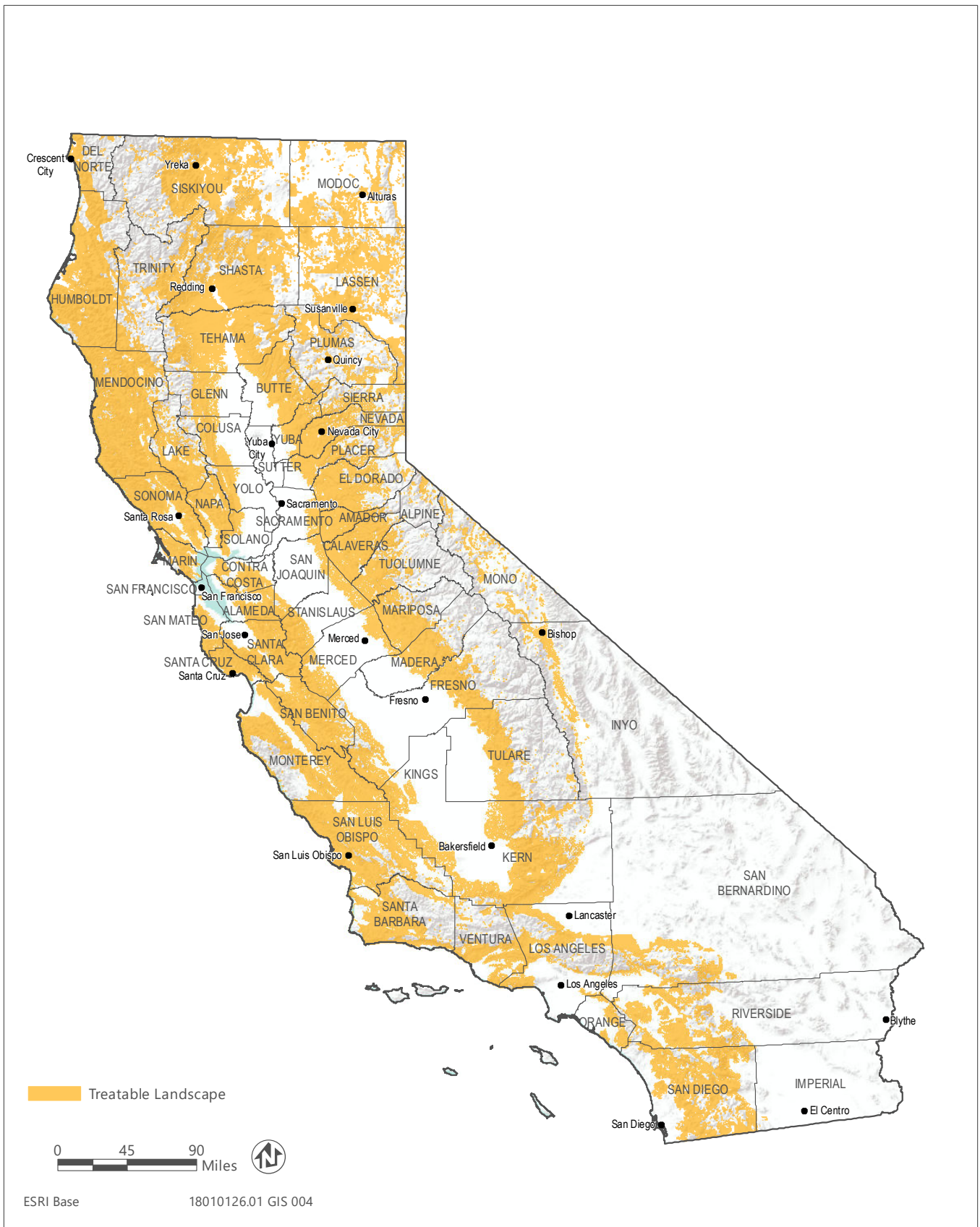
Special Agency Scoping Meetings: Pursuant to PRC Section 21080.4(b), responsible and trustee agencies have the right to request a meeting to determine the scope and content of the environmental information required. Please contact the Board at the addresses below to request such a meeting. Responsible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

Submittal of Comments:

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

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

The Board will also accept verbal comments from those physically attending the scoping meetings, but the Board will not accept comments submitted over the webinar during the meetings. The Board will also collect written comments at the scoping meetings. Because this is a new Program Environmental Impact Report, the Board will not be considering comments on other Draft PEIRs.



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

1/14/2019

Treatable Landscape

Figure 1

Table A-1 NOP Comment Summary

Commenter/Date	Summary	Addressed in Draft EIR Section
Received by Email/Letter		
Joan Brockman March 1, 2019	<ul style="list-style-type: none"> ▶ Supports recommendations enumerated in Chaparral Institute letter 	See California Chaparral Institute comment summary
California Chaparral Institute February 25, 2019	<ul style="list-style-type: none"> ▶ Expresses opposition to the “fuel-centric approach as described in the Notice of Preparation;” ignores the wind-driven fires that cause nearly all the devastation to our communities ▶ Questions the NOP’s “fundamental assumption that fire suppression is directly responsible for catastrophic wildfire ▶ Focus on wind-driven, fine-fueled, ember-generating fires ▶ Native shrublands have suffered from too much fire ▶ Treatments in CalVTP do not protect communities from embers from wind-driven fires and do not address fine fuels ▶ NOP ignores science from Jack Cohen demonstrating the wildfire problem is a home ignition problem, not a wildfire control problem” ▶ Ecological restoration projects only apply to limited areas such as lower elevation mixed conifer forests. ▶ Use scientific evidence rather than anecdotes ▶ NOP’s approach will make California more flammable by focusing on forested areas rather than human development; facilitate the movement of embers towards homes; increase the amount of flashy fuels; increase fire rate of spread; failing to address the most dangerous accumulation of dead fuels – homes ▶ The Board’s and CAL FIRE’s traditional approach to wildfire protection needs to change; offers 24 recommendations <ol style="list-style-type: none"> 1. Shift focus to save lives, property, and natural habitats instead of expecting to control wind-driven wildfires 2. Create separate, regional Program EIRs 3. Science-based defensible space 4. Require any WUI VTP project include structure and community retrofits 5. CAL FIRE should have a well trained and adequately staffed Defensible Space Inspection Program 6. Science-based defensible space compliant plant list 7. Train officials, fire marshals, and defensible space inspectors; draft EIR should set the framework to develop such a program as a mitigation process 8. Help with grants and retrofits 9. Reassess the efficacy of back country fuel modifications 10. Recognize that all chaparral is potentially threatened by excessive fire frequencies 11. Account for biodiversity in chaparral 	<p>1 Introduction & 2 Program Description</p> <p>Not a CEQA issue</p> <p>6 Alternatives</p> <p>3.6 Biological Resources</p> <p>Not a CEQA issue</p> <p>1 Introduction & 2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>3 Environmental Setting, Impacts & Mitigation Measures</p> <p>6 Alternatives</p> <p>Not a CEQA issue</p> <p>1 Introduction & 2 Program Description</p> <p>6 Alternatives</p> <p>1 Introduction</p> <p>1 Introduction & 6 Alternatives</p> <p>1 Introduction & 6 Alternatives</p> <p>1 Introduction</p> <p>1 Introduction & 2 Program Description & 6 Alternatives</p> <p>3.6 Biological Resources</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	12. Detail impacts	3 Environmental Setting, Impacts & Mitigation Measures
	<p>13. Consultation on chaparral treatments; treatments in old growth chaparral should be developed in consultation/agreement with CNPS</p> <p>14. Create fire risk maps; CAL FIRE hazard maps do not depict risk</p> <p>15. Reduce human-caused ignitions</p> <p>16. Comprehensive evacuation plans</p> <p>17. Climate action is fire prevention; CAL FIRE should maximize stations for PV solar production, electric vehicles, offset GHG emissions of emergency vehicles; stations should be retrofitted for energy and fire hardening</p> <p>18. Proper accounting of carbon sequestration; recalculate the potential increase in atmospheric carbon from the proposed program to account for the loss of below ground carbon sequestration in healthy chaparral communities due to fuel treatments</p> <p>19. Define terms</p> <p>20. Maintain consistency and research quality</p> <p>21. Increase transparency via a web-based public notification process for projects</p> <p>22. Plan for the future; base projects on projected climate change scenarios, not past anecdotal experiences</p> <p>23. Collaboration</p> <p>24. Peer-review; submit the draft EIR to an independent, science-based peer review process prior to its public release</p>	<p>2 Program Description & 3.6 Biological Resources</p> <p>Not a CEQA issue</p> <p>Not a CEQA issue</p> <p>1 Introduction</p> <p>Not a CEQA issue</p> <p>3.8 Greenhouse Gas Emission</p> <p>Chapters 1 through 6</p> <p>3 Environmental Setting, Impacts & Mitigation Measures</p> <p>1 Introduction & 2 Program Description</p> <p>3 Environmental Setting, Impacts & Mitigation Measures</p> <p>Not a CEQA issue</p> <p>Not a CEQA issue</p>
<p>California Invasive Plant Council March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Fuel modifications are important but present a risk of weed spread. The VTP should incorporate other aspects such as ignition reduction strategies and fire-safe landscaping. It's also important to recognize regional differences, especially in Southern California where wildfires are a result of wildfire-driven type conversion. ▶ The formal adoption of BMPs to reduce weed spread (see Cal-IPC's <i>Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers</i>). Comprehensively assess the disturbance from fuel breaks and fuel modification zones and work towards focusing them in areas that are already disturbed that help protect communities and that minimize disturbance-facilitated weed spread. ▶ The VTP should have a structure in place to address the funding required to implement strategic invasive plant management during post-fire recovery. The PEIR should evaluate the potential impact of delayed or deficient post-fire weed management activities. ▶ VTP should work with established collaborative groups to set a strategy for regional invasive plant management. Explicitly mention collaborative efforts such as Cal-IPC's work with CDFA and county-based Weed Management Areas and the 	<p>1 Introduction & 2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>Not a CEQA issue</p> <p>2 Program Description & 3.6 Biological Resources</p>

Table A-1 NOP Comment Summary

Commenter/Date	Summary	Addressed in Draft EIR Section
	<p>importance of working together with those managing other lands, including federal landowners and private landowners.</p>	
	<ul style="list-style-type: none"> ▶ Each region of California has significant invasive plant challenges to be addressed. We suggest that invasive plant management approaches be applied across the board in the design of the VTP. ▶ Recommend that the PEIR reflect the priorities of other relevant state plans, including the state’s strategic framework on invasive species, the California State Wildlife Action Plan, and the state’s new Biodiversity Initiative 	<p>3.6 Biological Resources</p> <p>3.6 Biological Resources</p>
<p>California Native Plant Society March 1, 2019</p>	<ul style="list-style-type: none"> ▶ California’s catastrophic wildfires and associated loss of life and property are as much a people problem (building codes, ignition sources, bad planning) as they are a vegetation program, and the NOP, the VTPEIR, and the VTP must acknowledge that. ▶ Clarify the purpose and need of the new VTP to avoid conflating two important but different goals: preventing homes and communities from burning, and returning forests to more natural conditions. ▶ Vegetation treatments beyond defensible space in chaparral and coastal sage scrub, eg 30’ to 50’ wide fuel breaks, can provide safer deployment opportunities for fire crews. Fire breaks provide no restorative or ecological benefit as can occur with forests and must be considered a natural resource sacrifice for the sake of strategic firefighting, and be mitigated for commensurate with program impacts. ▶ The VTPEIR must present maps of previous vegetation treatments, and data demonstrating the effect of the treatments on the goals it was expected to achieve...these data must be presented in the VTPEIR to demonstrate how vegetation treatments of various ages affected the behavior of wildfires. ▶ An effective VTP must be clear where and why vegetation treatments would occur in, around, and distant from communities. The NOP is not clear because it conflates treatment goals. ▶ Redefine treatment types based on whether they occur in predominately forest or chaparral/coastal sage scrub landscapes, on their proximity to life and property, and clarify the intended treatment outcomes for each type. ▶ The VTPEIR must define how project level analysis and review will be achieved and how the public will be able to participate in the process. ▶ CNDDDB is known to be incomplete and cannot be relied upon; current surveys of project sites are always necessary to determine what occurs there. ▶ VTPEIR must employ the most up to date vegetation maps and fire ecology of vegetation types in its selection of treatments, analysis of potential impacts to rare natural communities, and to 	<p>1 Introduction, 2 Program Description & 6 Alternatives</p> <p>1 Introduction & 2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>2 Program Description</p> <p>2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>2 Program Description/Appendix PD-3 Project-Specific Analysis</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>3.6 Biological Resources & 4 Cumulate Effects Analysis</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	<p>track cumulative impacts to plant communities as a result of VTP implementation.</p> <ul style="list-style-type: none"> ▶ Valid botanical surveys must be conducted under CDFW protocols and current state standard vegetation maps must be employed in order to analyze the kinds of impacts that may occur, and what types of avoidance, minimization, or mitigation of impacts might be necessary. 	<p>2 Program Description & 3.6 Biological Resources</p>
	<ul style="list-style-type: none"> ▶ The VTP must define how cumulative effects of projects implemented under the VTPEIR will be monitored and reported, how future conditions include climate change will be incorporated into project treatment assessment and analysis, and how the VTP will be adapted based on the findings of these analyses. 	<p>4 Cumulative Effects Analysis</p>
<p>Cal OES February 14, 2019</p>	<ul style="list-style-type: none"> ▶ The positive impacts of the CalVTP should be described in the PEIR due to the passage of AB 2782 (Friedman). ▶ Recommend using the new 2019 CEQA Checklist to address wildfire environmental considerations. ▶ Cal OES will share all available information relevant to the CalVTP as requested. 	<p>3 Environmental Setting, Impacts, & Mitigation Measures 3 Environmental Setting, Impacts, & Mitigation Measures Not a CEQA issue</p>
<p>Caltrans March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Include the State Highway System (SHS) Right-of-Way (R/W) for the scope of the CalVTP PEIR. ▶ Requests engagement with HQ Division of Maintenance – Forest Management Program, HQ Division of Environmental Analysis, and HQ Division of Traffic Operations – Encroachment Permits to outline fuels treatment project priorities, environmental compliance, and maintenance cycle to maintain defensible space within the SHS R/W ▶ Maintaining defensible space in the SHS R/W will require encroachment permits ▶ Include technical practices and procedures that will need to be further defined by District Maintenance, Environmental and Design staff ▶ Traffic safety concerns related to smoke from prescribed fire. Consider sight distance and logistics staging of workers, equipment, and activities ▶ Caltrans performs fire hazard control activities on roadside grasses, but additional fuels treatment is needed to address all level of fire fuels, which includes embankment protection and potential ditch debris removal. Requests collaboration with CAL FIRE to identify and partner on projects within VHFHSZ along highways. ▶ Transportation Management Plan should be prepared with Caltrans input to outline the process of minimizing projects related traffic impacts and delays associated with prescribed burns and vegetation control adjacent to SHS areas. ▶ Any work in a Caltrans R/W requires an encroachment permit 	<p>1 Introduction & 2 Program Description 1 Introduction & 2 Program Description 2 Program Description 2 Program Description & 3.15 Transportation 2 Program Description & 3.15 Transportation 1 Introduction 2 Program Description & Appendix PD-3 Project-Specific Analysis 1 Introduction & 2 Program Description</p>

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Committer/Date	Summary	Addressed in Draft EIR Section
	<ul style="list-style-type: none"> ▶ Request CAL FIRE engage with Caltrans District Traffic Operations and Permits staff for encroachment permits, impacts to SHS and its travelers, traffic control measures of other mitigation measures, and other requirements such as tree trimming and removal procedures. ▶ Provide hydraulics studies, drainage, and grading plans to Caltrans for review as required ▶ Consider soil displacement, including erosion, increased turbidity, and general soil stability. ▶ Address recent burn areas where potential debris flow near and adjacent to the SHS 	<p>1 Introduction & 2 Program Description</p> <p>1 Introduction, 2 Program Description, Appendix PD-3 Project-Specific Analysis</p> <p>2 Program Description, 3.7 Geology, Soils & Mineral Resources, & 3.11 Hydrology and Water Quality</p> <p>2 Program Description, 3.7 Geology, Soils & Mineral Resources, & 3.11 Hydrology & Water Quality</p>
	<ul style="list-style-type: none"> ▶ CAL FIRE will interact with Caltrans District Landscape Architect staff regarding tree removal or trimming within a Scenic Highway corridor. ▶ Consider cultural resources and Native American areas of special concern. ▶ Avoid impacts to State Owned Historic Resources. ▶ Address conflicts between CalVTP Objectives and existing laws and policies, such as emergency response protocols where HCP are established, locations subject to State Senate Resolution 1334 (Preservation of Oak Woodlands), where the Migratory Bird Act may be invoked, and how species of special concern, endangered, and threatened species may be affected ▶ Caltrans has BMPs to prevent the spread of pathogens, limit noise impacts to critical habitat areas, minimize erosion and sedimentation. ▶ Has concerns about changes in the roadside environment that may result in a less fire-resistant plant in the roadside environment, vegetation treatments that result in listed species eradication or proliferation, and more vehicle collisions with wildlife as a result of increasing grazing adjacent to roadways. 	<p>3.2 Aesthetics and Visual Resources</p> <p>3.5 Archaeological, Historic, and Tribal Cultural resources</p> <p>3.5 Archaeological, Historic, and Tribal Cultural resources</p> <p>3.6 Biological Resources</p> <p>2 Program Description</p> <p>2 Program Description</p>
<p>Center for Biological Diversity March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Change the direction of the VTP to create an effective, science-based plan that truly protects homes and lives from wildfire, while supporting forest and chaparral ecosystem health and the climate. ▶ Policies focused on fuels reduction are failing. Most home ignitions are caused by embers from wind-driven fires. Logging and thinning have degraded forest ecosystems, result in net loss of carbon storage, and take resources away from solutions that keep people safe. ▶ 1) prioritize effective fire-safety actions for home and defensible space; 2) place appropriate restrictions on the building of new developments in fire-prone areas; work from the home outward – do not thin beyond 100' from homes, thinning to reduce risk 	<p>1 Introduction & 6 Alternatives</p> <p>1 Introduction, 2 Program Description, & 6 Alternatives</p> <p>1 Introduction & 6 Alternatives</p>

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Committer/Date	Summary	Addressed in Draft EIR Section
	<p>to infrastructure or to establish evacuation routes must focus on vegetation within and immediately adjacent to those spaces.</p> <ul style="list-style-type: none"> ▶ Attached reports for Board to review related to implementing a home outward approach. 	6 Alternatives
<p>CDFW February 25, 2019</p>	<ul style="list-style-type: none"> ▶ CDFW as responsible and trustee agency ▶ Include a robust discussion of the environmental setting and baseline; identified thresholds of significance; a detailed, programmatic analysis of all potentially significant direct, reasonably foreseeable indirect, and cumulative impacts of the CalVTP; detailed discussion of feasible mitigation measures. ▶ Include alternatives to avoid, reduce, or substantially lessen related significant effects to the extent feasible. 	<p>1 Introduction & 2 Program Description</p> <p>3.6 Biological Resources & 4 Cumulative Effects Analysis</p> <p>6 Alternatives</p>
<p>Endangered Habitats League (1 of 2) February 20, 2019</p>	<ul style="list-style-type: none"> ▶ Current policies and practices are not working as intended. In chaparral and coastal sage scrub, modifying vegetation at a landscape scale distant from communities and structures is not and will not be effective in reducing fire hazard during wind driven fires. Focus on a 1) house-out approach and 2) curtail development in the WUI. ▶ Requests the Board and CAL FIRE meeting with fire ecologists and conservationists to find common ground. ▶ [in a footnote] Better define the exemptions to treatment restrictions and set reasonable distances from communities beyond which treatments would not occur. 	<p>1 Introduction & 6 Alternatives</p> <p>Not a CEQA issue</p> <p>1 Introduction, 2 Program Description, & 6 Alternatives</p>
<p>Endangered Habitats League (2 of 2) February 27, 2019</p>	<ul style="list-style-type: none"> ▶ Evaluate an alternative for scrub systems outlined by authors of the attached scientific article. Ignition prevention, wildfire suppression, land use and zoning, and home protection are all higher priorities for Southern California scrub systems. 	1 Introduction & 6 Alternatives
<p>UC Santa Cruz February 26, 2019</p>	<ul style="list-style-type: none"> ▶ Affirmation of intent to participate as a responsible agency under the CalVTP. 	1 Introduction
<p>UC Berkeley February 28, 2019</p>	<ul style="list-style-type: none"> ▶ Affirmation of intent to participate as a responsible agency under the CalVTP. 	1 Introduction
<p>Wayne Tyson March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Asserts that fuels reduction in wildlands is not the most effective way to manage fires in California because plants will grow back. ▶ Believes that we should instead focus on protecting homes and the WUI. ▶ Immediate ignition detection, rapid response times, and strategic use of air and ground suppression efforts are needed. ▶ Has concerns about prescribed burning and its effectiveness in potentially changing conditions, as well as how fuel structure, composition, and relationships are estimated. ▶ Has concerns about mastication because the chips produced may produce embers and because the fuel breaks may not stop wind-driven embers from spreading. Believes that graded firebreaks are ineffective as they sprout weeds. ▶ Believes that the most effective option is an on-site, automatic/remote-controlled fire suppression system. 	<p>2 Program Description & 6 Alternatives</p> <p>1 Introduction & 6 Alternatives</p> <p>1 Introduction & 6 Alternatives</p> <p>2 Program Description</p> <p>1 Introduction & 2 Program Description</p> <p>6 Alternatives</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
Sweetwater Authority March 1, 2019	<ul style="list-style-type: none"> ▶ Vegetation treatment surrounding essential infrastructure projects (e.g. dams and pump stations) should be included in the analysis and considered part of the scope of the VTP to ensure safe access to dams during fires and other emergencies. ▶ More clearly define the proposed methods of vegetation removal, mitigation measures to prevent watershed degradation and water quality impacts, and the dimensions of the fuel reduction zones and fuel breaks. ▶ Concerned about the erosion potential from burned slopes and the resulting sedimentation of water courses. Suggests that mitigation measures be taken for this and that post-fire recovery should promote native cover crop species to prevent erosion and invasive vegetation. ▶ Concerned about herbicide applications and the effect on drinking water resources. 	<p>2 Program Description & 3 Environmental Setting, Impacts & Mitigation Measures</p> <p>2 Program Description & 3.11 Hydrology and Water Quality</p> <p>2 Program Description, 3.11 Hydrology and Water Quality, & 3.6 Biological Resources</p> <p>3.11 Hydrology and Water Quality</p>
	<ul style="list-style-type: none"> ▶ Concerned that ecological restoration projects isn t defined well enough. 	<p>2 Program Description</p>
Nancy Summers February 11, 2019	<ul style="list-style-type: none"> ▶ Concerned that prescribed burning in forests will exacerbate effects of climate change. ▶ Concerned about reducing protective vegetation around water courses that reduce water temperatures and prevent erosion. ▶ Concerned about the potential for desertification and invasive species establishment as a result of intense erosion following treatments. ▶ Believes that research on the effects of prescribed burns near watercourses needs to be done before the project can be implemented without detrimental effects. ▶ Concerned about burning in the wintertime because Chaparral flowers in the winter and produces the food base for many wildlife species. ▶ Concerned about the use of pesticides because it will destroy wildlife habitat and may impact water quality. ▶ Suggests that CAL FIRE investigate further in each treatment area whether fuel reduction would actually make a significant difference. ▶ Suggests that CAL FIRE do a cost-benefit analysis of the VTP. ▶ Cites a previous VMP escape and feels that there needs to be environmental oversight of CAL FIRE unit staff to prevent improper implementation. They also suggest that there needs to be a clear definition of what enforcement will look like to ensure that implementation is done properly and mitigation measures are followed. ▶ Believes that funding should be provided to sister-agencies to monitor the effects of CalVTP Projects. 	<p>3 Environmental Setting, Impacts, & Mitigation Measures</p> <p>2 Program Description & 3.11 Hydrology and Water Quality</p> <p>2 Program Description, 3.6 Biological Resources, 3.7 Geology, Soils, and Mineral Resources, & 3.11 Hydrology and Water Quality</p> <p>3.6 Biological Resources & 3.11 Hydrology and Water Quality</p> <p>3.6 Biological Resources</p> <p>3.6 Biological Resources & 3.11 Hydrology and Water Quality</p> <p>1 Introduction & Appendix PD-3 Project-Specific Analysis</p> <p>Not a CEQA issue</p> <p>1 Introduction & 2 Program Description</p> <p>Not a CEQA issue</p>
State Lands Commission March 1, 2019	<ul style="list-style-type: none"> ▶ Affirmation of intent to participate as a responsible agency under the CalVTP. 	<p>1 Introduction</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	<ul style="list-style-type: none"> ▶ Requests to be consulted in the preparation of the Draft PEIR as required by CEQA section 21153, subdivision (a), and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2). ▶ Is concerned about the “programmatic level of the EIR; states that the PEIR needs to provide specific, feasible, enforceable mitigation. The PEIR should distinguish between activities and mitigations that don’t require additional environmental review and activities that do require additional analysis. ▶ Would like the Program Description to be as specific as possible to enable appropriate analysis and identification of locations under responsible agency’s jurisdictions. ▶ Suggests that CNDDDB and the Special Status Species Database be consulted in addition to collaborations with CDFW, USFWS, and NMFS to determine where Sensitive Species fall within the project area and how to mitigate any impacts on those species. ▶ Suggests that the PEIR specifically address whether treatment activities can occur near or within submerged lands, lakes, and waterways and any impacts to these areas. 	<p>1 Introduction & 2 Program Description</p> <p>3 Environmental Setting, Impacts & Mitigation Measures & Appendix PD-3 Project-Specific Analysis</p> <p>2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>3.11 Hydrology & Water Quality & Appendix PD-3 Project-Specific Analysis</p>
	<ul style="list-style-type: none"> ▶ Suggests that a GHG emissions analysis consistent with the California Global Warnings Solutions Act should be done and included in the PEIR, or that a discussion of how GHG emissions will be addressed in future individual project analysis should be included. ▶ Suggests that the Board partner with interested tribes to obtain information and recommendations regarding traditional burn practices and vegetation management. 	<p>3.8 Greenhouse Gas Emissions</p> <p>3.5 Archeological, Historical, and Tribal Cultural Resources</p>
Stanislaus County February 15, 2019	<ul style="list-style-type: none"> ▶ No comments at this time. 	Not a CEQA related issue.
Peter St. Clair January 31, 2019	<ul style="list-style-type: none"> ▶ Suggests that three separate EIRs are needed – one for Northern California and forested areas; one for Central California including foothills and moister chaparral communities; one for Southern California, chaparral, coastal sage scrub, and desert lands. ▶ Suggests that the number of acres in the treatable landscape should be significantly reduced because vegetation treatment in largely uninhabited areas doesn’t protect structures and access and believes that the focus should instead be placed on bolstering defensible space. ▶ Clearly state the alternatives to vegetation treatment and analyze them. States that the alternatives analysis in previous EIRs was not adequate. Includes as alternatives: broader enforcement of PRC 4291 and broader mandates for creation and upgrade of safe structures, new and existing; changes in local planning protocols that allow structures to be built in WUI and extension of WUI into previously undeveloped lands; “shelter in place” WUI communities. ▶ Suggests implementation of PRC 4291 sections for safer buildings; cleared space where shrubs and trees are left in place and properly maintained to prevent blowing embers from 	<p>3.1 Approach to Environmental Analysis & 6 Alternatives</p> <p>1 Introduction & 2 Program Description</p> <p>1 Introduction & 6 Alternatives</p> <p>1 Introduction & 6 Alternatives</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	reaching buildings is a better means of preventing loss of life and property;	
	<ul style="list-style-type: none"> ▶ Utilize scientific information from insurance company investigations, LA county FD research, and research by the federal government such as UC Riverside Fire Lab and USGS. 	1 Introduction
David Spak February 20, 2019	<ul style="list-style-type: none"> ▶ Questions regarding the development of herbicide treatments: will invasive brush, grasses, or both be treated; who will make those decisions; who will make the applications. ▶ Offered assistance with extended preemergence options (Esplanade 200SC and Esplanade F). 	2 Program Description, 3.10 Hazardous Materials, Public Health & Safety, & Appendix PD-3 Project-Specific Analysis Not a CEQA related issue
Rancho Simi Recreation and Park District February 8, 2019	<ul style="list-style-type: none"> ▶ No comments at this time. 	Not a CEQA related issue
Northcoast Environmental Center February 28, 2019	<ul style="list-style-type: none"> ▶ Support all fuel treatment methods except the use of chemical herbicides and suggest that creating a stable workforce of trained workers for creating and maintaining roadside shaded fuel breaks is the best long-term solution. 	2 Program Description & 3.10 Hazardous Materials, Public Health & Safety
Native American Heritage Commission February 14, 2019	<ul style="list-style-type: none"> ▶ Outlines the rules and regulations related to tribal consultation for CEQA documents. ▶ Outlines recommended actions for avoidance, preservation, or mitigation of tribal cultural resources 	3.5 Archeological, Historical, and Tribal Cultural Resources 3.5 Archeological, Historical, and Tribal Cultural Resources
Metro Water District of Southern California February 27, 2019	<ul style="list-style-type: none"> ▶ Requests to be kept informed of the progress of the EIR as it may impact their current fire and vegetation management practices. 	1 Introduction
Betsey Landis March 1, 2019	<ul style="list-style-type: none"> ▶ Is concerned that conditions are too erratic now for prescribed burning to be a safe and effective form of treatment. ▶ The shrublands of Southern California have been too frequently burned and this, among other impacts, is affecting the biodiversity and ecosystem health of these areas. ▶ Laws to govern the disposal of organic waste are being developed and they will preclude debris from prescribed fires from being taken to landfills; they must be taken to composting or other businesses for processing and if they are infested they must go to a California Food & Ag center. ▶ Recommends removing prescribed burning from the CalVTP. ▶ No treatment should be done without a thorough understanding of native plants being treated and how to help foster biodiversity after burns. 	2 Program Description, 3.4 Air Quality, & 3.17 Wildfire 3.6 Biological Resources 2 Program Description & 3.16 Public Services, Utilities & Service Systems 6 Alternatives 2 Program Description & 3.6 Biological Resources
Susan Krzywicki February 26, 2019	<ul style="list-style-type: none"> ▶ Ms. Krzywicki cites comments from the Chaparral Institute's letters of 2016 and 2017. ▶ Please look at better spatial data, and consider that wildfires are not the result of the plants, but of the humans. Solutions should be based on the restraints of humans, not the destruction of the very species that belong here - and need to be here in order to keep any semblance of a healthy ecosystem. 	See responses to Chaparral Institute letter above. 1 Introduction & 6 Alternatives

Table A-1 NOP Comment Summary

Commenter/Date	Summary	Addressed in Draft EIR Section
<p>Peter Gruchawka February 25, 2019</p>	<ul style="list-style-type: none"> ▶ Concerned about health effects of prescribed fire and the “accelerants” being used. Concerned about air pollutants in smoke. ▶ Concerned about the impacts of accelerants on waterways and watersheds. ▶ Suggests that the science behind the VMP is outdated and that the VMP should be discontinued and studied for adverse effects on the environment. ▶ Concerned about how property lines will be determined and what may happen to endangered and threatened species if neighboring parcels are protected areas for these species. ▶ Concerned about project effects on air and water quality. ▶ Concerned about project implications for climate change. ▶ Concerned about the cumulative effects of all vegetation treatment programs across the state that occur in different agencies and suggests that those effects should be studied including impacts on wildlife, plants, water and air quality, visual and aesthetic resources, recreation, soils, and invasive weed spread. ▶ Concerned about the effects of the CalVTP on insect populations. ▶ Concerned about the effects of prescribed burns on wildlife and the 6th mass extinction. 	<p>2 Program Description, 3.4 Air Quality, 3.10 Hazardous Materials, Public Health & Safety</p> <p>2 Program Description, 3.6 Biological Resources, & 3.11 Hydrology and Water Quality</p> <p>2 Program Description & 3 Environmental Setting, Impact, & Mitigation Measures</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>2 Program Description, 3.4 Air Quality, & 3.11 Hydrology & Water Quality</p> <p>3.8 Greenhouse Gas Emissions</p> <p>4 Cumulative Effects Analysis</p> <p>3.6 Biological Resources</p> <p>3.6 Biological Resources</p>
	<ul style="list-style-type: none"> ▶ Concerned about transparency of projects and public ability to view adequate records of vegetation treatment. ▶ The PEIR should find a determination of significant impacts due to its size and proposed methods. ▶ Is concerned about improper implementation by crews and believes that this possibility should be thoroughly considered and the impacts of this outcome documented. ▶ The project should include and review the following alternatives: a scaled down version; staging fire crews proactively instead of responding reactively; assisting PG&E with vegetation clearance around power lines instead of the currently proposed vegetation treatment. ▶ Citizens have the right to have individual projects evaluated under CEQA. ▶ Include methodology for monitoring compliance with mitigation measures on individual projects. 	<p>1 Introduction</p> <p>5.1 Significant and Unavoidable Impacts</p> <p>Not a CEQA issue</p> <p>1 Introduction & 6 Alternatives</p> <p>1 Introduction, 2 Program Description, & Appendix PD-3 Project-Specific Analysis</p> <p>3 Environmental Setting, Effects, and Mitigation Measures & Appendix PD-3 Project Specific Analysis</p>
<p>Audrey Fusco February 7, 2019</p>	<ul style="list-style-type: none"> ▶ Concerned about destruction of habitat from prescribed burns and pesticide applications. 	<p>2 Program Description & 3.6 Biological Resources</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	<ul style="list-style-type: none"> ▶ Proposes a better land management plan in lieu of the CalVTP that includes native vegetation. 	1 Introduction & 6 Alternatives
Jerry Fisher March 1, 2019	<ul style="list-style-type: none"> ▶ Proposes an alternative method of fire prevention – No ignition” system during Santa Ana Winds, volunteer fire fighters stationed at strategic locations, camera equipment, and road closures. 	6 Alternatives
Anne Fege February 28, 2019	<ul style="list-style-type: none"> ▶ Greater focus needs to be placed on structural hardiness for reducing flammability, improved alerts and evacuation procedures, plans for suppression, and fuel reduction to facilitate suppression actions. ▶ Approve of the use of fuel breaks and defensible space measures to control fires in the WUI. ▶ Suggests that homes are the most flammable substance and that defensible space of 100ft is the best tool to combat loss of life and property. More clearing is detrimental as it allows the establishment of flammable weeds and erosion. ▶ Concerned about scientific support for the treatment methods and alternatives considered. ▶ Fuel breaks should be selected from Unit Fire Plans and Community Wildfire Protection Plans. ▶ Engaging the public is an important piece of developing the PEIR. ▶ CAL FIRE should maintain an online list of proposed, current, and completed projects in each unit with project plans and schedule public meetings and comments. ▶ Climate change impacts on the growth of vegetation and the response of vegetation to prescribed fire must be considered. 	<p>1 Introduction & 6 Alternatives</p> <p>2 Project Description</p> <p>1 Introduction & 6 Alternatives</p> <p>2 Program Description & 6 Alternatives</p> <p>1 Introduction & 2 Program Description</p> <p>1 Introduction</p> <p>1 Introduction</p> <p>2 Program Description, 3.8 Greenhouse Gas Emissions, & 3.17 Wildfire</p>
Farm Bureau February 28, 2019	<ul style="list-style-type: none"> ▶ Include grazing in the CalVTP as a fuels reduction tool. ▶ There are significant fuel loads on lands managed by CDFW and the California State Parks that require annual treatment. These lands were actively grazed in the past and grazing on these lands should be included as a covered activity under the CalVTP. ▶ Suggests that the Board investigate both the positive and negative impacts on water quality and quantity – increased by reducing the amount of vegetation taking up water, decreased by the risk of erosion. ▶ Believe that the CalVTP activities will generate a net decrease in greenhouse gas emissions by preventing large, severe wildfires and decomposition of woody biomass post-fire. 	<p>2 Program Description</p> <p>2 Program Description</p> <p>3.11 Hydrology and Water Quality</p> <p>3.8 Greenhouse Gas Emissions</p>
Sonoma State University March 6, 2019	<ul style="list-style-type: none"> ▶ Will there be funding available to support projects? ▶ What is the treatable landscape area specific to Sonoma State University? ▶ What are the recommendations of treatment types and activities specific to Sonoma State University properties? 	<p>Not a CEQA issue</p> <p>2 Program Description</p> <p>2 Program Description</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
	<ul style="list-style-type: none"> ▶ Will there be an inspection sheet to obtain State Fire Marshal approval and to record work carried out? 	2 Program Description & Appendix PD-3 Project-Specific Analysis
CSU San Bernardino February 27, 2019	<ul style="list-style-type: none"> ▶ Notify and coordinate with CSU San Bernardino if herbicide application is necessary on or around the campus or of plans to reduce vegetation near the campus. 	2 Program Description, 3.10 Hazardous Materials, Public Health & Safety, & Appendix PD-3 Project-Specific Analysis
County of Santa Clara Parks and Recreation February 28, 2019	<ul style="list-style-type: none"> ▶ Request that the County of Santa Clara Parks and Recreation Department be included in the PEIR section G.2 and table G.2.1 and included in the project scope as a treatable recreational area. 	1 Introduction & 3.14 Recreation
County of Santa Barbara Planning and Development Department February 25, 2019	<ul style="list-style-type: none"> ▶ Ensure that fuel treatments in Santa Barbara County are tailored to the characteristics of the vegetation communities that occur, the spatial distribution of developed communities, and the changing conditions that can worsen fires. ▶ The PEIR should account for differences in fire frequency regimes in different vegetation types – particularly for chaparral and coastal sage scrub – and tailor the evaluation of impacts and mitigation appropriately. 	2 Program Description & Appendix PD-3 Project-Specific Analysis 2 Program Description & 3.6 Biological Resources
Santa Barbara Fire Department February 25, 2019	<ul style="list-style-type: none"> ▶ CalVTP would help the Fire Department be more efficient with existing programs by aiding in CEQA compliance. ▶ Because Santa Barbara county is the transition from Southern to Central California, it has unique vegetation and weather patterns and they suggest that the PEIR address location conditions, especially the impact of previous fires limiting subsequent fire spread. ▶ Prescribed fire in sage and grass/oak woodland vegetation, the impact of traditional herbivory (especially when combined with prescribed fire), and the efficacy of Santa Barbara’s local fuel breaks should be included in the PEIR. 	1 Introduction 2 Program Description & 3.17 Wildfire 2 Program Description & 3.6 Biological Resources
County of Santa Barbara Executive March 1, 2019	<ul style="list-style-type: none"> ▶ Comments submitted through the Planning and Development and Fire Department 	Not a CEQA related issue
San Diego County Department of Environmental Health Local Enforcement Agency March 1, 2019	<ul style="list-style-type: none"> ▶ Waste generated as a result of treatment would be considered feedstock for organic processing operations and would need permitting and inspection by LEA. They are also subject to solid waste regulatory standards. ▶ Waste should be handled using Title 14 CCR Chapter 3.1. Include a description and analysis for proposed management of generated organic materials from these treatments. ▶ How would infected vegetation such as trees infested with bark beetles be managed/processed to prevent further spread of pests? ▶ Would like to be given future updates on this PEIR. 	2 Program Description & 3.16 Public Services, Utilities and Service Systems 2 Program Description & 3.16 Public Services, Utilities and Service Systems 2 Program Description & 3.6 Biological Resources Not a CEQA related issue
San Diego County Department of Parks and Recreation	<ul style="list-style-type: none"> ▶ Would like to receive future updates. ▶ Coordinate closely with local jurisdictions and land managers to ensure that all potential treatments are covered under the PEIR. 	Not a CEQA related issue 1 Introduction

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Committer/Date	Summary	Addressed in Draft EIR Section
<p>March 1, 2019</p> <p>City of Santa Cruz March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Planning Dept.: Cooperate with the City of Santa Cruz when developing work plans near city limits and the PEIR should consider impacts from herbicide application, controlled burns, and vegetation removal on water supply, storm water runoff, water quality, air quality, and sensitive or protected habitats and species. ▶ Planning Dept.: No SRA within city limits, but some areas in the city's Sphere of Influence do fall in SRA and those areas area all sensitive or highly sensitive for archeological resources so they ask that potential impacts be thoroughly investigated. ▶ Planning Dept.: Three creeks are in the treatable area and the PEIR should evaluate any impacts to these creeks. ▶ Planning Dept.: some areas in the treatable area are at risk for liquefaction so any impacts on these areas should be thoroughly covered in the PEIR. ▶ Fire Dept.: Supports the program. ▶ City Urban Forester: Address how local input will be considered when developing plans for areas in the WUI. Any treatments should be consistent with the city's WUI policy, the Heritage Tree Ordinance, and the Integrated Pest Management policy. ▶ City Urban Forester: No brush, debris, or fuel load should be left on city property. ▶ City Urban Forester: Restoration projects performed on city property should be coordinated with city staff and have a one-year maintenance period. ▶ City Urban Forester: Erosion best management practices should be in place following treatments and should be monitored by the state for one-year. ▶ No work should impact city staff or city budgets, and press releases and public outreach should occur early and at the expense of the state. 	<p>1 Introduction, 3.4 Air Quality, 3.6 Biological Resources, 3.10 Hazardous Materials, Public Health & Safety, & 3.11 Hydrology and Water Quality</p> <p>3.5 Archeological, Historic, and Tribal Cultural Resources</p> <p>2 Program Description & 3.11 Hydrology and Water Quality</p> <p>3.7 Geology, Soils, and Mineral Resources</p> <p>Not a CEQA related issue</p> <p>1 Introduction, 2 Program Description, & Appendix PD-3 Project-Specific Analysis</p> <p>2 Program Description</p> <p>2 Program Description</p> <p>2 Program Description & 3.7 Geology, Soils, and Mineral Resources</p> <p>Not a CEQA related issue</p>
<p>City of Santa Barbara Fire Department February 28, 2019</p>	<ul style="list-style-type: none"> ▶ The City is potentially a responsible agency. ▶ Mitigation recommendations will be most useful if they are specific to local areas and ecosystems. ▶ Impact analysis should follow CEQA guidelines to identify related environmental regulations and policies and any inconsistencies between them. ▶ Address any permitting issues with other state and local agencies to enable the stronger vegetation treatment activities including treatments along creeks, air quality policies, greenhouse gas directives, and policies for limiting development in the WUI. 	<p>1 Introduction</p> <p>3 Environmental Setting, Impacts, & Mitigation Measures</p> <p>3 Environmental Setting, Impacts, & Mitigation Measures</p> <p>1 Introduction, 2 Program Description, 3.4 Air Quality, 3.8 Greenhouse Gas Emissions, & 6 Alternatives</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
<p>City of San Diego Planning Department March 1, 2019</p>	<ul style="list-style-type: none"> ▶ Much of the city is located downstream from treatable landscape and water quality and storm water drainage impacts are their main concern. ▶ The scope of the analysis should include preventing erosion and siltation from vegetation removal. ▶ Address impacts that could be associated with application of herbicides. ▶ Address potential effects on downstream flows, drainage facilities, and flooding. ▶ Address potential effects if heavy equipment is used to remove vegetation. ▶ Address potential downstream effects of herbivore grazing programs. 	<p>2 Program Description & 3.11 Hydrology & Water Quality</p> <p>2 Program Description, 3.7 Geology, Soils, & Mineral Resources, & 3.11 Hydrology & Water Quality</p> <p>2 Program Description, 3.10 Hazardous Materials, Public Health & Safety, & 3.11 Hydrology & Water Quality</p> <p>3.11 Hydrology and Water Quality</p> <p>3 Environmental Setting, Impacts, and Mitigation Measures</p> <p>3.11 Hydrology and Water Quality</p>
<p>California Department of Parks and Recreation March 11, 2019</p>	<ul style="list-style-type: none"> ▶ DPR has internal policies that prohibit the construction and maintenance of firebreaks, fuel breaks, and other fuel modification zones under park lands. ▶ Include a discussion of potential impacts on sensitive and listed species, especially on DPR lands. ▶ Include a discussion of how the CalVTP will prevent the spread of invasives on DPR lands. ▶ Address soil erosion, sedimentation, and impacts on water quality from the creation of fuel breaks. ▶ Include conditions to conduct cultural resource surveys and address any mitigation; PEIR should specify the appropriate project-level entity who should complete PRC 5024 documentation. ▶ Address impacts to recreation and aesthetics. ▶ The level of analysis in the PEIR should be sufficiently robust to support preparation of a project-level compliance through a NOE. ▶ Requests to be included in scoping of projects that include DPR land and DPR expects to maintain control over activities on its land regardless of who initiates project level review. 	<p>2 Program Description</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>2 Program Description & 3.6 Biological Resources</p> <p>2 Program Description, 3.7 Geology, Soils, & Mineral Resources, & 3.11 Hydrology and Water Quality</p> <p>2 Program Description & 3.5 Archeological, Historic, & Tribal Cultural Resources</p> <p>2 Program Description, 3.2 Aesthetics & Visual Resources, & 3.14 Recreation</p> <p>2 Program Description, 3 Environmental Setting, Impacts, & Mitigation Measures, & Appendix PD-3 Project-Specific Analysis</p> <p>2 Program Description & Appendix PD-3 Project-Specific Analysis</p>
	<ul style="list-style-type: none"> ▶ For fuel breaks that include or are adjacent to DPR lands, the entity responsible for long-term maintenance and associated funding should be identified prior to approval. ▶ Utilize DPR staff who currently carry out fuel reduction on DPR lands in CalVTP project-specific discussion, design, analysis, and implementation. 	<p>1 Introduction, 2 Program Description, & Appendix PD-3 Project-Specific Analysis</p> <p>1 Introductions</p>

Table A-1 NOP Comment Summary

Committer/Date	Summary	Addressed in Draft EIR Section
<p>California Coastal Commission March 8, 2019</p>	<ul style="list-style-type: none"> ▶ Explicitly state the requirement to obtain a CDP for development in the coastal zone, and the need to be consistent with the Coastal Act and/or applicable LCP. ▶ Describe the Coastal Act’s Chapter 3 policies that would apply to the subject development.v ▶ Recommend early coordination between the project applicant and the Coastal Commission and/or applicable local gov planning departments. ▶ More clearly and specifically describe project objectives. ▶ Include as much detailed information as possible about the location and characteristics of potential sensitive species and habitats, map known rare plant and animal populations and rare habitats. ▶ Ensure that within the scope projects are consistent with the Coastal Act and not just CEQA or other environmental laws; certain coastal resources might fall within the category requiring site-specific biological reviews. ▶ Include process for evaluating effectiveness of each vegetation treatment project, including its methods. ▶ Examine whether the use of methods with significant impacts to coastal resources are effective relative to other methods which have fewer impacts, particularly in relation to any recent scientific information. Recent study indicates fuel breaks can diminish the effectiveness of defensible space by providing a clear path for firebrands to come in contact with homes (Koo et al 2012). ▶ A section on fire history, including background information on frequency and footprints of wildfires throughout the state in sensitive habitats may aid in evaluating how effective a VTP activity may be ▶ Ecological Restoration projects should be examined more carefully as a potential treatment option within the WUI ▶ Evaluate which restoration activities might be beneficial in each habitat type included in the potential treatable areas, and it should describe with the potential benefits are ▶ Evaluate alternatives that reduce the treatable land area and/or actual treated land in the coastal zone, especially within sensitive habitats; look more precisely at identifying the area likely to be treated ▶ Evaluate an alternative considering other means of achieving fire safety beyond treating landscapes ▶ The proposed project, as well as other potential alternatives, including the reduced treatable area alternative, also should be evaluated for their effectiveness at reaching project objectives through such alternate means 	<p>2 Program Description</p> <p>3 Environmental Setting, Impacts, & Mitigation Measures</p> <p>1 Introduction & 2 Program Description</p> <p>2 Program Description</p> <p>3.6 Biological Resources</p> <p>Appendix PD-3 Project-Specific Analysis</p> <p>Appendix PD-3 Project-Specific Analysis</p> <p>3 Environmental Setting, Impacts, & Mitigation Measures</p> <p>2 Program Description & 3.17 Wildfire</p> <p>2 Program Description</p> <p>3.6 Biological Resources</p> <p>6 Alternatives</p> <p>6 Alternatives</p> <p>6 Alternatives</p>
	<ul style="list-style-type: none"> ▶ Evaluate coastal resources explicitly on their own regardless of where they fall in the Appendix G topic areas 	<p>3 Environmental Setting, Impacts, & Mitigation Measures</p>

Table A-1 NOP Comment Summary

Commenter/Date	Summary	Addressed in Draft EIR Section
	<ul style="list-style-type: none"> ▶ Include a rubric that outlines the criteria for which a particular approach would be appropriate including the needs/goals of a project, constraints, expertise needed, suitable locations, ability of BMPs to avoid impacts to biological resources, and any necessary mitigation measures to reduce anticipated impacts 	2 Program Description & Appendix PD-3 Project-Specific Analysis
Verbal Comments Received at Public Scoping Meeting on February 19, 2019		
Dan Silver (Endangered Habitats League)	Mr. Silver read aloud the letter sent from the Endangered Habitats League.	See “Endangered Habitats League (1 of 2)” content summary