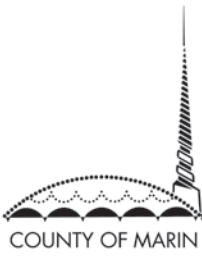


# Appendix A

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Comment Letters Received on the  
Draft Program EIR



# MARIN COUNTY FIRE DEPARTMENT

Committed to the preservation of life, property and environment.



Jason Weber  
FIRE CHIEF

33 Castle Rock Avenue  
PO Box 518  
Woodacre, CA 94973  
415 473 6717 T  
415 473 7820 F  
CRS Dial 711  
[www.marincounty.org/depts/fr](http://www.marincounty.org/depts/fr)

Woodacre  
Throckmorton Ridge  
Marin City  
Point Reyes  
Hicks Valley  
Tomales  
Ross Valley: Medic 18  
Tamalpais Fire Crew

July 16, 2019

Board of Forestry and Fire Protection

Marin County Fire Department supports the CalVTP to expand Marin County's vegetation treatment activities implemented by Marin County Fire Agencies, the public and local partners. Marin County recognizes the urgent need to increase vegetation treatment options to modify fire behavior to aid in reducing losses to life, property and natural resources.

A1-1

The CalVTP programmatic EIR will boost the ability to implement the Marin County's Community Wildfire Protection Plan (CWPP, 2016) adopted by Marin County Board of Supervisors with significant collaboration between land management agencies, fire departments, communities and land owners' which guides work to reduce the threat of wildfire to its residents. This plan has prioritized fuel reduction projects including WUI treatments and high priority fuel breaks utilizing combinations of prescribed fire, mechanical and manual treatment methods.

A1-2

The CalVTP is consistent and in direct alignment with the Marin County Fire Department's Strategic Unit Fire Plan which clearly identifies the need to modify fire behavior thru vegetation/fuel reduction specifically utilizing strategically placed treatments focused to protect Marin's numerous values at risk.

A1-3

Additionally, the VTP provides a streamlined CEQA compliant program which will reduce the compliance barriers associated for local landowners seeking to utilize grants, private funds and other cooperative efforts to achieve high priority fire hazard reduction work.

A1-4

We appreciate the opportunity to comment on this vital program.

Sincerely,

*/s/ Jason Weber*

Jason Weber  
Fire Chief



**ORANGE COUNTY FIRE AUTHORITY**  
P.O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602  
**Brian Fennessy, Fire Chief** (714) 573-6000 www.ocfa.org

July 22, 2019

Via email: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

Board of Forestry and Fire Protection  
Attention: CalVTP  
P.O. Box 944246  
Sacramento, California 94244-2460

The proposed Vegetation Treatment Program Programmatic Environmental Impact Report (VTP PEIR) is supported by the Orange County Fire Authority (OCFA) for its emphasis on protecting life, property, and natural resources through vegetation management options to modify fire behavior. The ability to use this VTP will allow OCFA and our partners to efficiently plan and implement projects, with hopes of reducing the size and scale of our fires by modifying vegetation composition and structure.

A2-1

Treatments described in the VTP are consistent with the OCFA Community Wildfire Protection Plan (CWPP), which identifies and prioritizes fuel reduction and modification projects that would occur under this VTP PEIR. The VTP would provide the streamlined CEQA analysis for these projects, which would significantly reduce the need for repetitive process of multiple CEQA documents, as well as the cost and time to the department and landowners with limited resources.

A2-2

The VTP is consistent and in direct alignment with the OCFA's Strategic Unit Fire Plan, which clearly identifies the need to modify fire behavior through vegetation and fuel reduction methods, specifically utilizing strategically placed treatments focused to protect Orange County's numerous values at risk.

A2-3

The ability to allow for ecological restoration within the VTP will also allow OCFA to better create and implement fuel reduction and modification projects within our SRA. Much of Orange County's SRA is owned and managed by conservancies for threatened and endangered species. This VTP will allow OCFA to create and implement win-win projects that both aid in fuel reduction and modification, while also creating and enhancing habitat for endangered species.

A2-4

The ability to plan and manage fire at a landscape scale is becoming more and more important, as a year-round fire season has become the "new normal," and fires are becoming more frequent, more intense, and threaten increasing numbers of lives and property. The implementation of this VTP EIR is much needed and much overdue.

A2-5

Respectfully,

Brian Fennessy  
Fire Chief

Serving the Cities of: Aliso Viejo • Buena Park • Cypress • Dana Point • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods • Lake Forest • La Palma  
Los Alamitos • Mission Viejo • Placentia • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana • Seal Beach • Stanton • Tustin • Villa Park  
Westminster • Yorba Linda • and Unincorporated Areas of Orange County



July 23, 2019

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

RE: CAL FIRE Vegetation Treatment Program Draft Program EIR

Dear Ms. Hannigan,

The City of Laguna Beach appreciates the opportunity to review and comment on the Draft Program Environmental Impact Report for the California Department of Forestry and Fire Protection (CAL FIRE) Vegetation Treatment Program (CAL VTP), and would like to offer the following for consideration:

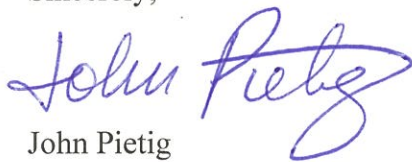
1. Projects considered and funded by the CAL VTP should include vegetated areas within and adjacent to incorporated cities, and not be solely confined to wildland areas classified as State Responsibility Area (SRA) wildlands. Significant populations and values are concentrated in these areas of the State that have proven susceptible to large and damaging wildfires. Incorporated areas within cities should be considered for CAL VTP programs. A3-1
  
2. Vegetation treatment projects should be exempt from additional Coastal Act review if approved under CAL VTP guidelines and CEQA. Currently, coastal zone projects that are fully approved by CEQA and CAL FIRE must also be submitted to a lengthy and costly additional process through the California Coastal Commission. The additional review adds hundreds of thousands of dollars and a year or more of additional delay to these critical projects. A3-2
  
3. The City of Laguna Beach believes that fuel treatments to benefit the Wildland-Urban Interface are best located adjacent to homes rather than in remote or distant wildlands. Projects that protect homes, and place vegetative treatments next to homes, should be prioritized higher than other projects in remote areas. A3-3
  
4. The CAL VTP program should also include the hardening of major roadway escape routes and utility corridors in wildland areas adjacent to communities at risk. A3-4



5. The CAL FIRE VTP currently makes no provision for hardening of structures against wind-borne embers due to major wildfires. The fuel treatments proposed in CAL VTP are generally designed for creation of fuel breaks that are most effective against fires moving with ground trajectory. The most damaging major wildfires in California are frequently wind-borne fires that cast firebrands and embers over fuel breaks to ignite homes. Hardening existing homes is a critical component of reducing wildfire loss in California but is ignored in the proposed program. The CAL VTP should be expanded to include hardening of homes in the Wildland-Urban Interface as a means of protecting lives and reducing wildfire property loss. A3-5
  
6. The CAL VTP should allow for use of State funds to augment local fire services and contract resources to accomplish VTP projects and work. Currently, a lack of available qualified contractors limits the production of desired projects. CAL VTP should allow for use of program assets and funds to develop local resources for vegetation clearance. A3-6

Thank you for your consideration.

Sincerely,



John Pietig  
City Manager  
City of Laguna Beach

# COUNTY OF EL DORADO

330 Fair Lane  
Placerville, CA 95667  
(530) 621-5390  
(530) 622-3645 Fax

JAMES S. MITRISIN  
Clerk of the Board



# BOARD OF SUPERVISORS

Letter  
A4

JOHN HIDAHL  
District I

SHIVA FRENTZEN  
District II

BRIAN K. VEERKAMP  
District III

LORI PARLIN  
District IV

SUE NOVASEL  
District V

July 23, 2019

**RECEIVED BY**

To: Matt Dias, Executive Officer  
Board of Forestry and Fire Protection  
Attn: CalVTP  
P.O. Box 944246  
Sacramento, CA 94244-2460

AUG 02 2019

**BOARD OF FORESTRY AND FIRE PROTECTION**

Re: Support Letter for: CalVTP (California Vegetation Treatment Program)

Dear Mr. Dias,

As destructive wildfires continue in our rural environments and beyond, the El Dorado County Board of Supervisors provide this letter to support the Board of Forestry and Fire Protection and their CalVTP program.

- This program will assist in expanding statewide vegetation treatment activities up to 500,000 acres per year to achieve the goal established in Executive Order B-52-18.
- This program will provide a robust environmental analysis as required by CEQA as well as project-level mitigation measures to help ensure the protection of public trust resources (water, air, wildlife, archaeology, greenhouse gas, etc.)

The CalVTP treatments include:

- Wildland-Urban Interface fuel reduction, including removal of vegetation to prevent or slow the spread of fires between wildlands and structures.
- Fuel breaks that support fire suppression activities by providing emergency responders with strategic staging areas and access to otherwise remote landscapes for fire control.
- Restoration in ecosystems where natural fire regimes have been altered due to fire exclusion, including restoring ecological process, conditions, and resiliency to more closely reflect historic vegetative composition, structure, and habitat values.
- Prescribed burning, mechanical and manual fuels treatment, prescribed herbivory, and limited herbicide use, where appropriate.

A4-1

The program and its defined treatments are in alignment with our efforts as it relates to the protection of residents and structures through clearing and vegetation removal. These efforts have been reinforced through the recent passage of our El Dorado County Vegetation Management Ordinance. Understanding some of the other elements of the CalVTP program will require environmental study and therefore extended timelines, we would encourage you to push ahead to strengthen the enforcement of California Public Resources Code 4291.

A4-2

We appreciate the unified message to address this critical issue that affects us all and with this letter the Board of Supervisors of El Dorado County support the passage of the California Vegetation Treatment Program.

Sincerely,



Sue Novasel

Chair, El Dorado County Board of Supervisors



County of Fresno  
DEPARTMENT OF PUBLIC HEALTH

Letter  
A5

July 26, 2019

California Board of Forestry  
Transmitted via email: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

Eastern Fresno County is “ground zero” for the tree mortality crisis in California. The rapid change our forest ecosystem suffered has been brought about by a prolonged drought and exacerbated by a history of poor forest management practices over the past century. The level of neglected overcrowded stands, dense vegetation, and tree mortality within our territory is overwhelming. Consequently, the majority of our region ranks within Tier 1 or Tier 2 High Hazard Zones. The threat of catastrophic wildfire and devastation to our ecosystems, residents, and communities is alarming.

A5-1

Regardless of the contributing factors, additional fuel removal treatments must be introduced beyond roadside hazard tree removal and fuel breaks. The proposed California Vegetation Treatment Program (Cal VTP) helps fill this gap. The Board of Forestry and CAL Fire’s proposed Cal VTP will increase vegetation treatment from 250,000 acres to 500,000 acres statewide, increase the use of prescribed burning as a vegetation treatment tool, and contribute to meeting California’s greenhouse gas emission goals by managing forests and other natural and working lands.

A5-2

The proposed Cal VTP is not only consistent with Fresno County Response Objectives, but it is necessary to increase the removal of fuel from the forest floor to provide reasonable levels of community protection. Communities, forests, and resources within the County of Fresno will benefit directly from future Cal VTP projects. We support the proposed Cal VTP and sincerely hope you will approve it as proposed.

A5-3

Sincerely,

David Pomaville,  
Director of Public Health  
Assistant Emergency Services Director

***Promotion, preservation and protection of the community’s health***

1221 Fulton Street /P. O. Box 11867, Fresno, CA 93775  
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# BUTTE COUNTY FEDERAL/STATE LAND-USE COORDINATING COMMITTEE

Letter  
A6

7 County Center Drive  
Oroville, CA 95965

August 2, 2019

Board of Forestry and Fire Protection  
Attn: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

Dear Board of Forestry and Fire Protection:

In response to the Notice requesting comments on the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP), the Butte County Federal/State Land-Use Committee (Committee) is communicating its support of the proposed program. The Committee is a Board appointed, Brown Act committee, whose purpose is to provide for public input on public land management issues and communicate concerns, ideas and comment to the Butte County Board of Supervisors (the Board). The Board generated a letter demonstrating their strong support of this program dated 1-09-18 (see attached).

A6-1

The Committee wishes to reiterate the Board's support of this program as it is critical to protection of our forest and grasslands, and especially to our vulnerable residents living in and near those lands. The Programmatic Environmental Impact Report (PEIR) for the VTP adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. Further, the PEIR clearly identified the limitations of the program in regards to environmental impacts and the mitigation measures that will minimize those impacts. For the health and well-being of those facing wildfire risks, we strongly encourage the California State Board of Forestry and Fire Protection Board to accept the PEIR and begin implementation of the VTP.

A6-2

The Board's letter references Butte County's four catastrophic wildfires in 2017. We routinely face wildfire devastation along the vast wildland-urban interface (WUI). Unfortunately, 2018 brought the devastating Camp Fire to Butte County, destroying the community of Concow and the Town of Paradise along with nearby unincorporated areas. "The Butte County community, primarily through the leadership of the Butte County Fire Safe Council, have taken considerable efforts to reduce wildfire fuels and risk. However, local wildfire fuels reduction programs continue to be stymied by existing rules and procedures that are outdated, inefficient, and costly. Under current rules, wildland fire prevention programs require conducting a project-by-project Environmental Impact Report (EIR), which results in increased costs and delays without any environmental benefit. A typical project can take up to 3 years to go through the EIR process. In the case of a small 45 acre project, the EIR costs alone could be \$45,000. The cost of conducting an EIR has increased from 2-5% to 10-15% of project costs, and has become a major cost component of wildfire reduction programs. The increased cost of conducting EIRs comes at the expense of wildfire fuel reduction projects. Having the ability to work under the VTP would have enormous benefit without posing adverse impacts to the environment."

A6-3

“The VTP describes a well-reasoned strategy to reduce wildfire fuel threat on SRA lands on a state wide scale. The program has undergone extensive review and refinement over the past four years. The treatment activities such as manual (hand crew work), mechanical, prescribed herbivory, and targeted ground application of herbicides are clearly described with appropriate limitations. The VTP PEIR adequately assessed the potential impact from the VTP as it is implemented in the wildland urban interface (WUI), including strategically placed fuel breaks and ecological restoration. The VTP PEIR offers the right balance of a state-wide program, local implementation and environmental safeguards. Given the enormity of statewide wildfire risks, adoption of the VTP is long overdue.”

A6-4

The Butte County Board of Supervisors offered its support for the VTP in 2018, firmly believing the draft VTP PEIR adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. The Committee strongly recommends the California State Board of Forestry and Fire Protection Board accept the PEIR and implement the VTP.

A6-5

Thank you for the opportunity to communicate support for this vital program.

Yours truly,



Dennis Schmidt  
Director of Public Works  
Butte County Federal/State Land-Use Coordinating Committee

CC: Butte County Board of Supervisors  
Butte County Chief Administrative Officer  
Butte County Forest Advisory Committee  
Butte County Fire Safe Council  
Butte County/CalFire  
Butte County Chief Administrative Officer



# BOARD OF SUPERVISORS

ADMINISTRATION CENTER  
25 COUNTY CENTER DRIVE, SUITE 200 - OROVILLE, CALIFORNIA 95965  
TELEPHONE: (530) 538-7631

BILL CONNELLY  
First District

LARRY WAHL  
Second District

MAUREEN KIRK  
Third District

STEVE LAMBERT  
Fourth District

DOUG TEETER  
Fifth District

January 9, 2018

Board of Forestry and Fire Protection  
ATTN: Edith Hannigan, Board Analyst  
VTP Draft PEIR Comments  
P.O. Box 944246  
Sacramento, CA 94244-2460

Dear Ms. Hannigan:

The Butte County Board of Supervisors supports the California State Board of Forestry and Fire Protection's Vegetation Treatment Program (VTP). The Programmatic Environmental Impact Report (PEIR) for the VTP adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. Further, the PEIR clearly identified the limitations of the program in regards to environmental impacts and the mitigation measures that will minimize those impacts. For the health and well-being of those facing wildfire risks, we strongly encourage the California State Board of Forestry and Fire Protection Board to accept the PEIR and begin implementation of the VTP.

Butte County has first-hand experience in the dangers posed by wildfires. We experienced four catastrophic wildfires in 2017. Unfortunately, this year's impacts are not unprecedented. We routinely face wildfire devastation along the vast wildland-urban interface (WUI). The Butte County community, primarily through the leadership of the Butte County Fire Safe Council, have taken considerable efforts to reduce wildfire fuels and risk. However, local wildfire fuels reduction programs have been stymied by existing rules and procedures that are outdated, inefficient, and costly. Under current rules, wildland fire prevention programs require conducting a project-by-project Environmental Impact Report (EIR), which results in increased costs and delays without any environmental benefit. A typical project can take up to 3 years to go through the EIR process. In the case of a small 45 acre project, the EIR costs alone could be \$45,000. The cost of conducting an EIR has increased from 2-5% to 10-15% of project costs, and has become a major cost component of wildfire reduction programs. The increased cost of conducting EIRs comes at the expense of wildfire fuel reduction projects. Having the ability to work under the VTP would have enormous benefit without posing adverse impacts to the environment.

The VTP describes a well-reasoned strategy to reduce wildfire fuel threat on SRA lands on a state wide scale. The program has undergone extensive review and refinement over the past four years. The treatment activities such as manual (hand crew work), mechanical, prescribed herbivory, and targeted ground application of herbicides are clearly described with appropriate limitations. The VTP PEIR

adequately assessed the potential impact from the VTP as it is implemented in the wildland urban interface (WUI), including strategically placed fuel breaks and ecological restoration. The VTP PEIR offers the right balance of a state-wide program, local implementation and environmental safeguards. Given the enormity of statewide wildfire risks, adoption of the VTP is long overdue.

The Butte County Board of Supervisors offers its support for the VTP. The draft VTP PEIR adequately analyzed the potential environmental impacts that may occur from undertaking the VTP. We recommend the California State Board of Forestry and Fire Protection Board accept the PEIR and implement the VTP.

Sincerely,

A handwritten signature in blue ink that reads "Steve Zahner". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Chair  
Butte County Board of Supervisors

cc: Butte County Fire Safe Council  
Butte County Forest Advisory Committee  
Butte County Federal/State Land Use Coordinating Committee



Re: Comments to the California Vegetation Treatment Program

Below are some comments regarding the California Vegetation Treatment Program. I appreciate the inclusion of prescribed herbivory, however there seems to be some confusion in the program description about what prescribed herbivory includes. This lack of clarity creates confusion throughout the document. As defined early in the document, prescribed herbivory (also known as “targeted grazing” [ASI 2006, Macon 2019]) is the use of domestic livestock to accomplish specific and measurable vegetation management objectives. This definition does not restrict prescribed herbivory to short duration, high intensity grazing. The impacts stated in this document generally reflect specific impacts from short duration, high intensity grazing and not broadly prescribed grazing.

A7-1

Although in some cases grazing a large number of animals in a small site for a very short time may be practical and an effective resource management tool, it is more common (at least in terms of acreage) for prescribed grazing in California to be practiced across extensive areas with low density of animals over a longer period of time. The management and impacts of different grazing systems to implement prescribed grazing should be considered in this document and should be considered in determining the best treatments for a given site. I have included some comments that attempt to present a broader perspective of prescribed grazing systems and potential impacts.

A7-2

Page 2-19

Table 2-4 Relative Likelihood of Implementing Treatment Activities by Fuel Type for each Treatment Type

Treatment Activity	Tree			Shrub			Grass		
	WUI	Fuel Break	Ecosystem Restoration	WUI	Fuel Break	Ecosystem Restoration	WUI	Fuel Break	Ecosystem Restoration
Prescribed Burning	L	M	M	L	M	L	M	M	H
Manual Treatments	H	M	M	M	M	M	L	L	L
Mechanical Treatments	H	H	H	H	L	M	M	M	L
Herbicides	M	M	L	L	M	L	L	L	L
Prescribed Herbivory	L	L	L	L	M	L	L	M	M

Notes: H: high; M: medium; L: low

A7-3

Comment 1: What is the source of the information for Table 2-4? Prescribed burning of grass makes little sense unless it’s timed to control an undesirable grass species like medusahead. Many of California’s grassland are annual and burning annual grass for fuels management should not be promoted. Burning annual grasslands is also not an effective tool for ecosystem restoration unless its specifically timed to control an undesirable plant species. Fire fuel load and ecosystem management of annual grasslands is best achieved by managing the cover, height and biomass of annual plants. This requires annual management, which makes grazing ideal. Grazing can also create a more desirable heterogenous vegetation structure that supports biodiversity (see Bartolome et al. 2014).

[https://www.semanticscholar.org/paper/Grazing-for-Biodiversity-in-Californian-Grasslands-Bartolome-Allen-D%C3%ADaz/Oc6e714584d08e64c25a3bf3d8217409644cc789?utm\\_source=email](https://www.semanticscholar.org/paper/Grazing-for-Biodiversity-in-Californian-Grasslands-Bartolome-Allen-D%C3%ADaz/Oc6e714584d08e64c25a3bf3d8217409644cc789?utm_source=email)



It's not realistic to expect prescribed burning to provide annual management. Revise the table as follows:

Treatment	Grass		
	WUI	Fuel Break	Ecosystem Restoration
Prescribed Burning	L	L	L
Mechanical Treatments	M	M	M
Herbicides	L	L	L
Prescribed Herbivory	H	M	H

A7-3  
cont.

Also consider the GHG emission from burning versus grazing 1,000 lbs of grass (dry weight) burning is a good alternative. Burning 1,000 lbs of dry annual grass generates 5 lbs of particulates, 1,829 lbs of CO2 equivalent (Urbanski et al. 2009, Ito and Penner 2004, Boubel et al. 1969). Grazing 1,000 lbs of annual grass feeds one cow for one month and she produces 375 lbs of CO2 equivalent (in methane). (DeRamus et al. 2003, Harper et al. 1999).

A7-4

Page 2-25

Comment 2: Consider amending the following text in Section 2-25: "Animals are best selected according to the types of vegetation that need to be managed. Goats are typically best suited to shrubs, and cattle are better suited to herbaceous plants, especially grasses. Sheep tend to prefer herbaceous plants, but they can be used in a variety of environments."

A7-5

A "variety of environments" is confusing since the rest of the information is about vegetation types, and should be clarified: Sheep graze selectively but may consume both herbaceous and woody vegetation. And include.... Dietary preference among species is not absolute as diet is also driven by the availability of vegetation, nutritional needs, experiences and inherited and learned behaviors.

Comment 3: Prescribed grazing or herbivory isn't typically a "treatment". Consider the stated definition, "Prescribed herbivory (also known as "targeted grazing" [ASI 2006, Macon 2019]) is the use of domestic livestock to accomplish specific and measurable vegetation management objectives," at the beginning of Section 2-25. As such, amend the following statement... "Successful herbivory treatments can enhance habitat for wildlife. Consider instead, "Prescribed grazing can enhance habitat for wildlife in addition to controlling fire fuel loads."

A7-6

Please note there is nothing in the definition of prescribed herbivory that requires high intensity short duration grazing. While high intensity short duration grazing may work to achieve some resource management objectives on some sites, prescribed grazing can also be conducted with long-term extensive grazing systems. Much of this EIR seems to assume that prescribed grazing will be short duration, high intensity grazing but it shouldn't be limited in this way.

Comment 4. In addition to the example of thinning understory to improve shrubs for deer and wildlife, consider including an example that is more typical in California's annual grasslands, for instance...

A7-7

In addition, using livestock grazing to minimize thatch and control non-native plant cover and height can improve habitat for many of California's native plants and animals including San Joaquin kit fox, Ohlone tiger beetle, western burrowing owl and grasshopper sparrow.

Comment 5. As stated before, consider removing the word "treatment" and replace with "prescribed herbivory or grazing" i.e. "For prescribed herbivory to be effective, the right combination of animals, stocking rates, timing, and rest must be used."

A7-8

Comment 7. This statement should be deleted or cited. "Additionally, prescribed herbivory should be restricted during critical growth stages of desirable competing plant species. When desirable species are present, the area needs a period without herbivory to allow the desirable species to recover." If cited, context should be provided

A7-9



as this statement is not accurate for prescribed grazing of California’s annual grasslands. Not all desirable species need “recovery” as they may not be selected by livestock. It may be more important to manage the undesirable species than “rest” the desirable species to achieve the site objectives.

A7-9  
cont.

Comment 8. This statement requires additional explanation or it should be deleted. “Short-term treatments can be used to reduce flammable vegetation, while longer term treatments can be used to change vegetation composition by depleting root carbohydrates in perennials and reducing the soil seed bank for annual plants (Nader et al. 2007).” On California’s annual grasslands long-term prescribed grazing with extensive livestock grazing may be most desirable to manage fire fuel loads while meeting other conservation objectives including improving habitat for special status species.

A7-10

Comment 9. “Typical prescribed herbivory costs range from \$500 to \$1,200 per acre.” When prescribed herbivory requires continuous livestock management and construction or development of livestock management infrastructure, costs range from \$500 to \$1,200; however, prescribed herbivory can also be achieved with minimal costs that can be covered by livestock production. Lower cost prescribed herbivory is most common on extensive sites that have adequate livestock management infrastructure.

A7-11

Page 2-42

Comment 10. Wildlife-Friendly fencing should require a qualified CRM as neither a RPF or biologist may be qualified to understand what sort of fencing or how to configure the fencing to best control livestock.

A7-12

Comment 11. Suspending grazing during rain is not practical or necessary. Prescribed grazing is conducted during rainfall events throughout California. Decisions about grazing management should be made based upon the resource need and not a “chance” of rain. Many of California’s rainfall events wouldn’t be characterized as “heavy precipitation”.

A7-13

Page 2-45

Comment 12. “SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments:

- Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.
- Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas.
- Grazing animals will be herded out of an area if accelerated soil erosion is observed.”

What is the source of this recommendation? They aren’t necessarily appropriate and these practices are in conflict with one another. On-site stock ponds are waterbodies and also support several special status species in many cases. Neither a buffer or exclusion is generally desirable. Prescribed grazing is currently being used to manage many “environmentally sensitive areas” including wetlands and riparian areas. Whether or not these areas are included in the project should depend on the objectives and resource needs. A 50-foot buffer (an area with unmanaged vegetation) could create a resource concern depending on the site and resources. It would be more effective to state that sensitive resources will be identified and excluded from prescribed grazing if appropriate for their protection as determined by a CRM.

A7-14

Accelerated soil erosion on a site indicates the management and oversight is lagging. Livestock grazing should be managed to maintain sufficient vegetation to protect soils from erosion.

The above comment also applies to 3.6-127, 3.7-23, 3-11-21



Page 3.6-20

Comment 13. Grazing is not necessarily a threat to riparian habitats. Prescribed or managed grazing can be used to effectively manage vegetation including invasive species in riparian habitats. Amend statement to state: "Riparian habitats face many threats including.... Inappropriate grazing..."

A7-15

Page 3.6-142

Comment 14. Consider revising the following statement since many special- status species are not only acclimated they actually benefit from managed livestock grazing. "Some special-status wildlife species may be acclimated to the presence of livestock. For example, golden eagle (Aquila chrysaetos) and Swainson's hawk are known to nest within or adjacent to rangeland or agricultural habitat."

A7-16

Consider, "Many special-status wildlife species in California benefit from managed livestock grazing (Bartolome et al. 2014). For example, golden eagle and Swainson's hawk are known to nest within or adjacent to rangeland or agricultural habitat.

Page 3.6-176-177

Comment 15. Please cite the source of your information that cattle more than sheep or goats will crush burrows. Cattle grazing is an important tool for managing habitat for California's special status amphibians and reptiles. The USFWS has recognized the benefit of grazing to maintain habitat for numerous burrowing species in California including SJ kit fox, burrowing owl, Red Legged Frog, Tiger Salamander.

A7-17

Page 3.7-27

Comment 16. The information (citation) regarding grazing and geomorphology is dated (1995) and may not be relevant to California's rangelands. Consider Salls et al. 2018.

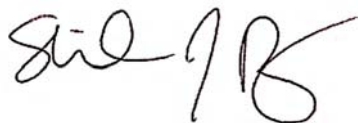
<http://calag.ucanr.edu/archive/?type=pdf&article=ca.2018a0021> Spatial variability with regards to erosion potential is extremely important.

A7-18

Comment 17. The EIR should consider the difference in GHG emissions from different control methods. For example, burning 1,000 lbs of dry annual grass generates 5 lbs of particulates, 1,829 lbs of CO2 equivalent (Urbanski et al. 2009, Ito and Penner 2004, Boubel et al. 1969). Grazing 1,000 lbs of annual grass feeds one cow for one month and she produces 375 lbs of CO2 equivalent (in methane). (DeRamus et al. 2003, Harper et al. 1999).

A7-19

Sincerely,



Sheila Barry  
Bay Area Livestock and Natural Resources Advisor  
University of California Cooperative Extension  
Certified Rangeland Manager #63







CHIEF EXECUTIVE OFFICER

Letter  
A8

Chief Executive Officer

Patricia Hill Thomas  
Chief Operations Officer/  
Assistant Executive Officer

Keith D. Boggs  
Assistant Executive Officer

Patrice M. Dietrich  
Assistant Executive Officer

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

August 5, 2019

Board of Forestry & Fire Protection  
Attention: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

RECEIVED BY  
AUG 07 2019  
BOARD OF FORESTRY AND FIRE PROTECTION

**SUBJECT: ENVIRONMENTAL REFERRAL – CALIFORNIA BOARD OF FORESTRY AND FIRE PROTECTION – PROPOSED STATEWIDE VEGETATION TREATMENT PROGRAM (CALVTP) – NOTICE OF AVAILABILITY OF DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT**

Sir/Madam:

Thank you for the opportunity to review the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time.

The ERC appreciates the opportunity to comment on this project.

Sincerely,

Patrick Cavanah  
Sr. Management Consultant  
Environmental Review Committee

PC:ss

cc: ERC Members

A8-1

August 6, 2019

Board of Forestry and Fire Protection  
Attn: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

**RE: Letter of Support for the California Vegetation Treatment Program's Draft  
Program Environmental Impact Report**

Board of Forestry and Fire Protection:

The San Mateo County Board of Supervisors ("Board") writes in support of the California Vegetation Treatment Program's (the "CalVTP") draft Program Environmental Impact Report ("PEIR"), dated June 24, 2019. Through the San Mateo County Parks Department, the County of San Mateo ("County") manages over 16,000 acres of parkland and open space; much of which qualifies as "treatable landscape" pursuant to the PEIR. As the County strives to take a more active management approach to land stewardship, in part because of the increasing effects of climate change, the PEIR will enable the County to more efficiently assess and implement critical fuel reduction and habitat restoration projects.

Using the treatment activities incorporated in the CalVTP, the County will also be able to reduce the threat of wildfire to its most vulnerable communities and improve overall ecosystem health. These treatment activities include the reduction of fuels within the wildland-urban interface, establishment of fuel breaks, and ecological restoration using manual, mechanical, and chemical treatment approaches. Further, while the County is working to reduce the amount of herbicide used in lieu of an integrated pest management approach to vegetation management, it acknowledges that due to the rapid rate of regrowth of non-native vegetation present in some parks, including eucalyptus trees, gorse, and broom, limited and select use of herbicides will be necessary.

A9-1



Equally important is the ability to more efficiently complete projects that significantly improve the ecological value of habitat in our parks and open spaces. Through the reduction of fuel loads in eligible areas, the County can promote a historic and natural disturbance regime, reduce competition for resources within the ecosystem, and in turn enhance the health of mature trees and vegetation. This will provide benefit to both the wildlife and the habitats they are dependent on.

A9-2

While implementation of the analyzed program activities has been determined to create specified impacts, some of which are considered significant and unavoidable, the adverse impacts created by wildfire are far greater. As California has experienced, recent high intensity and catastrophic landscape-level fires have been the largest, most destructive, and deadliest wildfires on record in the state. These types of fires are destructive to habitat, have caused loss of life and property, and generate air quality levels that are hazardous to public health. The impacts from these types of wildfires far exceed those created by carefully organized and planned fuel reduction and restoration projects that are made possible through the CalVTP.

A9-3

This Board appreciates the extensive work that has been dedicated to this effort. As the agency responsible for preserving San Mateo County's parkland and open space for future generations, the County is prepared to use the opportunities granted by the PEIR for the CalVTP in the most appropriate manner possible. Thank you for your consideration.

Sincerely,



Carole Groom, President  
San Mateo County Board of Supervisors



Tuolumne County  
Administration Center  
2 South Green Street  
Sonora, California 95370



Alicia L. Jamar, Clerk of the Board of Supervisors

**Letter  
A10**

Telephone: (209) 533-5521  
Facsimile: (209) 533-6549  
www.tuolumnecounty.ca.gov

**BOARD OF SUPERVISORS  
COUNTY OF TUOLUMNE**

Sherri Brennan, *First District*  
John L. Gray, *Fourth District*

Ryan Campbell, *Second District*

Daniel Anaiah Kirk, *Third District*  
Karl Rodefer, *Fifth District*

August 6, 2019

Via Email  
[CaIVTP@bof.ca.gov](mailto:CaIVTP@bof.ca.gov)

Board of Forestry and Fire Protection  
Attn: CaIVTP  
P.O. Box 944246  
Sacramento, CA 94244-2460

RE: Comments on Draft Program Environmental Impact Report regarding a  
Proposed Statewide Vegetation Treatment Program

To Whom it May Concern:

The Tuolumne County Board of Supervisors is appreciative of efforts by the Board of Forestry and Fire Protection to streamline the CEQA process in order to increase fuel reduction and ecological restoration projects throughout the state. This Board is also supportive of the intended uses of the CaIVTP Program EIR. In particular, we support the project-specific implementation of CEQA for later activities that are found to be "within the scope" of the CaIVTP PEIR. This will help with needed ongoing fuel break maintenance within our communities.

Developing an implementation program such as the CaIVTP Program EIR to increase prescribed burning, manual and mechanical vegetation treatment, prescribed grazing and herbicide use will help slow or prevent the spread of fire in the critical State Responsibility Areas. This type of model has been needed for many years and the environmental impacts appear to be generally less than significant, especially when comparing the environmental impacts of a large wildland fire.

This Board requests the PEIR contain an analysis of the "No Action Alternative" as well, in order to adequately highlight the catastrophic carbon emissions and losses to carbon storage as well as all the other ecosystem damage that would occur on SRA land should the PEIR not be approved. The Rim Fire in 2013 emitted an estimated fifteen million metric tons of carbon, equivalent to three million cars and destroyed up to \$72,389,913 worth of carbon storage value on private lands alone. A 2013 report from

A10-1

A10-2



Earth Economics assessed the catastrophic economic impacts the Rim Fire had to the totality of the ecosystem, including on SRA lands. A no action or diminished action alternative has potential quantifiable consequences that are critical in this analysis and important when considering environmental impacts to the vegetation treatments proposed in the CalVTP PEIR. Additionally, the impacts to water quality and quantity should be included in the analysis as there is a direct scientific correlation between heavy fuels, water quantity, catastrophic fire and water quality.

Tuolumne County is appreciative of this significant effort by the California Board of Forestry and Fire Protection and looks forward to a continued partnership to implement the PEIR with CAL FIRE for the health and safety of our citizens, our visitors and the natural resources we all value.

Sincerely,



Karl Rodefer, Chairman  
Tuolumne County Board of Supervisors

A10-2  
cont.



# TUOLUMNE UTILITIES DISTRICT

**Letter  
A11**

Board of Directors  
Barbara Balen  
Jeff Kerns  
Ronald D. Kopf  
Ron W. Ringen  
Bob Rucker

August 6, 2019

Board of Forestry and Fire Protection  
Attn: CalVTP (State Clearinghouse No. 2019012052)  
Matt Dias, Executive Officer  
PO Box 944246  
Sacramento, CA 94244-2460

RE: Comments on Board of Forestry and Fire Protection Draft Program Environmental Impact Report regarding a Proposed Statewide Vegetation Treatment Program

Dear Matt Dias:

The Tuolumne Utilities District (TUD) is the largest water and wastewater utility serving nearly 44,000 residents in the rural area of Tuolumne County in the Sierra foothills. The District, along with the Association of California Water Agencies (ACWA) through its Headwaters Framework (2015), applauds the efforts of Governor Newsom's Executive Order on developing a Water Resilience Portfolio. We share the common goal for substantially increasing proactive restoration efforts, as opposed to the current reactive mode that involves "chasing fires" that devastate communities and costing Californians lives, quality of life, water supply and reliability impacts, and many more. The efforts outlined in the Board of Forestry and Fire Protection to increase fuel reduction efforts will decrease the high risk to a wildfire threat while coinciding with the Governor's statewide initiative to a Water Resilience Portfolio and ACWA's Headwaters Initiative (currently being updated).

Tuolumne County was recently listed as the number one County at risk by the California Department of Insurance's, Availability and Affordability of Coverage for Wildfire Loss in Residential Property Insurance in the Wildland-Urban Interface. The protection of the District's watershed and water supply infrastructure are of great concern due to the extreme risk of wildfire in our community. Efforts provided by the CalVTP Program will greatly reduce the impact of wildfire and benefit the overall community.

Developing an implementation program such as the CalVTP Program EIR to increase prescribed burning, manual and mechanical vegetation treatment, prescribed grazing and herbicide use will help slow or prevent the spread of fire in the critical State Responsibility Areas. This type of proactive model has been needed for many years and the environmental impacts appear to be generally less than significant, especially when comparing the environmental impacts of a large wildland fire.

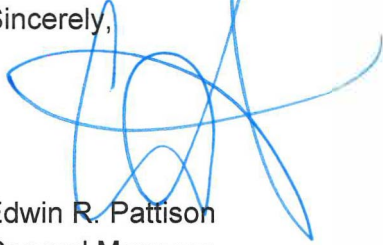
Tuolumne Utilities District is appreciative of this significant effort by the California Board of Forestry and Fire Protection to increase the health and safety throughout the state and Tuolumne County. We look forward to working with the many partners in California in reducing the risks of extreme fire hazards throughout the state, but especially in Tuolumne County.

A11-1

Thank you for your time and consideration. Please contact me by telephone at (209) 532-5536 or by e-mail at [epattison@tudwater.com](mailto:epattison@tudwater.com).

A11-1  
cont.

Sincerely,



Edwin R. Pattison  
General Manager



# SWEETWATER AUTHORITY

505 GARRETT AVENUE  
POST OFFICE BOX 2328  
CHULA VISTA, CALIFORNIA 91912-2328  
(619) 420-1413  
FAX (619) 425-7469  
<http://www.sweetwater.org>

GOVERNING BOARD  
STEVE CASTANEDA,  
JOSE PRECIADO, VICE  
JOSIE CALDERON-SOLIS  
JERRY CANO  
JOSÉ F. CERDA  
HECTOR MARTINEZ  
ALEJANDRA SOTELO-SOLIS

Letter  
A12

TISH BERGE  
GENERAL MANAGER

JENNIFER H. SABINE  
ASSISTANT GENERAL MANAGER

August 6, 2019

Edith Hannigan  
Land Use Planning Program Manager  
California Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

Subject: Comments on Draft Program Environmental Impact Report for the  
California Vegetation Treatment Program  
SWA File: (Gen) Land Use and Environmental

Dear Ms. Hannigan:

Thank you for providing Sweetwater Authority (Authority) with a notice of the draft Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP). The Authority provides the following comments:

## Standard Project Requirements and Mitigation Measures

1. Standard Project Requirement "**SPR AD-4 Public Notifications for Prescribed Burning**" will require project proponents to send notification letters to the local county supervisor in advance of a prescribed fire. This requirement, however, does not identify what type of notification will be given to other major stakeholders, including local water districts and other utilities. It is recommended to include in the notification process any local water districts or utility companies that may own essential infrastructure within, near, or immediately downstream of the affected area.
2. Standard Project Requirement "**SPR GEO-4 Erosion Monitoring**" mentions that the project proponent will inspect treatment areas for the proper implementation of erosion controls. SPR GEO-4, however, limits these inspections to areas managed with mechanical and prescribed burning treatments. Erosion issues may result from any type of activity that removes vegetation and directly or indirectly disturbs soils, regardless of the method. To ensure erosion and sediment controls are in place and to prevent any potential impacts to water quality, it is recommended that erosion and sediment controls are implemented with all treatment methods, as necessary.

A12-1

A12-2

Edith Hannigan

Re: Comments on Program Environmental Impact Report for the California Vegetation Treatment Program

August 6, 2019

Page 2 of 3

1. As currently written, Standard Procedure Requirement “**SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones**” would require the establishment of Watercourse and Lake Protection Zones (WLPZs), as described in the California Forest Practice Rules. While this measure aims to protect watercourses and water quality, it may fail to adequately protect drinking water sources, including surface water reservoirs. WLPZs appear to have been developed with the goal of protecting watercourses and lakes from commercial timber operations and not from vegetation treatment activities, as described in the CalVTP. It is unclear how the WLPZs will protect drinking water sources from prescribed burns, targeted herbicide applications, or any of the other proposed vegetation treatment methods.

The Authority, as a water agency, is concerned that source water reservoirs may be impacted by nutrient and organic matter load increases, resulting from capturing runoff from areas that are subject to prescribed fires. Captured runoff with high concentrations of nutrients and organic matter may result in (1) an increase of algae bloom frequencies at lakes and reservoirs, (2) the need for treating such algae blooms, and (3) an overall increase to the cost of treating reservoirs and drinking water, among other unintended consequences such as taste and odor and cyanotoxin production. Herbicide treatments and other CalVTP treatment methods may also result in an increase of other pollutants of concern at reservoirs. A well-known state program that various water districts use to conduct drinking water source analyses is California’s Drinking Water Source Assessment Program (DWSAP<sup>1</sup>). Although local water districts may modify it as they see fit, DWSAP has guidance for assessing impacts to drinking water sources from potentially contaminating activities (PCAs) within the watershed, including how to determine appropriate protection zones for drinking water reservoirs and how to conduct vulnerability analysis for both surface water and groundwater resources.

To avoid potential conflicts with local water districts and their source water protection programs, it is recommended to review DWSAP and revise SPR HYD-4 to incorporate DWSAP standards or similar protective measures. At a minimum, the CalVTP should incorporate a mitigation measure or standard project requirement that requires coordination between project proponents and applicable water districts before vegetation treatment activities take place to ensure drinking water sources will be fully protected.

A12-3

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<sup>1</sup> For more information on the DWSAP, see

[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/DWSAPGuidance.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/DWSAPGuidance.html).



Edith Hannigan

Re: Comments on Program Environmental Impact Report for the California Vegetation  
Treatment Program

August 6, 2019

Page 3 of 3

The Authority appreciates the effort that the California Board of Forestry and Fire Protection is currently undertaking during the development of the CalVTP. If you have any questions, please do not hesitate to contact our Environmental Project Manager, Israel Marquez at [imarquez@sweetwater.org](mailto:imarquez@sweetwater.org), or (619) 409-6759.

A12-3  
cont.

Sincerely,

SWEETWATER AUTHORITY



Ron R. Mosher  
Director of Engineering

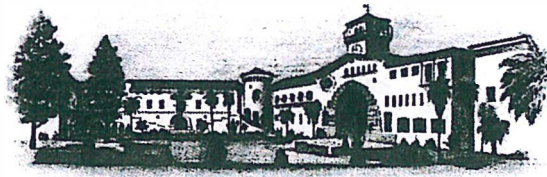
RRM:IM:ah

cc: Israel Marquez, Sweetwater Authority  
Mark Hatcher, Sweetwater Authority  
Justin Brazil, Sweetwater Authority

# County Of Santa Barbara

**Mona Miyasato**  
County Executive Officer

105 East Anapamu Street  
Room 406  
Santa Barbara, California 93101  
805-568-3400 • Fax 805-568-3414  
www.countyofsb.org



**Executive Office**

Assistant County Executive

Letter  
A13

John Plowman  
Bernard Melekian  
Terri Nisich  
Matt Pontes

Deputy County Executive Officer  
Dennis Bozanich

August 7, 2019

Attention: CalVTP  
Keith Gilles, Chair  
State Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, California 94244-2460

Email: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

RE: Notice of Availability of Draft Program Environmental Impact Report Regarding a Proposed Statewide Vegetation Treatment Program

Dear Mr. Gilles:

Thank you for the opportunity to comment on the Notice of Availability of Draft Program Environmental Impact Report Regarding a Proposed Statewide Vegetation Treatment Program. At this time, the County submits comments from the Planning and Development Department and Fire Department.

If you should have further questions, please do not hesitate to contact my office directly, Lisa Plowman, Director, Planning and Development Department, at (805) 568-2086, or Rob Hazard, Division Chief and Fire Marshal, Fire Department, at (805) 681-5554.

A13-1

Sincerely,

Dennis Bozanich  
Deputy County Executive Officer

cc: Lisa Plowman, Director, Santa Barbara County Planning and Development Department  
Daniel Klemann, Deputy Director of Long Range Planning, Planning and Development Department  
Rob Hazard, Division Chief, County Fire Department

Enclosure: Santa Barbara County Planning and Development Department Letter, dated August 6, 2019  
Santa Barbara County Fire Department Letter dated August 6, 2019



# County of Santa Barbara Planning and Development

Lisa Plowman, Director  
Jeff Wilson, Assistant Director  
Steve Mason, Assistant Director

August 6, 2019

Board of Forestry and Fire Protection  
Attention: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460  
[CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

**Re: Notice of Availability of a Draft Program Environmental Impact Report for the California Vegetation Treatment Program**

Dear Board of Forestry and Fire Protection:

The County of Santa Barbara Planning and Development Department has reviewed the Draft Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP) and appreciates the opportunity to provide the comments listed below.

### Implementation Framework

1. Under Section 2.6, when identifying who would be able to use the PEIR, the CalVTP should further clarify its applicability to “later activities that would be funded and/or implemented by private landowners, Fire Safe Councils, or non-governmental organizations.” The draft PEIR (page 2-29) states that the “implementing entity would enter into a contract or agreement with CAL FIRE to implement the CalVTP activity.” Under these circumstances, which entity would be the lead agency? Which entity would be obtaining permits for the activities?
2. Section 2.8 of the PEIR (Potential Permits and Approvals Required) should state that activities undertaken by entities other than CAL FIRE and State and local agencies may be subject to local agency permits prior to conducting any vegetation treatment projects, depending on the scope of the activities and local agency ordinance requirements. For example, potential future vegetation treatment project proponents, other than CAL FIRE and other Santa Barbara County Departments, should be aware that it may be necessary to obtain a land use entitlement from the County Planning and Development Department in order to conduct vegetation treatments that rely on the PEIR for compliance with the California Environmental Quality Act (CEQA).<sup>1</sup>

A13-2

A13-3

<sup>1</sup> Depending on location, County regulations may require a permit for the removal of vegetation for activities by nongovernmental entities. For example, Santa Barbara County Comprehensive Plan Land Use Element Hillside

3. The PEIR should further clarify the party responsible for concluding that a future vegetation treatment project is consistent with the PEIR and that no further environmental review will be necessary. In addition, it is not clear who will file the Notice of Determination and how the public will be notified of the subsequent determination regarding the environmental review.

A13-4

### **Comprehensive Plan Consistency**

4. County departments (e.g., County Fire Department) that could act as a project proponent would need to ensure their vegetation treatment project is consistent with the County's Comprehensive Plan (General Plan) and applicable community plan policies pursuant to California Government Code Section 65402. These policies may require protection of specific resources and dictate mitigation requirements for the loss or degradation of these resources (e.g., sensitive natural communities) related to vegetation treatment projects. For instance, certain coastal sage scrub and chaparral vegetation alliances are designated as Environmentally Sensitive Habitats in the Eastern Goleta Valley Community Plan, and Policy ECO-EGV-2.5 requires restoration at a 2:1 mitigation ratio for the loss of biological resources. Policies also exist that discourage the removal of protected trees and provide offset ratios for their replacement within certain community plan areas. These policies would also apply to non-governmental project proponents. The Final PEIR should state that there may be local environmental requirements, such as those mentioned above, with which future vegetation treatment activities would need to comply.

A13-5

### **Type Conversion**

5. The PEIR states that it is beyond its scope to define type conversion for the purposes of SB 1260 compliance which prohibits type conversion in chaparral or sage scrub vegetation communities. The PEIR further states that the definition for the purposes of SB 1260 compliance may be broader than the ecological definition provided in the PEIR and take into account geographic context, and that a project proponent may use the ecological definition to substantiate how type conversion is defined within the context of a project. Requiring each project proponent to determine the criteria by which type conversion is determined could result in inconsistent application of what is intended to be a uniform standard that provides protection to chaparral and coastal sage scrub habitats. It may not be appropriate to provide a general definition for all projects statewide. However, the PEIR should provide guidance on how to evaluate the factors that could result in type conversion. This should include the geographic extent of habitat modification and any other criteria that could contribute to type conversion based on literature and existing case studies. Such guidance could point to existing information

A13-6

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and Watershed Protection Policy 8 and Chapter 9A of the County Code requires brushing permits under specific circumstances; and several community plans may require land use permits for vegetation removal above certain thresholds within identified environmentally sensitive habitats (County and Montecito Land Use and Development Codes).

within the PEIR, which states on page 3.6-183, “Shortened fire return interval has been identified as a primary driver of type conversion from chaparral and coastal sage scrub vegetation types to vegetation types dominated by nonnative herbaceous vegetation in Southern California (Syphard et al. 2019).” By providing additional information and guidance, future vegetation treatment projects may benefit from better design and implementation and project proponents and decision makers would have additional substantial evidence on which to base their project findings.

A13-6  
cont.

6. Preventing type conversion in coastal sage scrub and chaparral habitats can be inherently challenging because of the difficulty in predicting confounding factors such as multi-year drought and invasion of invasive plants. Some fuel treatment projects will be ongoing or multi-year treatments in coastal sage scrub and chaparral vegetation alliances. The PEIR incorporates a monitoring and adaptive management framework; however, there is no requirement to monitor and adapt treatments or restore areas to ensure type conversion does not occur for treatment projects that require ongoing or periodic maintenance. Type conversion is avoided if habitat function is maintained, but there is no specific requirement within Standard Project Requirement BIO-5 (Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub) to monitor treatments to ensure type conversion is avoided and to adapt treatment practices to prevent it. Planning and Development recommends requiring increased monitoring and adaptive management for treatments that require periodic maintenance in coastal sage scrub and chaparral vegetation communities to allow project proponents to adjust treatment practices based on the conditions at that time if monitoring suggests type conversion could occur.

A13-7

#### **Administrative Standard Project Requirements**

7. The PEIR should state explicitly that for fuel treatments that require periodic maintenance in order to maintain desired conditions, the administrative Standard Project Requirements (SPR) should be applied prior to initial treatment and before any ongoing maintenance treatments in order to adequately avoid or mitigate impacts. For instance, SPRs that require sensitive wildlife surveys would likely be necessary prior to initiating maintenance activities on vegetation to adequately mitigate potential impacts to these resources.

A13-8

#### **Archaeological, Historical, and Tribal Cultural Resources**

8. The draft PEIR analysis and Impact CUL-3 identify 12 Native American tribes that were contacted regarding preparation of the CalVTP PEIR, identify four tribes that requested consultation, and one tribe (San Manuel Band of Mission Indians) with which consultation is ongoing. The impact analysis associated with Impact CUL-3 and Mitigation Measure CUL-3 appear to conclude that upon completion of consultation with the San Manuel Band of Mission Indians and incorporation of any mitigation if tribal cultural resources are identified by this tribe, that the impact will be mitigated. However, according to Table 3.5-1 of the draft PEIR, several tribes local to Santa Barbara County were not contacted. These tribes, including the federally recognized Santa Ynez Band of

A13-9



Chumash Indians, and the Barbaraeno/Ventureno Band of Mission Indians and the Coastal Band of Chumash Nation, have notified the Native American Heritage Commission requesting notification of project environmental review. It is likely that prehistoric archaeological rock art as well as other prehistoric sites in Santa Barbara County, which may also qualify as tribal cultural resources, are located within the treatable landscape. Contact with tribes (and possibly others) early in the environmental review process is important to determine whether future contact and mitigation requirements would apply to fuel treatment activities. Please ensure these tribes have been contacted regarding the Draft PEIR for the CalVTP project, pursuant to PRC Section 21080.3.1.

A13-9  
cont.

Thank you for the opportunity to provide comments on the Draft PEIR. If you have any questions or require further information, please contact me at (805) 568-2086 or Mr. Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director  
Planning & Development Department

cc: Dan Klemann, Deputy Director, Long Range Planning Division  
Whitney Wilkinson, Senior Planner, Planning and Development Department  
Julie Harris, Senior Planner, Planning and Development Department  
File



## Fire Department

"Serving the community since 1926"

### HEADQUARTERS

4410 Cathedral Oaks Road  
Santa Barbara, CA 93110-1042  
(805) 681-5500 FAX: (805) 681-5563

Mark A. Hartwig  
Fire Chief  
County Fire Warden

Rob Heckman  
Deputy Fire Chief

August 6, 2019

California Board of Forestry and Fire Protection  
Attn: CalVTP  
Mail: PO Box 944246  
Sacramento, CA 94244-2460

Dear Board of Forestry and Fire Protection,

SUBJECT: Notice of Availability/ Draft California Vegetation Treatment Program  
PEIR

Santa Barbara County Fire Department (SBC Fire) has reviewed the Draft Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP). SBC Fire supports the goals of the CalVTP and agrees that it could be an effective tool to address fuels management both state-wide and in Santa Barbara County. SBC Fire has an active fuels management program that reflects the fuel treatment types outlined in the Draft CalVTP- (1) WUI treatments, (2) strategic fuel breaks, and (3) prescribed fire. SBC Fire staff utilize the aging Vegetation Management Program (VMP) PEIR for prescribed fire projects, and individual CEQA analysis for WUI and fuel break treatments. The CalVTP PEIR would improve our ability to provide consistent, accurate, and quality CEQA review for future projects.

Santa Barbara County has experienced an intense decade of wildland fire. Past fuels management activities have proven instrumental in limiting structure loss, increasing firefighter and public safety, and improving fire control objectives. Community defensible space (WUI) treatments in the Santa Barbara front country foothills were utilized during the 2018 Thomas Fire to successfully protect thousands of structures. Strategic fuel breaks have been used to support critical backfiring operations on multiple incidents including the 2007 Zaca Fire, the 2008

A13-10

Gap Fire, The 2009 La Brea Fire, the 2017 Whittier Fire, and the 2018 Thomas Fire. Additionally, recent fires have demonstrated the value of vegetation age-class reduction, both from prescribed fire and wildfire, in providing large landscape-scale areas that limit fire spread. Chaparral fuel beds in Santa Barbara County have shown remarkable fire resistance in sub 20 year age class. Given the above described wildfire impacts SBC Fire supports the expanded scope of the Draft CalVTP PEIR.

A13-10  
cont.

An important component of vegetation management is the benefit to life safety, both to the public and to firefighters engaged in fire suppression activities. Properly designed fuel treatments can significantly reduce fireline intensities creating much safer conditions for firefighters. This holds true for all three types of fuel treatments described in the Draft CalVTP. Fuel break treatments when aligned with indirect fire suppression strategies can greatly enhance both safety and efficacy of backfiring operations. Prescribed fire treatments can help reduce fireline intensities in a large area, increasing the safety of firefighters engaged in initial attack, and WUI treatments provide for increased safety for engine crews engaged in structure protection. All these fuel treatments have the potential to greatly increase the safety of the public during evacuation and/or forced shelter-in place activities. The Draft CalVTP should emphasize the benefit to firefighter and public safety when describing the need, purpose, and benefits of the program.

A13-11

Santa Barbara County represents the transition from Southern to Central California, and as such contains unique vegetation alliances. Our local weather patterns are also distinct. To adequately support fuel treatment strategies specific to our unique area the Draft CalVTP should address these local conditions, particularly the impact of previous fires limiting subsequent fire spread. Prescribed fire in sage and grass/oak woodland vegetation alliances should be included in the scope of the proposed PEIR, as well as the impact of traditional herbivory, particularly when combined with range improvement prescribed fire. The efficacy of our local strategic fuel breaks, demonstrated in recent large fires, should also be incorporated into the EIR.

A13-12

A13-13

A13-14

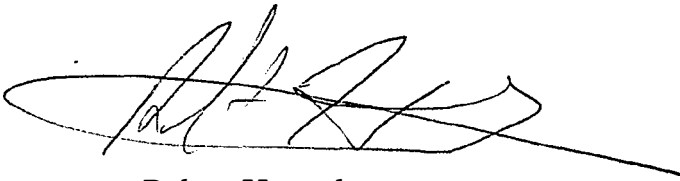
The Draft CalVTP describes the implementation framework in rather broad terms. It would be beneficial to provide additional clarity for the Contract Counties (LA, Ventura, Santa Barbara, Kern, Marin, Orange) regarding the Contract County Fire Department interactions with local governing bodies such as County Board of Supervisors, Fire District Boards, etc. when the Fire Department is the Project Proponent for projects within both the SRA and/or the LRA. Many county General Plans address and regulate activities that have the potential to impact sensitive habitat or vegetative alliances. The Standard Project Requirements should provide a comprehensive pathway to ensure that projects remain consistent with local plans.

A13-15

Santa Barbara County Fire supports the Board of Forestry in the continued effort to craft a comprehensive plan to reduce wildland fire risk statewide. The Draft CalVTP PEIR as outlined in the NOA will be a powerful tool for local agencies engaged in fuel reduction activities.

As always, if you have any questions or require further information, please call 681-5568 or 681-5523.

In the interest of life and fire safety,

A handwritten signature in black ink, appearing to read 'R. Hazard', with a long horizontal flourish extending to the right.

Robert Hazard  
Fire Marshal  
Santa Barbara County Fire Department

**DEPARTMENT OF TRANSPORTATION**

DIVISION OF TRANSPORTATION PLANNING

1120 N Street, MS-32

SACRAMENTO, CA 95814

PHONE (916) 653-0548

FAX (916) 653-4520

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life.*

August 7, 2019

Attention: Edith Hannigan  
Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

SCH#: 2019012052  
GTS# 74-ALL-2019-00098  
Statewide

Subject: Draft-Program Environmental Impact Report (DPEIR) for the California  
Vegetation Treatment Program (VTP)

Dear Ms. Hannigan:

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft- Program Environmental Impact Report (DPEIR) for the proposed Statewide Vegetation Treatment Program. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

A14-1

The project proposes 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. The project has a statewide scope. As owner and operator of the State Highway System (SHS), Caltrans is a responsible agency and has the following comments:

**General Comments:**

1. Caltrans has concerns related to potential limited visibility on state highways from prescribed treatment burn smoke. Please review Caltrans Highway Design Manual (HDM) Section 100 for sight distance and the Transportation Management Plan (TMP) logistics (e.g. time of day, stop control, equipment and worker staging areas, and other fire treatment related activities).

A14-2



For more information on sight distance and traffic management refer to the following website: <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>

A14-2  
cont.

2. Caltrans performs fire hazard control activities to roadside grasses to reduce fire risk. Additional fuels treatment is needed to address all levels of fire fuels (i.e., thinning of shrubs and trees), which includes embankment protection and potential ditch debris removal. Caltrans desires collaboration with Cal Fire to identify and partner on projects within high severity fire risk zones along highways. Collaboration will help the effort of creating a clear recovery zone area and SHS defensible space in the event of a naturally occurring fire or other hazard.

A14-3

3. Coordination with federal vegetation treatment plans for federal lands adjacent to the state Right-of-Way (R/W) is recommended.

A14-4

**Scenic Highway:**

4. Caltrans requests Cal Fire's consultation with District Landscape Architect staff regarding tree removal or trimming within a State Scenic Highway Corridor.

A14-5

**Transportation Planning / Traffic Operations:**

5. Please coordinate further with Caltrans' Traffic Operations and Maintenance for any activity that may occur in proximity or on Caltrans facilities.
  - a. If Cal Fire operations require any staging or activities on Caltrans facilities, the applicant must submit a traffic handling plan in addition to traffic management plans for further review during any encroachment permit process.
  - b. Vegetation removal may destabilize the surface soil layer. Make certain that soils remain stable to prevent unnatural erosion and debris from occurring.
  - c. During operations, please limit the amount of debris that may fall into Caltrans facilities. Please ensure that Caltrans culverts and drainage remain free from any debris and unobstructed.

A14-6

A14-7

A14-8

**Permits R/W:**

6. Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within Caltrans' R/W prior to activity. As part of the encroachment permit process, the applicant must provide an approved final environmental document including California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at:  
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>  
For Caltrans District Encroachment Permits Contacts please refer to the following link: <https://dot.ca.gov/programs/traffic-operations/ep/district-contacts>

A14-9

**Resources:**

7. For all vegetative removal areas, please consider cultural resources and Native American areas of special concern. Please coordinate with Caltrans' District Native American Liaisons.
8. As an agency with fee title and easement holdings over a considerable extent of land in the vegetation treatment project area, Caltrans is responsible for compliance with Public Resource Code (PRC) 5024 (which is intended to require that State Owned Historic Resources are protected and managed). Impacts to State Owned Historic Resources through the Cal VTP within Caltrans' R/W may require assessment and mitigation. The Cal VTP should be implemented in such a manner as to avoid impacts to State Owned Historic Resources.

A14-10

A14-11

**Maintenance:**

9. The California Vegetation Treatment Program (Cal VTP) includes three general types of treatments: wildland-urban interface (WUI) fuel reduction; fuel breaks that actively support fire control activities; and ecological restoration projects to restore ecosystem processes, conditions

A14-12

and resiliency to reflect historic vegetative composition, structure and habitat value. Due to the linear nature of the State Highway System (SHS) in every county in California, Caltrans has a strategic opportunity to participate in wildfire risk reduction to the state's people and natural resources under the coverage provided by Cal VTP. Caltrans Maintenance Forest Management Program has identified three primary land management objectives for vegetation treatment types covered by Cal VTP that may need further discussion in the document. 1) to reduce wildfire ignitions that originate from vehicles on the state highway system right of way; 2) to reduce emergency expenditures necessary to restore the highway infrastructure after wildfire; and 3) to restore vegetation in burn areas to re-establish resilience where debris flow, slope instability and flooding have increased and threaten the safety of highway users.

A14-12  
cont.

10. Defensible space zone along highways is envisioned as a band of vegetation treatment beyond the existing Clear Recovery Zone (CRZ) along all miles of state highways. CRZs are typically a clear zone with no vegetation other than ground cover. Treatable acres along roadways should include a discussion of CRZs in the Cal VTP. For more information concerning CRZ please refer to the Caltrans HDM Chapter 300 at the following website: <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>

A14-13

11. Land management objectives for defensible space to reduce wildfire risk and increase safety should be determined by a collaborative effort with Caltrans, Cal Fire, local agencies, and stakeholders in developing effective vegetation treatment baseline condition and alternatives once a baseline condition is established.

12. Please clarify if Cal Fire's existing Chaparral Management Program is combined with the existing Vegetation Management Program (VMP), and the extent of coverage these programs have under the Cal VTP.

A14-14

13. As noted in Section 3.12, "Land Use and Planning, Population and Housing," ...achieving the identified treatment acreage target under the Cal VTP within the vegetated roadside of the R/W owned and maintained by the SHS would require dedicated vegetation treatment

A14-15

crews within Caltrans Maintenance to maintain the fuels reduction risk reduction investment on a five-year maintenance cycle. Please discuss how the Cal VTP would support maintenance activities.

A14-15  
cont.

14. As noted in Table 3.12-3 in Section 3.12, "Land Use and Planning, Population and Housing," the majority of counties in California, including those in the 20.3 M acres of treatable landscape for the proposed Cal VTP, are expected to experience population growth, and associated expansion of development, by 2060 (DOF 2018). The expansion of development will result in increased demand for multimodal transportation facilities to serve the additional population. Please add discussion to the Cal VTP to affect that treatable landscape priorities should be considered higher where land-use pressure and transportation investment demand overlap.

A14-16

15. As noted in Section 4.4.14, "Transportation," the geographic scope of the cumulative transportation analysis covers the entirety of the treatable landscape and the surrounding roadway network used to access individual vegetation treatment sites. The SHS is comprised of 51,900 lane miles of roadway and approximately 350,000 acres. Of the 350,000 acres, approximately 98,000 is managed as pavement and 252,000 acres is considered roadside.

A14-17

A highly variable roadside vegetation condition exists, generally divided into "landscaped" and "non-landscaped" roadsides. Maintenance of landscaped roadside, (acres without planting or irrigation system design improvements), occurs on approximately 31,400 acres. Close to 210,000 acres are potentially treatable vegetation acreage (non-landscaped acres) along the state highway. Assessment of the existing treatable acres and condition as a "natural asset" is not discussed as an activity under Cal VTP but would be essential to establish a baseline condition (Refer to item 11: Land Management Objectives).

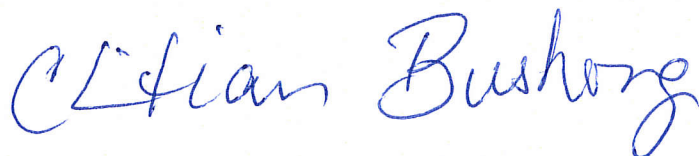


Board of Forestry and Fire Protection  
August 7, 2019  
Page 6

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Lloyd Light (916)651-8204. Email [Lloyd.Light@dot.ca.gov](mailto:Lloyd.Light@dot.ca.gov)

A14-17  
cont.

Sincerely,



Christian Bushong, LD-IGR Branch Chief  
Office of Smart Mobility and Climate Change  
Division of Transportation Planning

c: Coco Briseno, Caltrans Deputy Director of Planning and Modal Programs  
Steve Takigawa, Caltrans Deputy Director of Maintenance and Operations  
Karla Sutliff, Caltrans Deputy Director of Project Delivery  
Scott Morgan, Deputy Director Administration, State Clearing House, OPR





August 7, 2019

Via Email

Keith Gilles, Chair  
Board of Forestry and Fire Protection  
Attn: CalVTP  
P.O. Box 944246  
Sacramento, CA 94244-2460

Re: Notice of Availability of Draft Program Environmental Impact Report Regarding a  
Proposed Statewide Vegetation Treatment Program

Dear Mr. Gilles:

The Santa Clara Valley Open Space Authority (Authority) has reviewed the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP) and confirms our intent to participate as a responsible agency under the CalVTP. The Authority is also in support of the proposed program over the alternatives outlined in the PEIR.

As part of the CalVTP, the process outlined in Section 2.6 Implementation Framework, lays the groundwork for responsible agencies to more efficiently implement projects that will improve ecosystem function and reduce the risk of catastrophic wildfire. The streamlining provided through the CalVTP PEIR will save the Authority time and cost in implementing projects.

The Authority appreciates the opportunity to provide comments on the Draft PEIR for the CalVTP. If you have any questions regarding this letter, please contact me at [jhooper@openspaceauthority.org](mailto:jhooper@openspaceauthority.org) or (408) 224-7476.

Sincerely,

Jennifer Hooper  
Planning Technician

A15-1

**Hannigan, Edith@BOF**

**From:** Gonzalez, Brian <Brian.Gonzalez@ladwp.com>  
**Sent:** Thursday, August 8, 2019 4:51 PM  
**To:** CALVTP@BOF  
**Subject:** Comments - California Vegetation Treatment Program PEIR

**Warning:** this message is from an external user and should be treated with caution.

Good afternoon,

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the draft California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR). After reviewing the PEIR, the LADWP has determined the PEIR may have impacts to Power System infrastructure and respectfully submits the following comments:

1. *Board of Forestry and Fire Protection referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons, or invitees of Board of Forestry and Fire Protection; or any other Board of Forestry and Fire Protection affiliated entities.*
2. *Board of Forestry and Fire Protection shall acknowledge that the LADWP is an integral component of the transmission line system which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC). Safety and protection of critical facilities are primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion, and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.*
3. *The following locations will potentially be impacted by the California Vegetation Treatment Program:*
  - *Mojave Desert Ecological Section*
  - *Mono Ecological Section*
  - *Sierra Nevada Ecological Section*
  - *Southeast Great Basin Ecological Section*
  - *Southern California Coast Ecological Section*
  - *Southern California Mountain and Valley Ecological Section*
4. *Prescribed burning will not be allowed on the TLRW as no fires and burning of materials are allowed on LADWP's TLRW. The burning of materials on the TLRWs may lead to power outages in the transmission system and impact the system reliability of the transmission grid.*
5. *Mechanical Treatment, Manual Treatment, and Prescribed Herbivory must be reviewed and approved by the LADWP Right-of-Way Engineering Group before being implemented on LADWP's TLRW.*
6. *Herbicides within LADWP's TLRW will require LADWP's Environmental Group's review & approval.*

A16-1

A16-2

A16-3

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A16-6

7. *This comment letter shall in no way be construed as an approval of any project.*

A16-7

LADWP's formal response letter that includes the comments above has been sent via US Mail.

Should you have any questions or if I can be of further assistance, please do not hesitate to contact me.

Kind regards,

**BRIAN GONZALEZ**

**Environmental Planning and Assessment**

**Los Angeles Department of Water and Power**

111 N. Hope Street, Room 1044

Los Angeles, CA 90012

213.367.2612

[brian.gonzalez@ladwp.com](mailto:brian.gonzalez@ladwp.com)

**BRIAN GONZALEZ**

**Environmental Planning and Assessment**

**Los Angeles Department of Water and Power**

111 N. Hope Street, Room 1044

Los Angeles, CA 90012

213.367.2612

[brian.gonzalez@ladwp.com](mailto:brian.gonzalez@ladwp.com)

-----Confidentiality Notice-----

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Hannigan, Edith@BOF

**From:** Crader, Phillip@Waterboards <Phillip.Crader@waterboards.ca.gov>  
**Sent:** Thursday, August 8, 2019 4:51 PM  
**To:** CALVTP@BOF  
**Cc:** Mogus, Karen@Waterboards; Hann, Paul@Waterboards; Mascia, Jeanie@Waterboards  
**Subject:** Comments - Draft Program Environmental Impact Report Regarding a Proposed Statewide Vegetation Treatment Program - State Clearinghouse number 2019012052

**Warning:** this message is from an external user and should be treated with caution.

The State Water Resources Control Board and Regional Water Quality Control Boards (collectively the Water Boards) appreciate the opportunity to review the California Board of Forestry and Fire Protection’s Draft Program Environmental Impact Report Regarding a Proposed Statewide Vegetation Treatment Program (Draft PEIR) for the proposed California Vegetation Treatment Program (CalVTP).

The proposed CalVTP directs implementation of vegetation treatments to serve as one component of the state’s range of actions to reduce the risk of loss of lives and property, reduce fire suppression costs, and protect natural resources from wildfire. The CalVTP seeks to substantially increase the pace and scale of vegetation treatments to contribute to achieving a statewide total of at least 500,000 acres per year on non-federal lands, consistent with the former Governor’s EO B-52-18, which results in a CalVTP target up to 250,000 acres per year after considering other types and areas of vegetation treatments.

A17-1

The Water Boards understand the important need to manage forests and other natural and working lands to mitigate wildfire hazards to ultimately reduce the likelihood of catastrophic wildfire and its impacts to water quality and the environment. The Water Boards support the goals of the CalVTP and urge the Board of Forestry and Fire Protection to adopt the Draft PEIR.

In the interest of providing additional clarity to the proposed requirements described in the Draft PEIR, the Water Boards suggests that all relevant sections of the CalVTP listing Standard Project Requirements (SPRs) and related mitigation measures should be revised to explicitly state that:

A17-2

1. Project implementers must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive applies.

2. Use of herbicide should be prohibited within the riparian buffers of any classified watercourse or waterbody – i.e. 150 foot buffers for Class I (fish bearing and domestic water sources), 100 ft for Class II (non-fish bearing streams that support aquatic habitat, seeps, springs, ponds and wetlands), and 50 foot for Class III watercourses.

A17-3

3. Vegetation treatments performed using application of herbicides shall not cause herbicides to be detected in surface waters.

The Water Boards look forward to continuing to work collaboratively with the Board of Forestry and Fire Protection and your staff in planning and permitting activities related to implementation of the CalVTP. Phil Crader, Assistant Deputy Director with the State Water Resources Control Board, is the Water Boards’ point of contact relating to CalVTP implementation. Should you or your staff have questions, please do not hesitate to contact Mr. Crader.

A17-4

Sincerely

Karen L. Mogus  
Deputy Director  
Division of Water Quality





**MOUNTAINS RECREATION & CONSERVATION AUTHORITY**  
 Ramirez Canyon Park  
 5810 Ramirez Canyon Road  
 Malibu, California 90265  
 Phone (310) 589-3230 Fax (310) 589-3237

**Letter  
A18**

August 8, 2019

Board of Forestry and Fire Protection  
 Attn: CalVTP  
 PO Box 944246  
 Sacramento, California 94244-2460

**Comments on Draft Program EIR  
 Proposed Statewide Vegetation Treatment Program  
 SCH No. 2019012052**

Dear Board Members:

The Mountains Recreation and Conservation Authority (MRCA) manages over 70,000 acres of open space in Los Angeles and Ventura counties including all lands owned by the Santa Monica Mountains Conservancy, State of California. The majority of these lands support chaparral vegetation along with approximately 1,500 acres of coastal sage scrub and more inland Venturan sage scrub.

A18-1

The health and diversity of chaparral and coastal sage vegetation is particularly susceptible to soil disturbance and ill-timed and repeated fire events. Both communities are also susceptible to excessive levels of mechanical and manual disturbance. Likewise, overly light mechanical and manual treatments may not yield the desired level of fire protection. No matter how good this Program Environmental Impact Report (PEIR) is, and how good subsequent site specific plans are to physically clear these two community types, the knowledge, focus, and commitment of the people doing the actual clearance is what will determine the acceptability of both the immediate and multi-year outcomes. This PEIR does and cannot include an analysis of how such onsite protection can be provided under the proposed wholesale level of vegetation clearance or fuel reduction.

Another major factor not sufficiently addressed in the PEIR is that fluctuating annual soil moisture conditions can totally alter the current time ecological acceptability of mechanical and manual treatments. Both the above and below ground adverse effects of clearance during dry and particularly cumulative drought years, could often warrant holding off clearing until there is vegetation recovery from sufficient rainfall. The PEIR cannot provide this level of biological sensitivity. As a result, without required subsequent public environmental review, otherwise easily avoidable significant ecological impacts would occur frequently in chaparral and coastal sage scrub communities because of pressure to proceed from fire agencies and other advocates.

A18-2

SPR BIO-5 states, "Avoid environmental effects of type conversion and maintain function in chaparral and coastal sage scrub." That policy is of course excellent in concept but extremely difficult and expensive to implement because of the combined knowledge and site specific attention necessary to ensure that outcome over thousand of variable acres.

A18-3

The MRCA can support PEIR Alternative B because it provides a reduced acreage program (60,000 acres annually) limited just to fuel reduction in the Wildland Urban Interface (WUI) statewide. However, based on the PEIR analysis Alternative B has no legs with a total absence of prescribed burns, herbicide, fuel breaks, and restoration as program tools.

A18-4

As presented in the PEIR, the MRCA cannot support any other project alternatives (each with 250,000 acres affected annually) until the inclusion of fuel breaks is removed from chaparral and coastal sage scrub vegetation communities along with prescribed burns as is put forth in Alternative C. From our experience, approximately 90 percent of all fuel breaks within and proximate to MRCA managed lands do not stop wind driven fires and result in a permanent substantial sources of erosion and vectors for the spread of non-native invasive vegetation. Fuel breaks and staging areas have their place in the MRCA's management of natural lands but not in the wholesale, pre-approved fashion of the relevant project alternatives.

A18-5

MRCA recommends an alternative that would be limited to 60,000 acres of WUI fuel reduction but does not categorically exclude the use of herbicide and does put an emphasis on restoration.

A18-6

Thank you for your consideration. Should you have any questions, please contact me at (310) 589-3200, ext. 128, [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov), or at the above letterhead address.

Sincerely,



Paul Edelman  
Chief of Natural Resources and Planning

August 9, 2019

Board of Forestry and Fire Protection  
Attn: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

Subject: Statewide Vegetation Treatment Program

To Whom It May Concern,

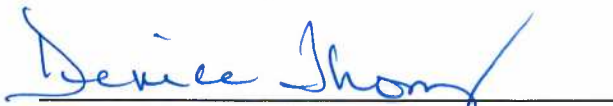
Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Anthony Ciuffetelli, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Anthony Ciuffetelli at (805) 654-2443.

A19-1

Sincerely,



Denice Thomas, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 19-008



**WATERSHED PROTECTION**  
WATERSHED PLANNING AND PERMITS DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Sergio Vargas, Deputy Director – (805) 650-4077

**MEMORANDUM**

**DATE:** August 8, 2019  
**TO:** Anthony Ciuffetelli, Case Planner  
County of Ventura  
**FROM:** Sergio Vargas, Deputy Director S.V.  
**SUBJECT:** RMA 19-008 Statewide Vegetation Treatment Program  
Watershed Protection Project Number: WC2019-0049

Pursuant to your request dated July 2, 2019, this office has reviewed the submitted materials and provides the following comments.

**PROJECT LOCATION:**

California - Statewide

**PROJECT DESCRIPTION:**

Expansion of California Department of Forestry and Fire Protection's (CAL FIRE's) vegetation treatment activities to reach a total treatment acreage target of approximately 250,000 acres per year to contribute to the achievement of the 500,000 annual non-federal acres expressed in Executive Order (EO) B-52-18, signed by former Governor Edmund G. Brown Jr. in May 2018.

The California Vegetation Treatment Program (CalVTP) is proposed by the California Board of Forestry and Fire Protection (Board) to treat vegetation that could become fire fuel to meet this Order. The purpose of the CalVTP is to serve as one component of the state's range of actions to reduce wildfire risk and diminish or avoid the harmful effects of wildfire on people, property, and natural resources within the CAL FIRE's State Responsibility Area (SRA).

**WATERSHED PROTECTION DISTRICT COMMENTS:**

1. The Ventura County Watershed Protection District (District) commends the Board for their strategy to reduce wildfire risk and greenhouse gas emissions. Nevertheless, the District believes there is a disconnect between CalVTP's objective to increase the treatment of vegetation to at least 500,000 acres (Objective 2) and managing forests as a net carbon sink (Objective 4). The two

A19-2

A19-3

- objectives appear to be in conflict as the vegetation is a carbon sink, the removal of which would reduce carbon emission sequestration.
2. The District contends that a 300-foot-wide fuel break (Page 2-13) is too wide for most ridgelines in Ventura County. We have observed that denuded hillsides contribute to adverse ecological succession from chaparral or forested habitats to non-native grasslands dominated by highly invasive weedy species including mustards and thistles. These conditions tend to increase the risk of fast-moving wildfires and reduces habitat available to sensitive species. We appreciate the intent and agree that any proposed fuel break should require a biological assessment on a case-by-case basis.
  3. Ecological Treatments (Page 2-16). Burning and mulching vegetation does not necessarily work. Furthermore, we can only assume what the pre-historic fire regimes were and believe that most of the State has burned at least once or twice in the last 100 years. Replacement of shrublands with non-native grasses and herbs as a result of increased fire frequency and disturbance has de-stabilized slopes, degraded wildlife habitat, and increased runoff. Non-native vegetation control (SPR BIO-9) should be a large component of any restoration program. Giant reed and other large woody non-native plants carry fire and increase intensity so they should be targeted for eradication/control.
  4. Mechanical Vegetation Treatment (Page 2-23). Mechanical treatments are described as more expensive based on the removal requirements of non-commercial biomass as cited in North et al. 2012. Please elaborate in the text what some of these removal requirements are and why they're more expensive. Mulching on site reduces biomass to small, quick to decompose pieces, which reduces fuel load. In addition, green resprouting shrubs/trees would take several years of growth to become a fuel threat following mechanical treatment. The District contends that mechanical treatments are a good option and should be considered.
  5. Herbicide Application (Page 2-27). "Site specificity is achieved by having a clear description of the site when the permit is issued. Because permits are issued for a 12- or 24-month period, time-specificity is achieved by having the permittee file a "notice of intent" to apply the herbicide at least 24 hours before the scheduled application." A 24 hour notice may not be enough time, especially if the public wishes to be informed of any herbicide application in the area.
  6. SPR BIO-4 (Page 2-37). "Only hand application of herbicides will be allowed and only during low-flow periods or when seasonal streams are dry." The District suggests a biological monitor be present during herbicide application in both riparian and upland habitats to ensure the proper plant species are treated and all required protocols are observed.
  7. SPR BIO-5 (Page 2-38). "Develop a treatment design that avoids environmental effects of type conversion..." The District requests to review the treatment design for projects in Ventura County.
  8. SPR BIO-5 (Page 2-38) . "The treatment design will seek to maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function..." The District requests that such treatments be conducted in a manner to avoid erosion and sedimentation that could alter adjacent regulated streams or

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cont.

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- District facilities. In addition, treatment should avoid reducing shrub cover because these vegetation types usually occur on slopes, which will be easily eroded if shrub cover is reduced. Shrubs preclude many herbaceous species, which can exacerbate fire.
9. SPR BIO-5 (Page 2-39). "A minimum of 35 percent of existing shrubs and associated native vegetation will be retained..." The District suggests striking this statement and relying on a reduction by no more than 20 percent from baseline density; 35 percent vegetative coverage is not enough to protect against erosion and preserve habitat integrity.
  10. SPR BIO-9 (Page 2-41). The District contends that the treatment of invasive plants is critical to restoration efforts. Furthermore, the District suggests the following revision: "This SPR applies to all treatment activities and treatment types throughout the State." The requirement to prevent the spread of these species should also be described earlier in the document to better integrate this component into the overall plan activities.
  11. SPR BIO-10 (Page 2-41). Measures to prevent the spread of invasive wildlife, including New Zealand mudsnail, have been omitted. New Zealand mudsnail can be transported on equipment and clothing during treatment activities. An SPR similar to SPR BIO-9 should be created specifically to address the spread of invasive wildlife species.
  12. SPR GEO-3 (Page 2-42). "The project proponent will stabilize soil disturbed during mechanical and prescribed herbivory treatments with mulch or equivalent immediately after treatment activities..." The District requests to review and approve any stabilization efforts adjacent to a District facility or regulated stream channel in Ventura County.
  13. SPR GEO-4 (Page 2-43). "The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season... Any area of erosion that will result in substantial sediment discharge will be remediated." The District requests to be notified, review, and approve any such activities conducted adjacent to a District facility or regulated stream channel in Ventura County. In addition, the District believes the remediation of substantial sediment discharge requires a programmatic measure (i.e., an erosion control plan for each action).
  14. SPR HYD-6 (Page 2-47). "If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and ensure that pre-project drainage conditions are restored." The District requests that the project proponent coordinate with the property owner prior to the proposed action to obtain any necessary permits and/or access agreements.
  15. SPR TRAN-1 (Page 2-48). The District requests that when working adjacent to a protected drainage system (e.g., a flood control facility) the project proponent shall coordinate with the facility owner/operator to ensure access coordination including but not limited to easements and right-of-way use.
  16. Potential Permits and Approvals – Local (Page 2-49). Please add Special Districts, including the Ventura County Watershed Protection District to the list of local

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cont.

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A19-18

permitting agencies. The District provides encroachment permits and regulates activities that have the potential to adversely affect water quality.

| A19-18  
| cont.

**END OF TEXT**



August 9, 2019

Board of Forestry and Fire Protection  
Attn: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

Thank you for the opportunity to comment on the California Vegetation Treatment Program Environmental Impact Report (CalVTP PTEIR). The following are the Placer County Air Pollution Control District (PCAPCD) comments.

The following comments are regarding Chapter 3 Environmental Setting, Impacts, and Mitigations Measures Comments.

1. Under Section California Code of Regulations Title 17, on page 3.4-6 there may be a misspelling in the last sentence in the third paragraph.
2. Under Section Prescribed Fire Incident Reporting System (PFIRS) program on page 3.4-6, the background on the beginning of PFIRS is provided below. PFIRS was first discussed and presented to the Interagency Air and Smoke Council (IASC) in 1994. From the 1994 meeting minutes held at the Placer County Air Pollution Control District files: "PFIRS is a consensus effort between agencies utilizing and conducting fire activities throughout California. The goal of the program is the coordination of prescribed fires conducted on a daily basis, reducing the impacts of individual multiple prescribed fires through a structured information-based system".

PFIRS was developed by the United States Forest Service (USFS) and went through many iterations, including the use of modems for communication. In the earlier versions of PFIRS a land manager could dial up and log in where prescribed burning was going to occur so that better communication could be used to determine if smoke could become a problem. In the early 2000s the California Air Resources Board (CARB) agreed to host the PFIRS program and worked with the USFS to hire a contractor to help develop an online program that would provide information on where prescribed burning would take place.

A20-1

A20-2

As the use of the internet expanded, work on the program came in house to the CARB Meteorology Section whose staff had the necessary skills to develop PFIRS into an online program. During that time, in consultation with those who had help create the original program, it was agreed that the name could be changed from Prescribed Fire Incident Reporting System to Prescribed Fire Information Reporting System. During the early online development, a small group of users, which included both the Placer County Air Pollution Control District and the El Dorado Air Quality Management District, beta tested the program with land managers in the Lake Tahoe area. This included the first online use of a smoke management plan, along with moving to an online authorization system where burns were displayed on a map. This work henceforth laid the groundwork for the widespread use and continued development of the USFS' original program. In addition to the PCAPCD records, historical records from IASC notes and minutes regarding PFIRS can be found at the following link: <https://ww3.arb.ca.gov/smp/progdev/iasc/historyiasc.pdf>

A20-2  
cont.

3. Under Section California Air Districts on page 3.4-7, in the last paragraph, what is CAAA?
4. Under Section Burn Day Designations and Smoke Management Plans on page 3.4-11, it should be noted that the California Health and Safety Code divides burning into Agricultural (41850) and Non-Agricultural Burning (41800). This distinction has been provided by the State legislature in which the definition of Prescribed Burning is a sub-category. The current Agricultural Burning definition and the Public Resource Code change occurred in 2004. The legislative intent for this change was to establish a consistent definition for prescribed burning.

A20-3

Health and Safety Code Section 39001

“Agricultural burning” means open outdoor fires used in any of the following:

(a) Agricultural operations in the growing of crops or raising of fowl or animals, or open outdoor fires used in forest management, range improvement, or the improvement of land for wildlife and game habitat, or disease or pest prevention.

(b) The operation or maintenance of a system for the delivery of water for the purposes specified in subdivision (a).

(c) Wildland vegetation management burning.

(1) For purposes of this subdivision, wildland vegetation management burning is the use of prescribed burning conducted by a public agency, or through a cooperative agreement or contract involving a public agency, to burn land predominantly covered with chaparral, trees, grass, or standing brush.

(2) For purposes of this subdivision, prescribed burning is the planned application

A20-4

and confinement of fire to wildland fuels on lands selected in advance of that application to achieve any of the following objectives:

(A) Prevention of high-intensity wildland fires through reduction of the volume and continuity of wildland fuels.

(B) Watershed management.

(C) Range improvement.

(D) Vegetation management.

(E) Forest improvement.

(F) Wildlife habitat improvement.

(G) Air quality maintenance.

(3) The planned application of fire may include natural or accidental ignition.

*(Amended by Stats. 2004, Ch. 693, Sec. 1. Effective January 1, 2005.)*

Public Resource Code 4464:

(a) "Wildland" means any land that is classified as a state responsibility area pursuant to Article 3 (commencing with Section 4125) of Chapter 1 and includes any land having a plant cover consisting principally of grasses, forbs, or shrubs that are valuable for forage. "Wildland" also means any lands that are contiguous to lands classified as a state responsibility area if wildland fuel accumulation is such that a wildland fire occurring on these lands would pose a threat to the adjacent state responsibility area.

(b) "Wildland fuel" means any timber, brush, grass, or other flammable vegetation, living or dead, standing or down.

(c) "Wildland fire" means any uncontrolled fire burning on wildland.

(d) "Prescribed burning" or "prescribed burning operation" means the planned application and confinement of fire to wildland fuels on lands selected in advance of that application to achieve any of the following objectives:

(1) Prevention of high-intensity wildland fires through reduction of the volume and continuity of wildland fuels.

(2) Watershed management.

(3) Range improvement.

(4) Vegetation management.

(5) Forest improvement.

(6) Wildlife habitat improvement.

(7) Air quality maintenance.

(e) "Prescribed burn crew" means personnel and firefighting equipment of the department that are prepared to contain fire set in a prescribed burning operation and to suppress any fire that escapes during a prescribed burning operation.

A20-4  
cont.



(f) "Person" means any natural person, firm, association, partnership, business trust, corporation, limited liability company, company, or combination thereof, or any public agency other than an agency of the federal government.

A20-4  
cont.

Air Districts were required by the California Code of Regulation to adopt, implement and enforce a smoke management program under Title 17, Section 80140. Air District Programs can be found on CARB's website: <https://ww3.arb.ca.gov/smp/district/district.htm> Some Air Districts have incorporated the Smoke Management Guidelines into their District Regulations, such as PCAPCD. These rules cannot be less stringent than the state's. In some cases, Air District burn rules have been adopted into the State Implementation Plan, such as those in PCAPCD. An addition of an appendix showing the different Air District rules from the CARB Title 17 Guidelines, to this document would be helpful.

A20-5

5. In Section Burn Day Designations and Smoke Management Plans in the fourth paragraph, on page 3.4-11, there a phrase at the end "and the risk of a burn escape". While no one wants a burn to escape, the responsibility in conducting a prescribed burn along with the risk of a burn escape is the responsibility of the land manager, not the Air District.

A local air district approves the smoke management plan, may issue a burn permit with or without conditions, and approves a land manager's authorization to conduct a prescribed burn. The work that goes into the smoke management plan is based upon what the land manager inputs, the conditions under which they are planning a prescribed burn, based on location, vegetation, weather, emissions and population areas. The District works with a land manager to minimize smoke impacts, while acknowledging that there may be periodic smoke impacts.

A20-6

The local air district is not the ultimate arbiter of whether a burn can occur as proposed. The land manager's go/no go decision is based upon a myriad of criteria, in addition to air quality conditions before they make the decision to burn. The prescriptive conditions include air quality, wind, precipitation, time of year to burn, vegetation moisture, or enough staffing, wildlife. Some of this is also noted in the document on page 3.17-6 under Planning a Prescribed Burn and under Executing a Prescribed Burn on page 3.17-8. These sections should have similar language.

In the last paragraph, given this is a California document, what would the percentage of burns accomplished with no reported escapes or near misses be for just California based on more current information than 2005?

A20-7

6. In Section Criteria Air Pollutant Emissions from Wildfires and Prescribed Burns on page 3.4-18, paragraph five, hazardous smoke has impacted populous areas more in the last few years, since the widespread wildfires in 2008. However, many smaller communities have had many days and weeks with unhealthy to hazardous air quality from smoke that should be mentioned. As an example, areas in the North Coast portion of California have had weeks of unhealthy to hazardous air quality in the last few years from wildfire smoke. A20-8
  
7. In Section Naturally Occurring Asbestos (NOA) on page 3.4-19, there is no mention of the adoption of the California Air Resources Board’s Air Toxic Control Measure for Construction, Grading, Quarrying and Surface Mining Operations. This statewide regulation is used by the Air Districts, at a minimum for dust control activities in those areas with NOA. Additionally, these requirements, may be included in an Air District’s rules such as is case with the PCAPCD’s Rule 228 – Fugitive Dust. A20-9
  
8. In Section Existing Levels of Emissions Generated By Wildfires on page 3.4-21 paragraph three, it does not seem appropriate that this document implies that the 2018 wildfires particulate matter emissions were more than the wildfire emissions from 2008. This information should have the appropriate reference provided if this is true. A20-10
  
9. In Section 3.4.3 Environmental Impacts and Mitigation Measures on page 3.4-22, it should be noted under SPR AD-4 Public Notifications for Prescribed Burning that Title 17 of the CCR, Section 80160 – Special Requirements for Prescribed Burning and Prescribed Fires in Wildland and Wildland/Urban Interface Areas, subsection (I), each Air District’s smoke management program is to “Require procedures for public notification and education, including appropriate signage at burn sites, and for reporting of public smoke complaints”. Public notification information is a required component of the PCAPCD’s smoke management plan. A20-11
  
10. In SPR AQ-2 Submit Smoke Management Plan on page 3.4-23, please include Title 17 Section 80160(d), which states “If smoke may impact smoke sensitive areas, require smoke management plans.....”. This section means that smoke management plans may be required for prescribed burns less than 10 acres or less than one ton of particulate matter. A20-12
  
11. Under Section SPR AQ-4 Minimize Dust – please include Air District Fugitive Dust rules if adopted by an Air District since these rules are the local applicable regulations to be used, especially if more these rules are more restrictive than CARB regulations. A20-13

Health and Safety Code Section 41700 has been mentioned regarding visible dust transport outside the treatment area. It is important to note that this section of the Health and Safety Code is not limited to dust but includes odor and smoke. Many Air Districts have included this Health and Safety Code into their regulations such as PCAPCD's Rule 205 Nuisance. <https://placerair.org/DocumentCenter/View/2181/Rule-205-PDF>

A20-13  
cont.

12. In Appendix PD-2 it should be noted that the smoke management plan included is from an air district in California which includes additional information that is not required in the Title 17 Smoke Management Guidelines. This plan does not reflect all air district smoke management plans. It may be more appropriate to use the plan that is provided on the CARB Smoke Management Program website which was created by CARB after the adoption of the Title 17 guidelines as an example. <https://ww3.arb.ca.gov/smp/techtool/techtool.htm>

A20-14

13. In Section Environmental Impacts and Mitigation Measures, Impact AQ-1, Generate Emissions of Criteria Air Pollutants and Precursors during Treatment Activities that Would Exceed CAAQS or NAAQS and Conflict with Regional Air Quality Plans on page 3.4-26, the following comments are provided under the subsection Localized Concentrations of Criteria Air Pollutants.

Prescribed burning typically does not occur during the high ozone concentration time, May to October, when high ozone levels form. This is also wildfire season. Prescribed burning activities can be very seasonal (as noted on page 3.17-6 under Planning a Prescribed Burn). Underburns and broadcast burns are typically conducted at times when conditions are right for burning. In many areas this is in the spring, after wet weather has passed, or the fall, when cooler atmospheric conditions begin (which make smoke dispersion harder). Although, in prior years before the 2007 Angora Fire - South Lake Tahoe, in Placer County, the USFS did conduct in season hand pile burning during the summer months. (Authorization to burn information on file at the PCAPCD Office.)

A20-15

Machine pile burning occurs usually after significant wetting rains or snows so that these piles can burn for extended periods into more winter wet weather. Hand pile burning can occur throughout the year as this is a type of burning that is much easier to have fewer staff burn with easier decision making on daily burning. Prescribed burning also takes place during those times of year when wood burning device (woodstoves and fireplaces) use begins along with other types of outdoor burning, such as residential backyard burning.

A20-16

Under Sub-Section Smoke Emissions from Prescribed Burns on page 3.4-30, will the new emergency regulations from Cal/OSHA be addressed?

A20-17

14. Under Section 3.8 Greenhouse Gas Emissions on page 3.8-13 there appears to be a typo for the total which should be 4.051 MMTCO<sub>2</sub>e (as noted on page 3.8-14 - Table 3.8-4), instead of 4,051 MMTCO<sub>2</sub>e.

A20-18

The following comments are regarding Section 4 Cumulative Effects Analysis:

1. There is no discussion regarding repetitive treatments of the same area. Once a prescribed burn, mechanical treatment occurs, or other treatment occurs, it will need to be maintained on a regular basis. Vegetation is like a crop, it keeps growing and from that standpoint, a one-time treatment of prescribed fire or mastication, for example, will not maintain that treatment.

A20-19

The following additional comments are provided following the review of the document.

1. The use of masticators can do a good job decimating the vegetation, with high soil disturbance, leaving behind the masticated vegetation including seeds for future vegetation growth. How will this be managed beyond the first vegetation management application? Will masticated areas also be treated with prescribed fire?

A20-20

2. The mastication of scotch broom should not be an option as it can spread the plant's seeds making it more of a problem. In many areas where scotch broom is pulled it is burned to prevent the spread of seeds.

A20-21

3. California State Park Campgrounds offer firewood which can be purchased by campers for their camping experience. There has been no comments nor discussion to use existing firewood – vegetation on site or close by instead of importing firewood hauled from other locations to a campground. Using firewood generated from the area close by where it is grown and being managed is one way of reducing vehicle haul emissions.

A20-22

4. The grown of vegetation following a wildfire can be exacerbated by the lack of vegetation management in the subsequent years as the land recovers. While a wildfire has, in many cases been devastating, there may be an opportunity to help keep an area that burned more fire resilient by learning how to manage vegetation. For those areas that have not had any vegetation management years following a wildfire, there is a great deal of work needed now to bring it back into a fire resilient landscape.

A20-23

Prioritizing areas with past wildfires to evaluate them for future vegetation management is as critical as developing new areas to manage vegetation.

A20-23  
cont.

The Placer County Air Pollution Control District appreciates the opportunity to comment. Any questions on the comments can be directed to Yu-Shuo Chang or Ann Hobbs of the District staff.

Cordially,



Ann Hobbs  
Associate Planner  
Placer County Air Pollution Control District

Letter  
A21

UNIVERSITY OF CALIFORNIA, SANTA CRUZ



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PHYSICAL PLANNING, DEVELOPMENT AND OPERATIONS

SANTA CRUZ, CALIFORNIA 95064

August 9, 2019

Ms. Edith Hannigan  
Land Use Planning Program Manager  
California Board of Forestry and Fire Protection  
Post Office Box 944246  
Sacramento, CA 94244-2460

Sent Via Email: CalVTP@bof.ca.gov

**Re: CAL FIRE California Vegetation Treatment Program  
Comments on the Draft Program Environmental Impact Report**

Dear Ms. Hannigan,

Thank you for the opportunity to comment on the proposed California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR). The University of California Santa Cruz (UCSC) understands that CAL FIRE intends to use the CalVTP in order to reduce wildfire risks and that this PEIR would be used to streamline the environmental review process for the program under the California Environmental Quality Act (CEQA).

As a responsible agency under CEQA, UCSC requests some additional clarification on the proposed treatment areas and treatment methods included in the program:

- **Mapping Identifying Potential Treatment Areas and Environmental Review:** It is our understanding that the statewide mapping that has been prepared for the CalVTP within CAL FIRE's State Responsibility Area (SRA) is based on vegetation formations that were appropriate for treatment throughout the State, which is at a very high level. We request clarification on whether treatment areas are limited to those areas modeled in the SRA or if other future treatment areas that are comprised of a treatable fuel type could be evaluated under this PEIR in order to reduce wildlife risk within University property (e.g. through a Supplemental EIR)?
- **Herbicides for Vegetation Treatment:** The CalVTP allows the use of the herbicides for vegetation treatment. The University of California has temporarily halted the use of the herbicide glyphosate on all UC campuses, which is identified as one of the herbicides that can be allowed as a treatment method. We request clarification on whether the University can prevent the use of glyphosates as a herbicidal vegetation treatment under this program?

A21-1

A21-2



CAL FIRE California Vegetation Treatment Program PEIR  
August 9, 2019  
Page 2

Thank you for taking these comments into consideration into your environmental review process for the California Vegetation Treatment Program.

A21-2  
cont.

Sincerely,

*Traci Ferdolage*

Traci Ferdolage  
Associate Vice Chancellor

Cc: Sarah Latham, Vice Chancellor  
Jean Marie Scott, Associate Vice Chancellor  
Melissa Whatley, Director of Government and Community Relations  
Jolie Kerns, Interim Campus Planner  
Nicholas Otis, Lead Designated Campus Fire Marshal



# County of San Diego

**MARK WARDLAW**  
DIRECTOR

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**KATHLEEN A. FLANNERY**  
ASSISTANT DIRECTOR

August 9, 2019

Dr. J. Keith Gillless  
Chairman  
California Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244-2460

Via e-mail to: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

## REQUEST FOR COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CALIFORNIA BOARD OF FORESTRY AND FIRE PROTECTION'S CALIFORNIA VEGETATION TREATMENT PROGRAM

Dear Mr. Gillless,

The County of San Diego (County) reviewed the California Board of Forestry and Fire Protection's (Board) Draft Program Environmental Impact Report (PEIR) for the California Vegetation Treatment (CalVTP), received on June 24, 2019.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

### DEPARTMENT OF PARKS AND RECREATION

1. The County of San Diego Department of Parks and Recreation (DPR) requires that the California Department of Forestry and Fire Protection (CAL FIRE) and the California Board of Forestry and Fire Protection coordinate the implementation of the California Vegetation Treatment Program (CalVTP) with the County, specifically, the Department of Parks and Recreation (DPR).
2. There is high potential that the proposed treatment area within the County includes some of the thousands of acres of parkland currently owned and managed by DPR. Page 2-49 of the PEIR under section 2.8, "Potential Permits and Approvals Required," does not include the approval and/or permits that DPR would require for CAL FIRE to implement the CalVTP on DPR lands. As the landowner, the County must authorize the implementation of the CalVTP on County lands.
3. Paragraph one of Section 2.3.2 "Proposed CalVTP Implementation" states, "After approval, implementation of the CalVTP would consist of vegetation treatment activities carried out by CAL FIRE on private or public land, by public agencies and organizations funded by CAL FIRE grants, or potentially by public agencies that own land within the treatable landscape." DPR requests that the California Board of Forestry and Fire Protection make clear that implementing vegetation treatment activities on County owned land would be contingent on County approval.

A22-1

A22-2

4. In addition to seeking authorization of implementing the CalVTP on DPR lands, DPR requests that CAL FIRE coordinate with the San Diego County Fire Authority on the implementation of this plan, including the placement of any fire breaks. A22-3
5. DPR requires that implementation of the CalVTP on DPR land or DPR adjacent land is consistent with the County's Multiple Species Conservation Plan (MSCP) and with the MSCP Preserve Land requirements. A22-4

#### DEPARTMENT OF PUBLIC WORKS

1. County-maintained public roadways and other facilities may be located within the proposed project area. Any pavement, curb/gutter/sidewalk, culverts, utilities, traffic control-related infrastructure, as well as any other infrastructure within the County-maintained road right-of-way that is damaged by the project shall be replaced to its original condition or better to the satisfaction of the County Department of Public Works. A22-5
2. Any improvements or impacts to County-maintained roads must be conducted in accordance with the County's Pavement Cut Policy. Such activities may also require an encroachment permit and/or excavation permit with accompanied traffic control plan in consultation with the County. We request coordination with the County Department of Public Works prior to any modification of County-maintained facilities. A22-6

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at [timothy.vertino@sdcounty.ca.gov](mailto:timothy.vertino@sdcounty.ca.gov).

Sincerely,



Eric Lardy, AICP  
Chief, Advance Planning Division  
Planning & Development Services

Enclosure: Attachment A: 2019-03-01 COSD Comment Letter

E-mail cc: Victor Avina, Policy Advisor, Board of Supervisors, District 1  
Adam Wilson, Policy Advisor, Board of Supervisors, District 2  
Melanie Woods, Policy Advisor, Board of Supervisors, District 3  
Emily Wier, Policy Advisor, Board of Supervisors, District 4  
Benjamin Mills, Policy Advisor, Board of Supervisors, District 5  
Lara Barrett, CAO Staff Officer, LUEG  
Emmet Aquino, Park Project Manager, DPR  
Jeff Kashak, Planning Manager, DPW



# County of San Diego

**MARK WARDLAW**  
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**KATHLEEN A. FLANNERY**  
ASSISTANT DIRECTOR

March 1, 2019

Edith Hannigan, Land Use Planning Program Manager  
California Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244-2460

Via e-mail to: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

## REQUEST FOR COMMENTS ON THE CALIFORNIA VEGETATION TREATMENT PROGRAM FOR THE CALIFORNIA BOARD OF FORESTRY AND FIRE PROTECTION

Dear Ms. Hannigan,

The County of San Diego (County) reviewed the California Board of Forestry and Fire Protection's (Board) Notice of Preparation Program Environmental Impact Report (PEIR) California Vegetation Treatment (CalVTP), received on January 31, 2019.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

### DEPARTMENT OF ENVIRONMENTAL HEALTH

The County's Department of Environmental Health Local Enforcement Agency (LEA) is certified by the California Department of Resources Recycling and Recovery to enforce State laws and regulations of solid waste activities throughout the unincorporated County pursuant to Public Resources Code (PRC) and Titles 14 and 27 of the California Code of Regulations (CCR).

According to the proposed Notice of Preparation of a PEIR for the proposed CalVTP, the implementation of vegetation treatments to reduce wildfire risks include Wildland-Urban Interface (WUI) fuel reduction, fuel breaks, and ecological restoration projects. As a potential responsible agency under the Statewide CalVTP, the LEA has the following comments:

1. It is unknown the type of treatment or processing that the vegetation would receive in the three proposed treatment categories. The organic (green) waste generated as a result of these treatments would still be considered feedstock for organic processing operations such as composting. Organic processing operations are subject to permitting and inspection by the LEA. Additionally, organic processing operations are subject to solid waste regulatory standards including pathogen reduction, metals and physical contaminants sampling. However, these solid waste standards do not include any

A22-7

chemicals of concern that would be part of a treatment that includes herbicides or flame retardants.

A22-7  
cont.

2. Please note that organic waste generated from the proposed treatments must be properly managed, processed, or disposed, and handled in accordance with Title 14, California Code of Regulations, Chapter 3.1 – Handling of Compostable Materials. Please include a description and analysis for proposed management of generated organic materials from these treatments.
3. Please identify how infected vegetation such as trees infested with bark beetle will be managed/processed to prevent further spread of this pest or other pests.
4. Please include the County of San Diego Solid Waste Local Enforcement Agency on the interested parties list for future updates on this proposed PEIR.

A22-8

A22-9

A22-10

County of San Diego  
Solid Waste Local Enforcement Agency  
5500 Overland Avenue, Suite 110  
San Diego, CA 92123

## PARKS AND RECREATION

The Department of Parks and Recreation (DPR) recognizes the Project has the goal of reducing the potential for wildfires; however:

1. Please ensure that the CalVTP coordinates closely with local jurisdictions and land managers to ensure that all potential vegetation treatment methods are covered under the California Environmental Quality Act (CEQA) document.

A22-11

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at [timothy.vertino@sdcounty.ca.gov](mailto:timothy.vertino@sdcounty.ca.gov).

Sincerely,



Eric Lardy, AICP  
Chief (Acting), Advance Planning Division  
Planning & Development Services

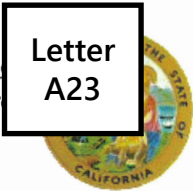
E-mail cc: Victor Avina, Policy Advisor, Board of Supervisors, District 1  
Adam Wilson, Policy Advisor, Board of Supervisors, District 2  
Jason Paguio, Policy Advisor, Board of Supervisors, District 3  
Gabe Gutierrez, Policy Advisor, Board of Supervisors, District 4  
Benjamin Mills, Policy Advisor, Board of Supervisors, District 5  
Lara Barrett, CAO Staff Officer, LUEG  
Mary Bennett, Administrative Analyst, DEH  
Emmet Aquino, Park Project Manager, DPR





State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Ecosystem Conservation Division  
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GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



August 9, 2019

Dr. Keith Gilles, Chair  
 California Board of Forestry and Fire Protection  
 PO Box 944246  
 Sacramento, CA 94244-2460

**California Vegetation Treatment Program Draft Program Environmental Impact Report (SCH# 2019012052)**

Dear Chair Gilles:

The California Department of Fish and Wildlife (CDFW) appreciates the opportunity to provide comments on the public review draft of the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR). CDFW submits its comments as a trustee and responsible agency under the California Environmental Quality Act (CEQA). (Pub. Resources Code, §§ 21069, 21070; CEQA Guidelines, §§ 15381, 15386, subd. (a).) CDFW serves by statute as California's trustee agency for fish and wildlife and holds those resources in trust for all the people of the state. (Fish & G. Code, § 711.7, subd. (a).) CDFW also has legal jurisdiction as trustee to conserve, protect, and manage fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.)

CDFW also provides the comments detailed below as a responsible agency because many of the CalVTP activities and treatments detailed in the PEIR are subject to CDFW's independent regulatory authority and will require a permit or other authorization from CDFW under the Fish and Game Code. This includes the notification and authorization requirements under CDFW's Lake and Streambed Program, and permitting under the California Endangered Species Act (CESA). A robust analysis in the PEIR of the potentially significant environmental effects that the CalVTP may have on California fish and wildlife, and a detailed mitigation framework to address those effects will be essential to satisfy these future permitting requirements. Details regarding CDFW's regulatory authority and related permitting obligations are available on CDFW's web page ([www.wildlife.ca.gov](http://www.wildlife.ca.gov)). Finally, CDFW provides the comments detailed below as a responsible agency because it owns land or has land management authority in the treatable landscape described in the PEIR.

CDFW would like to thank the Board of Forestry and Fire Protection (Board), and the Department of Forestry and Fire Protection (CAL FIRE) for consulting with and seeking input from CDFW during development of the draft PEIR. (See Pub. Resources Code, § 21080.4.) California is grappling with a lengthening fire season and large, catastrophic

A23-1



fires that are increasing in size and frequency. In addition to the human consequences, ever more frequent catastrophic fires cause significant, adverse effects to fish and wildlife, including loss of individuals, loss or type conversion of habitat, disruption of landscape connectivity, and changes in ecosystem processes. CDFW recognizes the consequences of catastrophic fire and supports the need for California to minimize the related risks. We also believe California's fire prevention efforts can and should be carried out to avoid and minimize unnecessary adverse effects to fish and wildlife. Indeed, with careful planning, California fish and wildlife could benefit in some respects from these important efforts. CDFW appreciates that the Board and CAL FIRE share these interests, and we look forward to continued coordination.

CDFW, with its trustee mandate and responsible agency obligations, reviewed the draft PEIR with an eye to potentially significant effects to fish and wildlife, and potentially feasible mitigation measures and alternatives to address those effects. (Pub. Resources Code, § 21104, subd. (c); CEQA Guidelines, § 15086, subd. (c).) CDFW focused its review specifically on the Program Description in Chapter 2, the biological setting and impact analysis in Chapter 3.6, and the treatment-specific implementation framework described in various places in the PEIR, but most importantly in the Project-Specific Analysis included as Appendix PD-3. Consistent with our review, CDFW's comments detailed below broadly fall into two categories: (1) future project implementation and tracking, and (2) clarity of requirements and protection measures detailed in the PEIR. We offer our comments with an interest in meaningful public review and with the goal of helping the Board, CAL FIRE, and others to carry out this important effort.

A23-1  
cont.

### **FUTURE PROJECT IMPLEMENTATION AND TRACKING**

One of the Board's objectives identified in the PEIR is to substantially increase the pace and scale of vegetation treatments to reduce the risk of catastrophic fire. The PEIR, to this end, provides a programmatic level of detail focused on potentially significant effects and a statewide, but region and species-specific mitigation framework for vegetation treatments consistent with the PEIR. The Project-Specific Analysis included in Appendix PD-3 and the related checklist provide the essential roadmap to implement individual treatments under the CalVTP (hereafter, the PSA or Checklist), and related reporting requirements will help the Board, CAL FIRE, and the public to track the pace and scale of vegetation treatments described in the PEIR.

Discussion in the PEIR regarding substantive implementation of the CalVTP and use of the PSA Checklist would be improved with additional detail concerning the bulleted topics that follow.

A23-2

- Additional detail regarding ongoing maintenance activities in connection with and following an individual treatment would improve the PEIR. CDFW agrees that maintenance activities will vary project to project, but it is not clear whether subsequent or ongoing maintenance will be addressed in the PSA Checklist as part of the review for an initial treatment. Likewise, even if ongoing maintenance following an individual treatment is addressed in the PSA Checklist for the initial treatment, it is not clear whether or in what circumstance subsequent changes in the landscape would make the initial Checklist no longer relevant to discretionary decisions concerning ongoing maintenance. Additional detail regarding

maintenance following an initial treatment and the shelf-life of the completed Checklist for the initial treatment would improve the PEIR.

A23-2  
cont.

- The PSA Checklist includes reporting requirements that must be submitted to CAL FIRE before an individual treatment project, but there is no guidance regarding data collection and reporting after a treatment is completed. Project proponents should be required to submit a report to CAL FIRE within a reasonable time after an individual treatment is completed. Details regarding the substantive content and the process to submit a post-treatment report should be added to the Project Description or otherwise included in the CalVTP implementation framework. The Board should require the report to include basic facts about the specific treatment and post-treatment conditions, including dates of work, type and acreage of treatments, and a description of post-treatment vegetation and sensitive resources identified for protection. A required post-treatment report will help the Board and CAL FIRE compile relevant data and better understand post-treatment conditions at a statewide scale.

A23-3

### **CLARIFYING SPECIFIC PROJECT REQUIREMENTS AND MITIGATION MEASURES**

Existing discussion in the PEIR regarding Standard Project Requirements (SPRs) and identified mitigation measures to address potentially significant effects on fish and wildlife would be improved with additional detail concerning the bulleted topics that follow.

- The PEIR should include an SPR to avoid potentially significant impacts to nesting birds. The PEIR identifies impacts to common nesting birds in Impact BIO-6 and provides a limited discussion of a few measures to prevent related effects. Absent a specific SPR that project proponents are required to implement in the field, however, these measures will not provide sufficient protection to nesting birds, chicks, and eggs during vulnerable periods of their lifecycle. The SPR should require biologically appropriate surveys based on habitat and time of year, and require additional avoidance and minimization measures for work that must be conducted during the nesting season.

A23-4

- The PEIR contains four biological mitigation measures (BIO-1c, BIO-2c, BIO-3b, and BIO-3c) that require a Compensatory Mitigation Plan. Language should be added advising project proponents to consult with CDFW and/or any other applicable responsible agency prior to finalizing any Compensatory Mitigation Plan in order to ensure that it will also satisfy that responsible agency's permitting requirements.

A23-5

- The PEIR should add more specific detail governing the application of certain SPRs and mitigation measures. For example, Mitigation Measure BIO-3a states: "To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled)." This measure should identify the specific scientifically based parameters governing fuel break feasibility determinations for individual treatments, including where special status species or other biologically sensitive resources may be present. The same parameters and

A23-6

required explanation for treatment-specific fuel break feasibility determinations should also be included in the PSA Checklist, particularly where a project proponent determines a fuel break is necessary in a sensitive natural community. Finally, to the extent a potentially significant impact to special status species or a sensitive natural community will result from a fuel break, the Board should consider the feasibility of and the parameters governing required compensatory mitigation.

A23-6  
cont.

Similarly, Mitigation Measures BIO-1a and BIO-2b state that "no-disturbance buffers will generally be a minimum of 50 feet from listed plants" and "will generally be a minimum of 100 feet" for special status wildlife. Both measures specifically allow for smaller or larger buffers if a qualified individual determines that the buffer size would adequately protect against potentially significant impacts to the species. CDFW appreciates a single buffer size for all special status or listed plants and animals is not biologically sound. Site-specific details including topography, habitat type, species, and the specific treatment activity, to name a few, should be considered when making treatment-specific determinations about an appropriate buffer. At a minimum, if a qualified individual determines that a buffer will be smaller than the general minimum prescribed in these measures, a scientifically based treatment-specific explanation for that determination should be required in the PSA Checklist.

A23-7

As another example, SPR BIO-4 states that the removal of large, native riparian hardwood trees will be minimized to the extent feasible. The same measure notes that the tree size retention parameter will be determined on a site-specific basis, depending on the vegetation present at the project site. Instead, this SPR would be improved with the inclusion of a minimum diameter at breast height limit, but with flexibility to remove larger trees. A scientifically based project-specific explanation substantiating the basis to remove larger trees should be required in the PSA Checklist. This will allow for site-specific flexibility, while directly encouraging the retention of larger native riparian hardwoods. This is similar to other Board regulations and exemptions where a standard is set but deviations from that standard are allowed with a scientifically based written justification.

A23-8

- CDFW, in general, supports the requirement in SPR-AD3 that individual treatment projects be consistent with local plans, policies, and ordinances. We recommend, however, that the SPR include more specific detail regarding local Community Wildfire Prevention Plans. Required consistency with these plans can help ensure that specific treatment activities account for any local variations in fire regime. Doing so will also require consideration of and promote consistency with local priorities and strategies, and consistency with already identified local strategies to effectively address fuels management and reduce wildfire impacts.

A23-9

- Currently, the PEIR only prescribes a timeline for habitat assessments and related details are not clear. The PEIR allows for habitat assessments older than one year, for example, if they can be "demonstrated" to remain valid. Further detail regarding the sideboards governing (e.g., unchanged site conditions) and how the validity of

A23-10

reconnaissance-level surveys, data review, and habitat assessments that are older than one year will be demonstrated should be addressed in the PSA Checklist.

\* \* \*

CDFW appreciates the opportunity to comment on the CalVTP PEIR and we look forward to our continued work with the Board, CAL FIRE, and our shared partners on this and similar efforts. If you have any questions regarding this letter or further coordination, please contact Ms. Isabel Baer, Environmental Program Manager, at (916) 651-3110, or [isabel.baer@wildlife.ca.gov](mailto:isabel.baer@wildlife.ca.gov).

A23-10  
cont.

Sincerely,



Chad Dibble  
Deputy Director  
Ecosystem Conservation Division

cc: Office of Planning and Research, State Clearinghouse, Sacramento  
Post Office Box 3044  
Sacramento, CA 95812-3044

ec: Ms. Jessica Morse, Deputy Secretary of Forest Resources Management  
California Natural Resources Agency  
[jessica.morse@resources.ca.gov](mailto:jessica.morse@resources.ca.gov)

**CALIFORNIA COASTAL COMMISSION**

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August 9, 2019

California Board of Forestry and Fire Protection  
Attention: Edith Hannigan  
Land Use Planning Policy Manager  
P.O. Box 944246  
Sacramento, CA 94244-2460

SUBJECT: Draft Program Environmental Impact Report for the Proposed California Vegetation Treatment Program dated June 24, 2019 (*State Clearinghouse #2019012052*)

Dear Ms. Hannigan,

Thank you for the opportunity to provide comments on the June 24, 2019 *Draft Program Environmental Impact Report (Draft PEIR) for the California Vegetation Treatment Program (CalVTP)* which directs the implementation of vegetation treatments as part of the State's ongoing efforts to prevent catastrophic wildfires in California. We particularly appreciate the Board of Forestry and Fire Protection (BOF) and CalFIRE's coordination with our staff to discuss and consider the CalVTP in the coastal zone. These coordination efforts have given us a better understanding of both the program itself and its administration within the coastal zone. We recognize that the CalVTP approach allows for the design of individual vegetation treatment projects on a case-by-case basis (within the parameters of the defined program activities) to efficiently address fire hazards and minimize impacts to resources. In addition, the programmatic approach recognizes that all necessary permits must be obtained from appropriate regulatory authorities, including coastal development permits (CDPs) for projects in the coastal zone.

The Coastal Act regulates the use of land and water within the coastal zone and applies a broad definition of "development", which includes vegetation treatment activities proposed in the CalVTP. CDPs are discretionary permits that evaluate a proposed development's consistency with the Chapter 3 policies of the Coastal Act or, where certified by the Coastal Commission, a local government's Local Coastal Program (LCP). CDPs ensure that development in the coastal zone is carried out in accordance with coastal protection policies and are issued by local governments with certified LCPs, or by the Coastal Commission for areas with no certified LCP and in areas of the Commission's retained jurisdiction.

Under the California Coastal Act (Public Resources Code § 30000 et seq.), the Commission is charged with ensuring the protection of coastal resources, which includes but is not limited to the protection of sensitive habitats and species (known under the Coastal Act as "environmentally sensitive habitat areas," or ESHA), visual resources, coastal water bodies and wetlands, coastal agriculture, visitor-serving land uses, natural landforms, and public access and recreation. In addition, the Coastal Act requires new development to be sited and designed to minimize risk from fire hazards.

A24-1

Fire is a natural phenomenon that habitats in California have experienced for millennia, and tree ring research shows that different habitats in California have adapted to specific fire frequencies and regimes. Prior to modern times, the main cause of fire was lightning. In the last century, however, approximately 90% of fires have been caused by human activity. During this time, large areas of California have been developed, and fires that threaten development have been suppressed such that some natural habitats adjacent to development have become unhealthy and contain dead and diseased vegetation. In the last several decades, there has been an increase in the size, intensity, and frequency of fires that are primarily attributed to the concomitant effects of fire suppression and climate change. More frequent and hotter fires can have devastating impacts to natural habitats including by causing habitat conversion and invasion by non-natives.

Commission staff supports CalVTP activities within the coastal zone that reduce risk to life and property, allow for regeneration of habitat, and are administered in a way that is most protective of the ecosystem. In addition to ESHA present in the Ecological Restoration areas that are mapped in Figure 2-9, ESHA may also be present within the mapped Wildland Urban Interface (WUI) and Fuel Break areas as shown on Figures 2-4 and 2-7. Where ESHA is present, only certain treatment activities would be appropriate, given that the Coastal Act provides a very high standard of protection for ESHA.<sup>1</sup> However, where ESHA is not present, multiple treatment activities may be appropriate. We note that the CalVTP appears to be designed to maximize flexibility of designing each individual vegetation treatment project to meet on the ground circumstances. In the coastal zone, these projects must be designed to moderate fire hazards in a manner that is also consistent with protection of coastal resources pursuant to the Coastal Act, including avoiding significant disruption to habitat values of ESHA.

We understand that the CalVTP PEIR is intended to streamline the CEQA review process by analyzing the individual and cumulative environmental effects of proposed treatment types and activities on a programmatic level, and by identifying a suite of mitigation measures that must be applied to individual projects to avoid or minimize those impacts. Each project undertaken as part of the CalVTP would require a Project Specific Analysis (PSA) to make a determination as to whether a particular project is within the scope of the PEIR or not. Future activities found to be “within the scope” of the PEIR would not require additional CEQA review. However, as we have previously discussed, a “within the scope” determination would not obviate the need for the project proponent to obtain a CDP for treatments within the coastal zone.

The CalVTP Draft PEIR includes a list of Standard Project Requirements (SPRs) that would be incorporated into all proposed vegetation treatments under the program. SPRs appear to be intended to ensure that projects avoid and minimize environmental impacts and comply with applicable laws and regulations. Generally, the SPRs provide a framework to identify resources that may be impacted by a proposed vegetation treatment, apply mitigation measures and best management practices, and direct project proponents to relevant federal, state, or local regulatory

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<sup>1</sup> See Coastal Act section 30240(a) which states: “Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.”

A24-1  
cont.

A24-2



bodies that may have authority to apply additional protectionary provisions. Given the unique nature of the coastal zone and coastal resources, as well as the unique authority which the Coastal Act provides to the Commission with respect to protection of the coastal zone and coastal resources, it is important that each project proponent coordinate with Commission staff prior to finalizing the design of a vegetation treatment within the coastal zone, as there may be additional resource protections based on the Coastal Act or certified LCP, as applicable, that apply to the project. For this reason, we recommend a separate SPR, specific to the coastal zone, which clarifies that project proponents should coordinate with Coastal Commission staff and design projects consistent with the Coastal Act or relevant LCP, as applicable (see Item #1 below). We also suggest changes to SPR BIO-8 and Appendix PD-3, as follows:

A24-2  
cont.

1. For all treatment types and treatment activities that will be implemented in the coastal zone, we suggest providing for a new SPR applicable to carrying out the VTP consistent with the Coastal Act, or where applicable, certified LCPs, such as the following:

**SPR Coastal Zone-1: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required.** When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office to determine if the area is within the jurisdiction of the Coastal Commission, or a local government with a certified Local Coastal Program (LCP). All treatment projects in the Coastal Zone will be reviewed as to whether a Coastal Development Permit (CDP) is required and will be designed to meet the following conditions:

- i. In designing the treatment, priority will be given to activities and methods that avoid, minimize, and lastly – if avoidance is not possible – mitigate for impacts to coastal resources;
- ii. The treatment activity will be designed in compliance with the Coastal Act, specifically Chapter 3 provisions (*PRC, Section 30200 – 30265.5*), which provide substantive standards for the protection of coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP;
- iii. The treatment activity will be designed in compliance with the provisions of the certified LCP, specifically the substantive standards for the protection of coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP;

A24-3

This SPR applies to all treatment activities and all treatment types.

2. For Appendix PD-3 (Project Specific Analysis), which serves as a checklist for CalFIRE and other project proponents to evaluate whether their vegetation treatment project qualifies as within the scope of this Draft PEIR or requires additional environmental review, we suggest including the California Coastal Commission, or local government with a certified LCP, under item 12, *Other public agencies whose approval is required*. The addition of the Commission (and local government with a certified LCP) as a separate entity to check off will prompt project proponents to identify whether their

A24-4

proposed vegetation treatment is in the coastal zone and requires a coastal development permit before implementing any treatment activities. We suggest a separate checkbox on the Environmental Checklist similar to:

- If the proposed treatment is within the coastal zone, has a coastal development permit been applied for or obtained from the Coastal Commission or local government with a certified LCP, as applicable? (Please specify.)

3. Finally, for Standard Project Requirement (SPR) BIO-8, we suggest adding a condition to ensure that treatment activities are designed in a way that prioritizes avoidance of impacts to ESHA over mitigation, as required by the Coastal Act. This will help ensure that projects that are located in coastal zone ESHA are developed in a way that is sensitive to Coastal Act or LCP requirements, as applicable. We also suggest allowing for removal of diseased trees as part of ecological restoration projects in coastal zone ESHAs, as well as other minor modifications. Our suggested revisions to SPR BIO-8 are shown below:

**SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs.** When planning a treatment project within the Coastal Zone, the project proponent will, **in consultation with the Coastal Commission or a local government with a certified LCP (as applicable)**, identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). All treatment projects in the Coastal Zone would require a coastal development permit (CDP) pursuant to the Coastal Act, regardless of whether **it the habitat within the project location** qualifies as an ESHA. If the area is an ESHA, the ecological restoration treatment type may be allowed pursuant to this PEIR, if it meets the following conditions, ~~however, a CDP may modify these conditions~~ **subject to approval of a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), approval which may result in modification to these conditions:**

- The treatment will be designed, in compliance with the Coastal Act **and or** Local Coastal Program (LCP) where applicable, if a site is within a certified **plan LCP** area, to improve the habitat function of the affected ESHA, improve habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA.
- Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, **diseased**, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.
- A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs.
- Appropriate no-disturbance buffers will be developed in compliance with the **Coastal Act or** relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs.

A24-4  
cont.

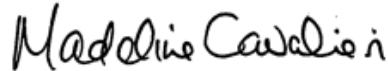
A24-5

- **In designing the treatment, priority will be given to activities and methods that avoid, minimize, and lastly – if avoidance is not possible – mitigate for impacts to ESHA.**

This SPR applies to all treatment activities and only the ecosystem restoration treatment type. **Note that SPR Coastal Zone-1 applies to all treatment activities and all treatment types.**

Thank you for the opportunity to provide comments on the Draft PEIR. We appreciate your consideration of our comments and look forward to continuing our collaboration. If you have any questions or would like to discuss these comments, please do not hesitate to contact me at (831) 427-4890.

Sincerely,



Madeline Cavalieri  
Statewide Planning Manager  
California Coastal Commission

A24-5  
cont.



# OFFICE OF THE COUNTY ADMINISTRATOR

Letter  
A25

## COUNTY OF SONOMA

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DEPUTY COUNTY ADMINISTRATOR  
  
MICHAEL GOSSMAN  
DEPUTY COUNTY ADMINISTRATOR

August 9, 2019

California Board of Forestry and Fire Protection  
Attn: Edith Hannigan, Land Use Planning Program Manager  
Re: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

[CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

### **Re: County of Sonoma Comments Regarding the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP)**

Dear Ms. Hannigan:

The County of Sonoma, through the Office of Recovery & Resiliency, appreciates the opportunity to comment on the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP) (State Clearinghouse # 2019012052).

As our local communities continue to recover and rebuild from the deadly and devastating October 2017 wildfires, we are pursuing ambitious fire prevention, preparedness and resilience measures outlined in our Recovery & Resiliency Framework adopted by our Board of Supervisors in December 2018 (<https://sonomacounty.ca.gov/Office-of-Recovery-and-Resiliency/Recovery-Framework/>). The California Department of Forestry and Fire Prevention (CAL FIRE) is one of several State agencies actively serving, supporting, and partnering with public and private entities to assist Sonoma County in moving towards our envisioned future. We greatly appreciate CAL FIRE's ongoing efforts and activities in Sonoma County. In particular, the efforts of CAL FIRE are relevant to achieving our Natural Resources Goal #1:

*Reduce fuel loads in forests, woodlands and shrub lands strategically to lower wildfire hazards to communities and sensitive habitats, improve delivery of resources and amenities people need, and move forests on a trajectory of increased resistance to drought, disease, and insects.*

CAL FIRE pre-fire programs and actions are particularly vital to fire prevention and community protection in Sonoma County since the State Responsibility Area (SRA) covers 1,239 square miles of the 1,454 square miles of unincorporated lands. The SRA represents 85.2 percent of Sonoma County's unincorporated lands and is home to 40.5 percent of our population.

A25-1

Therefore, we want to express our support for the intended outcomes of the proposed program of vegetation treatments, as part of a multi-faceted approach to reduce the risk of loss of lives, property damage, costly fire suppression, and detrimental environmental and human health effects of catastrophic wildfires.

The attached preliminary comments include both general and specific comments on the CalVTP PEIR regarding possible adjustments we feel could improve the likelihood of cost-effective, timely implementation of urgently needed fuels reduction and fuel breaks without unnecessary environmental consequences or undue burdens on CAL FIRE, their grantees, or other potential project proponents.

The PEIR and its related appendices are voluminous and complex, making it difficult to adequately review and comment within the advertised public comment period. We would appreciate the opportunity to provide additional input and respectfully request that the comment period be extended for an additional 30 days.

Thank you for your consideration of the County's comments. If you have questions or require additional information, please contact Virginia Mahacek, Natural Resources/Watershed Coordinator, at (707) 565-1739 or [virginia.mahacek@sonoma-county.org](mailto:virginia.mahacek@sonoma-county.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Gossman', with a stylized, flowing script.

Michael Gossman  
Deputy County Administrator – Office of Recovery and Resiliency  
Sonoma County Administrator's Office

Enclosure

A25-1  
cont.

## Attachment

### County of Sonoma Comments Regarding the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP)

The following comments are provided on the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP) (State Clearinghouse # 2019012052) to the Board of Forestry by the County of Sonoma, through its Office of Recovery & Resiliency, as an attachment to our cover letter dated August 9, 2019.

Page Reference	Topic	Comment
ES-1, Paragraph 1 and ES-2 Paragraph 2	Applicability of the PEIR	We are pleased with the intent to facilitate use of the PEIR for CEQA compliance by local, regional and state agencies with land ownership or land management responsibilities in the SRA implementing proposed CalVTP treatments.
ES-2	Program Objectives	Each of the stated program objectives have unquestionable merit, but the programs' full list of objectives may be so broad that they include competing needs. Providing prioritization, ranking, or proportional commitment of effort/outcome as part of the program description would improve the basis for weighing potential impacts in the alternatives evaluation.
ES-3	Treatable Landscape	It would be useful to include a hyperlink to the on-line viewable treatable landscape and treatment type maps within the body of the document.
		Please clarify how excluding agricultural CWHR vegetation types is consistent with the discussion of working lands under the stated program objectives.
ES-3	Proposed Treatments	The treatment target acreage is ambitious and a large increase relative to prior years. However, it is an extremely small percentage of the treatable landscape and it is not clear whether acreage targets by treatment type (and by inference, program objectives) would be applied in making program decisions on an annual basis or over the life of the program.
ES-3	Treatment Activities	For improved clarity in connection to the potential impacts and mitigation requirements, it may be prudent to list pile burning, conservation burning, and other forms of biomass removal associated with mechanical or manual treatment as a distinct category of treatment 'activity', or as a sub set of those other two treatments rather than as part of 'prescribed burning'.
ES-4	Standard Project Requirements	The intent of the Standard Project Requirements (SPRs) (described further in section 2.7) to provide consistent predictable environmental protections is understood and appreciated. However, they are extensive and may have complex interrelationships with each other and additional mitigation and permit requirements. Would it be possible to provide any

A25-2

A25-3

A25-4

A25-5

A25-6

A25-7

A25-8



Page Reference	Topic	Comment
		filtering of potential projects by WHR unit or eco-region to simplify the SPR requirements?
ES-7	Intended Uses of This EIR	<p>It seems that the effort to facilitate coverage of ‘most’ potential vegetation treatment projects in one review and delivery system may actually subject some low impact, large benefit projects to additional financial or schedule burdens.</p> <p>Would it be possible to more explicitly identify a compliance route for projects based on their benefits and impacts? Perhaps a screening matrix similar to the concept illustrated in the figure below could be used to sort projects into more than just two possible pathways (within vs outside the scope). While project specific analysis would still be needed at some level of detail, a couple of the resulting pathways (on the low impact side) could be advanced with lower cost, schedule, and coordination burdens. In contrast, projects falling in the high impact, small benefit zone could be diverted from the program for stand-alone consideration. For example, we provide this Conceptual Project Screening Matrix for your consideration:</p> <div data-bbox="662 940 1349 1564" data-label="Figure"> </div> <p>Figure 1: Conceptual Project Screening Matrix</p>
ES-7	Intended Uses of This EIR	Archaeologic Survey requirements are an example of an SPR that could be modified if a screening system was used to elevate some potential projects that meet a ‘little or no impact’ into a Fast Pass zone.

A25-8 cont.

A25-9

A25-10

Page Reference	Topic	Comment
		<p>For example, “SPR CUL-4 Archaeological Surveys” (described on page 2-34) requires that archaeological field surveys be performed for all treatment activities and types.</p> <p>The expense of hiring an archaeologist to perform field surveys could be a barrier to project proponents and may be unnecessary if pre-field research and Native American consultation under AB 52 do not reveal potential for resources to be present in the project area.</p>
ES-7	Intended Uses of This EIR	<p>A few of the treatment types, at least if they are the primary activity of a project, may be low impact. Some of the SPRs may unduly increase the expense and/or reduce the practicality of conducting some treatments.</p> <p>For example, SPR GEO-1 Suspend Disturbance during Heavy Precipitation (described on page 2-42) requires that prescribed herbivory be suspended when the National Weather Service forecast includes a 30 percent or more chance of rain within the next 24 hours.</p> <p>While heavy rain could lead to erosion in areas that are overgrazed, light rain in areas that are grazed to target fuels reduction is unlikely to result in significant erosion or sediment delivery to adjacent waterways. It may be useful to specify an amount/intensity threshold of forecasted precipitation, minimum distance to jurisdictional waterway, or slope categories to narrow the application of this requirement.</p>
ES-7	Intended Uses of This EIR	<p>Please clarify whether CAL FIRE will eventually require all of their grant recipients to conform to this program and rely on this CEQA approval as a condition of receiving funds.</p> <p>If so, the need to have a program that accelerates large benefit/low impact projects, filters the SPR requirements, or otherwise streamlines the burden of costly studies and analyses is even more crucial.</p>
ES-7	Intended Uses of This EIR	<p>We recommend that CAL FIRE personnel and other potential project proponents be provided adequate training and support to be able to take full advantage of the benefits of programmatic CEQA clearance and see the desired outcomes on the ground. In particular, more explicit guidance about the steps in determining consistency, substantiating findings, incorporating standard project requirements and applying mitigation measures is needed, particularly in relation to additional permits and approvals outside of CEQA.</p> <p>It would be beneficial to have some representative/typical implementation flowcharts describing how a project would navigate through the regulatory approvals, including seasonal or</p>

A25-10  
cont.

A25-11

A25-12

A25-13

A25-14

Page Reference	Topic	Comment	
		critical path steps and deliverables that require input from outside experts to establish guidance for potential project proponents about whether to attempt use of this PEIR or pursue separate CEQA compliance. This information would likely be beneficial to CAL FIRE personnel as well as outside project proponents.	A25-14 cont.
1-16, 1-17, 1-18	Responsible agencies and project proponents	The County of Sonoma and numerous potential project proponents engaged in these types of projects in our region are not included in your existing list. Despite the disclaimer that the list is representative and not inclusive, we suggest that it is not feasible to appropriately note all the potential local project proponents throughout the State of California. We recommend the bulleted list be replaced with a more complete description of the categories suggested in the preceding paragraphs rather than name any specific entities.	A25-15
2-25	Prescribed Herbivory, CRM	The Certified Rangeland Manager (CRM) license issued by the Board of Forestry and Fire Protection should also be considered a qualified person when preparing projects utilizing prescribed herbivory as a treatment activity.	A25-16
2-46, SPR-HYD-5	Herbicide use, local ordinances	The County of Sonoma prohibits the use of non-organic herbicides on public lands. Herbicide application restrictions should be limited to applicable local ordinances and the recommendations of the PCA. Herbicide use should have increased buffers around riparian areas, listed species habitat, and vernal pools. Herbicides should be excluded from the WLPZ and EEZ/ELZ buffers.	A25-17
3.6-120	Large Wood Recruitment	<p>While SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function includes requirements to maintain at least 75 percent of the overstory and 50 percent of the understory when implementing projects in riparian areas, no specific requirements are included to ensure adequate recruitment of large woody material to streams in support of geomorphic functions, hydraulic diversity, and aquatic habitat value.</p> <p>Please consider modified language such as the following:                      “Unless there is an verified ecological or infrastructural reason to do otherwise, trees will be felled into adjacent streams or waterbodies to accelerate wood recruitment and enhance fish habitat as approved and recommended by regulatory agencies (e.g., Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). Otherwise, removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone.”</p>	A25-18
PD-3, 2-18 to 2-21	Pile Burning	Pile burning is characterized as a type of prescribed burning (see table 2-3) but is not addressed in the Description of Treatment	A25-19

Page Reference	Topic	Comment
		<p>Activity (pages 2-19 to 2-21). Pile burning is often used as method of disposal of vegetation generated as a result of mechanical treatments which are addressed as separate activity (see page 2-23). As a result, it is ambiguous how to fill out the project checklist (question 8, page PD-3). We assume that a project that involves mechanical treatment and pile burning would report acreage of mechanical treatment where fuel was removed and report acreage of pile burning as the footprint of the pile. Please clarify.</p> <p>Another alternative would be to address pile burning as a method of disposal of material generated by mechanical treatment like lop and scatter or chipping.</p>
2-25	SPR GEO-4	<p>Erosion control treatments are not necessarily beneficial, and can be detrimental in situations where they are not required. Could some exemption be incorporated for projects occurring on low slopes and/or soil types where there is low or negligible erosion hazard?</p>

A25-19  
cont.

A25-20

**Hannigan, Edith@BOF**

**From:** Gonzalez, Brian <Brian.Gonzalez@ladwp.com>  
**Sent:** Friday, August 9, 2019 1:12 PM  
**To:** CALVTP@BOF  
**Cc:** Holloway, Chuck; Parker, Nadia; Demos, Nick; Portillo, Joshua  
**Subject:** Comments on the CalVTP Program Environmental Impact Report

**Warning:** this message is from an external user and should be treated with caution.

TO: Board of Forestry and Fire Protection  
ATTN: CalVTP

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Draft Program Environmental Impact Report (Draft PEIR) for the proposed California Vegetation Treatment Program (CalVTP).

Based on our preliminary review of the Draft PEIR, we have determined that the CalVTP may impact LADWP facilities/interests and respectfully submit the following comments below for consideration:

1. *Board of Forestry and Fire Protection referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons, or invitees of Board of Forestry and Fire Protection; or any other Board of Forestry and Fire Protection affiliated entities.*
2. *Board of Forestry and Fire Protection shall acknowledge that the LADWP is an integral component of the transmission line system which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC). Safety and protection of critical facilities are primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion, and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.*
3. *The following locations will potentially be impacted by the California Vegetation Treatment Program:*
  - *Mojave Desert Ecological Section*
  - *Mono Ecological Section*
  - *Sierra Nevada Ecological Section*
  - *Southeast Great Basin Ecological Section*
  - *Southern California Coast Ecological Section*
  - *Southern California Mountain and Valley Ecological Section*
4. *Prescribed burning will not be allowed on the Transmission Line Right of Ways (TLRW) as no fires and burning of materials are allowed on LADWP's TLRW. The burning of materials on the TLRWs may lead to power outages in the transmission system and impact the system reliability of the transmission grid.*

A26-1

5. *Mechanical Treatment, Manual Treatment, and Prescribed Herbivory must be reviewed and approved by the LADWP Right-of-Way Engineering Group before being implemented on LADWP's TLRW.*
6. *Herbicides within LADWP's TLRW will require LADWP's Environmental Group's review & approval.*
7. *This reply shall in no way be construed as an approval of any project.*

A26-1  
cont.

LADWP's formal response letter that includes the comments above will be sent via US Mail.

Should you have any questions or if I can be of further assistance, please do not hesitate to contact me.

Sincerely,

**BRIAN GONZALEZ**  
**Environmental Planning and Assessment**  
**Los Angeles Department of Water and Power**  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012  
213.367.2612  
brian.gonzalez@ladwp.com

-----Confidentiality Notice-----

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SENT VIA U.S MAIL and EMAIL

August 9, 2019

California Board of Forestry and Fire Protection  
Attn: CalVTP  
PO Box 944246  
Sacramento, CA 94244-2460

Email: [CalVTP@bof.ca.gov](mailto:CalVTP@bof.ca.gov)

**Subject: Response to Notice of Availability of Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP)**

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP). The University of California, Berkeley (UCB), manages close to 45,000 acres of wildlands within reserves and research field stations in more than ten counties throughout the state that may be located within the State Responsibility Area (SRA). Additionally, UCB manages approximately 800 acres of steep and rugged land in an area known as the Hill Campus within the wildland-urban interface (WUI) located mostly within the Local Responsibility Area (LRA) in Alameda and Contra Costa counties.

The CalVTP PEIR identifies the treatable landscape of the SRA where vegetation conditions are suitable for treatment as approximately 20.3 million acres. The CalVTP PEIR targets treatment of 250,000 acres annually of non-federal land to reduce wildfire risk and establish more natural fire regimes.

UCB supports CAL FIRE's understanding that the effectiveness of reducing the harmful effects of wildfire state wide will take a concerted effort by numerous public agencies and private landowners. This is demonstrated by CAL FIRE making available a variety of grant programs providing funding sources to specifically fund vegetation management to increase the acres of vegetation treated by other public agencies. Last year, UCB was awarded \$3.6 million through CAL FIRE's California Climate Investments Forest Health Grant Program to advance fire prevention in the Hill Campus.

UCB supports the goals of the CalVTP PEIR and the project objectives 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. Many of the UCB reserves and research field stations have planned projects that have similar aims; these projects are already part of the local CAL FIRE Unit Plans. UCB appreciates the extensive interagency coordination in preparation of the CalVTP PEIR and the project's programmatic design that allows various public agencies, including the University of California, with land ownership and/or management responsibilities in the treatable landscape, to implement vegetation treatments consistent with the CalVTP, using the PEIR for CEQA compliance. The CalVTP PEIR will facilitate implementation of wildfire hazard reduction projects on many of the UCB properties that will promote both life safety and ecosystem health.

Though the CalVTP focuses on vegetation treatment activities within the SRA, the PEIR also identifies areas suitable for fuel breaks within the WUI that extend into the LRA. The CalVTP PEIR covers fuel break construction activities within the LRA on UCB's Hill Campus. UCB strongly supports inclusion of limited treatment activities within the CalVTP PEIR because this CEQA streamlining could facilitate the pace and scale of UCB in implementing projects to reduce wildfire risk and diminish or avoid the harmful effects of wildfire.

Sincerely,

**Sally  
McGarrahan**

Digitally signed by Sally  
McGarrahan  
Date: 2019.08.09 10:36:22  
-07'00'

Sally McGarrahan  
Associate Vice Chancellor – Facilities  
2000 Carleton Street  
Berkeley, CA 94704  
Email: [smcgarrahan@berkeley.edu](mailto:smcgarrahan@berkeley.edu)  
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August 9, 2019

Edith Hannigan, Land Use Planning Program Manager  
California Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

Subject: Comments to the California Vegetation Treatment Program Programmatic  
Environmental Impact Report, 2019 update

Dear Ms. Hannigan,

The California Department of Parks and Recreation (DPR) appreciates the opportunity to provide comments on the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR). As a potential responsible agency for the CalVTP, as defined by Public Resources Code (PRC) 21069, DPR has a long history of cooperatively working with Cal Fire under the current Vegetation Management Program and looks forward to continued collaboration.

DPR submitted comments on the NOP for the CalVTP on March 11, 2019. We appreciate you addressing our comments in the preparation of the CalVTP PEIR. These comments closely track the comments submitted in our previous letter.

DPR's mission, in part, is to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources and creating opportunities for high-quality outdoor recreation. DPR manages roughly 300,000 acres of forest land across its forested park units. A well-crafted VTP will provide a valuable tool to manage these lands. In the context of our responsibility as stewards of these resources, we offer the following comments on this PEIR.

A28-1

DPR supports the intent of the VTP to provide a framework and program for vegetation treatments that seek to return the landscape to conditions that more closely replicate native habitats, allowing the re-establishment of natural fire processes and attendant ecosystem benefits. Implementation of the ecological restoration treatment type aligns well with DPR goals and current practices for forest management on DPR managed lands.

While prescribed fire and forest restoration treatments, including fuel reduction, that can lead to re-establishing natural fire, are closely aligned with DPR practices and goals, other mechanisms in the VTP are less applicable to State Park lands. For example, in general DPR's management goals and internal policies discourage the construction and

A28-2

maintenance of firebreaks, fuel breaks, and other fuel modification zones on park lands except under specific circumstances. While we understand fuel breaks are used as a treatment option, projects that propose fuel breaks on or adjacent to DPR land need to be closely scoped and coordinated with DPR staff to minimize disturbance and damage to park resources. Shaded fuel breaks provide a better option whenever strategically important to wildfire containment and installed/maintained in a manner that protects sensitive species and visual esthetics, and minimizes erosion and accidental introductions of exotic flora.

A28-2  
cont.

The PEIR describes mitigation and avoidance measures to address sensitive and listed plants and wildlife, as well as water quality, soil erosion, sedimentation, and recreation. For implementing such measures – or any treatment on DPR lands – it will always be critical to coordinate with DPR staff during project scoping to minimize impacts to park uses and resources.

SPR BIO-9 describes actions that will be taken to prevent the spread of invasive plants and noxious weeds. In addition to these actions, the PEIR should include actions that address follow up treatment, if invasive plants colonize a newly treated area.

A28-3

#### CEQA Compliance

DPR is responsible for CEQA compliance for projects on DPR land. DPR expects that the level of analysis is sufficiently robust to support preparation of a project-level compliance through a notice of exemption (NOE) if no other project impacts are identified.

A28-4

Specific to cultural resources, state-managed historic resources must be in compliance with PRC 5024 and 5024.5 if they may be impacted by this VTP. Compliance consists of identifying cultural resources, evaluating, and recommending historical significance. For any potential impacts identified, necessary avoidance, mitigation or treatment will be undertaken in consultation with the SHPO.

A28-5

DPR notes that CEQA checklist for Cultural Resources provided on page 4-299 is outdated. The new CEQA checklist (2016) moved the analyses of paleontological features to the Geology and Soils section of the EIR. A new checklist question provided by the Governor's Office of Planning and Research asks for inclusion in the Cultural Resources section of an EIR asks to identify Tribal Cultural Resources, which can only be completed in consultation with California Native American Tribal entities.

A28-6

DPR is responsible for managing significant acreage in the area defined as "treatable landscape" as defined in the PEIR and has a long history of conducting prescribed fires for land management. With proposed landscape scale projects that include DPR lands, DPR requests to be included in scoping of these larger projects that include DPR lands,

A28-7

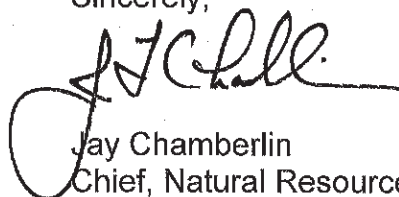
Ms. Edith Hannigan  
August 5, 2019  
Page 3

and expects to continue to maintain control over activities on its lands even in the rare instance that project level reviews are initiated by a non-DPR entity. For landscape level 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.

DPR has a cadre of trained and knowledgeable staff who currently carry out fuel reduction treatment on DPR lands. Given this fact, DPR requests to be included in discussions, decision making, and oversight on treatment standards/specifications and treatment, including prescribed fire, relating to CalVTP projects on DPR land or part of a larger multi-ownership landscape level project.

DPR looks forward to continued and increased collaboration in the treatment of DPR lands and appreciates the opportunity to provide comments on this CalVTP PEIR. We look forward to working with you as you complete this process. If you have any questions or additional clarification on these comments, please contact Terri Gaines at [terri.gaines@parks.ca.gov](mailto:terri.gaines@parks.ca.gov).

Sincerely,



Jay Chamberlin  
Chief, Natural Resources Division

A28-7  
cont.

Hannigan, Edith@BOF

**From:** Coty Sifuentes-Winter <csifuentes@openspace.org>  
**Sent:** Friday, August 9, 2019 11:30 AM  
**To:** CALVTP@BOF  
**Cc:** Brian Malone; Jane Mark; Meredith Manning; Kirk Lenington  
**Subject:** Agency Comment for CalVTP Draft PEIR - State Clearinghouse number 2019012052  
**Attachments:** Use of Fire of Yellow Star Thistle.pdf; Area of Interest.pdf

**Warning:** this message is from an external user and should be treated with caution.

Thank you for the opportunity to comment on the California Vegetation Treatment Program Draft Environmental Impact Report (DEIR) (State Clearinghouse number 2019012052).

Created in 1972, Midpeninsula Regional Open Space District (District) ([www.openspace.org](http://www.openspace.org)) is an independent special district that has preserved over 63,000 acres of public land and manages 26 open space preserves. The District's boundary extends from San Carlos to Los Gatos and to the Pacific Ocean from south of Pacifica to the Santa Cruz County line. The District's purpose is to create a regional greenbelt of unspoiled public open space lands in order to permanently protect the area's natural resources and to provide for public use and enjoyment.

A29-1

Preserves include redwood, oak, and fir forests, chaparral-covered hillsides, riparian corridors, grasslands, and wetlands along the San Francisco Bay. Ranging from 55 to over 18,000 acres, 24 preserves are open to the public free of charge, 365 days a year. Visitors will find over 225 miles of trails, ranging from easy to challenging terrain.

**Upon the review of the document, the District wishes to make the following comments:**

A29-2

The District lies completely within the USFS Ecological Section 261A (Central California Coast). The District's three-part Mission Statement includes our directive to "protect and restore the natural environment." The reintroduction of the ecological process of fire into fire-adapted or fire-obligated ecological communities would assist the District to meet this community-supported objective.

As a best management practice, the District encourages the use of Botanists and/or Invasive Species Biologists during the planning stages of any vegetation management project. The use of certain methods, such as using any tool that cuts plants off at the ground level, can greatly increase fuel load when certain plants respond to being cut. Many of these species are also considered a fire hazard in and of themselves (i.e. French broom, cotoneaster, blue gum eucalyptus). The use of more permanent treatment methods using an Integrated Pest Management approach, including mandatory follow-up treatments, should be employed. Although more permanent methods may increase the upfront costs of the project, the reduction in maintenance to the area would benefit the long-term budget of the project as well as reducing human

A29-3



residence time in wildland areas and thus impacts to wildlife. The District encourages language that calls out the use of a Botanist or Invasive Species Biologist within the Project-Specific Analysis (Appendix PD-3) under the Environmental Checklist #6: Description of the Project.

A29-3  
cont.

In reviewing the CalVTP Treatable Area, certain lands owned and managed by the District are excluded from the "Treatable Area" in which the safe use of Prescribed Fire would be beneficial both in terms of reducing fuel loads that may contribute to a higher risk of catastrophic fire to neighboring communities, as well as providing numerous ecological benefits. The CEQA analysis in the DEIR already includes all relevant environmental factors potentially affected (i.e. threatened and endangered species) for the excluded areas described below (see attached map of the areas described). The District believes that the described mitigation measure outlined in the DEIR are sufficient and the inclusion of the excluded areas described below would not change the findings of the DEIR.

#### Fremont Older Open Space Preserve (1)

Approximately 520 acres on the eastern side of this preserve has been excluded. Reintroduction of fire to the vast grasslands here would greatly increase the biodiversity.

#### La Honda Open Space Preserve (2)

Approximately 300 acres in the Northwest section of the preserve has been excluded. This area is a special management zone (Conservation Management Unit) that has been established in highly-sensitive areas to protect and enhance biotic resources, including native wildlife, and aquatic, riparian, grassland, and forest habitats. The exclusion of fire in this area has greatly increased the grass thatch layer which is starting to exclude native forbs. The reintroduction of fire in this area would greatly enhance the habitat for Federally-List species, such as the California red-legged frog.

A29-4

#### Los Trancos Open Space Preserve (3)

Approximately 160 acres in the Northern section of the preserve has been excluded. Half of this area contains a high-biodiverse oak woodland. Per the University of California Oak Woodland Management webpage ([https://ucanr.edu/sites/oak\\_range/Oak\\_Articles\\_On\\_Line/Oaks\\_and\\_Fire/The\\_Role\\_of\\_Fire\\_in\\_Californias\\_Oak\\_Woodlands/](https://ucanr.edu/sites/oak_range/Oak_Articles_On_Line/Oaks_and_Fire/The_Role_of_Fire_in_Californias_Oak_Woodlands/)):

Fire is a natural part of California's oak woodland ecosystem. It has also served as an important management tool since Native Americans first inhabited these areas. Fire plays a role in the development of oak woodland stand structure, oak regeneration processes, the development of habitat for wildlife, nutrient cycling ...

Outside of the oak woodlands, the District has been managing high-biodiverse grasslands, and the exclusion of fire in this area has greatly increased the grass thatch layer, which is starting to exclude native forbs.

#### Monte Bello Open Space Preserve (4)

The entirety of 3,436 acre preserve has been excluded from "Treatable Area." Vast areas of this preserve have yellow-star thistle infestations which the District wished to use phenology-timed Prescribed Fire to treat; peer-review research has shown this

A29-5



method to reduce the yellow star thistle infestations. Prescribed Fire within Sugarloaf Ridge State Park demonstrated a marked reduction in the occupation of yellow star thistle while nearly doubling the cover of other forbs, and native species. (see Use of Fire for Yellow Star Thistle). In addition, the District has identified an area within the preserve to perform fire suppression training (i.e. suppression activities, Unified Command) during a prescribed fire event.

Sincerely,  
Coty Sifuentes-Winter, Supervisory Vegetation Ecologist  
Project Manager for the development of the District's Wildland Fire Resiliency Program

**Coty Sifuentes-Winter** | Senior Resource Management Specialist

[csifuentes@openspace.org](mailto:csifuentes@openspace.org)

Midpeninsula Regional Open Space District

330 Distel Circle, Los Altos, CA 94022

(650)-625-6560 | Direct Line

(650) 691-1200 | Main Line

A greenbelt system in the San Francisco Bay Area comprised of over 60,000 acres in 26 preserves | [www.openspace.org](http://www.openspace.org)

**Brain Teaser of the Week:**

*The circumference of the Earth is approximately 40,000 km. If we made a circle of wire around the globe, that is only 10 meters (0.01 km) longer than the circumference of the globe, could a flea, a mouse, or even a man creep under it?*

**Last Week**

*A man bumps into his mathematician friend on the street that he hasn't seen in 5 years. The man asks the mathematician how old his children are. The mathematician, who always replies in riddles said, "I now have three children. The sum of their ages is equal to the number of windows on the building in front of you and the product of their ages equals 36." The friend then says "I need one more piece of information." The mathematician then replies "My youngest child has blue eyes." What are the ages of the mathematician's three children?*

*Answer: 6, 6, 1 or 9, 4, 1 (This one assumes the mathematician's wife was knownly pregnant the last time they met).*

THE USE OF FIRE FOR YELLOW STARHISTLE (Centaurea solstitialis)  
MANAGEMENT AND THE RESTORATION OF NATIVE GRASSLANDS AT SUGARLOAF  
RIDGE STATE PARK

by Marla S. Hastings and Joseph M. DiTomaso

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ABSTRACT

Three consecutive summer prescribed burns conducted within Sugarloaf Ridge State Park have demonstrated a marked reduction in the occupation of yellow star thistle while nearly doubling the cover of other forbs, and native species. Essential elements to assure project effectiveness are identified which include the critical timing for conducting the burns, and the requirement to burn annually over a three year period.

INTRODUCTION

Sugarloaf Ridge State Park, Sonoma County, is located in the northern Coast Range near Santa Rosa, California. It contains a complex mosaic of vegetation types which include chaparral, mixed evergreen forest, woodland-savanna, grassland and coniferous forest. Open grasslands occupy approximately 350 acres of the park's 2700 acres. Livestock grazing and related agricultural practices since before 1900 heavily impacted the grassland areas.

The current grassland complex of the park includes both a native perennial component dominated by purple needle grass (Nassella pulchra), blue wildrye (Elymus glaucus), and (Leymus triticoides), and an exotic annual European grassland component, dominated by ripgut brome (Bromus diandrus), soft brome or blando brome (Bromus hordeaceus), silver European hairgrass (Aira caryophyllea), wild oats (Avena fatua), and little quakinggrass (Briza minor). Significant populations of yellow starthistle are found throughout the grassland areas. Mixed evergreen forest, composed of Douglas fir (Pseudotsuga menziesii), canyon oak (Quercus chrysolepis), tanoak (Lithocarpus densiflora), and madrone (Arbutus menziesii), is the major vegetation type throughout the park.

Yellow starthistle (Centaurea solstitialis) first invaded open grassland sites within the San Francisco Bay Area before 1869 (Maddox, D.M., and A. Mayfield. 1985). Today, yellow starthistle is the most widely distributed weed in California, occupying over 10 million acres. This represents approximately 10% of the total

surface area of the state. Infestations of yellow starthistle lower forage yield and quality, interfere with grazing, cause problems in harvesting of forage and crops, and cause "chewing disease" in horses. In many areas of California, including Sugarloaf Ridge State Park, yellow starthistle reduces wildlife forage and habitat, displaces native plants and decreases native plant and animal diversity (Sheley, R.L. and L.L. Larson, 1994).

The historical fire frequency within the Sonoma Valley was analyzed utilizing fire scars on redwoods at Annadel State Park, located approximately 10 miles southwest of Sugarloaf Ridge. Finney and Martin (1992) reported that the mean fire intervals from all stumps varied from 6.2 to 20.9 years, with many intervals between 2 and 10 years. The native vegetation at Sugarloaf Ridge flourishes under this historical regime of relatively low intensity frequent fire. California natives have become fire adapted in that plants are dependent on fire to arrest succession, reduce competition, remove thatch, provide soil enrichment and seed scarification. Douglas-fir invasion into the open grasslands and oak woodlands within the park is a specific example of the effect of fire exclusion. Under the historical, frequent fire regime, the Douglas-fir would experience fire-caused mortality. Modern fire suppression activities curtailed frequent fires. Approximately 50 years of fire suppression have allowed many unnatural conditions to occur.

Fire exclusion has jeopardized essential wildlife habitat, biodiversity and the open character provided by the park's grasslands and oak woodlands. Preliminary investigations at Sugarloaf Ridge document that Douglas-fir invasion, biodiversity loss, and the rampant invasion of yellow starthistle are all occurring within the park's grassland sites (Whatford, 1994).

#### Methods

In 1984, yellow starthistle was identified as a seriously invasive component of the vegetation at Sugarloaf Ridge. Yellow starthistle had become dominant within the 10 acre meadow portion of the developed campground. It then rapidly spread within the park's 350 acres of grassland.

In 1993, park resource managers initiated an active yellow starthistle management program. A 30 acre (Pony Gate Compartment) prescribed burn was conducted within a targeted high-priority location in the park. This burning program had two main objectives, 1) eliminate the current year's yellow starthistle seed production by causing seed death; and 2) stimulate yellow starthistle seed germination. This, in theory, would rapidly exhaust the yellow starthistle seed bank. It was anticipated that seed bank depletion and long-term yellow starthistle control could be achieved by annual burning.

The burn was located directly adjacent to the park's entry road. Its location was selected for good accessibility during prescribed burning operations, and high public visibility for interpretation

of the yellow starthistle management program.

Prescribed burning was again conducted in July, 1994 and during July, 1995, an additional 155 acres were treated. The third consecutive annual Pony Gate prescribed burn was also completed while burning the new compartment. In all locations, the fire carried well, and nearly complete yellow starthistle mortality was observed.

One eroded gully within the Pony Gate compartment was occupied with a 100% cover of yellow starthistle. There was insufficient grass fuel to carry a surface fire during either the 1993 or 1994 burn. As a result, yellow starthistle mortality was limited. During December, 1994, annual grasses blando brome, and zorro fescue were sown to produce fuel for the 1995 burn. Even with this added fuel, yellow starthistle remained dominant in this location.

At Sugarloaf Ridge fall burning is not appropriate for yellow starthistle control. Burning must occur after the annual and perennial grasses have cured and set their seeds but prior to yellow starthistle seed development. Early or mid summer burns also provide two to three extra months of fire protection due to the blackened area against the homes in urban interface locations.

#### Results

Although the 1993 burn was too cool to fully consume all of the yellow starthistle plants yet nearly 100% of the yellow starthistle plants not consumed by the fire demonstrated complete foliar scorch two days following the burn. Yellow starthistle flowers and immature seed heads remained on the plants. The seeds of these plants did not mature during that growing season. The objective of eliminating yellow star thistle seed production was fully achieved.

May, 1995 results following the second annual consecutive burn showed a 90% reduction in relative yellow starthistle cover (rosette stage). Even at maturity in July, two consecutive annual burns reduced yellow starthistle cover by 62%, while nearly doubling the relative cover of other forbs, particularly native species. Perennial grass cover was reduced by 40% in the burned areas in May, but subsequently increased by nearly 300% in July.

The effectiveness of burning for yellow starthistle control was also reflected in significant seed bank reduction. After a single burn, the soil seed bank was reduced by 74%, and after three years of burning, the reduction was over 99%.

#### Seed Bank Analysis, Sugarloaf Ridge State Park

Burn Sequence

Yellow Starthistle seeds in the soil per square meter (5cm deep)

Unburned	10,000
After 1 burn	2,600
After 3 burns	52

As is generally the case in grassland burning, each of the annual prescribed fires burned in a mosaic of lesser and more severe fire intensity. Variability in volumes and flammability of surface fuels produces a full range of fire intensity. Although the fire intensity was not measured during the burns, the dramatic reduction in yellow starthistle cover and seed bank documents that fire intensity is not crucial to the reduction of yellow starthistle. Burning during the appropriate phenological stage is critical for the elimination of seed production. Full consumption of yellow starthistle plants by fire is not crucial. Only sufficient heat to produce foliar scorch and stem girdle the plants is necessary, thereby arresting their development to maturity. Heat is critical for seed bank depletion.

Biodiversity was also measured in the unburned and burned compartments at Sugarloaf Ridge. Significant increases in forb or non-grass species within the burn compartments dramatically contrasted with unburned locations. In addition, the vegetative cover of native species increased two-fold. Six species, all non-California natives, increased in both frequency and vegetative cover in the unburned sites. By contrast, 15 species were more prevalent in the burned sites. Of these, eight were California broadleaf natives.

Light interception and soil temperature were also measured at and near the soil surface. Unburned plots contained noticeably more thatch, with a corresponding reduction in light penetration to the soil surface. Increased soil temperatures were measured when burning removed the thatch layer. Although other factors may also be involved, it is possible that reduced yellow starthistle competition, increased light, and higher soil temperatures in the spring could influence the establishment and success of native plant species following burning.

#### Discussion

The resource management strategy for the park is to continue with annual consecutive prescribed burns within the larger 155 acre, and other additional burning compartments. The Pony Gate compartment will not be burned during the next 3 years, so that yellow starthistle recolonization can be monitored. This analysis will allow park resource managers to develop the fire regime required to maintain sustainable control of yellow starthistle.

It is extremely difficult to have complete success with burning alone in the park. Prescribed fire is very reliable in reducing yellow starthistle in most park locations, yet problems are

presented with burning in near proximity to facilities and in roadside locations. Non-flammable, fleshy yellow starthistle does not readily burn during the appropriate phenological stage without sufficient grass fuel to carry the fire. A flame thrower will be used to produce foliar scorch on roadside plants that do not burn during future broadcast burns. Fuel can be provided for large areas dominated by yellow starthistle without a grass component by sowing grass seed the winter prior to a planned prescribed burn. The preferable treatment would be to sow locally collected native seed. Unfortunately, financial limitations may make this option infeasible.

Herbicide application has also been integrated into the park's management strategy. Within the 10 acre developed campground area at Sugarloaf Ridge, a private contractor applied three separate herbicide treatments during winter and spring, 1994, and early winter, 1995. A solution of Garlon 4, (Triclopyr) along with Telar (Chlorsulfuron) was used during the winter applications. Garlon 4 was applied solely during a spring, 1994 treatment. Summer mowing occurred in 1994 and 1995 after the relic perennial grasses set seed. Isolated yellow starthistle plants were hand pulled during the summer of 1994 and 1995. Although the results are very favorable to date, burning is clearly the preferred management technique for the reduction of yellow starthistle at Sugarloaf Ridge. Since the seed bank analysis documents such a remarkable reduction in yellow starthistle seeds following burning, the campground meadows will be burned in late June or early July, 1996 during the other prescribed burning operations in the park. Herbicide will continue to be applied as spot treatments, and along some roadsides to plants escaping the burning.

Research continues to be conducted within the park. Full project documentation is forthcoming in an upcoming edition of California Agriculture.

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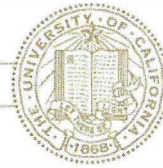
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August 9, 2019

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**Subject: Response to Notice of Availability of Draft Program Environmental Impact Report for the proposed California Vegetation Treatment Program**

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (PEIR) for the proposed California Vegetation Treatment Program (CalVTP). The University of California, Merced (UC Merced), manages several properties that includes the UC Merced campus consisting of 1,026 acres and the adjoining Merced Vernal Pools and Grassland Natural Reserve consisting of 6,460-acres that are both located in Merced County, and the Buckhorn Flat Ranch consisting of 503 acres that is located in Mariposa County. It is our understanding that these properties are located within the State Responsibility Area (SRA).

A30-1

The CalVTP PEIR will facilitate implementation of wildfire hazard reduction projects in the State of California that will promote both life safety and ecosystem health. UC Merced's management of the properties mentioned above have similar goals that are already part of the local CAL FIRE Unit Plans. The University supports the goals of the CalVTP PEIR including the project objectives to reduce wildfire risks and avoid or diminish the harmful effects of wildfire on the people, property and natural resources. In addition, UC Merced supports the inclusion of limited treatment activities within the CalVTP PEIR because this CEQA streamlining could facilitate the implementation of projects that would reduce wildfire risk and diminish or avoid the harmful effects of wildfire.

A30-2

UC Merced appreciates the extensive interagency coordination in preparation of the CalVTP PEIR and the project's programmatic design that allows various public agencies, including the University of California, with land ownership and/or management responsibilities in the treatable landscape, to implement vegetation treatments consistent with the CalVTP, using the PEIR for CEQA compliance.

Sincerely,

Phillip Woods  
Director of Physical and Environmental Planning  
UC Merced

Cc: Gini Krippner, UC Merced Designated Campus Fire Marshall & Chief Building Official