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# Environmental Setting, Impacts, and Mitigation Measures

## Approach to the Environmental Analysis

As required by California Environmental Quality Act (CEQA) (State CEQA Guidelines Section 15126.2), this PEIR identifies and focuses on the potentially significant direct and indirect environmental effects of the proposed CalVTP. This PEIR considers the full range of treatment types and activities included in the proposed CalVTP to provide a broad, comprehensive analysis of environmental impact issues. Where relevant to address variations in resources in different parts of California, the existing conditions and impact analysis are organized by ecoregion. This approach is designed to provide CEQA review streamlining by planning for future use of the PEIR in connection with later vegetation treatment activities. This approach is consistent with State CEQA Guidelines Section 15168, “Program EIR,” which allows for the use of a Program EIR in connection with a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities having generally similar environmental effects that can be mitigated in similar ways.

As contemplated by State CEQA Guidelines Section 15168(c), CAL FIRE and other public agencies proposing treatment activities (i.e., project proponents) will examine proposed vegetation treatments in light of this PEIR to determine whether any additional environmental review document(s) must be prepared. CAL FIRE or other project proponent may use the Project-Specific Analysis (PSA) (Appendix PD-3) of this PEIR, or another similar documentation, to document evaluation of the site and the proposed treatments to determine whether the proposed treatment project is consistent with the descriptions in Chapter 2, “Program Description” and whether the environmental effects of the proposed treatment have been sufficiently evaluated in this PEIR. The PSA for a streamlined CEQA review of site-specific, later vegetation treatment activities that are consistent with the proposed program will document a project’s environmental effects and how they have been addressed in the PEIR. This will include documenting the application of environmentally protective Standard Project Requirements (SPRs) and relevant mitigation measures from the PEIR. The PEIR discloses and analyzes the proposed CalVTP’s reasonably foreseeable effects on the environment that would occur from any of the treatments within the treatable landscape. Through the PSA, the project proponent will document whether and how the proposed treatment would be consistent with the program description and evaluation of impacts in the PEIR. If the proposed treatment meets the criteria in State CEQA Guidelines Section 15168(c) to be within the scope of the program description and impact analysis, the PSA will document this determination. The Guidelines state the criteria this way:

If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

A “within the scope” finding would shorten the time needed for CEQA review of later treatment activities consistent with CalVTP, which would support the objective to increase in the pace and scale of project approvals in a manner that includes environmental protections. Where a later vegetation treatment project does not qualify for a “within the scope” finding, a negative declaration, mitigated negative declaration or EIR may be prepared that focuses on the environmental impacts not adequately considered in the PEIR.

### Scope of the Analysis

As noted in Chapter 2, “Program Description,” the CalVTP would be implemented within the 20.3-million-acre treatable landscape. This CalVTP PEIR employs a programmatic approach to evaluation because the specific characteristics and locations of actual treatment projects are not known at this time. As such, the level of detail of the environmental impact analysis is also programmatic in that it addresses the full range of potential environmental effects of implementing the CalVTP. Environmental impact conclusions are broadly and comprehensively applied to types of treatments and treatment activities that would occur. As described above, this approach is consistent with the State CEQA Guidelines provisions for a Program EIR, as described in Section 15168.

### Impact Analysis Approach

This section explains the approach for conducting environmental impact analyses and determining the significance of environmental effects resulting from implementation of the proposed CalVTP. In doing so, it describes how the SPRs are considered in the impact analysis and when it is appropriate to identify mitigation measures for impacts resulting from vegetation treatments.

#### ROLE OF SPRs AND DETERMINATION OF SIGNIFICANCE IN THE PEIR

Section 2.7 of Chapter 2, “Program Description,” presents the SPRs for the CalVTP. The SPRs will be incorporated by CAL FIRE or other project proponents into all proposed vegetation treatments seeking to qualify for coverage under the CalVTP PEIR. SPRs would be implemented for all treatments to the extent they are applicable, analogous to standard operating procedures or best management practices. The applicable treatment activities and treatment types are identified within each SPR, typically at the end of each SPR. SPRs are intended to avoid and minimize environmental impacts and, in some cases, promote compliance with applicable laws and regulations. For example, a prescribed burn may cause smoke in the vicinity of a public roadway, raising a potential traffic safety effect. Because SPR TRAN-1, Implement Traffic Control during Treatments, requires preparation of a Traffic Management Plan for prescribed burns, including temporary signage, traffic controls along public roadways, and flag personnel for traffic management, its implementation would avoid or minimize significant impacts to public safety and residual impacts (with SPRs) are analyzed against the identified threshold of significance accounting for the SPR’s environmental protective influences.

Refer to the Section 3.4.1, “Terminology Used in the PEIR” for definitions of these terms used in the impact analysis.

### Analysis Contents

Sections 3.2 through 3.17 of this PEIR present a discussion of existing conditions, regulatory background, environmental impacts associated with implementation of vegetation treatments, SPRs, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). The environmental resource topics evaluated in Chapter 3 are consistent with those identified in the Notice of Preparation (NOP) prepared for this PEIR (see Appendix A) and consider relevant comments provided on by agencies, organizations, and the public during NOP review.

Sections 3.2 through 3.17 follow the same general format:

**Environmental Setting** presents the existing environmental conditions within the treatable landscape in accordance with Section 15125 of the State CEQA Guidelines. The CalVTP would apply to all CAL FIRE Administrative Units and the jurisdictions of other project proponents. The degree of specificity under this EIR’s programmatic level analysis is more generalized than a site-specific analysis, because the exact locations and proposed treatment prescription of later vegetation treatments are not yet known. Nonetheless, the analysis comprehensively considers the full range of treatments potentially implemented within the modeled treatment areas for each treatment type (see maps in Section 2.5.1 of Chapter 2, “Program Description.”

Where applicable and helpful for conducting the impact evaluation, the setting description and environmental analysis for the CalVTP are organized into geographic regions reflecting different environmental characteristics. For instance, the ecological regions or “ecoregions” established by the U.S. Forest Service (USFS) are used to organize natural resources information for biological resources. The USFS Ecoregion system is based on geomorphology, soils, geology, hydrology, and vegetation and classifies California into 19 Ecological Sections and 190 Ecological Subsections. Other topics use different geographic region approaches appropriate to the subject (e.g., air basins for air quality or watersheds for water quality), or address the State as a whole, if dividing California into smaller regions does not provide value for the particular environmental issue (e.g., for greenhouse gas emissions).

**Regulatory Setting** presents the laws, regulations, plans, and policies that are relevant to each environmental resource. Regulations originating from the federal, state, and local levels are each discussed where applicable. When state agencies, including CAL FIRE, are conducting governmental activities under the authority of state law or the state Constitution, such as treatments implemented by CAL FIRE under the proposed CalVTP, they are exempt from local government plans, policies, and ordinances (unless a constitutional provision or statute directs otherwise). Nonetheless, CAL FIRE voluntarily seeks to operate consistently with local governance to the extent feasible. Given its statewide extent and the possible number of local and regional responsible agencies, this PEIR does not identify potential individual local government plans, policies, and ordinances. This PEIR assumes that any vegetation treatments proposed by local or regional agencies under the CalVTP would necessarily be consistent with local plans, policies, and ordinances, as required by SPR AD-3.

**Impact Analysis and Mitigation Measures** identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with the State CEQA Guidelines (Sections 15126, 15126.2, and 15143). The thresholds of significance used in this PEIR are primarily based on the checklist presented in Appendix G of the State CEQA Guidelines, best available data, applicable regulatory standards of relevant public agencies, and professional judgement. The significance of each impact is determined by evaluating the physical changes in the environmental setting that would be caused by implementation of treatments under the proposed CalVTP and analyzing those effects against the identified threshold. Key methods and assumptions used to frame and conduct the impact analysis as well as issues or potential impacts not discussed further (such issues for which the program would have no impact) are also described. In addition, as discussed above, SPRs applicable to each resource section are identified.

Impacts are organized by letter convention for each resource (e.g., in Section 3.2, “Aesthetics,” impacts are numbered as follows Impact AES-1, Impact AES-2). A bold-font impact statement, a summary of each impact, and its level of significance before application of any necessary mitigation precedes the discussion of each impact. The discussion that follows the impact summary presents the substantial evidence supporting the impact significance conclusion.

If an environmental impact cannot be avoided or maintained at a less-than-significant level assuming implementation of the SPRs, then it would be a potentially significant impact, and the PEIR must describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for potentially significant adverse impacts. The measures are to be fully enforceable and adopted as a condition of approval (PRC Section 21081.6[b]). Mitigation measures are not required for effects that are determined to be less than significant. Where feasible mitigation for a potentially significant impact is available the mitigation measures are presented. Each identified mitigation measure is labeled with the same letter convention to correspond with the number of the impact that would be mitigated by the measure (e.g., Mitigation Measure AES-1 for Aesthetics). Following the mitigation measure, the measure’s effectiveness at reducing the impact is described and compared again against the identified threshold to determine the level of significance after mitigation. Where sufficient feasible mitigation is not available to reduce an impact to a less-than-significant level, or where CAL FIRE or other project proponent may lack the ability to ensure that the mitigation is implemented when needed, the impact is identified as remaining “significant and unavoidable.”

Chapter 4 of this PEIR, “Cumulative Effects Analysis,” presents an analysis of CalVTP’s impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 5, “Significant Effects and Growth-Inducing Effects,” includes an analysis of the project’s growth-inducing impacts, as required by Public Resources Code (PRC) Section 21100(b)(5). Chapter 6, “Alternatives,” presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the CalVTP, as required by Section 15126.6 of the State CEQA Guidelines.

### Terminology Used In the PEIR

Following are key terms used in this PEIR to describe important components of the CalVTP:

**Project proponent:** Refers to a public agency providing funding for vegetation treatment or with land ownership, land management, or other regulatory responsibility in the treatable landscape and seeking to implement vegetation treatments consistent with this PEIR for CEQA compliance~~CAL FIRE or other public agency funded by a CAL FIRE grant or with land ownership/management responsibilities in the treatable landscape and seeking to implement vegetation treatments consistent with this PEIR for CEQA compliance~~.

**Treatable landscape:** the approximately 20.3-million-acre area of the State Responsibility Area within which proposed CalVTP treatments could be implemented (refer to Section 2.4 of Chapter 2 “Program Description” for additional description)

**Qualifying treatment** (also qualifying project): a later vegetation treatment project that is consistent with the treatment methods described in this PEIR, would not result in new or substantially increased significant effects relative to those identified in this PEIR, and would otherwise be considered within the scope of this EIR pursuant to State CEQA Guidelines Section 15168(c)(2).

**Treatment type:** wildland-urban interface fuel reduction, fuel break, ecological restoration (each is described in Section 2.5.1 of Chapter 2 “Program Description”)

**Treatment activity:** prescribed burning, manual treatments, mechanical treatments, prescribed herbivory, herbicide application (each is described in Section 2.5.2 of Chapter 2 “Program Description”); any of these activities could be used in various combinations to implement a treatment type.

This PEIR uses the following terminology to describe environmental effects of the program:

**Less-than-Significant Impact**: An impact is considered less than significant when it, either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible mitigation measures.

**Potentially Significant Impact**: A potentially significant impact is an environmental effect that may cause a substantial adverse change in the physical conditions of the environment. In this PEIR, a potentially significant impact is treated as if it were a significant impact. “Potentially” is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR; it is expected that most treatments would result in effects that are less severe than those disclosed, but some treatments could result in significant impacts consistent with the severity described in this PEIR. Potentially significant impacts are identified by the evaluation of treatment effects in the context of specific significance thresholds. Mitigation measures and/or alternatives are identified to reduce these effects to the environment below the threshold of significance where feasible.

**Significant and Unavoidable Impact**: An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. If a lead agency decides to approve a project with significant unavoidable impacts, it must adopt a statement of overriding considerations to explain its actions (State CEQA Guidelines, Section 15093(b)).

**Mitigation Measures**: State CEQA Guidelines (Section 15370) define mitigation as:

a) avoiding the impact altogether by not taking a certain action or parts of an action;

b) minimizing impacts by limiting the degree of magnitude of the action and its implementation;

c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

e) compensating for the impact by replacing or providing substitute resources or environments.

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