

## 6 ALTERNATIVES

### 6.1 CEQA REQUIREMENTS FOR ALTERNATIVES

The State CEQA Guidelines Section 15126.6(a) requires EIRs to describe "... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed program. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (State CEQA Guidelines Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered in an EIR (Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed program with the impacts of not approving the proposed program. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "...shall also identify an environmentally superior alternative among the other alternatives." (Section 15126[e][2]).

In defining "feasibility" (e.g., "... feasibly attain most of the basic objectives of the project ..."), State CEQA Guidelines Section 15126.6(f) (1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the Board of Forestry and Fire Protection (Board) (See PRC Sections 21081.5, 21081[a] [3]).

## 6.1.1 Summary of Alternatives Screening Criteria

In compliance with State CEQA Guidelines Section 15126.6, as described above, each alternative is evaluated in three ways:

- ▶ Does the alternative **accomplish all or most of the project objectives** (described below relative to each alternative)?
- ▶ Is the alternative **potentially feasible** (from economic, legal, regulatory, and technological standpoints)?
- ▶ Does the alternative **avoid or substantially lessen any significant effects of the proposed project** (including consideration of whether the alternative could create significant effects additional to those of the proposed project)? Potentially significant and significant effects are described in Sections 3.2 through 3.17. The proposed CalVTP would result in the following significant and unavoidable impacts:
  - Aesthetics and Visual Resources (landscape alteration by non-shaded fuel breaks);
  - Air Quality (three significant and unavoidable impacts related to: 1) increased emissions from expanded treatment activities that could exceed California or national standards, 2) toxic air contaminants from increased prescribed burning, and 3) objectionable odors from increased prescribed burning);
  - Archeological, Historical, and Tribal Cultural Resources (two significant unavoidable impacts related to: 1) potential to disturb unknown resources and 2) potential effects to tribal cultural resources);
  - Biological Resources (substantial effects to special-status bumble bee species directly and through habitat modifications)
  - Greenhouse Gas Emissions (increase in GHG emissions from treatment activities);
  - Public Services, Utilities, and Service Systems (generation of solid organic waste [biomass from vegetation removal] that exceeds infrastructure capacity); and
  - Transportation (increase in vehicle miles traveled from the increased scale of treatment activities).

Each alternative that meets the evaluation criteria identified above is evaluated in the PEIR. Those that do not meet these criteria are described in Section 6.4, "Alternatives Considered and Eliminated from Detailed Analysis."

## 6.1.2 Identification of Alternatives

The alternatives incorporate input provided by agencies, organizations, and individuals during interagency consultation and review of the Notice of Preparation (NOP). The following organizations and individuals submitted comments on the NOP with suggested alternatives or alternative features for consideration in this PEIR (see Appendix A):

- ▶ California Chaparral Institute provided 24 recommendations, including the following that could inform development of alternatives:
  - focus on defensible space treatments within 100 feet of structures (see Section 6.4.2),
  - prepare separate, regional PEIRs (see Section 6.4),
  - limit or modify vegetation treatments in chaparral to avoid type conversion (see Alternative C), and
  - emphasize non-vegetation treatment actions related to structure retrofits, ignition reduction, evacuation planning, and GHG emission reduction (see Section 6.4.1).
- ▶ California Invasive Plant Council suggested adding actions related to ignition reduction and fire-safe landscaping and modifying treatments in southern California shrubland ecosystems (see Section 6.4.1 and Alternative C [Section 6.2.4]).
- ▶ Center for Biological Diversity provided several recommendations, including the following that could inform development of alternatives:

- focus on defensible space treatments within 100 feet of structures and infrastructure (see Section 6.4.2),
  - place restrictions on development in fire-prone areas (see Section 6.4.1),
  - restore wildfire as a natural process outside of areas directly adjacent to homes and communities (see the ecological restoration treatment type in the proposed CalVTP, No Program Alternative [Section 6.2.1], Alternative A [Section 6.2.2] and Alternative E [Section 6.2.6]), and
  - include non-vegetation treatment actions related to structure retrofits, ignition reduction, and GHG emission reduction (see Section 6.4.1).
- ▶ Endangered Habitats League provided several recommendations, including the following that could inform development of alternatives:
- include an alternative that minimizes vegetation treatment in chaparral and coastal sage scrub systems (see Alternative C [Section 6.2.4]);
  - focus on defensible space treatments within 100 feet of structures and infrastructure (see Section 6.4.2), and
  - place restrictions on development in fire-prone areas (see Section 6.4.1).
- ▶ Northcoast Environmental Center suggested avoiding the use of herbicides in the creation and maintenance of fuel breaks (see Alternative E [Section 6.2.6]).
- ▶ Various individuals provided several recommendations, including the following that could inform development of alternatives:
- focus on structure ignition prevention rather than large-scale vegetation management (see Section 6.4.1);
  - increase enforcement of defensible space requirements (see Section 6.4.2);
  - focus vegetation management on the WUI (see Alternative B [Section 6.2.3]);
  - prepare separate, regional PEIRs (see Section 6.4);
  - place restrictions on development in fire-prone areas (see Section 6.4.1);
  - develop shelter-in-place opportunities in WUI communities (see Section 6.4.1);
  - stage fire crews proactively instead of responding reactively (see Section 6.4.1);
  - assist PG&E with vegetation clearance around power lines instead of the currently proposed vegetation treatment (see Section 6.4.3);
  - focus on solutions that address human ignitions or development (see Section 6.4.1);
  - implement actions that restore native vegetation (see the ecological restoration treatment type in the proposed CalVTP, No Program Alternative [Section 6.2.1], Alternative A [Section 6.2.2] and Alternative E [Section 6.2.6]);
  - prohibit the use of herbicides (see Alternative E [Section 6.2.6]);
  - implement restrictions to prevent human ignitions in specific locations during weather conditions that contribute to a high fire danger (see Section 6.4.1); and
  - focus on defensible space treatments within 100 feet of structures and including non-vegetation treatment actions related to structure retrofits, ignition reduction, and evacuation planning (see Sections 6.4.1 and 6.4.2).

The Board of Forestry and Fire Protection reviewed and considered recommendations regarding alternatives provided in response to the NOP. Recommendations that were consistent with the alternatives screening criteria were incorporated into the alternatives evaluated in this PEIR, described in Section 6.2. Recommendations that were considered and eliminated from detailed analysis because they do not meet the alternatives screening criteria are described in Section 6.4.

## 6.2 ALTERNATIVES EVALUATED IN THIS PROGRAM EIR

Alternatives evaluated in this PEIR are:

- ▶ **No Program Alternative**, which assumes vegetation treatments would continue to be implemented through existing plans, policies, and operations;
- ▶ **Alternative A: Reduced Scale of Treatments**, which would treat up to 60,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration projects across the entire treatable landscape;
- ▶ **Alternative B: WUI Fuel Reduction Only**, which would seek to treat approximately 250,000 acres per year entirely within the WUI, encompassing approximately 10.1 million acres of the treatable landscape;
- ▶ **Alternative C: Modified WUI Fuel Reduction and Fuel Breaks**, which would seek to treat approximately 250,000 acres per year through WUI fuel reduction and fuel breaks without the use of prescribed burning in chaparral and coastal sage scrub vegetation types;
- ▶ **Alternative D: No Prescribed Burning Treatments**, which would seek to treat approximately 250,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration projects without the use of prescribed burning; and
- ▶ **Alternative E: No Herbicide Treatments**, which would seek to treat approximately 250,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration projects without the use of herbicides.

These alternatives are described in comparison to the proposed program. Where elements of the alternatives would remain the same as the proposed program, details are presented in Chapter 2, "Program Description." Accordingly, the alternative descriptions below focus on elements that differ from the proposed program.

Table 6-1, at the end of Section 6.2, presents a comparison of the environmental effects of each alternative relative to the proposed CalVTP. It identifies whether an alternative would avoid any significant and unavoidable impact of the proposed program and presents the degree of environmental effects relative to the proposed program (e.g., similar, less, greater) for each resource area.

### 6.2.1 No Program Alternative

#### DESCRIPTION OF THE ALTERNATIVE

Under the No Program Alternative, CAL FIRE would continue to implement vegetation treatments through existing programs, authorities, and funding and would continue to rely on the existing range of CEQA compliance tools. CEQA Guidelines Section 15126.6(e)(2) states that the no project alternative shall describe "what would be reasonably expected to occur in the foreseeable future if the project were not approved." For the revision of a regulatory plan, policy or ongoing operation, "the no project alternative will be continuation of the existing plan, policy, or operation into the future." (CEQA Guidelines Section 15126[e][3][A]).

Determining what vegetation treatments would be reasonably expected without approval of the CalVTP would consider efforts by the Board and CAL FIRE to implement existing plans, policies, and operations. It would also need to recognize constraints on the pace and scale of treatments associated with the necessity to use project-by-project environmental review and permitting, because of the absence of programmatic approval of the full spectrum of management tools (i.e., no expansion of prescribed burning nor program targeting the goal of 250,000 acres of treatment, and limited existing environmental clearance in forest vegetation). Because executive orders, an emergency declaration, and several programs are in place to address the state's wildfire crisis, it is reasonable to expect that efforts would continue to increase the amount of vegetation treatment carried out in the future. However, it is also reasonable to expect that any increase in the amount of vegetation treatment would be limited without the streamlining provisions of the CalVTP, but estimating a precise acreage treated under the No Program Alternative would be speculative.

CEQA compliance strategies would be varied for the No Program Alternative, consisting of a range of existing, standard environmental review options. Small treatments could qualify for Categorical Exemptions, where applicable. Some vegetation treatments located in shrub and grass fuel types could continue to rely on the 1981 Chaparral Management Program EIR for environmental compliance, but vegetation treatments in forested (tree) fuel types could not. Vegetation management projects in forest fuel types or otherwise outside the scope of the Chaparral Management Program EIR could fall within the scope of activities considered in the California Forest Improvement Program EIR. Most substantial vegetation treatments, including mechanical mastication or herbicide application, would typically require the preparation of project-specific CEQA documents, such as EIRs or Negative Declarations/Mitigated Negative Declarations.

A project-by-project approach to environmental review of vegetation treatment projects has proven time consuming and costly. CAL FIRE and other project proponents would need to dedicate a greater proportion of available funding and staff resources to project-specific environmental review than under the proposed program, which would streamline project-level environmental review of vegetation treatment. As a result, it would not be feasible to substantially increase the pace and scale of vegetation treatments. Because California has committed to implementing measures to reduce the risk of wildfire, such as in response to Executive Orders B-52-18, and N-05-19, the rate of vegetation treatments would likely increase to some degree beyond what has occurred under CAL FIRE's existing programs, but to estimate an acreage target would be speculative. Vegetation treatment through CAL FIRE's existing Vegetation Management Program (VMP) has been limited, averaging approximately 7,000 acres treated annually over the past 14 years (see Table 4-1 in Chapter 4, "Cumulative Effects Analysis"). This is partly because the VMP does not include the use of herbicides or mechanical treatments on forested lands. Most recently, CAL FIRE treated approximately 33,000 acres in 2017/2018 using the same methods proposed under the CalVTP (see Table 2-1 in Chapter 2, "Program Description")

This alternative would include the same treatment types as the proposed program (see Section 2.5.1 in Chapter 2, "Program Description"). Treatment activities would also be the same as those that would occur under the proposed CalVTP, however, treatment activities not addressed within an existing PEIR would require detailed project-level review before implementation. As with the proposed program, the distribution of treatment activities is anticipated to follow historic trends. Treatments under this alternative would involve approximately 50 percent prescribed burning, 20 percent mechanical treatments, 10 percent manual treatment, 10 percent prescribed herbivory, and 10 percent herbicide application (see sections 2.5.2 and 2.5.3 in Chapter 2, "Program Description").

Treatment activities would occur in all fuel types (i.e., tree, shrub, and grass). Treatments under the No Program Alternative would be expected to occur within the approximately 20.3 million-acre treatable landscape described in Section 2.4 in Chapter 2, "Program Description." However, the location and extent of treatments would be limited by the ability of project proponents to complete project-level environmental review.

### Consistency with Program Objectives

CEQA requires that an EIR evaluate a no project alternative to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project, even if the no project alternative does not meet most of the basic project objectives (State CEQA Guidelines Section 15126[e]). To allow for an informed comparison of the merits of the No Program Alternative, each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which the No Program Alternative would achieve the objective. As described below, the No Program Alternative would achieve two of the five objectives of the CalVTP, to some degree.

#### **Objective 1 - Serve as the vegetation management component of the state's range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California's 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

The No Program Alternative would not substantially increase management of the amount and continuity of wildland fire fuel and would, therefore, achieve Objective 1 to a lesser degree than the proposed program. The No Program Alternative would allow for continued actions that manage the amount and continuity of wildland fire fuels through WUI, fuel break, and ecological restoration treatment activities. This would help to implement Goal 5 of California's

2018 Strategic Fire Plan, which, in part, calls for promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of fuels treatment activities.

**Objective 2 - 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 Governor's Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

The No Program Alternative would not achieve the pace and scale identified in Objective 2. Executive Order B-52-18 directs the Natural Resources Agency to take necessary steps to achieve vegetation treatments on at least 500,000 acres of non-federal lands per year within 5 years. Because the No Program Alternative and the associated absence of improved CEQA streamlining would allow for only a limited increase in the existing pace and scale of vegetation treatments, it would not achieve Objective 2.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

The No Program Alternative would not achieve Objective 3, because it would not help increase the use of prescribed burning as a vegetation treatment activity. The No Program Alternative would not provide a programmatic environmental review document for prescribed fires, as directed by PRC Section 4483(a); therefore, the No Program Alternative would not be consistent with the intent of Senate Bill 1260 of 2018.

**Objective 4 - Contribute to meeting California's GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (CARB 2017), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

The No Program Alternative would not achieve Objective 4, because it would not support a substantial increase in the pace and scale of forest management for fire fuel and carbon management purposes. The 2017 Climate Change Scoping Plan and the Forest Carbon Plan call for active management of forests and other natural and working lands to increase the potential for carbon sequestration and reduce carbon emissions associated with wildfire. Under the No Program Alternative, active management of natural and working lands, including ecological restoration treatments, would continue as it is currently performed; however, it would not increase the pace and scale of such treatments. Without a substantial increase in the amount of treatments under the No Program Alternative, it would not meaningfully contribute to the management of natural and working lands as a net carbon sink.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

The No Program Alternative would result in less ecological restoration than the proposed program, so it would not fully achieve Objective 5. Under this alternative, some ecological restoration treatments would continue in target fire-adapted plant communities by restoring degraded, damaged, or destroyed ecosystems and habitats to conditions associated with a natural fire regime. Treatment activities would continue to include prescribed burning, but with only a limited increase in pace and scale, because of the absence of programmatic environmental review and CEQA streamlining.

## Feasibility

The No Program Alternative would reflect a continuation of current practices. Because the No Program Alternative would involve limited changes from existing practices, the alternative would be potentially feasible to implement; however, it would not feasibly attain most of the basic objectives of the proposed program.

## ENVIRONMENTAL ANALYSIS OF THE NO PROGRAM ALTERNATIVE

Treatment activities implemented under the No Program Alternative would not integrate the SPRs required under the CalVTP into treatment design to avoid and minimize impacts. Because treatments under this alternative would be subject to project-by-project CEQA review or would be implemented under existing programmatic CEQA documents, it is assumed some environmental protections would be in place as environmentally protective measures proposed by project proponents and/or mitigation measures identified through project-level CEQA review. Because treatment activities under the No Program Alternative would be similar to the proposed program, it is possible that environmental impacts could be mitigated to a similar degree as under the CalVTP. However, it is not known whether the environmental protection measures applied to treatments under this alternative would reduce impacts to the same degree of effectiveness as the proposed program. The SPRs that would be implemented under the CalVTP are the product of coordinated interagency efforts to integrate environmental protection into a comprehensive approach to reduce wildfire risk statewide through vegetation treatment. These SPRs provide the benefit of being mutually-supported and predictable, such that they would be implemented consistently to achieve environmental protection. In addition, the CalVTP SPRs were developed in consideration of cumulative effects at a statewide scale for most resources. In contrast, environmental protection measures developed for individual projects could not have these environmentally protective benefits. It is therefore, reasonable to assume that the SPRs required under and specifically developed for the proposed program would be more effective at consistently avoiding and minimizing impacts statewide than those developed for individual projects.

Because the No Program Alternative would not include the streamlining benefits of the CalVTP, it is anticipated that less vegetation management would occur under this alternative than the proposed program. Less vegetation management could generally result in reduced environmental effects from treatment operations compared to the proposed program, but the lack of consistent SPRs specifically developed to avoid and minimize statewide impacts of treatments could contribute to greater impacts than the proposed program. Thus, where there are no other differences between the No Program Alternative and the proposed program, the environmental effects of the No Program Alternative are expected to be similar to the proposed program. In addition, the adverse environmental effects of wildfire would be more likely to manifest under the No Program Alternative because fewer acres would be treated for wildfire prevention.

The following sections describe the relative effect of the No Program Alternative on each resource area. The degree of environmental effects compared to the proposed program is summarized in *italic text* in parenthesis after the discussion of each resource area.

### Aesthetics and Visual Resources

Under the No Program Alternative, the same treatment activities as the proposed program would occur, although CEQA review would be conducted on a project-by-project basis. These treatments could affect aesthetics and visual resources across the entire treatable landscape. The extent of effects on aesthetics and visual resources would be less than the proposed program because fewer acres would be treated each year, owing to the need for project-by-project planning and environmental review. As with the proposed program, the visual effects of implementing treatments would be short-term and temporary. Like the proposed program, the long-term effects of most treatment types would be visible, but would not result in substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. The exception is for non-shaded fuel break treatments. Under the No Program Alternative, non-shaded fuel break treatments could result in a substantial long-term adverse change in the landscape by creating a contrasting linear element in an otherwise natural environment. As with the proposed program, mitigation measures could be implemented, but it would not be possible to reduce the visual effects of non-shaded fuel break to a less-than-significant level. This would result in the same significant and unavoidable impact as the proposed program. (*Same significant and unavoidable impact*)

## Agriculture and Forestry Resources

Treatment activities under the No Program Alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). As with the proposed program, treatment activities under the No Program Alternative would not result in the loss of forest land or conversion of forest land to a non-forest use. This impact would be similar to the proposed program.

## Air Quality

The No Program Alternative would result in the same significant and unavoidable air quality impacts as the proposed program related to treatment emissions that could conflict with CARB's *Mobile Source Strategy* or exceed CAAQS or NAAQS, and smoke from prescribed burns that could result in toxic air contaminants and objectionable odors. As with the proposed program, treatment activities would comply with all existing applicable regulations for the protection of air quality. Like the proposed program, the No Program Alternative would result in a significant and unavoidable impact because the level of mobile-source emissions would conflict with the California Air Resource Board's *Mobile Source Strategy*. The No Program Alternative would also result in a significant and unavoidable impact because it could generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS depending on the frequency, location and duration of treatments. As with the proposed program, the No Program Alternative would also result in a significant and unavoidable impact because prescribed burns could result in objectionable odors and the short-term exposure of people to concentrations of TACs associated with an acute health risk. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors from diesel exhaust would be similar to the proposed program. In summary, the air quality effects of the No Program Alternative would be similar to the proposed program. The same significant and unavoidable impacts would remain. (*Same significant and unavoidable impacts*)

## Archeological, Historic, and Tribal Cultural Resources

The effects of the No Program Alternative on archeological, historic, and Tribal Cultural Resources (TCRs) would be similar to the proposed program. As with the proposed program, compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities. This would result in the same significant and unavoidable impact as the proposed program. Overall, the impacts would be similar to the proposed program. (*Same significant and unavoidable impact*)

## Biological Resources

The No Program Alternative would result in similar effects on biological resources as the proposed program including the same significant and unavoidable impact to special-status bumblebees. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. Treatment activities under the No Program Alternative would not implement the mitigation measures identified for the proposed program. However, it is assumed that project-level environmental reviews would adequately identify and mitigate these effects. Treatments implemented under the No Program Alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees and this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be similar to the proposed program; however, any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., at the landscape level) as the proposed program because fewer acres would be treated. Treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. It is assumed that project-level environmental review would identify and appropriately mitigate these impacts where they could occur. The No Program Alternative would also result in the same effects related to state or federally protected wetlands, movement corridors, nurseries, and common nesting birds; and it is assumed that project-level environmental review would identify and mitigate these impacts where they could occur. Like the proposed program, the No Program Alternative would have no impact related to conflicts with local policies, ordinances, and plans because each project

would be evaluated for consistency during project-level CEQA review. Overall, the No Program Alternative would include the same impact mechanisms and the same effects as the proposed program because treatment activities are the same. *(Same significant and unavoidable impact)*

### **Geology, Soils, and Mineral Resources**

The effects of the No Program Alternative on geology, soils, and mineral resources would be similar to the proposed program. The No Program Alternative includes similar treatments, but at a reduced scale owing to the time required for project-by-project CEQA review. Like the proposed program, Alternative A would reduce the amount of vegetation in treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. It is assumed that compliance with existing regulations would avoid and minimize impacts and, recognizing treatments would be similar to the proposed program, it is expected that residual impacts, if any, could be reduced to less than significant with mitigation measures developed during project-by-project environmental review.

### **Greenhouse Gas Emissions**

The No Program Alternative would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment activities. It would include the same GHG emission-generating activities as the proposed alternative. Under the No Program Alternative, treatment activities would reduce wildfire risk, which would reduce GHG emissions and increase carbon sequestration over the long-term. This would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. However, because the No Program Alternative would likely include less vegetation management than the proposed program, it would not reduce wildfire risk to the same extent as the proposed program and therefore could result in less potential long-term GHG emission reduction and carbon sequestration benefits. Even though GHG emissions may be less under the No Program Alternative, the GHG impact would be slightly greater than the proposed program because it would result in less long-term GHG emission reduction and carbon sequestration than the proposed program. *(Same significant and unavoidable impact)*

### **Energy Resources**

The No Program Alternative would have a similar effect on energy resources as the proposed program. Slightly less energy would likely be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment than the proposed program because the No Program Alternative would likely include less vegetation management. However, the No Program Alternative would reduce the relatively inefficient consumption of energy during wildfire response to a lesser extent than the proposed program. Neither this alternative nor the proposed program would result in the inefficient, wasteful, or unnecessary consumption of energy. Overall, the energy effects of the No Program Alternative would be similar to the proposed program.

### **Hazardous Materials, Public Health and Safety**

Effects related to hazardous materials, and public health and safety would be similar to the proposed program. Like the proposed program, the No Program Alternative would include increased transportation, use, storage, and disposal of various herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. The No Program Alternative would also include compliance with applicable laws and regulations that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. It is assumed that project-level environmental review would require effective mitigation measures where residual impacts could occur. The No Program Alternative would not require implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites, but, because treatment activities would be the same as the CalVTP and individual projects must comply with CEQA's mandate to reduce impacts, it is assumed that project-level environmental review would identify and mitigate effects associated with known hazardous waste sites.

## Hydrology and Water Quality

The No Program Alternative would have similar effects on hydrology and water quality as the proposed program. The treatment activities would have the potential to violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, conflict with or obstruct the implementation of a water quality control plan, or substantially alter existing drainage patterns. These effects would be partially avoided through compliance with applicable laws and regulations. Because these treatments would be similar to treatments that can be mitigated under the proposed program, it is assumed the project-level environmental review would identify and effectively mitigate residual impacts related to hydrology and water quality.

## Land Use and Planning, Population and Housing

Like the proposed program, the No Program Alternative would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation because treatment activities would be evaluated for consistency through project-level CEQA review. The effects of the No Program Alternative related to inducing population growth would be similar to the proposed program. The No Program Alternative would likely result in less treatment activity requiring fewer workers, but it would require more personnel to conduct project-level planning and environmental review for each treatment.

## Noise

Short-term increases in noise would be similar to the proposed program. Treatment activities would be consistent with local noise policies and ordinances to the extent the project is subject to them. Residual noise impacts could be mitigated by, limiting vegetation treatment activities to daytime hours, ensuring proper notification of nearby sensitive receptors, locating treatment activities and staging areas away from sensitive receptors, or other mitigation measures developed. project-level CEQA review.

## Recreation

The effects of the No Program Alternative on recreation would be similar to the proposed program because it would include similar treatment activities in similar locations. The potential for treatments under the No Program Alternative to affect recreation would be evaluated and mitigated, if necessary, through project-level CEQA review.

## Transportation

The transportation effects of the No Program Alternative would be similar to the proposed program. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Potential temporary traffic effects resulting from individual vegetation treatment projects would be partially reduced through compliance with existing laws and regulations. Most residual traffic impacts could be avoided or minimized by minimizing potential hazards because of smoke generated during prescribe burns, requiring that a TMP be prepared, or other mitigation measures identified through project-level CEQA review. However, the increase in treated acres above existing conditions under this alternative may result in a net increase in vehicle miles traveled (VMT) to implement treatments. *(Same significant and unavoidable impact)*

## Public Services, Utilities and Service Systems

The No Program Alternative would have the same significant and unavoidable impact as the proposed program related to generating solid organic waste that could exceed local infrastructure capacity, and would generally have similar or slightly less severe effects on public services, utilities, and service systems. Like the proposed program, the No Program Alternative would result in an increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing. Because the timing, treatment location, and destination for biomass from future projects cannot be known, it is not possible to verify that this increase in solid organic waste would not exceed the capacity of local solid waste infrastructure in some locations. As with the proposed program, the No Program Alternative would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. *(Same significant and unavoidable impact)*

## Wildfire

Overall, the No Program Alternative would have a greater impact related to the risk of wildfire than the proposed program. The short-term effects of the No Program Alternative would be similar to, but slightly less than, the proposed program because the No Program Alternative would implement the same treatment activities, but these treatments would occur on fewer acres. The No Program Alternative would comply with existing laws and regulations, and project-level mitigation measures would minimize risk associated with treatment activities. Over the long term, the risk of the uncontrollable spread of wildfire would be greater than under the proposed program because the No Program Alternative would treat fewer acres than the proposed program. Thus, less fuel reduction would occur leaving greater amounts of wildfire fuels, which would increase the risk of the uncontrollable spread of wildfire.

## Summary

The No Program Alternative would reduce the significant and unavoidable impact associated with utilities and service systems related to exceeding capacity of local organic solid waste processing facilities. Because less vegetation treatment would occur under the No Program Alternative, treatment activities would be less likely to increase the production of solid organic waste that would exceed the capacity of local processing facilities. The No Program Alternative would result in slightly greater impacts related to GHG emissions and wildfire risk because with less vegetation treatments, there would be a greater risk of wildfire and associated emissions, and reduced potential for carbon sequestration. All other impacts would be similar to the proposed program.

## 6.2.2 Alternative A - Reduced Scale of Treatments

### DESCRIPTION OF THE ALTERNATIVE

Alternative A is intended to substantially lessen potentially significant environmental impacts that could result from treatment types by reducing the annual target acreage of treatments. It would treat up to 60,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration treatments. This annual target acreage is used to define the Reduced Scale of Treatments Alternative, because at less than 25 percent of the treatment target in the proposed program, it reflects a substantial decrease in the scale of treatments and associated impacts. This treatment target was used by CAL FIRE in the 2017 VTP Draft PEIR.

This alternative would include the same treatment types as the proposed program (see Section 2.5.1 in Chapter 2, "Program Description"). It would also include the same treatment activities and relative distribution of activities as the proposed program. This would include a combination of prescribed burning (50 percent of treatment area), mechanical treatments (20 percent), manual treatment (10 percent), prescribed herbivory (10 percent), and herbicide application (10 percent) (see sections 2.5.2 and 2.5.3 in Chapter 2). As with the proposed program, the treatment activity or combination of activities for a specific treatment site would be selected based on the site-specific characteristics and objectives of the treatment.

Treatment activities would occur within the approximately 20.3 million-acre treatable landscape (see Figure 2-1 in Chapter 2, Program Description). As with the proposed program, treatment activities would occur in all fuel types (i.e., tree, shrub, and grass). However, under Alternative A, treatments would be limited to 60,000 acres per year, which is 24 percent of the area that would be treated under the proposed program. Because it is anticipated that it would take the proposed program several years to "ramp up" from current treatment levels, the extent of treatments under Alternative A would be similar to the proposed program in the initial years of implementation. Ultimately, the extent of treatments under Alternative A would be more limited than the proposed program in later years, as treatments under the proposed program exceed 60,000 acres per year.

### Consistency with Program Objectives

An alternative under CEQA must achieve most of the basic project objectives (State CEQA Guidelines Section 15126.6). Each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which Alternative A would achieve the objective. As described below, Alternative A would achieve most of the basic project objectives because it would achieve four of the five objectives of the CalVTP, to some degree.

**Objective 1 - Serve as the vegetation management component of the state's range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California's 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

Alternative A would achieve Objective 1 because it would increase the pace and scale of treatments that manage the amount and continuity of wildland fire fuels through WUI, fuel break, and ecological restoration treatment activities. This would help to implement Goal 5 of California's 2018 Strategic Fire Plan, which, in part, calls for promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of fuels treatment activities. While Alternative A would increase the pace and scale of fire fuel treatments compared to existing conditions, it would increase treatments to a lesser extent than the proposed program. Therefore, Alternative A would achieve Objective 1 to a lesser degree than the proposed program.

**Objective 2 - 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 Governor's Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

Alternative A would not achieve the pace and scale described in Objective 2. Executive Order B-52-18 directs the Natural Resources Agency to take necessary steps to achieve vegetation treatments on at least 500,000 acres of non-federal lands per year within five years, which results in a target of approximately 250,000 acres per year for vegetation treatments under the CalVTP after considering other sources of vegetation treatments. Therefore, the proposed program is a primary strategy to achieve that target. Because Alternative A would limit treatments to 60,000 acres per year, other programs would need to treat at least 440,000 acres per year to achieve the statewide target, which is extremely unlikely given resource limitations. Alternative A would not achieve Objective 2 because it would not substantially increase the pace and scale of vegetation treatments to a level anywhere close to the 250,000-acre target necessary to meet the goals in Executive Order B-52-18.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

Because Alternative A would limit the extent to which prescribed burning could be applied as a vegetation treatment tool, it would achieve Objective 3 to a lesser degree than the proposed program. It would increase the use of prescribed burning as a vegetation treatment activity within the treatable landscape but would limit the total annual acres treated using this treatment activity. It would allow for this PEIR to serve as the programmatic environmental review document for prescribed fires initiated by third parties consistent with PRC Section 4483(a) and would promote the use of prescribed burning to reduce wildland fire hazards consistent with the intent of Senate Bill 1260 of 2018.

**Objective 4 - Contribute to meeting California's GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (CARB 2017), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

Alternative A would include less active management and ecological restoration than the proposed program. As a result, it would achieve Objective 4 to a lesser degree than the proposed program. The 2017 Climate Change Scoping Plan and the Forest Carbon Plan call for active management of forests and other natural and working lands to increase the potential for carbon sequestration and reduce carbon emissions associated with wildfire. Because Alternative A would include active management of natural and working lands, including ecological restoration treatments, it would contribute to California's greenhouse gas emission goals.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

Because Alternative A would result in less ecological restoration than the proposed program, it would achieve Objective 5 to a lesser degree. Alternative A would include ecological restoration treatments that would restore fire resiliency in target fire-adapted plant communities by restoring degraded, damaged, or destroyed ecosystems and habitats to conditions associated with a natural fire regime. Treatment activities under this alternative would include prescribed burning, which can be used to restore the ecological function in areas that have departed from their natural fire regime (Van Wagtenonk and Lutz 2007).

## Feasibility

Alternative A would treat up to 60,000 acres per year within the approximately 20.3 million acres of treatable landscape. The treatment acreage target under this alternative would be easier to achieve than the proposed program, because it would seek to treat a smaller number of acres within the same treatable landscape. CAL FIRE has determined that treating approximately 250,000 acres annually under the proposed program with allocation of adequate resources would be feasible. Therefore, identifying, planning, and funding treatment activities to achieve the smaller annual treatment target under Alternative A is also potentially feasible; however, it would not attain the key objective of the proposed program to increase the scale of vegetation treatment to 250,000 acres per year. This alternative would feasibly achieve most of the project objectives because it would achieve Objectives 1, 3, 4, and 5, to some degree.

## ENVIRONMENTAL ANALYSIS OF ALTERNATIVE A

### Aesthetics and Visual Resources

Under Alternative A, the same treatment activities as the proposed program could affect aesthetics and visual resources across the entire treatable landscape. However, the extent of effects on aesthetics and visual resources would be less than the proposed program because Alternative A would treat approximately one fourth of the area treated by the proposed program each year. As with the proposed program, the visual effects of implementing treatments would be short-term, temporary, and implementing SPR AES-2 as part of the treatment activities under the program would minimize visual impacts from the presence of treatment equipment. Like the proposed program, the long-term effects of most treatments would be visible, but would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. Alternative A would include non-shaded fuel break treatments, which could result in a long-term substantial adverse change in the landscape by resulting in a contrasting linear element in an otherwise natural environment. This would result in the same significant and unavoidable impact as the proposed program, however the impact would occur in fewer locations than under the proposed program. *(Same significant and unavoidable impact)*

### Agriculture and Forestry Resources

Treatment activities under Alternative A would be similar to the proposed program. The alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Similar to the proposed program, treatment activities under Alternative A would not result in the loss of forest land or conversion of forest land to a non-forest use. This impact would be similar to the proposed program.

### Air Quality

Alternative A would result in the same significant and unavoidable air quality impacts as the proposed program related to exceedance of CAAQS or NAAQS, although the quantity of air pollutant emissions would be less than under the proposed program. Alternative A would result in a significant and unavoidable impact because it would generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS. As with the proposed program, Alternative A would also result in a significant and unavoidable impact because prescribed burns could result in objectionable odors and the short-term exposure of people to concentrations of TACs associated with an acute health risk. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors from diesel exhaust would be similar to, but less than, the proposed program because treatment activities would be similar to the proposed program but reduced in scale. Overall, the air quality effects of the Alternative A would be similar to, but less than, the proposed program and the same significant and unavoidable impacts would remain. *(Same significant and unavoidable impacts)*

### Archeological, Historic, and Tribal Cultural Resources

The effects of Alternative A on archeological, historic, and TCRs would be similar to but less than the proposed program because fewer acres would be treated. As with the proposed program, implementation of SPRs would avoid any substantial adverse change to any built historical resources and compliance with California Health and Safety

Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Despite implementation of SPRs, unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities. This would result in the same significant and unavoidable impact as the proposed program; however, the impact would occur in fewer locations than under the proposed program. *(Same significant and unavoidable impact)*

### **Biological Resources**

Alternative A would result in similar effects on biological resources than the proposed program, but they would occur across fewer acres, including the same significant and unavoidable impact to special-status bumble bees. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. These effects would be less than the proposed program because fewer treatment activities would occur and less habitat would be affected. Alternative A would implement the same mitigation measures as the proposed program, which would reduce potentially significant impacts on special-status plants and wildlife. However, treatments implemented under this alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees and this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be similar to the proposed program; however, any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., at the landscape level) as the proposed program because fewer acres would be treated. Like the proposed program, Alternative A would implement SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-7, BIO-8, and HYD-4 to identify and protect sensitive natural communities and habitats; however, treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. Alternative A would implement Mitigation Measures BIO-3a through c, which would reduce these effects to a less-than-significant level. Alternative A would also result in the same significant effects related to state or federally protected wetlands, movement corridors, and nurseries; and would implement the same mitigation measures to reduce these effects to less than significant. Alternative A would also result in the same less-than-significant effect related to common nesting birds; and, like the proposed program, would have no impact related to conflicts with local policies, ordinances, and plans. Overall, Alternative A would include the same impact mechanisms and the same effects as the proposed program, but these effects would occur across a smaller portion of the treatable landscape. *(Same significant and unavoidable impact)*

### **Geology, Soils, and Mineral Resources**

The effects of Alternative A on geology, soils, and mineral resources would be less than the proposed program because Alternative A would include substantially less treatment activity, which would result in less ground disturbance and less risk of erosion. Like the proposed program, Alternative A would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. As with the proposed program, this alternative would implement SPRs GEO-1 through GEO-8, which would avoid or minimize the risk of erosion and landslides.

### **Greenhouse Gas Emissions**

Alternative A would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment operations. It would include the same GHG emission-generating treatment activities as the proposed program, though the activities would be implemented on fewer acres than under the proposed program. This would result in approximately 972,253 MMTCO<sub>2e</sub> per year less than the proposed program (see Table 3.8-3 in Section 3.8, "Greenhouse Gas Emissions"), but GHG emissions from treatment activities would still result in a potentially significant and unavoidable contribution to climate change. A purpose of Alternative A, like the proposed program, is to reduce wildfire risk, which would reduce GHG emissions and increase carbon sequestration over the long-term. This would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. However, because Alternative A would treat fewer acres than the proposed program, it would result in less wildfire risk reduction and less long-term GHG emission reduction potentially less and carbon sequestration. Even though treatment emissions would be less under Alternative A, the GHG impact of

Alternative A would be greater than the proposed program because it would result in less long-term GHG emission reduction and carbon sequestration than the proposed program. (*Same significant and unavoidable impact*)

## Energy Resources

Alternative A would have a similar effect on energy resources as the proposed program. Less energy would be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment than the proposed program because Alternative A would treat fewer acres. However, Alternative A would reduce the relatively inefficient consumption of energy during wildfire response to a lesser extent than the proposed program. Overall, the energy effects of Alternative A would be similar to the proposed program.

## Hazardous Materials, Public Health and Safety

Effects related to hazardous materials, and public health and safety would be less than the proposed program because Alternative A would include treat fewer acres of vegetation overall. Alternative A would include less transportation, use, storage, and disposal of various herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. Alternative A would include compliance with the same SPRs (SPR HAZ-5 through SPR HAZ-9) and mitigation measures (Mitigation Measure HAZ-1 and HAZ-2) as the proposed program, which would minimize risks associated with the handling and use of herbicides. Alternative A would also include compliance with applicable laws, regulations, and SPRs that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. As with the proposed program, Alternative A would include implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites.

## Hydrology and Water Quality

Alternative A would have less effects on hydrology and water quality than the proposed program because Alternative A would include substantially less treatment activity. As with the proposed program, Alternative A would include the implementation of SPRs that would prevent each treatment activity from violating water quality standards or waste discharge requirements, substantially degrading surface or ground water quality, conflicting with or obstructing the implementation of a water quality control plan, or substantially altering existing drainage patterns. However, the extent of effects on hydrology and water quality would be less than the proposed program because Alternative A would treat approximately one fourth of the area treated by the proposed program each year.

## Land Use and Planning, Population and Housing

Like the proposed program, Alternative A would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation. The effects of Alternative A related to inducing population growth would be less than the proposed program because Alternative A would include less treatment activity, thereby requiring fewer workers.

## Noise

Short-term increases in noise would be similar to the proposed program, however short-term noise increase would occur less often than the proposed program because Alternative A would treat fewer acres than the proposed program each year. As with the proposed project, vegetation treatment activities implemented under Alternative A would adhere to SPRs that require consistency with local noise policies and ordinances to the extent the project is subject to them, limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure.

## Recreation

The effects of Alternative A on recreation would be less than the proposed program because the alternative would treat fewer acres than the proposed program each year, resulting in less potential to disrupt recreation activities. As with the proposed program, vegetation treatment activities under Alternative A would implement SPRs that avoid or minimize the disruption of recreational activities within designated recreation areas.

## Transportation

The transportation effects of Alternative A would be less than the proposed program because less vehicle use would result from treating the reduced acreage under Alternative A. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Alternative A would implement SPRs that manage and minimize potential hazards because of smoke generated during prescribe burns, require consistency with local traffic operations policies and standards to the extent the project is subject to them, and require that a Traffic Management Plan (TMP) be prepared to manage and minimize potential temporary traffic operations effects resulting from individual vegetation treatment projects. However, the increase in treated acres above existing conditions under this alternative may result in a net increase in VMT to implement treatments. *(Same significant and unavoidable impact)*

## Public Services, Utilities and Service Systems

Alternative A would have the same significant and unavoidable impact as the proposed program, and would generally have lesser effects on public services, utilities, and service systems. Like the proposed program, Alternative A would result in an increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing. While this increase in solid organic waste would be less than under the proposed program, it could still exceed the capacity of local solid waste infrastructure in some locations. As with the proposed program, Alternative A would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. *(Same significant and unavoidable impact)*

## Wildfire

Overall, Alternative A would have a greater impact related to the risk of wildfire than the proposed program. The short-term effects of Alternative A would be similar to, but less than, the proposed program because Alternative A would implement the same treatment activities, but these treatments would occur on fewer acres. Like the proposed program, SPRs and stringent safety protocols would prevent the uncontrolled spread of wildfire from prescribed burning and other treatment activities, and reduce the risk of flooding or landslides after prescribed burning. Over the long term, the risk of the uncontrollable spread of wildfire would be greater than under the proposed program because Alternative A would treat less than one fourth of the area treated under the proposed program. Thus, less fuel reduction would occur leaving greater amounts of wildfire fuels, which would increase the risk of the uncontrollable spread of wildfire.

## Summary

Alternative A would reduce more environmental impacts of the proposed program than any other alternative because it would treat the least amount of vegetation of any alternative. In comparison to the proposed program, it would result in reduced impacts related to aesthetics; air quality; archeological, historical, and tribal cultural resources; biological resources; geology, soils, paleontology, and mineral resources; hazardous materials, public health and safety; noise; recreation; transportation; and public services, utilities, and service systems. However, because Alternative A would include substantially less vegetation treatment, it would result in a greater wildfire risk, less carbon sequestration, and more GHG emissions during potential future wildfires.

## 6.2.3 Alternative B - WUI Fuel Reduction Only

### DESCRIPTION OF THE ALTERNATIVE

Alternative B would seek to treat approximately 250,000 acres per year entirely within the WUI. This alternative is intended to avoid or substantially lessen environmental impacts that could result from fuel break and ecological restoration treatments, such as degradation of biological resources, soils, or water quality. Because the application of prescribed burning would be reduced under this alternative (see explanation under Objective 3, below), it would also reduce air quality impacts. Alternative B incorporates recommendations provided in scoping comments on the NOP and on comments in previous draft environmental documents related to the VTP that suggested focusing vegetation treatments near developed communities and avoiding large-scale vegetation management outside of these areas.

As described in more detail in Section 2.5.1.1 in Chapter 2, "Program Description," the WUI is the geographic interface between wildland and structures where buildings and vegetation are sufficiently close that a wildland fire could spread to a structure or a structure fire could ignite wildland vegetation. Under Alternative B, WUI fuel reduction treatments would be the only treatment type implemented under the CalVTP. These treatments would be intended to: 1) directly protect communities and assets at risk from potential damage from wildfires originating in the adjacent wildlands, 2) protect the wildlands from fires starting in or near development, and 3) reduce flammable vegetation to improve emergency access to, and evacuation from, communities in the WUI. No fuel break or ecological restoration treatments would occur as part of Alternative B.

Activities implemented under Alternative B would occur outside of the 100-foot defensible space requirements under Public Resource Code (PRC) section 4291 and within the outer edge of the defined WUI. The modeled WUI fuel reduction treatment areas within the treatable landscape are shown in Figure 2-3 in Chapter 2, "Program Description." The WUI portion of the treatable landscape encompasses approximately 10.1 million acres, which is approximately half of the treatable landscape. Specific locations for WUI fuel reduction treatments would be prioritized based on an evaluation of the topography, fuel loading, and proximity to communities. Because Alternative B would seek to treat the same number of acres per year as the proposed program and would condense all treatment activities into the WUI, it would result in a substantial increase in the pace and scale of WUI fuel reduction treatments compared to the proposed program. As with the proposed program, the actual acres treated annually would fluctuate based on several factors such as the number of willing landowners, funding ability, and access constraints; it would take several years to "ramp up" from the current treatment acreage to the proposed treatment acreage.

Under Alternative B, WUI fuel reduction treatment would occur in all fuel types (i.e., tree, shrub, and grass). Treatment activities would be the same as those described for the proposed program in Section 2.5.2 in Chapter 2, "Program Description." These activities would include a combination of prescribed burning, mechanical treatments, manual treatment, prescribed herbivory, and herbicide application. As with the proposed program, the treatment activity or combination of activities for a specific treatment site would be selected based on the site-specific characteristics and objectives of the treatment site.

### Consistency with Program Objectives

An alternative under CEQA must achieve most of the basic project objectives (CEQA Guidelines Section 15126.6). Each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which Alternative B would achieve the objective. As described below, Alternative B would achieve most of the basic project objectives because it would achieve three of the five objectives of the CalVTP, to some degree.

#### **Objective 1 - Serve as the vegetation management component of the state's range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California's 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

Alternative B would achieve Objective 1 to a lesser degree than the proposed program because it would seek to treat 250,000 acres per year to reduce the amount and continuity of wildland fire fuels through WUI fuel reduction treatments, which would help to implement Goal 5 of California's 2018 Strategic Fire Plan. Goal 5 calls for, in part, promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of fuels treatment activities. Alternative B would take a different approach than the proposed program in achieving Objective 1. It would forgo opportunities to manage wildland fire fuels outside of the WUI but would substantially increase the treatment of fuels within the WUI. Because this alternative would not treat vegetation outside of the WUI, it would not be as effective as the proposed CalVTP in reducing wildfire risk overall. Without comprehensive vegetation treatment, the continuity of wildland fire fuels and associated risk of wildfire outside of the WUI would be higher under this alternative.

**Objective 2 - 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 Governor's Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

Alternative B would achieve Objective 2 by providing a streamlined environmental review approach to increase the pace and scale of vegetation treatments. It would seek to treat 250,000 acres per year within the WUI. Because Alternative B would seek to treat the same number of acres per year as the proposed program, it would achieve Objective 2 to the same degree as the proposed program.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

Alternative B would achieve Objective 3 to a lesser degree than the proposed program. It would increase the use of prescribed burning as a vegetation treatment tool in the WUI but would not increase the use of prescribed burning elsewhere. It would allow for this PEIR to serve as the programmatic environmental review document for prescribed fires initiated by third parties consistent with PRC Section 4483(a) to the extent that those prescribed fires occur in the WUI. Similarly, this alternative would promote the use of prescribed burning to reduce wildland fire hazards consistent with the intent of Senate Bill 1260 of 2018. However, this alternative would only increase the use of prescribed burning within the WUI, which accounts for approximately half of the treatable area for prescribed burning under the proposed program. In addition, in many portions of the WUI prescribed burning would not be an appropriate treatment because of the proximity to structures, and there is a low likelihood that prescribed burning would be implemented in these areas (see Table 2-3 in Chapter 2).

**Objective 4 - Contribute to meeting California's GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (CARB 2017 ), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

Alternative B would not achieve Objective 4. The 2017 Climate Change Scoping Plan describes strategies to maintain natural and working lands as a net carbon sink, including enhancing the resilience and carbon sequestration potential of these lands through restoration, management, and the reduction of wildfire emissions. These strategies require management actions throughout natural and working lands in the state, much of which are outside of the WUI. The Forest Carbon Plan identifies strategies to reduce wildfire emissions and increase carbon sequestration in forested portions of the state. It describes forest characteristics that should be used to prioritize areas for management actions, including: forests at the greatest risk to high-severity events, overly dense forests, forests at risk of climatic-driven stressors, and areas with high habitat values at risk (Forest Climate Action Team 2018:45). Much of these priority areas occur outside of the WUI. Because Alternative B would limit treatment activities to the approximately 10.1 million acres of treatable landscape within the WUI, it would not include management actions in much of California's forests and other natural and working lands necessary to achieve the goals of the Forest Carbon Plan or 2017 Climate Change Scoping Plan.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

Alternative B would not achieve Objective 5. As described above, Alternative B would focus on WUI fuel reduction treatments intended to reduce the potential for fire to move between the wildland and developed communities, and improve access for fire suppression and emergency evacuation. As described in Section 2.5.1 of Chapter 2, "Program Description," areas suitable for implementation of the ecological restoration treatment type were identified by excluding the WUI fuel reduction treatable area and intersecting the remaining treatable acreage with land identified as Condition Class 2 or 3. This places the ecological restoration treatments in more remote locations identified outside of the WUI. Ecological restoration goals related to generally improving ecological health would be integrated into WUI fuel reduction treatments to the extent that existing vegetation conditions warrant (e.g., non-native, invasive plant infestations). However, it would not include ecological restoration treatments that would restore fire habitat resiliency in target fire-adapted plant communities, because wildfire suppression or exclusion has priority over habitat resiliency within the WUI, recognizing the proximity of urban uses.

## Feasibility

Alternative B would seek to treat 250,000 acres per year within the approximately 10.1 million acres of the treatable landscape within the WUI. This alternative could be more difficult to implement than the proposed program, because it would seek to treat the same number of acres within approximately half of the treatable landscape extent.

Therefore, it could be more difficult to identify and plan enough treatment activities to achieve the treatment target within this more limited area. However, this alternative would require treating less than 2.5 percent of the available area each year. This alternative would include the same range of treatment activities as the proposed program, which would provide project proponents with a variety of options to efficiently achieve the treatment targets. Furthermore, treatment activities in the WUI tend to be more accessible than treatments elsewhere because of the existing network of roads in and around developed communities. Thus, while Alternative B could be more difficult to implement than the proposed program, it is potentially feasible. As described above, Alternative B would also feasibly attain most of the basic program objectives because it would achieve Objectives 1, 2, and 3, to some degree.

## ENVIRONMENTAL ANALYSIS OF ALTERNATIVE B

### Aesthetics and Visual Resources

Alternative B would avoid the significant and unavoidable impact of the proposed program because it would not include non-shaded fuel break treatments (the fuel break treatment type is not included in this alternative). Non-shaded fuel breaks could result in a long-term adverse change in the landscape by resulting in a contrasting linear element in an otherwise natural environment. As with the proposed program, the visual effects of implementing treatments would be short-term, temporary, and would implement SPR AES-2 to minimize visual impacts from the presence of treatment equipment. Like the proposed program, the long-term effects of most treatments would be visible, but would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. *(Avoids the significant and unavoidable impact)*

### Agriculture and Forestry Resources

Treatment activities under Alternative B would be similar to the proposed program. The alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Similar to the proposed program, treatment activities under Alternative B would not result in the loss of forest land or conversion of forest land to a non-forest use. This effect would be similar to the proposed program.

### Air Quality

Alternative B would result in the same significant and unavoidable air quality impacts as the proposed program and would result in a similar level of air pollutant emissions because Alternative B would include the same treatment activities and would seek to treat the same number of acres each year as the proposed program. Alternative B would result in a significant and unavoidable impact because it would generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS. As with the proposed program, Alternative B would also result in a significant and unavoidable impact because prescribed burns could result in objectionable odors and the short-term exposure of people to concentrations of TACs associated with an acute health risk. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors from diesel exhaust would be less than significant, like the proposed program. Overall, the air quality effects of the Alternative B would be similar to the proposed program and the same significant and unavoidable impacts would remain. *(Same significant and unavoidable impacts)*

### Archeological, Historic, and Tribal Cultural Resources

The effects of Alternative B on archeological, historic, and TCRs would be similar to the proposed program. As with the proposed program, Implementation of SPRs would avoid any substantial adverse change to any built historical resources and compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Despite implementation of SPRs, unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities. This would result in the same significant and unavoidable impact as the proposed program. *(Same significant and unavoidable impact)*

## Biological Resources

Alternative B would result in similar types of, but slightly less severe effects on biological resources than the proposed program. It would result in the same significant and unavoidable impact to special-status bumblebees. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. These effects could be slightly less than the proposed program because all treatment activities would occur in the WUI, which, because of its location adjacent to development and associated disturbance, would likely include less suitable habitat for some but not all special-status wildlife species. Alternative B would implement the same mitigation measures as the proposed program, which would reduce potentially significant impacts on special-status plants and wildlife. However, treatments implemented under this alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees and this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be slightly less severe than the proposed program and any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., at the landscape level) as the proposed program because treatments would be concentrated in a smaller geographic area. Like the proposed program, Alternative B would implement SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-7, BIO-8, and HYD-4 to identify and protect sensitive natural communities and habitats, however treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. Alternative B would implement Mitigation Measures BIO-3a through c, which would reduce these effects to a less-than-significant level. Alternative B would also result in the same significant effects related to state or federally protected wetlands, movement corridors, and nurseries; and would implement the same mitigation measures to reduce these effects to less than significant. Additionally, Alternative B would result in the same less-than-significant effect related to common nesting birds; and, like the proposed program, would have no impact related to conflicts with local policies, ordinances, and plans. Overall, Alternative B would include the same impact mechanisms and the same effects as the proposed program. These effects could be slightly less than the proposed program because all treatment activities would occur in the WUI, which could contain less habitat for some special status species because of the proximity to development and existing disturbance associated with adjacent development. *(Same significant and unavoidable impact)*

## Geology, Soils, and Mineral Resources

The effects of Alternative B on geology, soils, and mineral resources would be similar to the proposed program because Alternative B includes similar treatments at the same scale. Like the proposed program, Alternative B would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. As with the proposed program, this alternative would implement SPRs GEO-1 to GEO-8, which would avoid or minimize the risk of erosion and landslides.

## Greenhouse Gas Emissions

Alternative B would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment operations. It would include the same GHG emission-generating treatment activities across the same number of acres as the proposed program. GHG emissions from treatment activities under this alternative would result in a potentially significant and unavoidable contribution to climate change. A purpose of Alternative B, like the proposed program, is to reduce wildfire risk, which would reduce GHG emissions and increase carbon sequestration over the long-term. This would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. However, because Alternative B would restrict vegetation management to within the WUI, it would not reduce wildfire risk through fuel breaks or ecological restoration treatments outside of the WUI. With this approach, the extent and intensity of wildfires that occur outside the WUI would not be affected. Thus, Alternative B would result in less long-term GHG emission reduction and potentially less carbon sequestration in the approximately 10.2 million acres of treatable landscape outside of the WUI. For this reason, the GHG impact of Alternative B would be greater than the proposed program. *(Same significant and unavoidable impact)*

## Energy Resources

Alternative B would have a similar effect on energy resources as the proposed program. Approximately the same amount of energy would be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment as the proposed program because Alternative B would seek to treat the same amount of land each year. Like the proposed program, Alternative B would reduce the relatively inefficient consumption of energy during wildfire response.

## Hazardous Materials, Public Health and Safety

Effects related to hazardous materials, and public health and safety would be similar to, but greater than, the proposed program. Alternative B includes similar treatments at the same scale as the proposed program, however all treatments would occur in the WUI, which is in closer proximity to population centers, public use areas (e.g., public parks), and sensitive receptors (e.g., schools). Like the proposed program, Alternative B would include increased transportation, use, storage, and disposal of various herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. This risk would be greater under Alternative B, because more herbicide application would occur in the WUI resulting in a greater likelihood of application occurring in areas in close proximity to the public. Alternative B would include compliance with the same SPRs (SPR HAZ-5 through SPR HAZ-9) and mitigation measures (Mitigation Measure HAZ-1 and HAZ-2) as the proposed program, which would minimize risks associated with the handling and use of herbicides. Alternative B would also include compliance with applicable laws, regulations, and SPRs that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. As with the proposed program, Alternative B would include implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites.

## Hydrology and Water Quality

Alternative B would have similar effects on hydrology and water quality as the proposed program. As with the proposed program, Alternative B would include the implementation of SPRs that would prevent treatment activities from violating water quality standards or waste discharge requirements, substantially degrading surface or ground water quality, conflicting with or obstructing the implementation of a water quality control plan, or substantially altering existing drainage patterns. The effects on hydrology and water quality would be similar to the proposed program because Alternative B would treat the same area treated by the proposed program with the same treatment activities.

## Land Use and Planning, Population and Housing

Like the proposed program, Alternative B would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation. The effects of Alternative B related to inducing population growth would be the same as the proposed program because Alternative B would include the same amount of treatment activity requiring approximately the same number of workers.

## Noise

Short-term increases in noise would be similar to the proposed program, however short-term noise increase would likely occur in proximity to sensitive receptors more often than the proposed program because Alternative B would focus all vegetation management activities within the WUI, where they would be closer to residences, schools, hospitals, and other sensitive receptors. As with the proposed project, vegetation treatment activities implemented under Alternative B would adhere to SPRs that require consistency with local noise policies and ordinances to the extent the project is subject to them, limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure.

## Recreation

The types of effects of Alternative B on recreation would be similar to the proposed program. Alternative B would not affect recreation areas outside of the WUI, but it would have a greater potential to disrupt recreational activities within the WUI. As with the proposed program, vegetation treatment activities under Alternative B would implement SPRs that avoid or minimize the disruption of recreational activities within designated recreation areas.

## Transportation

The transportation effects of Alternative B would be similar to, but greater than, the proposed program for most impact considerations. Alternative B would result in a similar amount of vehicle use, but traffic associated with treatments would be concentrated in the WUI. Vehicle use in the WUI would be closer to existing development where it would be more likely to affect public roadways than fuel break or ecological restoration treatments, which could occur on partially on roads that are remote, closed to the public, or otherwise receive very little public traffic. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Alternative B would implement SPRs that manage and minimize potential hazards because of smoke generated during prescribed burns, require consistency with local traffic operations policies and standards to the extent the project is subject to them, and require that a TMP be prepared to manage and minimize potential temporary traffic operations effects resulting from individual vegetation treatment projects. The increase in treated acres above existing conditions under this alternative may result in a net increase in VMT to implement treatments; however, because this alternative would be implemented near development, VMT may be less than under the proposed program, but still may increase over existing conditions. *(Same significant and unavoidable impact)*

## Public Services, Utilities and Service Systems

Alternative B would have the same significant and unavoidable impact as the proposed program, and would generally have similar effects on public services, utilities, and service systems. Like the proposed program, Alternative B would result in a similar increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing, which could exceed the capacity of local solid waste infrastructure. As with the proposed program, Alternative B would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. *(Same significant and unavoidable impact)*

## Wildfire

Alternative B would have a similar impact related to the risk of wildfire as the proposed program. The short-term effects of Alternative B would be similar to the proposed program because Alternative B would implement the same treatment activities across the same number of acres. Like the proposed program, SPRs and stringent safety protocols would prevent the uncontrolled spread of wildfire from prescribed burning and other treatment activities, and reduce the risk of flooding or landslides after prescribed burning. Over the long term, Alternative B would result in more fuel reduction activities in the WUI, which would consist of strategic removal of vegetation to prevent or slow the spread of wildfire between structures and wildlands and vice versa. However, the alternative would not create fuel breaks that would help to passively interrupt the path of a fire or slow its progress and to support fire suppression by providing responders with a staging area and access to remote locations for fire control actions. It would also not include ecological restoration to restore ecosystem processes, conditions, and resiliency by modifying uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values. Because Alternative B would focus vegetation management activities in the WUI, it has the potential to better protect developed areas from the uncontrollable spread of wildfire that originates outside of the WUI. However, by precluding vegetation management outside of the WUI, this alternative would result in less ability to control the spread of wildfire outside of the WUI, where wildfires could occur in higher intensities across larger areas making them more difficult to control. While Alternative B would take a different approach to reducing long-term wildfire risk, it would result in a similar risk of the uncontrollable spread of wildfire as the proposed program.

## Summary

Alternative B would avoid a significant and unavoidable impact associated with long-term substantial degradation of aesthetics and visual resources because it would not include non-shaded fuel breaks. It could also result slightly reduced impacts to biological resources because treatment activities would be confined to the WUI, which is subject to relatively more existing disturbance than other treatment areas, but it would not avoid the significant and unavoidable impact to bumblebees. However, this alternative would result in greater impacts associated with GHG emissions; hazardous materials, public health and safety; noise; and transportation.

## 6.2.4 Alternative C - Modified WUI Fuel Reduction and Fuel Breaks

### DESCRIPTION OF THE ALTERNATIVE

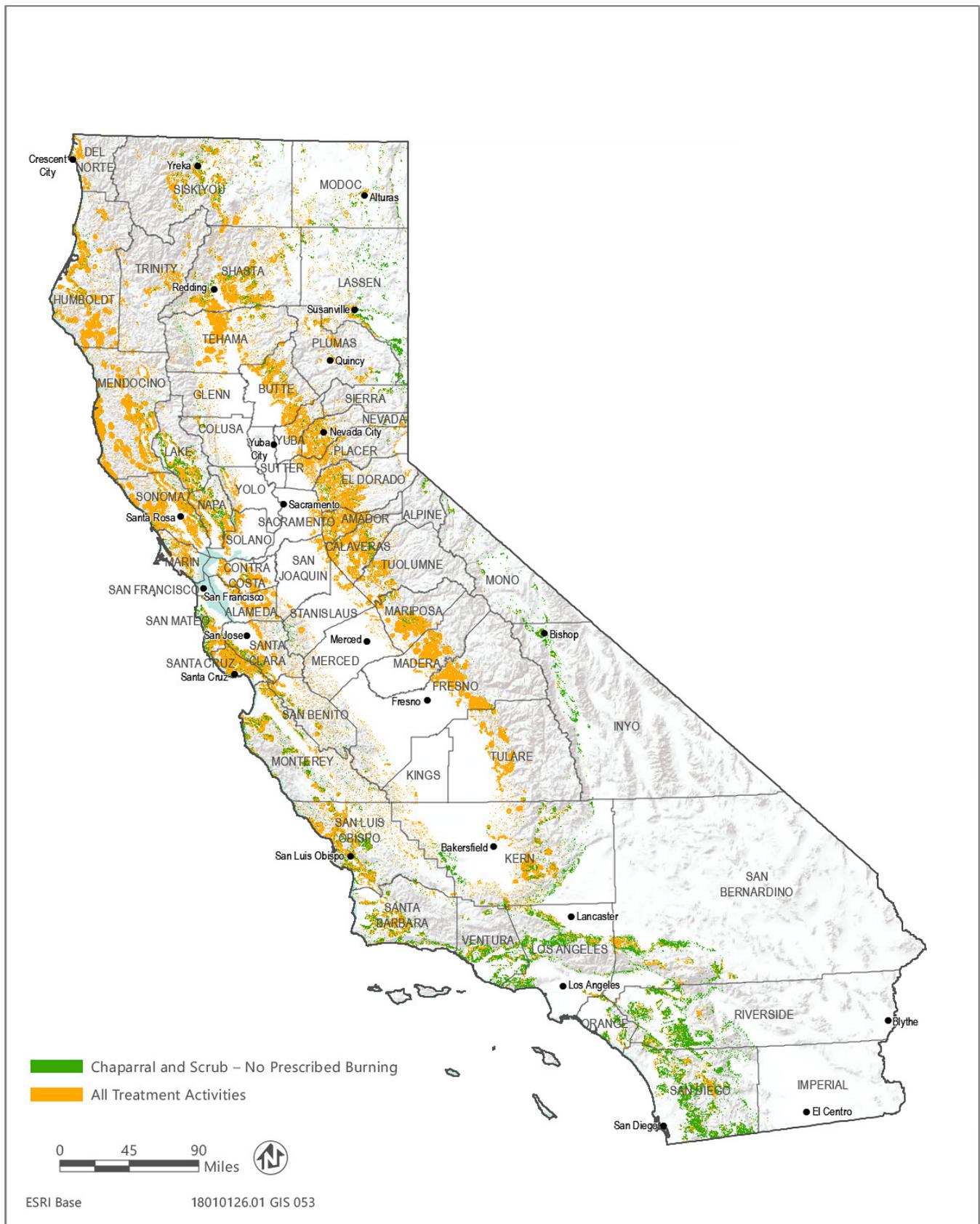
Alternative C would seek to treat approximately 250,000 acres per year through a combination of WUI fuel reduction and fuel break treatments. This alternative would also prohibit the use of prescribed burning within chaparral and coastal sage scrub vegetation types. It is intended to avoid or substantially lessen environmental impacts that could result from ecological restoration treatments, such as degradation of biological resources, soils, or water quality. Because the application of prescribed burning would be reduced under this alternative it would also reduce air quality impacts. Similar to the proposed program, this alternative is intended to avoid the potential for the large-scale conversion of chaparral and coastal sage scrub vegetation types to other vegetation types; however, this alternative avoids type conversion by prohibiting prescribed burning in these areas altogether. This alternative also responds to several comments provided on the NOP and on previous versions of the CalVTP, which advocate for including an alternative similar to the Fire Management Plan for the Santa Monica Mountains National Recreation Area, which minimizes prescribed burning within chaparral and coastal sage scrub vegetation types.

Alternative C would include similar WUI fuel reduction treatments as described for Alternative B, above. In addition to WUI fuel reduction treatments, Alternative C would include establishing shaded or non-shaded fuel breaks in strategic areas where flammable vegetation can be modified to reduce fire spread to structures and/or natural resources, while providing a safer location for firefighters to fight fires. Additional detail on WUI fuel reduction and fuel break treatments is provided in Sections 2.5.1.1 and 2.5.1.2 in Chapter 2, "Program Description." The modeled treatable landscape under Alternative C (i.e., areas potentially subject to WUI and fuel break treatments) is shown in Figure 6-1. WUI fuel reduction and fuel break treatments would be the only treatment types implemented under the CalVTP. These treatments would be intended to: 1) directly protect communities and assets at risk from potential damage from wildfires originating in the adjacent wildlands, 2) protect the wildlands from fires starting in or near development, 3) reduce flammable vegetation to improve emergency access to, and evacuation from, communities, and 4) modify fuels in strategic locations to improve the effectiveness of active wildland fire suppression efforts. These treatments would occur within the approximately 12.4 million acres of the treatable landscape that are appropriate for WUI and/or fuel break treatments. Because Alternative C would seek to treat the same number of acres per year as the proposed program through fewer treatment types, it would result in a substantial increase in the extent and pace of WUI fuel reduction and fuel break treatments, similar to the proposed program. As with the proposed program, the actual number of total acres treated annually would fluctuate.

Alternative C would include WUI fuel reduction and fuel break treatments in all fuel types (i.e., tree, shrub, and grass). It would include a combination of prescribed burning, mechanical treatments, manual treatment, prescribed herbivory, and herbicide application. However, Alternative C would not include the use of prescribed fire treatments within chaparral and coastal sage scrub vegetation types (see Figure 6-1). Comments on the NOP expressed concern regarding the potential for large-scale type conversion of these vegetation types. Type conversion of chaparral and coastal sage scrub habitats means a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. Short fire-return intervals of less than 10 to 15 years can lead to type conversion by prohibiting shrub regeneration (Underwood et al. 2018). This alternative takes a different approach than the proposed program to avoid the potential for type conversion. Under this alternative, WUI and fuel break treatments in chaparral and coastal sage scrub vegetation types would employ only non-burning methods such as prescribed herbivory, herbicide application, or manual treatment that can be focused on target species or treatment intensities that would not result in type conversion.

### Consistency with Program Objectives

An alternative under CEQA must achieve most of the basic project objectives (CEQA Guidelines Section 15126.6). Each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which Alternative C would achieve the objective. As described below, Alternative C would achieve most of the basic project objectives because it would achieve three of the five objectives of the CalVTP, to some degree.



Source: Data received from CAL FIRE in 2019

Figure 6-1 Alternative C Treatable Area

**Objective 1 - Serve as the vegetation management component of the state's range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California's 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

Alternative C would achieve Objective 1 to a similar degree as the proposed program because it would seek to treat 250,000 acres per year to reduce the amount and continuity of wildland fire fuels through WUI and fuel break treatment activities, which would help to implement Goal 5 of California's 2018 Strategic Fire Plan. Goal 5 calls for, in part, promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of fuels treatment activities. Alternative C would take a different approach than the proposed program in achieving Objective 1. It would forgo opportunities to manage wildland fire fuels through ecological restoration treatments but would substantially increase WUI fuel reduction and fuel break treatments. It would also limit the frequency of prescribed burning within certain vegetation types.

**Objective 2 - 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 Governor's Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

Alternative C would achieve Objective 2 to the same degree as the proposed program by providing a streamlined environmental review approach to increase the pace and scale of vegetation treatments. Like the proposed program, it would seek to treat 250,000 acres per year, however the entire treatment target would be achieved through WUI fuel reduction and fuel break treatments.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

Alternative C would achieve Objective 3, but to a lesser degree than the proposed program. It would increase the use of prescribed burning as a vegetation treatment tool in the WUI and in fuel breaks, but would not increase the use of prescribed burning in chaparral or coastal sage scrub, or outside of the WUI and fuel break treatment areas. It would allow for this PEIR to serve as the programmatic environmental review document for prescribed fires initiated by third parties consistent with PRC Section 4483(a) to the extent that those prescribed fires occur in the WUI or create fuel breaks outside of chaparral or coastal sage scrub vegetation. Similarly, this alternative would promote the use of prescribed burning to reduce wildland fire hazards consistent with the intent of Senate Bill 1260 of 2018, but only within certain areas. Senate Bill 1260 of 2018 mandates that CAL FIRE's vegetation treatment activities can only be carried out if they will not result in type conversion of chaparral and coastal sage scrub vegetation types. This alternative would comply with that requirement by prohibiting the treatment activities most likely to result in type conversion. For these reasons, Alternative C would achieve Objective 3. However, this alternative would only increase the use of prescribed burning within the WUI and fuel breaks, and only outside of chaparral and coastal sage scrub vegetation types within these modeled treatment areas. In addition, in many portions of the WUI prescribed burning would not be an appropriate treatment because of the proximity to structures, and there is a low likelihood the prescribed burning would be implemented in these areas (see Table 2-3 in Chapter 2).

**Objective 4 - Contribute to meeting California's GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (CARB 2017), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

Alternative C would not achieve Objective 4. As described for Alternative B, above, the Forest Carbon Plan and 2017 Climate Change Scoping Plan include strategies to manage natural and working lands as a net carbon sink. These strategies require management actions throughout natural and working lands in the state, much of which are outside the WUI fuel reduction and fuel break treatment areas. Because Alternative C would limit treatment activities to the approximately 12.4 million acres of treatable landscape within the modeled WUI and fuel break treatment areas, it would not include implementation of management actions in much of California's forests and other natural and working lands necessary to achieve the goals of the Forest Carbon Plan and 2017 Climate Change Scoping Plan.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

Alternative C would not achieve Objective 5. As described above, Alternative C would focus on WUI fuel reduction and fuel break treatments intended to reduce the potential for fire to move between the wildland and developed communities, improve access for fire suppression and emergency evacuation, and improve the effectiveness of suppression efforts at strategic locations. Although ecological restoration goals related to generally improving ecological health would be integrated into WUI fuel reduction and shaded fuel break treatments to the extent that existing vegetation conditions warrant, this alternative would not include ecological restoration treatments that would restore fire resiliency in target fire-adapted plant communities by restoring degraded, damaged, or destroyed ecosystems and habitats to conditions associated with a natural fire regime.

### **Feasibility**

Alternative C would seek to treat 250,000 acres per year within the approximately 12.4 million acres of the treatable landscape within the modeled WUI fuel reduction and modeled fuel break treatment areas. This alternative could be more difficult to implement than the proposed program, because it would seek to treat the same number of acres within a smaller portion of the treatable landscape and without the use of prescribed burning within certain vegetation types. Therefore, it could be more difficult to identify and plan enough treatment activities within this more limited area available for treatment. However, this alternative would require treating approximately two percent of the area within the treatable landscape each year. With the exception of prescribed burning in certain vegetation types, this alternative would include the same range of treatment activities as the proposed program. This would provide project proponents with a range of options to achieve the target treatment acres. Furthermore, fuel breaks and fuel reduction treatment activities in the WUI tend to be more accessible than treatments elsewhere because of the existing network of roads in these areas. Thus, while Alternative C could be more difficult to implement than the proposed program, it is potentially feasible. Alternative C would also feasibly attain most of the program objectives because it would achieve Objectives 1, 2, and 3, to some degree, as described above.

## **ENVIRONMENTAL ANALYSIS OF ALTERNATIVE C**

### **Aesthetics and Visual Resources**

Under Alternative C, the same treatment activities as the proposed program could affect aesthetics and visual resources. These treatment activities would be concentrated in fuel break areas and the WUI. To achieve the same treatment target as the proposed program without ecological restoration treatments, Alternative C would increase the amount of other treatment types, including non-shaded fuel breaks, which could result in a long-term adverse change in the landscape by resulting in a contrasting linear element in an otherwise natural environment. This would result in a greater significant and unavoidable impact than the proposed program. As with the proposed program, the visual effects of implementing treatments would be short-term, temporary, and would implement SPR AES-2 would minimize visual impacts from the presence of treatment equipment. Like the proposed program, the long-term effects of most treatments would be visible, but would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. Because Alternative C would include more non-shaded fuel breaks, it would result in a greater impact than the proposed program. (*Same significant and unavoidable impact*)

### **Agriculture and Forestry Resources**

Treatment activities under Alternative C would be similar to the proposed program, although they would include only WUI and fuel break treatments. The alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Similar to the proposed program, treatment activities under Alternative C would not result in the loss of forest land or conversion of forest land to a non-forest use. This effect would be similar to the proposed program.

## Air Quality

Alternative C would result in the same three significant and unavoidable air quality impacts as the proposed program and would result in a similar level of air pollutant emissions because Alternative C would include similar treatment activities and would seek to treat the same number of acres each year. Alternative C would result in a significant and unavoidable impact because it would generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS. As with the proposed program, Alternative C would also result in a significant and unavoidable impact because prescribed burns could result in objectionable odors and the short-term exposure of people to concentrations of TACs associated with an acute health risk, although this risk could be slightly lower because prescribed burning would not occur in chaparral or coastal scrub communities. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors from diesel exhaust would be less than significant, like the proposed program. Overall, the air quality effects of the Alternative C would be similar to, the proposed program and the same significant and unavoidable impacts would remain. (*Same significant and unavoidable impacts*)

## Archeological, Historic, and Tribal Cultural Resources

The effects of Alternative C on archeological, historic, and TCRs would be similar to the proposed program. As with the proposed program, Implementation of SPRs would avoid any substantial adverse change to any built historical resources and compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Despite implementation of SPRs, unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities. This would result in the same significant and unavoidable impact as the proposed program. (*Same significant and unavoidable impact*)

## Biological Resources

Alternative C would result in similar effects on biological resources as the proposed program. It would result in the same significant and unavoidable impact to special-status bees. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. Alternative C would implement the same mitigation measures as the proposed, which would minimize or avoid potentially significant impacts on special-status plants and wildlife. However, treatments implemented under this alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees and this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be similar to the proposed program and any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., to as many species and vegetation communities) as the proposed program because treatments would be concentrated in a smaller geographic area. Like the proposed program, Alternative C would implement SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-7, BIO-8, and HYD-4 to identify and protect sensitive natural communities and habitats, however treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. Alternative C would avoid the potential for type conversion in chaparral and coastal scrub habitats because it would not include prescribed burning in these areas. The potential for type conversion in these habitats could occur through other intensive treatment activities, and Alternative C would implement the applicable elements of Mitigation Measures BIO-3a through c, which would reduce effects on sensitive natural communities to a less-than-significant level. Alternative C would also result in the same significant effects related to state or federally protected wetlands, movement corridors, and nurseries; and would implement the same mitigation measures to reduce these effects to less than significant. Alternative C would also result in the same less-than-significant effect related to common nesting birds; and, like the proposed program, would have no impact related to conflicts with local policies, ordinances, and plans. Overall, Alternative C would include the same impact mechanisms with the exception of prescribed burning in some habitats. Treatments would occur in fuel break areas and in the WUI across the same number of acres as the proposed program. While treatment locations would vary from the proposed program and Alternative C would take a different approach to avoiding type conversion in some habitats, the effects would be generally similar in part because the proposed program and Alternative C would both avoid type

conversion of chaparral and coastal sage scrub as required by Senate Bill 1260, Statutes of 2018. *(Same significant and unavoidable cumulative impact)*

### **Geology, Soils, and Mineral Resources**

The effects of Alternative C on geology, soils, and mineral resources would be similar to the proposed program because Alternative C includes similar treatment activities at the same scale. Like the proposed program, Alternative C would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. As with the proposed program, this alternative would implement SPRs GEO-1 to GEO-8, which would avoid or reduce the risk of erosion and landslides.

### **Greenhouse Gas Emissions**

Alternative C would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment operations. It would include the same GHG emission-generating activities across the same number of acres as the proposed program. GHG emissions from treatment activities under this alternative would result in a potentially significant and unavoidable contribution to climate change. As with the proposed program, a purpose of Alternative C is to reduce wildfire risk, which would reduce GHG emissions and increase carbon sequestration over the long-term. This would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. However, because Alternative C would restrict vegetation treatments to fuel breaks and WUI treatments, it would not reduce wildfire risk through ecological restoration treatments. With this approach, Alternative C would not restore ecosystem processes, conditions, and resiliency by modifying uncharacteristic wildland fuel conditions to more closely reflect vegetative conditions that would occur under a natural fire return interval. Thus, Alternative C would result in less long-term GHG emission reduction and potentially less carbon sequestration in the approximately 7.9 million acres of treatable landscape outside of the WUI and fuel break treatment areas. For this reason, the GHG impact of Alternative C would be greater than the proposed program. *(Same significant and unavoidable impact)*

### **Energy Resources**

Alternative C would have a similar effect on energy resources as the proposed program. Approximately the same amount of energy would be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment as the proposed program because Alternative C would seek to treat the same amount of land each year. Like the proposed program, Alternative C would reduce the relatively inefficient consumption of energy during wildfire response.

### **Hazardous Materials, Public Health and Safety**

Effects related to hazardous materials, and public health and safety would be similar to, but could be slightly greater than, the proposed program. Alternative C includes similar treatments at the same scale as the proposed program, however more treatments would occur in the WUI, which is in closer proximity to population centers, public use areas (e.g., public parks), and sensitive receptors (e.g., schools). Like the proposed program, Alternative C would include increased transportation, use, storage, and disposal of various herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. This risk would be slightly greater under Alternative C, because more herbicide application would occur in the WUI resulting in a greater likelihood of application occurring in areas in close proximity to the public. Alternative C would include compliance with the same SPRs (SPR HAZ-5 through SPR HAZ-9) and mitigation measures (Mitigation Measure HAZ-1 and HAZ-2) as the proposed program, which would minimize risks associated with the handling and use of herbicides. Alternative C would also include compliance with applicable laws, regulations, and SPRs that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. As with the proposed program, Alternative C would include implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites. *(Similar)*

## Hydrology and Water Quality

Alternative C would have similar effects on hydrology and water quality as the proposed program. As with the proposed program, Alternative C would include the implementation of SPRs and assumes compliance with regulations that would prevent each treatment activity from violating water quality standards or waste discharge requirements, substantially degrading surface or ground water quality, conflicting with or obstructing the implementation of a water quality control plan, or substantially altering existing drainage patterns. The effects on hydrology and water quality would be similar to the proposed program because Alternative C would treat the same acreage treated by the proposed program with similar treatment activities.

## Land Use and Planning, Population and Housing

Like the proposed program, Alternative C would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation. The effects of Alternative C related to inducing population growth would be the same as the proposed program because Alternative C would include the same amount of treatment activity requiring approximately the same number of workers.

## Noise

Short-term increases in noise would be similar to the proposed program, however short-term noise increase would likely occur in proximity to sensitive receptors more often than the proposed program because Alternative C would focus more vegetation treatment activities within the WUI, where they would be closer to residences, schools, hospitals, and other sensitive receptors. As with the proposed project, vegetation treatment activities implemented under Alternative C would adhere to SPRs that require consistency with local noise policies and ordinances to the extent the project is subject to them, limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure.

## Recreation

The effects of Alternative C on recreation would be similar to the proposed program because the alternative would treat the same number of acres as the proposed program each year. Alternative C would not affect recreation areas away from fuel breaks and WUI treatment areas, but it would have a greater potential to disrupt recreational activities within the WUI or near fuel breaks. As with the proposed program, vegetation treatment activities under Alternative C would implement SPRs that avoid or minimize the disruption of recreational activities within designated recreation areas.

## Transportation

The transportation effects of Alternative C would be similar to, but slightly greater than, the proposed program for most impact considerations. Alternative C would result in a similar amount of vehicle use, but more traffic associated with treatments would occur in the WUI. Vehicle use in the WUI would be closer to existing development where it would be more likely to affect public roadways than fuel break or ecological restoration treatments, which could occur on partially on roads that are remote, closed to the public, or otherwise receive very little public traffic. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Alternative C would implement SPRs that manage and minimize potential hazards because of smoke generated during prescribe burns, require consistency with local traffic operations policies and standards to the extent the project is subject to them, and require that a TMP be prepared to manage and minimize potential temporary traffic operations effects resulting from individual vegetation treatment projects. The increase in treated acres above existing conditions under this alternative may result in a net increase in VMT to implement treatments; however, because this alternative would be implemented near development, VMT may be less than under the proposed program, but still may increase over existing conditions. *(Same significant and unavoidable impact)*

## Public Services, Utilities and Service Systems

Alternative C would have the same significant and unavoidable impact as the proposed program, and would generally have similar effects on public services, utilities, and service systems. Like the proposed program, Alternative C would result in a similar increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing, which could exceed the capacity of local solid waste infrastructure. As with the proposed program, Alternative C would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. (*Same significant and unavoidable impact*)

## Wildfire

Alternative C would have a similar impact related to the risk of wildfire as the proposed program. The short-term effects of Alternative C would be similar to the proposed program because Alternative C would implement similar treatment activities across the same number of acres. Like the proposed program, SPRs and stringent safety protocols would prevent the uncontrolled spread of wildfire from prescribed burning and other treatment activities, and reduce the risk of flooding or landslides after prescribed burning where those treatments would occur. These risks would be slightly lower under Alternative C because it would include less prescribed burning because of the prohibition on prescribed burning in chaparral and coastal scrub communities. Over the long term, Alternative C would result in more fuel breaks and fuel reduction activities in the WUI, which would passively interrupt the path of a fire or slow its progress and to support fire suppression and prevent or slow the spread of wildfire between structures and wildlands and vice versa.

However, the alternative would not reduce the size and intensity of wildfires through ecological restoration, which is intended to restore ecosystem processes, conditions, and resiliency by modifying uncharacteristic wildland fuel conditions. Because Alternative C would result in more vegetation management activities in the WUI, it has the potential to better protect developed areas from the uncontrollable spread of wildfire that originates outside of the WUI. It would also include more fuel breaks to assist with wildfire control efforts outside of the WUI. However, by precluding ecosystem restoration treatments and prescribed burning in certain vegetation types, this alternative would limit the treatment options available and would not promote wildland resiliency and reduce fuel levels away from fuel breaks and the WUI. This could result in wildfires occurring at higher intensities across larger areas in areas away from fuel breaks and the WUI, making them more difficult to control. Additionally, because ecosystem restoration would promote resiliency in fire-adapted vegetation communities, it is reasonable to expect that as ecosystems are restored, the vegetation would regenerate more quickly after a wildfire, which would reduce landslide risk in burned areas. While Alternative C would take a different approach to reducing long-term wildfire risk, it would result in a similar risk of the uncontrollable spread of wildfire as the proposed program.

## Summary

Alternative C would not reduce environmental impacts associated with any environmental resource area. This alternative would result in greater impacts related to aesthetics and visual resources, and GHG emissions; and slightly greater impacts associated with hazardous materials, noise, and transportation.

## 6.2.5 Alternative D - No Prescribed Burning Treatments

### DESCRIPTION OF THE ALTERNATIVE

Similar to the proposed program, Alternative D would seek to treat approximately 250,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration treatment types across the entire 20.3 million-acre treatable landscape. However, Alternative D would not include the use of prescribed burning as a treatment activity. This alternative is intended to avoid air quality impacts or other effects that could result from prescribed burning.

Alternative D would include the same treatment types as the proposed program (see Section 2.5.1, in Chapter 2, Program Description) except for prescribed burning. It would include treatments in all fuel types (i.e., tree, shrub, and grass). To achieve the target of 250,000 acres per year, the proportion of other treatment types would increase substantially in comparison to the proposed CalVTP. To feasibly achieve the treatment target, it is anticipated that the extent of all other treatment activities, and in particular mechanical treatments, would increase. Under this alternative, the estimated distribution of each treatment activity would be:

- ▶ 20 percent manual treatment (approximately 50,000 acres),
- ▶ 50 percent mechanical treatments (approximately 125,000 acres),
- ▶ 15 percent herbicide treatments (approximately 37,200 acres), and
- ▶ 15 percent prescribed herbivory (approximately 37,200 acres).

As with the proposed program, the treatment activity or combination of activities for a specific treatment site would be selected based on the site-specific characteristics and objectives of the treatment site. Because fewer types of treatment activities would be available to achieve a substantial increase in the pace and scale of treatments, it would likely take longer to “ramp up” from current treatment levels to approximately 250,000 acres than under the proposed program.

### Consistency with Program Objectives

An alternative under CEQA must achieve most of the basic project objectives (State CEQA Guidelines Section 15126.6). Each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which Alternative D would achieve the objective. As described below, Alternative D would achieve most of the basic project objectives because it would achieve four of the five objectives of the CalVTP, to some degree.

**Objective 1 - Serve as the vegetation management component of the state’s range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California’s 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

Alternative D would achieve Objective 1 to a similar degree as the proposed program because it would increase the pace and scale of treatments that manage the amount and continuity of wildland fire fuels through WUI, fuel break, and ecological restoration treatment activities. This would help to implement Goal 5 of California’s 2018 Strategic Fire Plan, which, in part, calls for promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of treatments.

**Objective 2 - 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 Governor’s Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

Alternative D would achieve Objective 2 to the same degree as the proposed program by providing a streamlined environmental review approach to increase the pace and scale of vegetation treatments. It would seek to treat 250,000 acres per year by increasing the pace and scale of manual, mechanical, herbicide, and prescribed herbivory treatment activities.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

Alternative D would not achieve Objective 3. It would not increase the use of prescribed burning as a vegetation treatment tool. Thus, it would be inconsistent with the provisions of Senate Bill 1260, Statutes of 2018 and PRC Section 4483(a).

**Objective 4 - Contribute to meeting California's GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (CARB 2017), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

Alternative D would achieve Objective 4 to a similar degree as the proposed program. The 2017 Climate Change Scoping Plan and the Forest Carbon Plan call for active management of forests and other natural and working lands to increase the potential for carbon sequestration and reduce carbon emissions associated with wildfire. Because Alternative D would include active management of natural and working lands, including ecological restoration treatments, it would contribute to California's greenhouse gas emission goals. Implementation of Alternative D would result in less GHG emissions from treatment activities because it would not include prescribed burning, which results in greater GHG emissions than other treatment activities.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

Alternative D would not achieve Objective 5. It would include ecological restoration treatments that would restore fire resiliency in target fire-adapted plant communities by restoring degraded, damaged, or destroyed ecosystems and habitats to conditions associated with a natural fire regime. However, Alternative D would not include the application of prescribed burning. Instead, ecological restoration projects would include mechanical, manual, or other treatment activities, which would not mimic the effects of a natural fire regime because it would not reintroduce fire.

## Feasibility

Alternative D would seek to treat 250,000 acres per year within the approximately 20.3 million-acre treatable landscape. This alternative could be more difficult to implement than the proposed program because it would limit the use of prescribed burning, which is considered the primary mechanism for achieving the increase in pace and scale of treatments and would require a substantial increase in the pace and scale of other treatment activities. However, this alternative would maintain the same range of treatment types as under the proposed CalVTP (WUI fuel reduction, fuel breaks, and ecological restoration), and all other treatment activities besides prescribed burning. These activities could be implemented within the entire treatable landscape. Provided sufficient resources are available, Alternative D is potentially feasible. Alternative D would also feasibly meet the basic project objectives because it would achieve Objectives 1, 2, and 4, to some degree.

## ENVIRONMENTAL ANALYSIS OF ALTERNATIVE D

### Aesthetics and Visual Resources

Under Alternative D, there would be no visual effects related to prescribed burning, but more visual effects related to other treatment activities, resulting in similar effects overall. As with the proposed program, the visual effects of implementing treatments would be short-term, temporary, and would implement SPR AES-2 would minimize visual impacts from the presence of treatment equipment. Like the proposed program, the long-term effects of most treatments would be visible, but would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. Alternative D would include non-shaded fuel break treatments, which could result in a long-term adverse change in the landscape by resulting in a contrasting linear element in an otherwise natural environment. This would result in the same significant and unavoidable impact as the proposed program. (*Same significant and unavoidable impact*)

### Agriculture and Forestry Resources

Treatment activities under Alternative D would be similar to the proposed program, except that they would not include prescribed burning. The alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Similar to the proposed program, treatment activities under Alternative D would not result in the loss of forest land or conversion of forest land to a non-forest use. This effect would be similar to the proposed program.

## Air Quality

Alternative D would avoid two significant and unavoidable impacts of the proposed program and would result in one of the same significant and unavoidable air quality impacts as the proposed program. Alternative D would also result in a significant and unavoidable impact because it would generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS. However, this impact, while significant and unavoidable, would be less than under the proposed program. That is because under the proposed program, treatment activity–related emissions could result in, or contribute to, localized exceedances of NAAQS and CAAQS for CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from fugitive dust and smoke from prescribed burns, but under Alternative D this impact would only occur from fugitive dust. Because Alternative D does not include prescribed burning, it would avoid two significant and unavoidable impacts of the proposed program related to the short-term exposure of people to concentrations of TACs associated with an acute health risk, and objectionable odors from smoke during prescribed burning. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors from diesel exhaust would be less than significant, similar to the proposed program. Overall, the air quality effects of the Alternative D would be less than the proposed program and two of the three significant and unavoidable impacts would be avoided. *(Avoids two of the three significant and unavoidable impacts)*

## Archeological, Historic, and Tribal Cultural Resources

The effects of Alternative D on archeological, historic, and TCRs would be similar to the proposed program. As with the proposed program, implementation of SPRs would avoid any substantial adverse change to any built historical resources and compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Despite implementation of SPRs, unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities under this alternative. This would result in the same significant and unavoidable impact as the proposed program. *(Same significant and unavoidable impact)*

## Biological Resources

Alternative D would result in similar effects on biological resources as the proposed program, and the same significant and unavoidable impact to special-status bumblebees. This alternative would avoid effects associated with prescribed burning, but it would increase the amount of other treatment activities, which would result in a similar effect as the proposed program. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. Alternative D would implement the same mitigation measures as the proposed program, which would minimize or avoid potentially significant impacts on special-status plants and wildlife. However, treatments implemented under this alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees and this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be similar to the proposed program and any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., to as many species and vegetation communities) as the proposed program because treatments would be concentrated in a smaller geographic area. Like the proposed program, Alternative D would implement SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-7, BIO-8, and HYD-4 to identify and protect sensitive natural communities and habitats, however treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. Alternative D would avoid the potential for type conversion due to prescribed burning because it would not include prescribed burning. The potential for type conversion could still occur through other intensive treatment activities, and Alternative D would implement the applicable elements of Mitigation Measures BIO-3a through c, which would reduce effects on sensitive natural communities to a less-than-significant level. Alternative D would also result in the same significant effects related to state or federally protected wetlands, movement corridors, and nurseries; and would implement the same mitigation measures to reduce these effects to less than significant. Alternative D would also result in the same less-than-significant effect related to common nesting birds; and, like the proposed program, would have no impact related to conflicts with local policies, ordinances, and plans. Overall, Alternative D would result in no impacts associated with prescribed burning, but greater impacts associated with all

other treatment activities. While impact mechanisms would vary from the proposed program, the effects would be generally similar.

### **Geology, Soils, and Mineral Resources**

The effects of Alternative D on geology, soils, and mineral resources would be similar to the proposed program. Like the proposed program, Alternative C would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. Alternative D would include more mechanical treatment than the proposed program, which would result in a greater risk of compaction caused by mechanical equipment, loss of soil cover, and the churning and breakdown of soil structure by mechanical equipment. However, without prescribed burning, Alternative D would not result in a risk of loss of soil cover, increased risk of water repellency, or the breakdown of soil structure associated with prescribed burning. As with the proposed program, this alternative would implement SPRs GEO-1 to GEO-8, which would avoid or reduce the risk of erosion and landslides.

### **Greenhouse Gas Emissions**

Alternative D would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment operations, but less GHG emissions overall. It would include GHG emission-generating treatment activities across the same number of acres as the proposed program. Alternative D would produce less GHG emissions from prescribed burning but more GHG emissions from other treatment activities, including mechanical treatments. As shown in Table 3.8-3 in Section 3.8, "Greenhouse Gas Emissions," prescribed burning is the most GHG-intensive treatment method. Based on the per acre estimates of GHG emissions in Table 3.8-3, Alternative D would result in approximately 3,960 less MMTCO<sub>2e</sub> annually than the proposed action. However, without prescribed burning, Alternative D would likely result in more hauling of material off-site and associated GHG emissions, which are not accounted for in Table 3.8-3. GHG emissions from treatment activities and haul trips, while less than the proposed program, would nonetheless result in a significant and unavoidable contribution to climate change. As with the proposed program, a purpose of Alternative D is to reduce wildfire risk, which would reduce GHG emissions and potentially increase carbon sequestration over the long-term. Alternative D would result in similar long-term GHG emission reductions and increased carbon sequestration as the proposed program, because it would include the same treatment types (i.e., WUI fuel reduction, fuel breaks, and ecosystem restoration) across the same number of acres. However, it would take longer to realize these GHG emission reductions due to the longer time period before the annual treatment target of 250,000 acres could be reached without the use of prescribed burning. This alternative would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. *(Same significant and unavoidable impact)*

### **Energy Resources**

Alternative D would have a greater effect on energy resources than the proposed program. Because Alternative D would include more mechanical treatments, a greater amount of energy would be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment. Like the proposed program, Alternative D would reduce the relatively inefficient consumption of energy during wildfire response.

### **Hazardous Materials, Public Health and Safety**

Effects related to hazardous materials, and public health and safety would be greater than the proposed program. Like the proposed program, Alternative D would include increased transportation, use, storage, and disposal of various herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. This risk would be greater under Alternative D, because more herbicide treatments would be necessary to achieve the target of 250,000 acres per year without the use of prescribed burning. Alternative D would include compliance with the same SPRs (SPR HAZ-5 through SPR HAZ-9) and mitigation measures (Mitigation Measure HAZ-1 and HAZ-2) as the proposed program, which would minimize risks associated with the handling and use of herbicides. Alternative D would also include compliance with applicable laws, regulations, and SPRs that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. As with the proposed program, Alternative D would include implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites.

## Hydrology and Water Quality

Overall, Alternative D would have similar effects on hydrology and water quality as the proposed program. This alternative would avoid water quality effects associated with prescribed burning, however it would result in greater effects associated with the more widespread application of other treatment activities. As with the proposed program, Alternative D would include the implementation of SPRs that would prevent each treatment activity from violating water quality standards or waste discharge requirements, substantially degrading surface or ground water quality, conflicting with or obstructing the implementation of a water quality control plan, or substantially altering existing drainage patterns. The effects on hydrology and water quality would be similar to the proposed program because Alternative D would treat the same area treated by the proposed program with similar treatment activities.

## Land Use and Planning, Population and Housing

Like the proposed program, Alternative D would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation. The effects of Alternative D related to inducing population growth would be similar to the proposed program because Alternative D would include a similar amount of treatment activity requiring approximately the same number of workers.

## Noise

Short-term increases in noise would be greater than, the proposed program, because it would include more widespread use of mechanical and manual treatments, which generate more noise than prescribed burning because of the use of motorized equipment. As with the proposed project, vegetation treatment activities implemented under Alternative D would adhere to SPRs that require consistency with local noise policies and ordinances to the extent the project is subject to them, limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure.

## Recreation

The effects of Alternative D on recreation would be similar to the proposed program because the alternative would include the same treatment types (i.e., WUI fuel reduction, fuel breaks, and ecosystem restoration) and would treat the same number of acres as the proposed program each year. As with the proposed program, vegetation treatment activities under Alternative C would implement SPRs that avoid or minimize the disruption of recreational activities within designated recreation areas.

## Transportation

The transportation effects of Alternative D would be greater than the proposed program. Alternative D would not include prescribed burning to remove biomass from treatment areas. As a result, a greater proportion of biomass would need to be transported off site resulting in additional vehicle use, including vehicle miles traveled. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Alternative D would implement SPRs that require consistency with local traffic operations policies and standards to the extent the project is subject to them, and require that a TMP be prepared to manage and minimize potential temporary traffic operations effects resulting from individual vegetation treatment projects. *(Same significant and unavoidable impact)*

## Public Services, Utilities and Service Systems

Alternative D would have the same significant and unavoidable impact as the proposed program and this impact would be greater than under the proposed program. Because Alternative D would not include the use of prescribed burning to dispose of biomass, it would result in a greater increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing than the proposed program. This could exceed the capacity of local solid waste infrastructure to a greater extent than the proposed program. As with the proposed program, Alternative D would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. *(Same significant and unavoidable impact)*

## Wildfire

Overall, Alternative D would have a similar, but greater impact related to the risk of wildfire than the proposed program. The short-term effects of Alternative D would be less than the proposed program because Alternative D would not include the use of prescribed burning and would have no risk related to the unintentional spread of a prescribed fire. Like the proposed program, SPRs and stringent safety protocols would prevent the uncontrolled spread of wildfire from other treatment activities. Over the long term, Alternative D would seek to reduce the potential for the uncontrolled spread of wildfire through WUI fuel reduction, fuel breaks, and ecological restoration within the 20.3 million-acre treatable landscape. However, Alternative D would be less effective than the proposed program because it would preclude the use of prescribed burning, which is a primary existing treatment approach that would occur on approximately half of the area treated under the proposed program. While the effectiveness of any vegetation management treatment in controlling wildfire depends on numerous site-specific characteristics, some evidence indicates that a combination of mechanical treatments followed by prescribed burning can be more effective at reducing fire severity and extent in certain locations than treatments that do not include prescribed burning (Schwilk et al. 2009, Prichard et al. 2010). Because Alternative D would not include the use of prescribed burning, it would be less effective in reducing the intensity and extent of wildfire over the long term, resulting in a greater impact than the proposed program.

## Summary

Alternative D would eliminate two significant and avoidable impacts associated with air quality because it would not result in emissions from prescribed burning. It would also result in less severe impacts associated with GHG emissions. However, Alternative D would result in greater impacts associated with energy resources; hazardous materials, public health and safety; noise; transportation; public services, utilities, and service systems; and wildfire risk.

## 6.2.6 Alternative E - No Herbicide Treatments

### DESCRIPTION OF THE ALTERNATIVE

Alternative E would seek to treat approximately 250,000 acres per year with a combination of WUI fuel reduction, fuel break, and ecological restoration treatment activities across the entire 20.3 million-acre treatable landscape. However, Alternative E would not allow for the application of herbicides, except for Borax fungicides as described below. This alternative is intended to avoid or substantially lessen impacts related to hazardous materials and other effects that could result from herbicide treatments. This alternative is also responsive to comments provided on the NOP, which recommended avoiding the use of herbicides in vegetation treatments.

Alternative E would include treatments in all fuel types (i.e., tree, shrub, and grass). Except for herbicide treatments, it would include the same treatment types as the proposed program (see Section 2.5.1, in Chapter 2, Program Description). To achieve the target of 250,000 acres per year, the proportion of non-herbicide treatment types would increase. To feasibly achieve the treatment target, it is anticipated that the extent of manual treatments and mechanical treatments, would increase. Under this alternative, the estimated distribution of each treatment activity would be:

- ▶ 50 percent prescribed burning (approximately 125,000 acres),
- ▶ 15 percent manual treatment (approximately 37,500 acres),
- ▶ 25 percent mechanical treatments (approximately 62,500 acres), and
- ▶ 10 percent prescribed herbivory (approximately 25,000 acres).

As with the proposed program, the treatment activity or combination of activities for a specific treatment site would be selected based on the site-specific characteristics and objectives of the treatment. This alternative would include the use of Borax fungicides (e.g., Sporax or Cellu-Treat), where applicable as part of manual or mechanical treatments in tree fuel types. These fungicides are often applied to freshly cut stumps to prevent the spread of heterobasidion

root disease to nearby healthy trees. No other herbicides or pesticides would be used in vegetation treatments under this alternative. Because fewer types of treatment activities would be available to achieve a substantial increase in the pace and scale of treatments, it would likely take longer to “ramp up” from current treatment levels to approximately 250,000 acres than under the proposed program.

### Consistency with Program Objectives

An alternative under CEQA must achieve most of the basic project objectives (State CEQA Guidelines Section 15126.6). Each of the objectives of the CalVTP is listed below, followed by a discussion of the extent to which Alternative E would achieve the objective. As described below, Alternative E would achieve most of the basic project objectives because it would achieve all five objectives of the CalVTP, to some degree.

**Objective 1 - Serve as the vegetation management component of the state’s range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California’s 2018 Strategic Fire Plan (Board and CAL FIRE 2018).**

Alternative E would achieve Objective 1 to a similar degree as the proposed program because it would increase the pace and scale of treatments that manage the amount and continuity of wildland fire fuels through WUI, fuel break, and ecological restoration treatment activities. This would help to implement Goal 5 of California’s 2018 Strategic Fire Plan, which, in part, calls for promoting forest and rangeland resilience through fuels reduction, restoring the ecological role of fire through prescribed burning, and increasing the pace and scale of fuels treatment activities.

**Objective 2 - 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 Governor’s Executive Order B-52-18, which results in a target of up to 250,000 acres per year after considering other types and areas of vegetation treatments.**

Alternative E would achieve Objective 2 to the same degree as the proposed program by providing a streamlined environmental review approach to increase the pace and scale of vegetation treatments. It would seek to treat 250,000 acres per year by increasing the pace and scale of prescribed burning, mechanical, manual, and prescribed herbivory treatment activities.

**Objective 3 - Increase the use of prescribed burning as a vegetation treatment tool consistent with the provisions of Senate Bill 1260, Statutes of 2018 and Public Resources Code (PRC) Section 4483(a).**

Alternative E would achieve Objective 3 to a similar degree as the proposed program. It would increase the use of prescribed burning as a vegetation treatment activity within the treatable landscape. It would allow for this PEIR to serve as the programmatic environmental review document for prescribed fires initiated by third parties consistent with PRC Section 4483(a) and would promote the use of prescribed burning to reduce wildland fire hazards consistent with the intent of Senate Bill 1260 of 2018.

**Objective 4 - Contribute to meeting California’s GHG emission goals by managing forests and other natural and working lands as a net carbon sink consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California’s 2017 Climate Change Scoping Plan (CARB 2017 ), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (CalEPA et al. 2019).**

Alternative E would achieve Objective 4 to a similar degree as the proposed program. California’s 2017 Climate Change Scoping Plan and the California Forest Carbon Plan call for active management of forests and other natural and working lands to increase the potential for carbon sequestration and reduce carbon emissions associated with wildfire. Because Alternative E would include active management of natural and working lands, including ecological restoration treatments, it would contribute to California’s GHG emission goals.

**Objective 5 - Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.**

Alternative E would achieve Objective 5 to a slightly lesser degree than the proposed program. It would include ecological restoration treatments that would restore fire resiliency in target fire-adapted plant communities by restoring degraded, damaged, or destroyed ecosystems and habitats to conditions associated with a natural fire

regime. Alternative E would not include herbicide treatments, which could make some elements of ecological restoration treatments (e.g., invasive weed control) less effective than the proposed program.

### Feasibility

Alternative E would seek to treat 250,000 acres per year within the approximately 20.3 million-acre treatable landscape. This alternative could be more difficult to implement than the proposed program because it would limit the use of herbicide treatments, which would require an increase in the pace and scale of other treatment activities and possibly increase the need to re-treat a project area in comparison to treatments using herbicides or to re-treat a project area more frequently than if herbicide was used. However, this alternative would maintain the same range of treatment types as under the proposed CalVTP (WUI fuel reduction, fuel breaks, and ecological restoration), and all other treatment activities besides herbicide use. These activities could be implemented within the entire treatable landscape. Alternative E is potentially feasible and would feasibly attain all the program objectives to some degree.

## ENVIRONMENTAL ANALYSIS OF ALTERNATIVE E

### Aesthetics and Visual Resources

Under Alternative E, there would be no visual effects related to herbicide application, but more visual effects related to other treatment activities, resulting in similar effects overall. As with the proposed program, the visual effects of implementing treatments would be short-term, temporary, and would implement SPR AES-2 would minimize visual impacts from the presence of treatment equipment. However, if more frequent retreatment is necessary without the use of herbicide, vehicles could be visible more often. Like the proposed program, the long-term effects of most treatments would be visible, but would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site. Alternative E would include non-shaded fuel break treatments, which could result in a long-term adverse change in the landscape by resulting in a contrasting linear element in an otherwise natural environment. This would result in the same significant and unavoidable impact as the proposed program. *(Same significant and unavoidable impact)*

### Agriculture and Forestry Resources

Treatment activities under Alternative E would be similar to the proposed program, although they would not include herbicide application. The alternative would alter forest land through vegetation removal, but forested treatment areas would generally continue to support at least 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Similar to the proposed program, treatment activities under Alternative E would not result in the loss of forest land or conversion of forest land to a non-forest use. This effect would be similar to the proposed program.

### Air Quality

Alternative E would result in the same significant and unavoidable air quality impacts as the proposed program and would result in a similar or slightly greater level of air pollutant emissions. Alternative E would include similar treatment activities (with the exception of herbicide application) and would seek to treat the same number of acres each year. Alternative E would result in a significant and unavoidable impact because it would generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS. These treatment-related emissions could be slightly greater than under the proposed program if herbicide application is replaced by more emission-intensive activities like mechanical treatments and due to the anticipated need to re-treat areas with greater frequency than under the proposed project. As with the proposed program, Alternative E would result in significant and unavoidable impacts because prescribed burns could result in objectionable odors and the short-term exposure of people to concentrations of TACs associated with an acute health risk. Other impacts related to diesel particulate matter, fugitive dust containing naturally occurring asbestos, and objectionable odors associated with diesel emissions would be less than significant, like the proposed program. Overall, the air quality effects of the Alternative C would be similar to, but slightly greater than the proposed program and the same significant and unavoidable impacts would remain. *(Same significant and unavoidable impacts)*

## Archeological, Historic, and Tribal Cultural Resources

The effects of Alternative E on archeological, historic, and TCRs would be similar to the proposed program. As with the proposed program, implementation of SPRs would avoid any substantial adverse change to any built historical resources and compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance of human remains. Despite implementation of SPRs, unknown TCRs, unique archaeological resources or subsurface historical resources could be inadvertently damaged during treatment activities. This would result in the same significant and unavoidable impact as the proposed program (*Same significant and unavoidable impact*)

## Biological Resources

Alternative E would result in similar effects on biological resources as the proposed program, including the same significant and unavoidable impact related to special-status bumblebees. This alternative would avoid effects associated with herbicide application, but it would increase the amount of other treatment activities, which would result in a similar effect as the proposed program. As with the proposed program, treatment activities under this alternative could inadvertently damage or destroy special-status plants, fish, wildlife, and their habitat. Alternative E would implement the same mitigation measures as the proposed program, which would minimize or avoid potentially significant impacts on special-status plants and wildlife. However, treatments implemented under this alternative would encounter the same difficulty as the Proposed Program with effectively mitigating impacts to overwintering and nesting special-status bumblebees. Herbicide-related impacts, which are acknowledged as a threat to species survival in the CESA listing petition (Xerces Society et al. 2018), would be eliminated under this alternative, but given the remaining potential for direct mortality and injury of undetected overwintering and nesting bees during other treatment activities, this impact would be significant and unavoidable. Adverse long-term effects from treatments under this alternative would be similar to the proposed program and any long-term benefits related to ecological restoration would not be realized to the same extent (e.g., to as many species and vegetation communities) as the proposed program because treatments would be concentrated in a smaller geographic area. Like the proposed program, Alternative E would implement SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-7, BIO-8, and HYD-4 to identify and protect sensitive natural communities and habitats, however treatment activities could result in a loss of acreage of sensitive natural communities and habitats, eliminate sensitive natural communities or habitats from a treatment area, or reduce the habitat value or ecological function of sensitive natural communities and habitats. Alternative E would implement Mitigation Measures BIO-3a through c, which would reduce these effects to a less-than-significant level. Alternative E would also result in the same significant effects related to state or federally protected wetlands, movement corridors, and nurseries; and would implement the same mitigation measures to reduce these effects to less than significant. It would also result in the same less-than-significant effect related to common nesting birds; and, like the proposed program, would have no impact related to conflicts with local policies, ordinances, and plans. Overall, Alternative E would avoid impacts associated with herbicide application, but result in more of the other treatment activities and associated impacts. While impact mechanisms would vary from the proposed program, the effects would be generally similar.

## Geology, Soils, and Mineral Resources

The effects of Alternative E on geology, soils, and mineral resources would be similar to but slightly greater than the proposed program. Like the proposed program, Alternative E would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion or increase the risk of landslide. Alternative E could include more manual and mechanical treatment than the proposed program, which would result in a greater risk of compaction caused by mechanical equipment, loss of soil cover, and the churning and breakdown of soil structure by mechanical equipment. As with the proposed program, this alternative would implement SPRs GEO-1 to GEO-8, which would avoid or reduce the risk of erosion and landslides.

## Greenhouse Gas Emissions

Alternative E would result in the same significant and unavoidable impact as the proposed program related to GHG emissions from treatment activities. It would include slightly more GHG emissions overall because it would include a greater proportion of manual and mechanical treatments and increased frequency of re-treatment, which produce

more GHG emissions than herbicide application (see Table 3.8-3 in Section 3.8, "Greenhouse Gas Emissions"). Based on the per acre estimates of GHG emissions in Table 3.8-3, Alternative E would result in approximately 21,481 more MMTCO<sub>2</sub>e annually than the proposed action. Alternative E may also require more frequent retreatments of sites, which could result in additional GHG emissions. As with the proposed program, a purpose of Alternative E is to reduce wildfire risk, which would reduce GHG emissions and potentially increase carbon sequestration over the long-term. Alternative E would result in similar long-term GHG emission reductions and increased carbon sequestration as the proposed program, because it would include the same treatment types (i.e., WUI fuel reduction, fuel breaks, and ecosystem restoration) across the same number of acres. This would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. (*Same significant and unavoidable impact*)

### Energy Resources

Alternative E would have a similar but slightly greater effect on energy resources than the proposed program. Because Alternative E would include more mechanical treatments than the proposed program and an increased frequency of re-treatment, a greater amount of energy would be consumed in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment. Like the proposed program, Alternative E would reduce the relatively inefficient consumption of energy during wildfire response. (*Similar/Slightly greater*)

### Hazardous Materials, Public Health and Safety

Effects related to hazardous materials, and public health and safety would be less than the proposed program under Alternative E. Alternative E would not result in increased transportation, use, storage, and disposal of herbicides. Thus, it would avoid risks related to human exposure when applied in areas in close proximity to the public. Alternative E would also include compliance with applicable laws, regulations, and SPRs that reduce the risk associated with the use of fuels, oils, lubricants, and other hazardous materials. As with the proposed program, Alternative D would include implementation of Mitigation Measure HAZ-3 to identify and avoid known hazardous waste sites.

### Hydrology and Water Quality

Overall, Alternative E would have similar effects on hydrology and water quality as the proposed program. This alternative would avoid water quality effects associated with herbicide application, however it would result in greater effects associated with the more widespread implementation of other treatment activities. As with the proposed program, Alternative E would include the implementation of SPRs that would prevent each treatment activity from violating water quality standards or waste discharge requirements, substantially degrading surface or ground water quality, conflicting with or obstructing the implementation of a water quality control plan, or substantially altering existing drainage patterns. The effects on hydrology and water quality would be similar to the proposed program because Alternative E would treat the same area treated by the proposed program with similar treatment activities.

### Land Use and Planning, Population and Housing

Like the proposed program, Alternative E would not cause a significant environmental impact because of a conflict with a land use plan, policy, or regulation. The effects of Alternative E related to inducing population growth would be similar to the proposed program because Alternative E would include a similar amount of treatment activity requiring approximately the same number of workers.

### Noise

Short-term increases in noise would be similar to, but slightly greater than, the proposed program because Alternative E would include slightly more widespread use of mechanical and manual treatments, which generate more noise than herbicide application because of the use of motorized equipment, as well as an increased frequency of re-treatment. As with the proposed project, vegetation treatment activities implemented under Alternative E would adhere to SPRs that require consistency with local noise policies and ordinances to the extent the project is subject to them, limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure.

## Recreation

The effects of Alternative E on recreation would be similar to the proposed program because the alternative would include the same treatment types (i.e., WUI fuel reduction, fuel breaks, and ecosystem restoration) and would treat the same number of acres as the proposed program each year. As with the proposed program, vegetation treatment activities under Alternative E would implement SPRs that avoid or minimize the disruption of recreational activities within designated recreation areas.

## Transportation

The transportation effects of Alternative E would be similar to, but slightly greater than, the proposed program. This is because Alternative E would seek to treat the same number of acres each year with similar treatment activities but may result in more traffic and VMT associated with more frequent retreatments that would be necessary without the use of herbicide. Like the proposed program, traffic operations during vegetation treatments would be temporary and localized. Alternative E would implement SPRs that manage and minimize potential hazards because of smoke generated during prescribe burns, require consistency with local traffic operations policies and standards to the extent the project is subject to them, and require that a TMP be prepared to manage and minimize potential temporary traffic operations effects resulting from individual vegetation treatment projects. (Same significant and unavoidable impact)

## Public Services, Utilities and Service Systems

Alternative E would have the same significant and unavoidable impact as the proposed program, and would generally have similar or slightly greater effects on public services, utilities, and service systems. Like the proposed program, Alternative E would result in an increase in the volume of solid organic waste transported offsite to existing biomass power plants, wood product processing facilities, and/or composting facilities for processing, which could exceed the capacity of local solid waste infrastructure. This increase could be slightly greater if more biomass is disposed of off-site as a result of non-herbicide treatments, or treatment areas must be retreated more frequently. As with the proposed program, Alternative E would comply with federal, State, and local management and reduction goals, statutes, and regulations related to solid waste; and would not discernably affect the availability of water supply. (Same significant and unavoidable impact)

## Wildfire

Overall, Alternative E would have a similar, but greater impact related to the risk of wildfire than the proposed program. The short-term effects of Alternative E would be slightly greater than the proposed program because Alternative E would not include herbicide application treatments, which have a low risk of causing ignitions during treatment activities, and would include relatively more treatment activities that have a higher risk of causing ignitions. Like the proposed program, SPRs and stringent safety protocols would prevent the uncontrolled spread of wildfire from treatment activities. Over the long term, Alternative E would seek to reduce the potential for the uncontrolled spread of wildfire through WUI fuel reduction, fuel breaks, and ecological restoration within the 20.3 million-acre treatable landscape. However, Alternative E would be slightly less effective than the proposed program because it would preclude the use of herbicide application, which can be an efficient and effective vegetation management tool in certain scenarios. Without this management tool, some vegetation management projects could be less effective, more expensive, and/or require more frequent retreatments, which could reduce the total amount of vegetation management that could occur with available resources. For these reasons, Alternative E could be less effective in reducing the intensity and extent of wildfire over the long term, resulting in a greater impact than the proposed program.

## Summary

Alternative E would result in less severe impacts associated with hazardous materials, public health and safety because it would avoid risks related to herbicide use and handling. However, Alternative E would result in slightly greater impacts related to geology, soils, paleontology, and mineral resources; GHG emissions; energy resources; noise; transportation, public services, and wildfire risk.

**Table 6-1 Comparison of Environmental Effects of the Alternatives Relative to the Proposed CalVTP**

Environmental Topic	Proposed CalVTP	No Program Alternative	Alternative A: Reduced Scale of Treatments	Alternative B: WUI Fuel Reduction Only	Alternative C: Modified WUI Fuel Reduction and Fuel Breaks	Alternative D: No Prescribed Burning Treatments	Alternative E: No Herbicide Treatments
Aesthetics and Visual Resources	SU (program and cumulative)	similar	less	less *Avoids significant and unavoidable impact	greater	similar	similar
Agriculture and Forestry Resources	LTS (program and cumulative)	similar	similar	similar	similar	similar	similar
Air Quality	SU (three impacts) (program and cumulative)	similar	less	similar	similar	less *Avoids two of three significant and unavoidable impacts	slightly greater
Archeological, Historical, and Tribal Cultural Resources	SU (program and cumulative)	similar	less	similar	similar	similar	similar
Biological Resources	LTS (program and cumulative)	similar	less	slightly less	similar	similar	similar
Geology, Soils, Paleontology, and Mineral Resources	LTS (program and cumulative)	similar	less	similar	similar	similar	slightly greater
Greenhouse Gas Emissions	SU (program and cumulative)	potentially slightly greater	potentially greater	potentially greater	potentially greater	potentially less	potentially slightly greater
Energy Resources	LTS (program and cumulative)	similar	similar	similar	similar	greater	slightly greater
Hazardous Materials, Public Health and Safety	LTS (program and cumulative)	similar	less	greater	slightly greater	greater	less

**Table 6-1 Comparison of Environmental Effects of the Alternatives Relative to the Proposed CalVTP**

Environmental Topic	Proposed CalVTP	No Program Alternative	Alternative A: Reduced Scale of Treatments	Alternative B: WUI Fuel Reduction Only	Alternative C: Modified WUI Fuel Reduction and Fuel Breaks	Alternative D: No Prescribed Burning Treatments	Alternative E: No Herbicide Treatments
Hydrology and Water Quality	LTS (program and cumulative)	similar	less	similar	similar	similar	similar
Land Use and Planning, Population and Housing	LTS (program and cumulative)	similar	less	similar	similar	similar	similar
Noise	LTS (program and cumulative)	similar	less	greater	slightly greater	greater	slightly greater
Recreation	LTS (program and cumulative)	similar	less	similar	similar	similar	similar
Transportation	SU (program and cumulative)	similar	less	greater	slightly greater	greater	slightly greater
Public Services, Utilities, and Service Systems	SU (program and cumulative)	slightly less	less	similar	similar	greater	slightly greater
Wildfire	LTS (program and cumulative)	greater	greater	similar	similar	greater	greater

LTS: less than significant, LTSM: less than significant with mitigation, SU: significant and unavoidable

## 6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA calls for the identification of an environmentally superior alternative in an EIR but gives no definition for the term (State CEQA Guidelines Section 15126.6(e)). For the purposes of this PEIR, the environmentally superior alternative is the alternative that would result in the fewest potentially significant impacts while achieving most of the basic program objectives to the greatest extent. Table 6-1 presents a comparison of the environmental effects of each alternative relative to the proposed CalVTP and identifies whether an alternative would avoid any significant and unavoidable impact of the proposed program.

With each alternative, there would be environmental tradeoffs; that is, impacts to certain resource areas from an alternative would increase while others would decrease relative to the proposed program. Additionally, each alternative would result in significant and unavoidable impacts. Each alternative, except Alternative C: Modified Fuel Reduction and Fuel Breaks, would reduce one or more impacts of the proposed program, and all alternatives would result in greater impacts than the proposed program for some resource areas. Alternative B: WUI Fuel Reduction Only, would avoid a significant and unavoidable related to aesthetics and visual resources because it would not include non-shaded fuel breaks. Alternative D: No Prescribed Burning Treatments, would avoid two of the three significant and unavoidable impacts related to air quality, because it would not generate smoke and associated air pollutants from prescribed burning treatments. However, Alternative D: No Prescribed Burning Treatments would exacerbate a significant and unavoidable impact related to utilities and service systems because it would require that more solid organic waste be disposed of off-site than the proposed program, which could further exceed the capacity of local solid organic waste processing facilities to a greater extent than the proposed program. No other alternative would avoid all of the significant and unavoidable impacts of the proposed program, and no alternative would result in a new significant impact that would not also occur under the proposed program.

The extent to which an alternative achieves the program objectives should also be considered when identifying the environmentally superior alternative. The proposed program would achieve the objectives to the greatest degree of any alternative. Alternative B: WUI Fuel Reduction Only would not achieve Objective 4 or Objective 5 and would not achieve Objectives 1 or 3 to the same degree as the proposed program. Alternative D would not achieve Objective 3 and would not achieve Objective 5 to the same degree as the proposed program. It would achieve the other objectives to a similar degree as the proposed program.

In summary, the proposed program would achieve all of the basic program objectives, but would result in potentially significant impacts and require the application of mitigation to reduce some, but not all, of the significant impacts to less than significant levels. The alternatives, particularly Alternative B: WUI Fuel Reduction Only and Alternative D: No Prescribed Burning Treatments, would result in fewer potentially significant impacts for some resources and exacerbate impacts for other resources, but would not achieve the basic program objectives to the same extent as the proposed program. In light of these tradeoffs among the alternatives and the proposed program, none of the alternatives clearly stands out as environmentally superior. Identification of the environmentally superior alternative is, therefore, not an objective choice based on quantifiable criteria, but rather, an exercise of discretion in balancing environmental priorities among potential impacts in relation to the extent to which the alternative would meet the program objectives. If the key criterion for identifying the environmentally superior alternative is avoiding significant and unavoidable impacts and priority is given to issues related to human health, Alternative D would become the environmentally superior alternative, because it would avoid a significant and unavoidable air quality impact of the proposed program related to short-term exposure of people to toxic air contaminants during prescribed burning.

## 6.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED ANALYSIS

State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives to the proposed CalVTP. The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be evaluated in the PEIR, it is important to consider the objectives of the CalVTP, its significant impacts, and any unique considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a) (stated in Section 6.1, above). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body (See PRC Section 21081(a)(3)).

The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination (State CEQA Guidelines Section 15126.6(c)). Several commenters identified potential alternatives to the CalVTP in response to the NOP (see Section 6.1.2). Some of these comments recommended alternatives to the PEIR format or approach, such as preparing multiple separate, regional PEIRs. These suggestions address the environmental review process and do not suggest alternatives to the proposed CalVTP and would therefore not constitute an alternative to the proposed project pursuant to State CEQA Guidelines Section 15126.6. Those comments that do suggest alternatives to the proposed CalVTP were evaluated against the alternatives screening criteria described in Section 6.1.1. Suggested alternatives that are consistent with the screening criteria are evaluated in Section 6.2. The following sections describe the alternatives that were considered by the Board but are not evaluated further in this PEIR and the reasons for eliminating each from detailed analysis in the PEIR.

### 6.4.1 Non-Vegetation Management Alternatives

Several comments on the NOP and on prior versions of the VTP PEIR suggested that the PEIR should consider an approach that reduces wildfire risks to life, property, and natural resources through methods that do not involve vegetation management (called "non-vegetation" management alternatives in this PEIR). These comments recommended a variety of non-vegetation management techniques for reducing wildfire risk, including retrofitting existing structures to reduce their potential for ignition during a wildfire; revising building codes to require that new structures be less prone to ignition; implementing various land use controls that would limit new development in fire-prone areas; enhancing emergency evacuation planning; implementing measures to prevent human ignition such as public education or restrictions on high-risk activities; and expanding fire suppression activities.

As described in Chapter 1, "Introduction" state, federal, and local agencies implement a wide range of programs to reduce wildfire risks to life, property, and natural resources. These programs include various vegetation management activities, as well as non-vegetation management approaches similar to the techniques suggested in comments. The non-vegetation management approaches suggested in comments are consistent with other state, federal, and local programs, but they are not analyzed as alternatives in this PEIR because these approaches would not meet any of the objectives of the CalVTP, which are described in Section 2.2, "Objectives of the CalVTP," and are inherently focused on managing vegetation as an integral component of statewide wildfire risk reduction efforts.

As described in Section 2.2, Objective 1 of the CalVTP is to serve as the vegetation management component of the state's range of actions underway to reduce risks to life, property, and natural resources by managing the amount and continuity of wildland fire fuels consistent with California's 2018 Strategic Fire Plan. These non-vegetation management alternatives would not meet this objective because, by definition, they are not vegetation management and would not serve to manage the amount and continuity of wildland fuels as recommended in California's 2018

Strategic Fire Plan. The non-vegetation management alternatives would also not meet the Objectives 2 or 3 of the CalVTP, which include substantially increasing the pace and scale of vegetation treatments and increasing the use of prescribed burning consistent with applicable executive orders and legislation because they do not involve vegetation treatment, including prescribed burns. Because Senate Bill 1260, Statutes of 2018 (SB 1260) directs that this PEIR serve as the programmatic CEQA coverage for prescribed burns within the SRA, precluding prescribed burning under these alternatives would also be inconsistent with statute. The non-vegetation management alternatives would also meet the objectives 4 and 5 of the CalVTP, which require vegetation treatments to manage natural and working lands as net carbon sinks and to improve ecosystem health in fire-adapted habitats, because they do not involve vegetation management.

Many of the non-vegetation management approaches recommended in comments are currently enacted under existing programs as described in Section 1.4 of Chapter 1, "Introduction" other than the proposed CalVTP that are intended to reduce the risk or effects of wildfire. The Board recognizes the need to implement a comprehensive strategy to reduce wildfire risk in California that integrates non-vegetation management with vegetation management approaches within the state, encompassing urban, rural, and wildland areas at the federal, state, and local levels, and by potentially affected members of the public (which is every Californian). Therefore, these alternatives must occur in combination with the CalVTP, rather than as alternatives to or a part of the CalVTP. For the purposes of CEQA, non-vegetation management alternatives are not evaluated in detail in this PEIR because these alternatives would not meet any of the objectives of the CalVTP.

## 6.4.2 Defensible Space Focus

Comments on the NOP and on prior versions of the VTP PEIR suggested that the Cal VTP should focus solely on implementing and enforcing defensible space within 100 feet of homes and other structures. An alternative that focuses solely on defensible space within 100 feet of structures is not evaluated in detail because maintenance of defensible space within 100 feet of structures is already required by PRC Section 4291, and because it would not meet any of the program objectives.

PRC Section 4291 requires that owners of a structure "in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material" manage vegetative fuels "so that a wildfire burning under average weather conditions would be unlikely to ignite the structure." This requirement is enforced through several mechanisms including as a condition of a building permit, by insurance companies as a condition of an insurance policy, and by the code enforcement programs of local jurisdictions and fire districts.

An alternative that limits vegetation management to within 100 feet of structures would not meet any of the program objectives. A sole focus on defensible space would not meet Objective 1, because it would not reflect the range of vegetation management actions called for in California's 2018 Strategic Fire Plan. While defensible space is consistent with this plan, the plan also calls for restoring the ecological role of prescribed fire, forest and rangeland fuel reduction, and fuel reduction efforts at the watershed or fireshed level. By limiting vegetation management to within 100 feet of structures, it would not be possible to achieve the substantial increase in the pace and scale of vegetation management identified in Objective 2 (and directed by Executive Order), or to increase the use of prescribed burning consistent with Objective 3 (and directed by SB 1260). A defensible space focused alternative would also not meet the Objectives 4 and 5 of the CalVTP, which identify vegetation treatments to manage natural and working lands as net carbon sinks and to improve ecosystem health in fire-adapted habitats, because these objectives involve management actions throughout natural and working lands.

Focusing treatment to implement and enforce defensible space while forgoing or substantially reducing vegetation treatments outside of defensible space would not achieve the same level of wildfire risk reduction to life and property or avoid the indirect effects (i.e., smoke exposure) in the communities that defensible space is intended to protect as a more comprehensive that also aims to reduce wildfire risk in wildlands through vegetation management. Vegetation treatments implemented under the CalVTP may not avoid catastrophic wind-driven fires such as those experienced in California in 2018. However, vegetation treatments that have been implemented in wildlands and in

the WUI (outside of defensible space) have a valuable role in containing these extreme fires, when weather conditions shift, wind subsides, and fire intensity decreases. In addition, and importantly, most fires that occur within the state, including those that threaten communities, are not highly wind driven and can ignite outside of defensible space; treatments under the proposed CalVTP are intended to help slow and suppress them.

The Board recognizes the need to implement a comprehensive strategy to reduce wildfire risk in California that integrates various approaches within the state, encompassing urban, rural, and wildland areas. Defensible space must be maintained pursuant to PRC Section 4291, the CalVTP would treat vegetation in the WUI and wildlands in furtherance of a “community-out” approach to wildfire risk reduction. These alternatives focused on implementing and enforcing defensible space must occur in combination with the CalVTP, rather than as alternatives to or a part of the CalVTP and are not evaluated in detail in this PEIR.

### 6.4.3 Electric Utility Focus

Comments on the NOP suggested that the CalVTP should focus on vegetation management around powerlines. This alternative is not evaluated in detail because vegetation management around powerlines is already required by state and federal law and because it would not achieve most of the program objectives. PRC Sections 4292 and 4293 establish minimum required fuel breaks surrounding utility poles and power lines. Both requirements are already enforced by CAL FIRE in State Responsibility Areas during the fire season. California Public Utilities Commission (CPUC) General Order 95 establishes additional year-round clearance requirements below powerlines. CPUC Resolution ESRB-4 directs utilities to take additional measures to reduce the risk of fire, including increasing vegetation inspections; removing hazardous, dead and diseased trees and other vegetation near electric power lines and poles; sharing resources with CAL FIRE to staff lookouts adjacent to the utilities’ property; and clearing access roads under power lines for fire truck access. At the federal level, the North American Electric Reliability Corporation enforces Standard FAC 003-4, which mandates vegetation clearance near high-voltage transmission lines. Actions to reduce wildfire risk specific to electric utilities must be implemented as part of the comprehensive strategy to reduce wildfire risk throughout California in combination with the CalVTP, rather than as alternatives to or as part of the CalVTP, and are not evaluated in detail in this PEIR.

### 6.4.4 Alternatives Evaluated in the 2017 Draft VTP PEIR

In 2017, the Board released a Draft PEIR for the VTP. The 2017 Draft VTP PEIR evaluated a proposed program, a No Program Alternative, and four action alternatives. The alternatives in the 2017 Draft VTP PEIR were developed to meet objectives that were developed before 2017. Since the 2017 Draft VTP DEIR was released, California has experienced the two largest recorded wildfires in its history (Mendocino Complex and Thomas Fire), and the most destructive wildfire in its history (Camp Fire). Substantial progress has been made in responding to California’s wildfire crisis since 2017. Since the 2017 Draft VTP PEIR was released, California’s 2018 Strategic Fire Plan was prepared, Executive Order B-52-18 was issued, Senate Bill 1260 Statutes of 2018 was enacted, and California’s 2030 Natural and working Lands Climate Change Implementation Plan was adopted. These recent plans, executive order, and legislation provide the foundation for the CalVTP’s objectives. Because the 2017 alternatives were prepared before these recent plans, executive order, and legislation, those alternatives do not meet the objectives of the CalVTP, and do not adequately respond to the current wildfire crisis and directives of the Governor’s administration.

However, elements of the alternatives evaluated in the 2017 Draft VTP PEIR are incorporated into the alternatives evaluated in this PEIR, as relevant. In particular, the proposed program evaluated in the 2017 Draft VTP PEIR forms the basis of Alternative A: Reduced Scale of Treatments in this PEIR. Alternative A: WUI Only, from the 2017 Draft VTP PEIR shares similarities with Alternative B: WUI Fuel Reduction Only in this PEIR. Alternative B: WUI and Fuel Breaks from the 2017 Draft VTP PEIR is similar to Alternative C: Modified WUI Fuel Reduction and Fuel Breaks in this PEIR; and Alternative D: Reduction of Prescribed Fire Treatments to Reduce Air Quality Impacts, in the 2017 Draft VTP PEIR included a similar strategy as Alternative D: No Prescribed Burning Treatments in this PEIR. The 2017 Draft VTP PEIR also evaluated Alternative C, which would focus vegetation management on only those areas classified as Very High Fire Hazard Severity Zones (VHFHSZ). As the 2017 Draft VTP PEIR noted, a significant inadequacy of this alternative

would be the inability to protect communities at risk that are located outside of areas mapped as VHFHSZ. This alternative is also unlikely to reduce any potentially significant impacts of the proposed CalVTP, and was therefore, not evaluated in detail in this PEIR.

In summary, the alternatives evaluated in the 2017 Draft VTP PEIR would not meet the new objectives of the CalVTP or reduce any potentially significant impacts of the proposed CalVTP; therefore, the alternatives evaluated in the 2017 Draft VTP PEIR are not evaluated in detail in this PEIR. However, relevant components of the alternatives evaluated in the 2017 Draft VTP PEIR have been integrated into the alternatives evaluated in this PEIR.

## 6.4.5 Alternatives Dismissed in the 2017 Draft VTP PEIR

The 2017 Draft VTP PEIR considered but eliminated the following seven alternatives from detailed review:

- ▶ reduced acreage,
- ▶ Highly Constrained – WUI and VHFHSZ,
- ▶ Limiting Treatment to Areas with High Incidence of Wildfires,
- ▶ High Acres in the WUI Only,
- ▶ Focusing on Areas of Historical Use of Treatments,
- ▶ 1,000 Foot WUI and Fuel Break Maintenance Only, and
- ▶ Fire Return Interval Departure.

Elements of the High Acres in WUI Only Alternative were incorporated into Alternative B in this PEIR. The remaining alternatives are not evaluated in detail in this PEIR for the same reasons they were not evaluated in detail in the 2017 Draft VTP PEIR. The 2017 Draft VTP PEIR explained why these alternatives were not evaluated in detail on pages 3-36 through 3-40.