



THE CALIFORNIA VEGETATION TREATMENT PROGRAM ENVIRONMENTAL CHECKLIST



PROJECT INFORMATION

1. **Project Title:** Las Posadas Demonstration State Forest VTP
2. **CAL FIRE Project Number:** Rx-North-119-LNU
3. **CalVTP I.D. Number:** 2024 – 08.
4. **Project Proponent Name and Address:** Mike Wink,
Assistant Chief, Sonoma-Lake-Napa Unit
1199 Big Tree Road, St. Helena Ca. 94574
5. **Contact Person Information and Phone Number:** Mike Wink
Assistant Chief, Sonoma-Lake-Napa Unit
mike.wink@fire.ca.gov
(707)-967-1408
6. **Project Location:** Napa County

Approximate coordinates of center of project:
Latitude: North 38° 33.532'
Longitude: West 122° 24.328'

Township 8 N, Range 5, portions of sections 4, 9, 10, 14, 15. Mt. Diablo Baseline and Meridian.

APNs 025-030-023-000, 025-030-023-000, 025-030-002-000, 025-030-006-000, and 025-030-006-000

Project is located off Las Posadas Rd., 2 miles east of Angwin CA at the intersection of Cold Springs Rd and Howell Mountain Rd. LPDSF is approximately 5 air miles NE of St. Helena CA and 4 air miles SSE of Pope Valley CA at the intersection of Howell Mt Rd and Pope Valley Rd.

See vicinity map for details (Figure 1).
7. **Total Area to be Treated (acres):** 843
8. **Description of Project:**

Las Posadas Demonstration State Forest (LPDSF; Figure 1) is a 796-acre parcel zoned by Napa County as Agricultural Watershed (AW). The parcel is comprised of annual grassland, blue oak woodland, blue oak-foothill pine, chamise-redshank chaparral, mixed chaparral, montane hardwood, montane hardwood-conifer, ponderosa pine, and Sierran mixed conifer habitats. LPDSF was deeded to the State by a private landowner with deed restrictions allowing for research and demonstration, but not commercial timber operations. The property is heavily overgrown and currently exhibits a dangerously high volume of burnable fuels. This accumulation of fuels would normally be reduced by periodic

wildfire, but fire suppression, lack of prescribed burning, and absence of other forms of fuels management has created a significant fire risk.

To address this risk, this project will employ several treatment activities (listed below in Item 10) to achieve and maintain strategic goals. Treatments will be based on factors such as vegetation type, previous operations, slope/ accessibility, specific state forest objectives, funding and/or partnership opportunities, and biomass utilization capabilities.

The goals of this project are:

- 1. Reduce hazardous fuel accumulation**
- 2. Maintain a resilient natural ecosystem**
- 3. Restore the ecological function of fire through prescribed fire**
- 4. Provide tactical and strategic locations for wildfire attack (fuel breaks)**
- 5. Provide opportunity to engage in cultural burning where appropriate**
- 6. Solidify community-wide efforts for forest health and wildfire preparation**
- 7. Establish and maintain reliable evacuation routes for local residents**

This project will allow the California Department of Forestry and Fire Protection (CAL FIRE) Forest Manager to implement the desired treatment activity at the opportune time of entry. Many areas on the LPDSF are outside the historic range of variability in terms of fuel loading, biomass accumulation, structure, and species composition. It is expected that numerous entries will be required to achieve the desired result of a resilient landscape. Initial entries are expected to reduce risk before broadcast burning is appropriate. Successive entries will likely utilize a combination of treatment activities that help meet project goals.

Treatment types proposed within this project include:

Wildland-Urban Interface (WUI) Fuel Reduction

Located in WUI-designated areas, fuel reduction will generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind-driven wildfire between structures and wildlands, and vice versa.

Because of the location of the LPDSF in relation to the community of Angwin, all of the project area falls within the scope and scale of WUI Fuel Reduction treatment type. Any treatment area not designated for Fuel Break or Ecological Restoration will be treated under this analysis for WUI Fuel Reduction. Refer to Item 13 below for an in-depth discussion on the setting of the LPDSF.

Fuel Breaks

In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks.

Most mainline roads on the LPDSF will be designated Fuel Breaks under this project. This will allow the responding resources to tactically engage a fire should a wildfire impact the community. The LPDSF has already seen impacts from fires in the area and fuel breaks have been proposed on-site as part of the emergency response. This supports the narrative that fuel breaks along the existing road network will provide value during a fire event.

In addition to providing a tactical advantage, these fuel breaks will bolster the opportunities for community egress in the event of wildfire. One of the main roads on the LPDSF is the established evacuation route for Angwin. Supporting and maintaining the viability of the evacuation route is critical to the safety of the community.

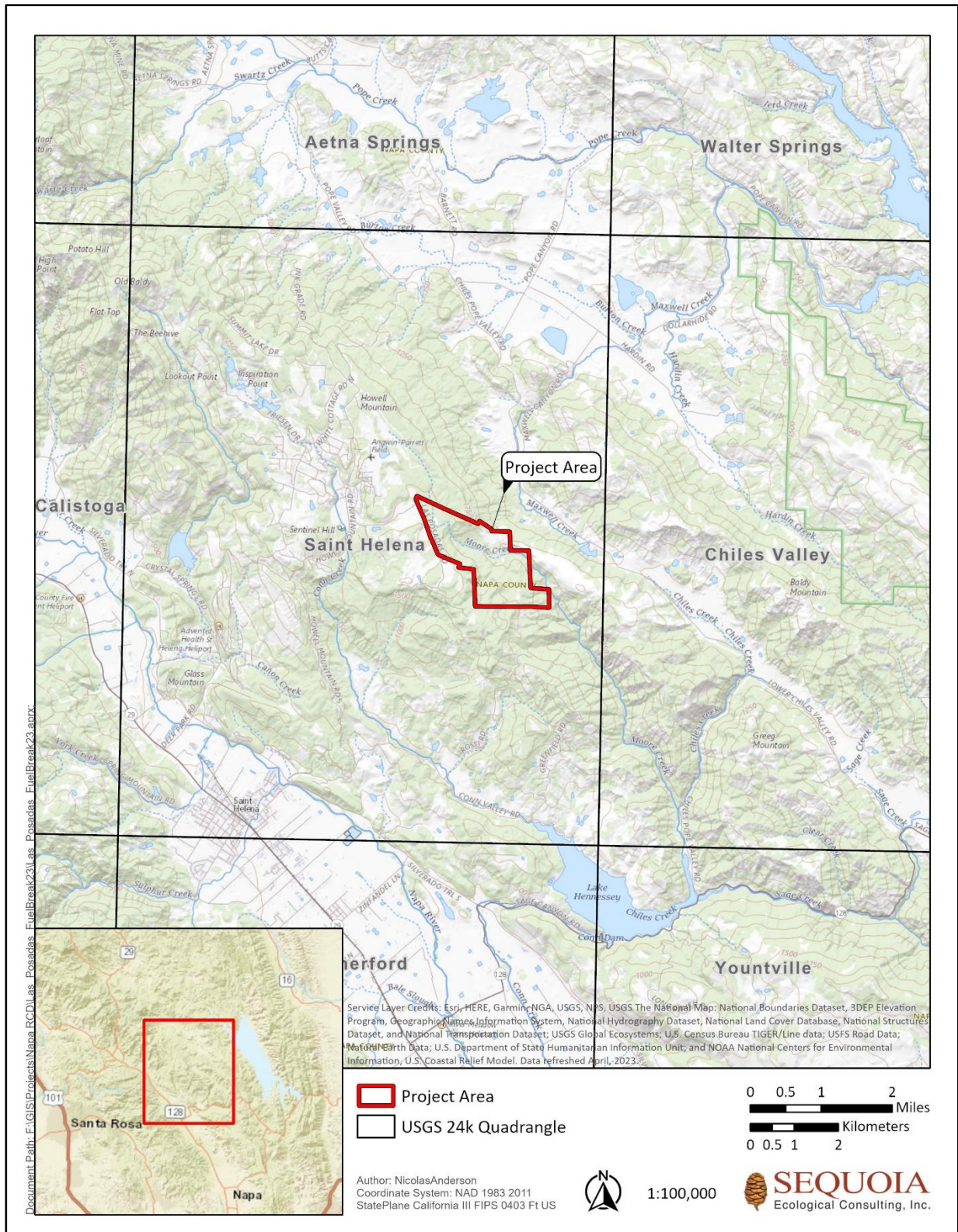


Figure 1. Vicinity of the Las Posadas Vegetation Treatment Program.

Ecological Restoration

In areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration will focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

Though the areas designated as ecological restoration are within the WUI zone for this project, the Ecological Restoration treatment type is a better fit for two distinct ecotypes within the property. The first is an oak woodland type in the NW portion of the ownership and the second is a serpentine grass/chaparral type in the eastern part of the forest. This treatment type may facilitate cultural burning and involvement of tribal partners when developing specific treatment activity. Cultural burning is consistent with prescribed burning treatment activity under the California Vegetation Treatment Program (CalVTP) analysis.

To accomplish these treatment types, an array of treatment activities will be utilized:

Prescribed Burning

Prescribed burning is the intentional application of fire to vegetation under specified conditions of fuels, weather, and other variables. The intent is for the fire to stay within a predetermined area to achieve site-specific resource management objectives. Prescribed low-intensity surface fires may be used to control vegetation by enhancing the growth, reproduction, or vigor of certain species, in addition to managing fuel loads and/or maintaining a targeted vegetation community.

Prescribed burning can be used to restore the ecological function in areas that have departed from their natural fire regime. Fire suppression has changed fire activity in the 20th century, and prescribed burning is a tool that can restore and maintain appropriate fire regimes (Keeley and Syphard 2016).

Typically, prescribed burning requires the construction of control lines or containment lines to stop the spread of prescribed fire. In order to create control lines, mature shrubs may be trimmed or removed manually by hand crews or by mechanical equipment in advance of burning, or vegetation may be pretreated with herbicides to kill the aboveground portions and cause them to dry before burning. Prescribed burning may be used where other activities are not feasible because of rocky soils, steep slopes (i.e., greater than 65 percent or 50 percent in high erosion areas), or irregular terrain; although, prescribed burning is limited to situations where sufficient fuel is available and arranged properly to carry the fire.

Mechanical Treatment

Mechanical treatment is effective for removing dense stands of vegetation and is typically used in shrub and tree fuel types. Some mechanical equipment can masticate (mulch) or lop and scatter vegetative debris concurrently with vegetation removal. Mastication involves the use of large, mechanized equipment for chopping/grinding in areas with shrubs and trees to break up the fuel pattern and decrease combustibility by placing fuels on the ground. Mechanical treatments may be the best tool to restore forest overstory health and have also proven to reduce fire hazards while maintaining a healthy overstory over time (Collins et al. 2014). Mechanical treatments are appropriate where a high level of control over vegetation removal is needed, such as near residential area, communities, or in sensitive habitats. They are often used instead of prescribed burning or herbicide application. Unless followed with targeted application of herbicides, mechanical treatment has limited use for noxious weed control, as the machinery tends to spread seeds and may not kill root systems.

Prescribed Herbivory

Prescribed herbivory (also known as “targeted grazing” [ASI 2006, Macon 2019]) is the use of domestic livestock to accomplish specific and measurable vegetation management objectives. These include things like removing biomass (fine fuel loads), reducing populations of specific plant species, slowing the re-establishment of shrubs on burned or mechanically thinned sites, and improving plant community structure for wildlife habitat values.

Cattle, sheep, and goats are the animals most often used for this purpose because they are relatively common and easy to manage. Grazing/browsing by these animals is best used for green herbaceous plants that produce fine fuels and smaller diameter woody species that produce highly flammable fire fuels (Nader et al. 2007). Animals are best selected according to the types of vegetation that need to be managed. Goats are typically best suited to shrubs, and cattle are better suited to herbaceous plants, especially grasses. Sheep graze selectively but may consume both herbaceous and woody vegetation. Dietary preference among species is not absolute as diet is also driven by the availability of vegetation, nutritional needs, experiences, and inherited and learned behaviors.

For this treatment activity to be effective at reducing wildfire risk or in achieving other applicable objectives of the CalVTP, the right combination of animals, stocking rates, timing, and rest must be used. Prescribed herbivory by domestic livestock should occur when the target plant species is (are) palatable and when feeding on the plants can damage them or reduce viable seeds.

Manual Treatment

Manual treatment would involve the use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous and woody species. Activities could include the following:

- Thinning trees with chainsaws, loppers, or pruners;
- Cutting undesired competing brush species above ground level to favor desirable species and spacing;
- Pulling, grubbing, or digging out root systems of undesired plants to prevent sprouting and regrowth; and
- Placing mulch around desired vegetation to limit competitive growth.
- Increasing the vertical and horizontal fuel break continuity by limbing trees up to 12 feet and removing smaller (<12 inches DBH) trees, and/or dead and dying trees.

Herbicide Application

Herbicides are chemicals that damage or kill plants and can be classified by their mode of action. They include growth regulators, amino acid inhibitors, grass meristem destroyers, cell membrane destroyers, root and shoot inhibitors, and amino acid derivatives, all of which interfere with plant metabolism in different ways.

Herbicides can also be categorized as selective or non-selective. Selective herbicides kill only a specific type of plant, such as broad-leaved plants, which allows the herbicide to be used to control weeds while maintaining grass species. Other herbicides, such as glyphosate (Roundup®), are non-selective and kill any type of plant. These must be used carefully to avoid damaging non-target plants. Herbicides that may be applied under the CalVTP are:

- Borax (tetraborate decahydrate);
- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt, and diammonium salt);
- Hexazinone;
- Imazapyr (isopropylamine salt);
- Sulfometuron Methyl;
- Triclopyr (butoxyethyl ester and triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E);
- Cleantraxx (penoxsulam and oxyfluorfen);
- Velpar (hexazinone); and
- Indaziflam.

Herbicide application under the CalVTP must comply with the U.S. Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency and Department of Pesticide Regulation (DPR) label standards. Only ground-level application would occur; no aerial applications would be allowed under the CalVTP. Several herbicide application methods are available for use by on-the-ground personnel, including paint-on stems, backpack hand-applicator, hypo-hatchet tree injection, boom sprayers from ATVs (sprayers would be pointing down and only used when the target species occurs throughout the treated area), or hand placement of pellets. The application method chosen would depend on the written recommendations of an independent Pest Control Advisor (PCA) licensed by DPR for the targeted weed species and characteristics of the site to which the treatment is proposed.

9. Treatment Types: [See description in CalVTP Programmatic Environmental Impact Report (PEIR) Section 2.5.1, check every applicable category; provide detail in Description of Project.]

Wildland-Urban Interface Fuel Reduction

Fuel Break

Ecological Restoration

10 Treatment Activities:

Prescribed (Broadcast) Burning, 843 acres

Prescribed (Pile) Burning, 843 acres

Mechanical Treatment, 843 acres

Manual Treatment, 843 acres

Prescribed Herbivory, 843 acres

Herbicide Application, 843 acres

11 Fuel Type:

Grass Fuel Type

Shrub Fuel Type

Tree Fuel Type

12 Geographic Scope:

The treatment site is entirely within the CalVTP treatable landscape.

The treatment site is NOT entirely within the CalVTP treatable landscape.

The CalVTP Treatable Landscape boundary was digitally developed at a large spatial scale which prevented high resolution mapping. As a result, certain areas were incorrectly mapped and characterized as outside of the treatable landscape even though the vegetation and land uses are very similar to those areas mapped within the treatable landscape. Onsite field evaluation of the project area confirmed that vegetation and land uses in areas mapped outside the treatable landscape do not differ from adjacent vegetation types or land uses within the treatable landscape. Additionally, the entire project area is within the SRA and the vegetation is not a wet meadow, estuary, or other non-fire prone area that was purposefully excluded from the treatable landscape. Therefore, the environmental analysis in the PEIR is applicable to the entire project area due to the similarities of the areas within and outside of the treatable landscape.

13 Surrounding Land Uses and Setting:

Setting

The LPDSF is in Napa County and ranges in elevation from 1,800 feet above mean sea level (MSL) on the northern and western portion of the property to approx. 1,000 feet MSL in the far SE corner. The slopes on top (NW and W) are flat to mild but quickly become steep as the general SE aspect of LPDSF follows Moore Creek, which empties 4.5 miles downstream SSE to Lake Hennessey. In the southern portion of LPDSF, two main ridges run north to south, and the associated drainages (Uncle John Creek and another unnamed tributary) drain into Moore Creek.

The higher elevation habitats include coastal interior mixed conifer. This encompasses stands of coast redwood (*Sequoia sempervirens*) where soils allow, mixed conifers including ponderosa pine (*Pinus ponderosa*) and interior Douglas-fir (*Pseudotsuga menziesii*), and oak woodland habitat types. At about 1,400 feet elevation, there is a definitive habitat type change to chaparral and scrub oak habitat types. The soils present are serpentine in nature and isolated foothill pines (*Pinus sabiniana*), various oak species, and brush dominate the plant communities. There are isolated areas of annual grasses, while yellow star thistle (*Centaurea solstitialis*) has an established presence across the lower elevations of the property.

LPDSF is located within the community of Angwin in the Howell Mountain American Viticulture Area (AVA). Viticulture is the primary industry of the region and represents a significant local investment economically and socially. LPDSF shares a common boundary on the south and west with multiple private vineyards and ranchettes. Angwin is located approximately 4.5 miles NNW from the town of St. Helena in the Napa County hills between Pope Valley and Napa Valley. The Napa Valley and greater Napa County area is a popular destination for travelers and vacationers seeking to explore this world-renowned wine-making area.

Community Context

The community of Angwin is home to approximately 3,000 residents, as well as Pacific Union College (PUC). The college has an average enrollment of roughly 1,600 students. The northern boundary of LPDSF is adjacent to the college. PUC owns and manages their campus and publicly accessible open space where mountain bikers, hikers, and outdoor enthusiasts use the PUC Demonstration Forest.

LPDSF's eastern boundary is adjoined by the Land Trust of Napa County (Okin Preserve), where trail construction is ongoing and will provide public trail access from PUC to other public space near Lake Hennessey. There are other private properties adjoining the eastern boundary of LPDSF, where newly established public right-of-way trail access will provide trail connectivity in the area.

Though there is no public recreation allowed on the LPDSF, the newly established "Public Evacuation Route" transects the property and allows a secondary escape route in the event that wildfire inhibits the primary route away from Angwin. This evacuation route was established in 2018 and is an integral part of the community's safety plan.

PUC and some other landowners have begun forest restoration and fuel reduction work on adjoining ownerships. This project will allow CAL FIRE to "tie in" to treatment activities on these other landowners and form a more comprehensive forest health strategy within the community. The LPDSF is a critical geographic link that will anchor sound resource stewardship practices from multiple ownerships and provide a unified community effort.

14 Other public agencies whose approval is required: (e.g., permits)

No other public agency approval is required for this project. During the development, the California Department of Fish and Wildlife (CDFW) and San Francisco and Central Valley Water Quality Control Boards were consulted during project development. The Bay Area Air Quality Management District (BAAQMD) will be consulted prior to any burn plan development and the appropriate smoke management plans will be prepared and approved prior to burning operations.

15 Native American Consultation:

For treatment projects that are within the scope of this PEIR, AB 52 consultation has been completed. The Board of Forestry and Fire Protection and CAL FIRE completed consultation pursuant to Public Resources Code section 21080.3.1 in preparation of the PEIR.

CAL FIRE Associate State Archaeologist Ben Harris was consulted during the planning phase of the proposed project. A records search, tribal notification, pre-field research, and field survey, were conducted for the VTP area and an archaeological survey report (ASR) was prepared. Prehistoric and historic sites are present in the project area; refer to the attached Archaeological Survey Report performed by Sonoma State University archeologists for more information.

If previously undocumented cultural resources are encountered during project activities (including but not limited to dark soil containing shell fragments, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will stop until a CAL FIRE cultural resource specialist has evaluated the find and implemented appropriate Mitigation Measures. Furthermore, should project activities expose human bone/remains, operations will cease, and the Napa County Coroner's Office and a CAL FIRE archaeologist must be contacted within 24 hours of discovery. All work will remain halted until clearance is granted.

16 Use of PSA for Treatment Maintenance:

Prior to re-treating any area within the project boundary, the project proponent will verify that site conditions described in the PSA are still relevant. CAL FIRE is the landowner, and no work is proposed outside of the LPDSF property boundary.

17 Standard Project Requirements and Mitigation Measures:

- All applicable SPRs and Mitigation Measures are feasible and will be implemented.
- There is NO new information which would render Mitigation Measures previously considered infeasible or not considered in the CalVTP PEIR now feasible OR such Mitigation Measures have been adopted. [Guidelines Sec.15162(a)(3); PRC Sec. 21166(c)]
- All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented (*provide explanation*).

DETERMINATION (To be completed by project proponent)

On the basis of this initial evaluation:

- I find that all of the effects of the proposed project (a) have been analyzed adequately in the CalVTP PEIR, (b) have been avoided or mitigated pursuant to the CalVTP PEIR, and (c) all applicable Mitigation Measures and Standard Project Requirements identified in the CalVTP PEIR will be implemented. The proposed project is therefore **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.

- I find that the presence of proposed project areas outside the CalVTP treatable landscape will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an **ADDENDUM** is adopted to address the project areas outside the geographic extent presented in the Program EIR.

- I find that the proposed project will have effects that were not examined in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. **A NEGATIVE DECLARATION** will be prepared.

- I find that the proposed project will have effects that were not examined in the CalVTP PEIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the CalVTP PEIR, revisions to the proposed project or additional Mitigation Measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. **A MITIGATED NEGATIVE DECLARATION** will be prepared.

- I find that the proposed project will have environmental effects that were not examined in the CalVTP PEIR. Because these effects are or may be significant and cannot be clearly mitigated, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

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|---------------|---|--------|-----------------------|
| Signature: | <div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">DocuSigned by:</div> </div> <div style="font-size: 8px; margin-top: 2px;">28E8C5BCE01E4BC...</div> | Date: | 11/22/2024 |
| Printed Name: | George Morris III | Title: | Northern Region Chief |

CALIFORNIA DEPARTMENT OF
 FORESTRY AND FIRE PROTECTION
 CAL FIRE

 Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for each Impact, Standard Project Requirement (SPR) and Mitigation Measure (MM) identified in the Project-Specific Analysis Checklist (PSA Checklist). The information provides clarity for review and/or provides direction to the field staff that will implement the project utilizing the checklist (persons familiar with the project and preparation of the document may be different through the life span of the document). Answers should consider whether the proposed project would result in new or more substantial environmental effects than described in the CalVTP PEIR, after incorporation of applicable SPRs and MM required by the CalVTP PEIR.
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP PEIR for each environmental topic.
3. Once the project proponent has evaluated the environmental effect that may occur, then the checklist answers must indicate whether the impact is:

(Definitions located in Chapter 3 – “Environmental Settings, Impacts, and Mitigation Measures, 3.1.4 – Terminology Used In the PEIR”)

- **Less Than Significant (LTS)** - An impact either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible Mitigation Measures.
- **Less Than Significant with Mitigation (LTSM)** - An impact was identified within the PEIR which was viewed in totality as potentially significant and/or significantly unavoidable and the Mitigation Measures and SPRs provided in the PEIR will be implemented mitigating to a point of less than significance.
- **Potential Significant (PS)** - An impact treated as if it were a significant impact. “Potentially” is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR.
- **Potentially Significant and unavoidable (PSU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. “Potentially” is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR.
- **Significantly Unavoidable (SU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
- **Not applicable (N/A)**

If the impact is evaluated to be the same or equal to the impact in the PEIR, the PEIR can be utilized without a Negative Declaration, Mitigated Negative Declaration or EIR. If there are one or more entries where the impact is evaluated to be greater than the impact in the PEIR, additional documentation is required.

4. Where a Negative Declaration, Mitigated Negative Declaration is required, the environmental review would be guided by the directions for use of the PEIR with later activities in Section 15168. Where an EIR is required, the environmental review would be guided by Sections 15162 and 15163. When preparing any environmental document, the environmental analysis may incorporate by reference the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.

5. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.
6. Standard Project Requirements (SPR) and Mitigations Measures (MM).
 - **Applicable (Yes/No).** Document whether the SPR or MM is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
 - **Implementing Entity.** In most cases this will be CAL FIRE. The implementing entity is the individual or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
 - **Verifying/Monitoring Entity.** In most cases this will be CAL FIRE. The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

NOTE: The cited SPRs and MMs are summarized to manage the template's size. Refer to the approved CalVTP language attached for the full list of requirements.

ENVIRONMENTAL CHECKLIST

EC-1 AESTHETICS AND VISUAL RESOURCES

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities | Impact AES-1, 3.2 | LTS | <u>SPR AES- 2</u> <u>SPR AQ- 2, 3</u> <u>SPR REC-1</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project would involve manual treatment, mechanical treatment, prescribed herbivory, prescribed (broadcast) burning, prescribed pile burning, and herbicide application. The potential for these treatment activities to result in short-term substantial degradation of visual character was examined in the PEIR and was found to be less than significant.</p> <p>Due to topography in the area, it is likely that portions of the treatment area would not be visible from any neighboring public roads in the area. While the project is not located within the jurisdiction of Napa County, it borders land on all sides which is under the jurisdiction of Napa County, and portions of the treatment area would be visible from scenic roadways in the area designated by Napa County as being subject to viewshed protection program (Napa County 2008). This ordinance primarily relates to restrictions on issuing permits for grading or earthmoving, for building, or other administrative purposes when sites are visible and located on slopes of fifteen percent or more, or structures are located on any ridgeline (Napa County, 2006). The closest officially designated state scenic highway is State Route (SR) 12, approximately 11.7 miles southwest of the treatment areas (California Department of Transportation 2018). Eligible State Route SR 128 is located approximately 4.25 miles south, and 4.46 miles west of the treatment areas (California Department of Transportation 2018). Additionally, while the proposed treatments would occur within LPSDF, which is not open for public recreation, neighboring open space areas such as the Pacific Union College Demonstration and Experimental Forest (PUC Forest) have several public hiking trails nearby which may offer views of treatment areas. The visual character in the vicinity of the treatment areas is largely characterized by undeveloped forested areas, agricultural developments such as vineyards, and developed areas such as the Pacific Union College (PUC). Viewers in the vicinity of the treatment areas would be mostly residents, students and teachers at PUC, motorists, or recreationalists on existing trails that overlook, or are adjacent to, the treatment areas.</p> <p>Consistent with the PEIR, the presence of large equipment could contrast with the natural environment where publicly visible, such as adjacent to a public trail or roadway. However, project treatment would be temporary and would not dominate a view or block any views from scenic vistas or state scenic highways. Smoke from prescribed burning could also be visible from public viewpoints, scenic corridors, and SR 12. Project activities would not substantially degrade the existing visual character or quality of an area given that the treatment activities would be limited in geographic extent. The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities and types of equipment proposed for use are consistent with those analyzed in the PEIR. SPRs applicable to the proposed treatments are AES-2, AQ-2, AQ-3, and REC-1, which require that treatment-related equipment be stored outside of the public viewshed,</p> | | | | | | |

submittal of a smoke management plan if the prescribed burning triggers the threshold (17 CCR Section 80160), creation of a Burn Plan, and notification of recreational users of any temporary recreation area closures.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within, adjacent to, and outside of the treatable landscape; therefore, the short-term aesthetic impact would also be the same, as described above. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

| | | | | | | |
|--|--------------------------|------------|--|------------|------------|--|
| <p>Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types</p> | <p>Impact AES-2, 3.2</p> | <p>LTS</p> | <p><u>SPR AES- 1,</u> <u>2, 3</u> <u>SPR AD-3, 4</u> <u>SPR REC- 1</u></p> | <p>Yes</p> | <p>LTS</p> | <p><input checked="" type="checkbox"/></p> |
|--|--------------------------|------------|--|------------|------------|--|

Initial and maintenance treatments would include Shaded Fuel Break, WUI Fuel Reduction, and Ecological Restoration treatment types. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the PEIR and found to be less than significant. Treatments would occur on public land and would be compliant with the Community Character chapter of the Napa General Plan (Napa County 2008). The WUI treatments, shaded fuel breaks, and ecological restoration treatments on-site would be consistent with the PEIR. Activities to implement these treatments would include prescribed broadcast burning, prescribed pile burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. These treatments and activities could result in a visual change to the existing environment, with a reduction in the number of trees and density of vegetation on site. However, these methods would largely preserve the natural appearance of the area and would therefore not substantially affect views.

As described in the PEIR, prescribed burning would result in grasses temporarily changing color from green or brown to a dark gray/black. Grass would regrow during the following winter, so this adverse change would be temporary. Additionally, prescribed burning and wildfires occur in this area under existing conditions, so similar burned vegetation is already visible in the vicinity of the treatment areas. For example, the boundary of the 1983 Howell Mountain Fire is approximately 280 feet north of the project treatment area, and the boundary of the 2020 Glass Fire is approximately 2.2 miles to the west (CAL FIRE 2024). Finally, the project would be designed to create a landscape which promotes a resilient natural ecosystem closer to native conditions and could therefore result in long-term beneficial visual impacts in the future.

As described in Impact AES-1, distance and topography means that the treatment area may be less visible from the nearest designated state scenic highway SR 12 but is likely to be somewhat visible from the eligible route SR 128. Public hiking trails are also present within and adjacent to the treatment areas. The aesthetic impacts of the proposed treatments would be temporary and short term, and the natural characteristics of the treatment areas would remain following treatment. SPRs applicable to the proposed treatments are SPRs AD-3, AD-4, AES-1, AES-2, and AES-3, which require that proposed project treatments be consistent with local plans, policies, and ordinances, that notifications would be made prior to the commencement of prescribed burning operations, that treatment-related equipment be stored outside of the public viewshed, that treatment area edges are feathered to create a natural transitional appearance, and that vegetation screening is provided within and adjacent to treatment areas. The proposed treatment activities are consistent with those analyzed in the PEIR, therefore, the potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the

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| <p>treatable landscape; therefore, the short-term aesthetic impact would also be the same, as described above. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| <p>Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type</p> | <p>Impact AES-3, 3.2</p> | <p>SU</p> | <p>N/A</p> | <p>No</p> | <p>N/A</p> | <p><input checked="" type="checkbox"/></p> |
| <p>The project does not propose the use or implementation of a non-shaded fuel break.</p> | | | | | | |
| <p>Other Impacts to Aesthetics: Would the project result in other impacts to aesthetics that are not evaluated in the CalVTP PEIR?</p> | | | | <p>No</p> | <p>N/A</p> | <p><input checked="" type="checkbox"/></p> |
| <p>The proposed treatments are consistent with the covered treatment types and activities included in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (per Sections 3.2.1, "Environmental Setting" and 3.2.2, "Regulatory Setting" in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts would be the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.</p> | | | | | | |

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>SPR AES-1 Vegetation Thinning and Edge Feathering: This SPR only applies to mechanical and manual treatment activities within all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AES-2 Avoid Staging within Viewsheds: This SPR applies to all treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |

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| <p>The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project area is within the LPDSF, where no public recreation is allowed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AES-3 Provide Vegetation Screening: This SPR applies to all treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks</p> | <p>No</p> | <p><u>CAL FIRE</u> N/A</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent does not propose the use or implementation of a non-shaded fuel break. A shaded fuel break will be established along roadways, including the evacuation route within LPDSF.</p> | | | |

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EC-2 AGRICULTURE AND FOREST RESOURCES

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact AG-1: Result Directly in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use | Impact AG-1, 3.3-7 | LTS | N/A | No | N/A | <input checked="" type="checkbox"/> |
| <p>The proposed project would involve prescribed broadcast burning, prescribed pile burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. The vegetation communities in the project area include annual grassland, blue oak woodland, blue oak-foothill pine, chamise-redshank chaparral, mixed chaparral, montane hardwood, montane hardwood-conifer, ponderosa pine, Sierran mixed conifer, and vineyard habitats. There is no farmland within the project area. The potential for the proposed treatment to result in the loss of forest land was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the treatment activities are consistent with those addressed in the PEIR.</p> <p>The majority of the vegetation within the treatment area consists of the tree fuel type. Implementation of the project would alter forested land through implementing WUI treatments, shaded fuel breaks, and ecological restoration treatments on-site. Activities to implement these treatments would include prescribed broadcast burning, prescribed pile burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. Tree cover within woodlands and forested areas remaining after treatment would be consistent with the definition of forest land used in PRC 12220(g): land that can support 10 percent native tree cover of any species under natural conditions. The proposed project would not remove trees for commercial purposes and would not result in conversion of the dominant vegetation types, therefore, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use. This impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. Within the project area, existing conditions within forested land are essentially the same within and outside of the treatable landscape. Therefore, the impact to forested land is also the same. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present within the project area (California Department of Conservation [CDC] 2024); therefore, no conversion of farmland would occur. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Other Impacts to Agriculture and Forest Resources: Would the project result in other impacts to agriculture and forest resources that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |

Treatments included in the proposed project are consistent with the treatments and activities that are considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed project and determined that they are consistent with the environmental and regulatory settings stated in the CalVTP PEIR (Volume II, Sections 3.3.1 and 3.3.2). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forest resources would occur that is not covered in the PEIR.

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EC-3 AIR QUALITY

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS | Impact AQ-1, 3.4 | PSU | <u>SPR AD- 1, 4</u> <u>SPR AQ- 1-6</u> <u>MM AQ- 1</u> | Yes | PSU | <input checked="" type="checkbox"/> |
| <p>The use of vehicles, mechanical equipment, prescribed herbivory, herbicides, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standard (CAAQS) or national ambient air quality standard (NAAQS) thresholds for the San Francisco Bay Area Air Basin. The San Francisco Bay Area Air Basin is classified as non-attainment for the one-hour state ozone standard as well as for the federal and state eight-hour ozone standards. Additionally, the SFBAAB is classified as non-attainment for the state 24 hour and annual arithmetic mean PM10 standards, as well as the state annual arithmetic mean and the national 24 hour PM2.5 standards. The SFBAAB is unclassified, or classified as attainment for all other pollutant standards. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR and was found to be potentially significant. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed in the PEIR.</p> <p>The SPRs applicable to this treatment project are: SPR AD-1, which requires project coordination with CAL FIRE to discuss all environmental resources, discuss the burn plan, and identify protection measures; SPR AD-4, which requires public notification for prescribed burning; SPR AQ-1, which requires compliance with applicable BAAQMD air quality requirements; SPR AQ-2, which requires submission of a smoke management plan in accordance with 17 CCR Section 80160 (unless the burn is less than 10 acres and is also not near smoke sensitive areas, unless otherwise required by the air district); SPR AQ-3, which requires the creation of a burn plan to model fire behavior and predict emissions; SPR AQ-4, which implements measures to minimize dust emissions; and SPR AQ-6, which requires following all safety procedures required of a CAL FIRE crew, including implementation of an Incident Action Plan, which will require coordination with the appropriate air district. Although there have not been studies to confirm observed serpentine soils or serpentine outcrops on the proposed project site, SPR AQ-5, which requires avoiding ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos, applies because Napa County is known to contain naturally occurring asbestos, ultramafic rock outcrops, or former asbestos mines which may be present in or near the treatment area (McCarten 1993, USGS 2011, USGS 2023).</p> <p>The Napa County Resource Conservation District (RCD) would implement the emission reduction techniques included in Mitigation Measure AQ-1 to the extent feasible. However, because the treatments would be implemented by a public agency with limited funding, procuring or paying additional amounts for contractors that use equipment meeting the latest efficiency standards, including meeting the EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology may be cost prohibitive. Carpooling would be encouraged by the RCD, but because crews may not all be employed with the same CAL FIRE station, carpooling may not be feasible to implement for some workers. The RCD will document the extent to which the agency and/or its contractors are able to implement Mitigation Measure AQ-1. Renewable diesel will be used by RCD and/or its contractors to the extent required by state regulations. For these reasons, and as explained in the PEIR, this impact would remain potentially significant and unavoidable. In addition to the CalVTP PEIR SPRs and MMs, additional project-specific measures are described below for Mitigation Measure AQ-1.</p> | | | | | | |

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk | Impact AQ-2, 3.4 | LTS | <u>SPR HAZ- 1</u> <u>SPR NOI- 4,</u> <u>5</u> <u>SPR AQ- 1</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people in particular sensitive receptors located near treatment areas to diesel particulate matter emissions was examined in the PEIR and found to be less than significant. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5, which require complying with air quality regulations, maintaining equipment, locating staging areas away from sensitive receptors, and limiting equipment idling time, respectively.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. The inclusion of additional land does not impact the duration of treatment activities progress across treatment sites as described in the PEIR and thus diesel particulate matter (PM) generated by treatment activities would not take place near any single sensitive receptor for an extended period. However, within the boundary of the project area, the air quality conditions and types of sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within or adjacent to the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk | Impact AQ-3, 3.4 | LTS | <u>SPR AQ-</u> <u>4, 5</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground-disturbing activities. The potential to expose people to naturally occurring asbestos was examined in the Program EIR and found to be less than significant. Some, but not all, of the treatment area is located on soil types where naturally occurring asbestos (NOA) could be present, and portions of the project area have been mapped as underlain by serpentine soils. Serpentine soils or serpentine outcrops are known to be present in the vicinity, and throughout Napa County, and may be exposed during treatment activities (McCarten 1993, USGS 2017, USGS 2023). In accordance with SPR AQ-5, prior to treatments in these areas, an Asbestos Dust Control Plan (17 CCR Section 93105) will be prepared by the project proponent and approved by BAAQMD. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the Program EIR because avoidance of treatments in NOA-containing areas or implementation of an Asbestos Dust Control Plan is consistent with the impacts analyzed in the Program EIR.</p> <p>The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this impact are AQ-4 and AQ-5. AQ-4 implements fugitive dust control measures such as applying water to disturbed areas. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.</p> | | | | | | |
| Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk | Impact AQ-4, 3.4 | PSU | <u>SPR AD- 4</u> <u>SPR AQ-</u> <u>1, 2, 3, 6</u> | Yes | PSU | <input checked="" type="checkbox"/> |

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| <p>Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants. The potential to expose people to toxic air contaminants from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and within the San Francisco Bay Area Air Basin, air quality conditions are consistent with those analyzed in the PEIR for Napa County. Therefore, the potential for exposure to toxic air contaminants is also within the scope the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs, however this impact would remain potentially significant and unavoidable, as explained in the PEIR.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| <p>Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust</p> | <p>Impact AQ-5, 3.4</p> | <p>LTS</p> | <p>SPR HAZ- 1 SPR NOI- 4, 5</p> | <p>Yes</p> | <p>LTS</p> | <p><input checked="" type="checkbox"/></p> |
| <p>The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the exposure potential and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are HAZ-1, NOI-4, and NOI-5, which would require equipment maintenance, limiting vehicle idling time to 5 minutes, and notification of off-site sensitive receptors.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and types of sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within, or adjacent to, the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| <p>Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning</p> | <p>Impact AQ-6, 3.4</p> | <p>PSU</p> | <p>SPR AD- 4 SPR AQ- 1, 2, 3, 6</p> | <p>Yes</p> | <p>PSU</p> | <p><input checked="" type="checkbox"/></p> |
| <p>Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burn treatment and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs, however, this impact would remain significant and unavoidable, as explained in the PEIR.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and types of sensitive receptors in the areas outside the treatable landscape are essentially the same as those within, or adjacent to, the treatable landscape; therefore, the air quality impact is also</p> | | | | | | |

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| the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. | | | | | | |
| Other Impacts to Air Quality: Would the project result in other impacts to air quality that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
| <p>The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Sections 3.4.1, "Regulatory Setting" and 3.4.2, "Environmental Setting" in Volume II of the Final PEIR). The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR, but the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they are immediately adjacent to each other, the air basin is the same, and the treatment activities and associated air emissions are the same. Therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. No new impact related to air quality would occur that is not covered in the PEIR. Therefore, no new impact related to air quality would occur.</p> | | | | | | |

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| SPR AQ-1 Comply with Air Quality Regulations: This SPR applies to all treatment activities and all treatment types. | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| The project proponent will comply with the applicable air quality requirements of the Bay Area Air Quality Management District (BAAQMD) within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. | | | |
| SPR AQ-2 Submit Smoke Management Plan: This SPR applies only to prescribed burning treatment activities and all treatment types. | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| The project proponent will submit a smoke management plan for all prescribed burns to the BAAQMD, in accordance with 17 CCR Section 80160. Pursuant to this regulation, a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance. | | | |
| SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types. | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |

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| <p>The project proponent will create a burn plan using the CAL FIRE Burn Plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model (FOFEM) and BEHAVE or other fire behavior modeling simulation that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified state burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AQ-4 Minimize Dust: This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE During | CAL FIRE |
| <p>To minimize dust during treatment activities, the project proponent will implement the following measures:</p> <ul style="list-style-type: none"> Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by the CARB, the EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may “cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property,” per Health and Safety Code Section 41700. <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AQ-5 Avoid Naturally Occurring Asbestos: This SPR applies to all treatment activities and treatment types.</p> | Yes | Prior-During | CAL FIRE |
| <p>The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AQ-6: Prescribed Burn Safety Procedures: Prescribed burns will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP).</p> | Yes | CAL FIRE Prior-During | CAL FIRE |

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| <p>Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crews, including the implementation of an approved Incident Action Plan (IAP), which will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting on-site briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques: Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible.</p> <p>Techniques for reducing emissions may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Diesel-powered off-road equipment used in construction will meet EPA’s Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit’s certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. • Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: <ul style="list-style-type: none"> ○ Meet California’s Low Carbon Fuel Standards and be certified by CARB Executive Officer; ○ Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ○ Contain no fatty acids or functionalized fatty acid esters; and ○ Have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. • Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. • Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. • Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_x and PM. | | | |

Project-Specific Implementation

The RCD will document the extent that it and/or its contractors are able to implement Mitigation Measure AQ-1 by documenting each unit's certified engine tier specification and applicable CARB fleet regulation compliance certificates prior to mobilization. This information will be compiled in an annual monitoring compliance report for the project. Renewable diesel will be used by the agency and/or its contractors to the extent required by state regulations.

DRAFT

EC-4 ARCHEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources | Impact CUL-1, 3,5 | LTS | <u>SPR CUL-1</u> , 7, 8 | No | N/A | <input checked="" type="checkbox"/> |
| <p>This impact does not apply to the initial or maintenance treatments, because no built resources, including built historic resources, are present within the project area that could be affected by the proposed treatment project. As mentioned previously, no project-related activity will occur within the buffer around the legacy 4-H Camp and associated structures.</p> | | | | | | |
| Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources | Impact CUL-2, 3,5 | SU | <u>SPR CUL-2</u> , 3, 4, 5, 8 <u>MM CUL-2</u> | Yes | LTSM | <input checked="" type="checkbox"/> |
| <p>Initial and maintenance treatments would include mechanical, manual, herbivory, herbicide, and pile and broadcast burning treatment activities that utilize heavy equipment and will result in ground disturbance. In some situations, the application of herbicides from manual or mechanical devices may be employed as well. The potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was evaluated in the PEIR. The potential for there to be an inadvertent discovery of unique archaeological resources or subsurface historical resources is within the scope of the activities and impacts discussed in the PEIR because the treatment activities and the extent of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. CAL FIRE, as the project proponent, will implement SPR CUL-1 through CUL-5 and CUL-8 to minimize the risk of inadvertently damaging or discovering unknown resources during treatment activities.</p> <p>The applicable SPRs require the following: an archaeological and historical resource records search has been performed (SPR CUL-1), all geographically affiliated California Native American Tribes have been notified of the treatment activities (SPR CUL-2), pre-field research will be conducted (SPR CUL-3), a site-specific archaeological survey will be conducted and survey reports will be completed (SPR CUL-4), culturally affiliated tribes will be notified if cultural resources are identified and cannot be avoided to develop protection measures for the resource(s) (SPR CUL-5), and all crew members and contractors will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources and avoidance measures for encountered or discovered archaeological resources (SPR CUL-8). Mitigation Measure CUL-2 will also be implemented to further minimize impacts on unknown unique archaeological or subsurface historical resources by ceasing all activities within 100 feet of the discovered resource(s) until a qualified archaeologist is contacted and determines the significance of the find. Although the implementation of the protocol and avoidance measures, SPRs, and Mitigation Measure will reduce the risks of this impact, unknown resources could be inadvertently damaged. Therefore, this impact would remain significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 16).</p> | | | | | | |
| Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource | Impact CUL-3, 3,5 | LTS | <u>SPR CUL-1</u> , 2, 3, 5, 6, 8 | Yes | LTS | <input checked="" type="checkbox"/> |

Initial and maintenance treatments would include mechanical and pile and burning treatment activities that utilize heavy equipment and will result in ground disturbance. The potential for treatment activities to cause a substantial adverse change in the significance of a tribal cultural resources was examined in the Archaeological Survey Report prepared by Sonoma State University. The potential for adverse effects to tribal cultural resources during implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. The implementation of SPR CUL-1 through CUL-6 and CUL-8 would minimize the potential for impacting tribal cultural resources. The applicable SPRs require the following: an archaeological and historical resource records search will be conducted (SPR CUL-1), all geographically affiliated California Native American Tribes will be notified of the treatment activities (SPR CUL-2), pre-field research will be conducted (SPR CUL-3), a site-specific archaeological survey will be conducted and survey reports will be completed (SPR CUL-4), culturally affiliated tribes will be notified if cultural resources are identified and cannot be avoided to develop protection measures for the resource(s) (SPR CUL-5), consultation with geographically affiliated tribes will occur if cultural resources are identified in the treatment areas to develop protection measures for the resource(s) (SPR CUL-6), and all crew members and contractors will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources and avoidance measures for encountered or discovered archaeological resources (SPR CUL-8). An information request letter was sent out to the geographically affiliated tribes on December 5, 2023.

Based on the implementation of the applicable SPRs and the results from consulting with geographically affiliated tribes, it is unlikely that this project will result in an adverse change in the significance of tribal cultural resources and this impact will be less than significant.

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| Impact CUL-4: Disturb Human Remains | Impact CUL-4, 3.5 | LTS | N/A | Yes | LTS | <input checked="" type="checkbox"/> |
|--|-------------------|-----|-----|-----|-----|-------------------------------------|

Initial and maintenance treatments would include mechanical treatments utilizing heavy equipment, which would result in ground disturbing activities. The potential for treatment activities to uncover human remains was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 17). The potential for human remains to be uncovered during the implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and the level of ground disturbance are consistent with those analyzed in the PEIR. As stated in the PEIR, this project would comply with the California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097, which indicate that if human remains are discovered, there shall be no further disturbance or excavation of the site and the human remains shall be left undisturbed. Furthermore, a CAL FIRE Archaeologist and the Napa County Coroner's Office will be notified immediately. There are no SPRs or MMs for this impact. Based on this project's compliance with the California Health and Safety Code Sections 7050.5 and 7052 in addition to PRC Section 5097, any impact to discovered human remains is expected to be less than significant.

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| Other Impacts to Archeological, Historical, and Tribal Cultural Resources: Would the project result in other impacts to archeological, historical, or tribal cultural resources that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics of the treatment project and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur that is not addressed in the PEIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
|--|------------|---|-----------------------------|
| <p>SPR CUL-1 Conduct Record Search: For treatments led by CAL FIRE, an archaeological and historical resource record search will be conducted per the “Archaeological Review Procedures for CAL FIRE Projects” (current edition dated 2010). This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>An Archaeological Records Check Request for CAL FIRE Projects was completed by Sonoma State University and sent to the Northwest Information Center on December 6, 2023. A response was received in December 2023. Sonoma State University contacted the NAHC for a query of the sacred lands file on December 5, 2023, and on December 6, 2023, the NAHC responded, indicating that a search would take 4 weeks. No response was recorded by the time of completion of the Archaeological Report.</p> | | | |
| <p>SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List, which may be obtained from the CAL FIRE website, as appropriate. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>An information request letter was sent out to the geographically affiliated tribes on December 5, 2023, and several responses were received. Comments from geographically affiliated tribes were addressed in the Archaeological Survey Report. Second notification letters were sent to tribes on May 8 and May 13, 2024. After fieldwork was completed, CAL FIRE had a tribal meeting with Michael Rivera, the Tribal Historic Preservation Office (THPO) for the Middletown Rancheria on April 17, 2024 to discuss findings and protection measures.</p> | | | |
| <p>SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>Sonoma State University staff member, Mark Walker, RPA, conducted pre-field research including review of a historic plate maps, literature covering indigenous tribes known to occupy the area, and conversations with the current Forest Manager.</p> | | | |
| <p>SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>An Archaeological survey was completed by Sonoma State University archaeologists December 12-15, 2023, January 4, 2024 and May 8, 2024 as part of completing a full Archaeological Survey Report (ASR) submitted to CAL FIRE and the Napa County RCD upon submittal of the CalVTP PSA. An updated ASR was submitted to CAL FIRE on May 22, 2024.</p> | | | |
| <p>SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |

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| The implementation of this SPR will minimize impacts to archaeological cultural resources discovered during operations. | | | |
| SPR CUL-6 Treatment of Tribal Cultural Resources: If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types. | Yes | CAL FIRE Prior-During | <u>CAL FIRE</u> |
| The archaeological survey will be completed prior to treatment activities. When ground cover is disturbed, the potential to discover previously concealed resources exists. Should a prehistoric artifact be discovered, operations will cease within 100 feet of the discovery, and appropriate tribal representatives and the CALFIRE State Archeologist will be notified. If tribal cultural resources are identified within a treatment area, culturally affiliated tribes will be contacted to ensure protection measures are appropriate to protect the resource. These protection measures will be written in clear, enforceable language, and will be included in the archaeological survey report. Coordinated mitigations will be developed to maintain the integrity of the site. | | | |
| SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. This SPR applies to all treatment activities and treatment types. | Yes | CAL FIRE Prior-During | <u>CAL FIRE</u> |
| No built historical resources are found onsite. | | | |
| SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types. | Yes | CAL FIRE Prior-During | <u>CAL FIRE</u> |
| All crew members and contractors implementing treatment activities will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources as well as to halt work if archaeological resources are encountered during the course of project activities. The implementation of this SPR will reduce the risk of treatment activities resulting in an impact to sensitive archaeological, historical, or tribal cultural resources. | | | |
| MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources. If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find. | Yes | CAL FIRE During | <u>CAL FIRE</u> |
| This project proposes mechanical and manual treatments that will result in ground disturbance. Implementation of this Mitigation Measure will minimize the impacts to subsurface resources that may be discovered during operations. | | | |

EC-5 BIOLOGICAL RESOURCES

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications | Impact BIO-1, 3.6 | PS | <u>SPR BIO-1, 2, 7, 9</u> <u>SPR AQ-3, 4,</u> <u>SPR GEO-1, 3, 4, 5, 7</u> <u>SPR HYD-5</u> <u>MM BIO-1a, 1b, 1c</u> | Yes | LTSM | <input checked="" type="checkbox"/> |
| <p>Project treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) could result in direct or indirect impacts on special-status plant species because suitable habitat is present for some species. The potential for adverse effects to special-status plants is within the scope of the activities and impacts addressed in the PEIR.</p> <p>Sequoia Ecological Consulting, Inc. (Sequoia) performed a desktop review on October 30, 2023. This process utilized a California Native Plant Society (CNPS) Rare Plant Inventory 9-quad search (CNPS 2023) and a California Natural Diversity Database (CNDDB) 9-quad search of the project area to determine which species have potential to occur (CDFW 2023a).</p> <p>One (1) listed plant species, Napa false indigo (<i>Amorpha californica</i> var. <i>napensis</i>), was observed during reconnaissance surveys performed by Sequoia biologists on November 16-17, 2023. Based on a survey conducted throughout the project area by CNPS botanist Amy Patten in April 2019, suitable habitat is present for 18 special status plant species known to occur or have potential to occur within the project site. With implementation of Mitigation Measure SPR BIO-7, appropriately timed rare plant surveys will be performed to avoid impacts to special-status plant species. Per Mitigation Measures BIO-1a and BIO-1b, if a listed or unlisted special-status plant species is found during surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species for pile burning, mechanical treatment, and manual treatments. For prescribed burning, residual effects of the treatment would not be significant under CEQA with the implementation of Mitigation Measures BIO-1a and BIO-1b and SPRs BIO-1, 2, 7, and 9 because implementation of the treatment would maintain habitat function of the special-status plant habitat. If special-status plant species are identified, the plants may need to be avoided during prescribed burning by establishing a no-disturbance/no-ignition buffer of 50 feet, unless: burning is occurring outside the blooming period, the plant is an annual and has completed its life cycle for the season, or it is determined that the special-status species would receive long-term benefits from burning. However, for plants that are ESA or CESA-listed, this determination must be made in consultation with CDFW and USFWS, as appropriate, depending on the species' status.</p> <p>Serpentine soils are also present within treatment areas. This soil type hosts serpentine endemic plants, including Sharsmith's western flax (<i>Hesperolinon sharsmithiae</i>) and green jewelflower (<i>Streptanthus hesperidis</i>). Both species are known to be on-site from prior botanical surveys performed by CNPS botanist Amy Patten during April 2019. Impacts to this sensitive natural community shall be avoided to the extent possible, as detailed in SPR BIO-3. Surveys to determine the presence of special-status plant species will be conducted pursuant to SPR-BIO-7. If populations of special-status plants are found, protective measures pursuant to mitigation measure BIO 1b will be implemented.</p> | | | | | | |

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| <p>In addition, an encompassing handline may be installed outside the buffer to preserve a fire exclusion area for special-status plant species in order for residual impacts to be mitigated to less than significant under CEQA, and consistent with the determination in the PEIR.</p> | | | | | | |
| | PEIR specific | | | Project specific | | |
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| <p>Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications</p> | Impact BIO-2, 3.6 | PS / SU | <p><u>SPR BIO-1, 2, 3, 4, 5, 8, 10, 11</u> <u>SPR HYD-1, 3, 4, 5</u> <u>SPR HAZ-5, 6</u> <u>MM BIO-2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 3a, 3b, 3c, 4</u></p> | Yes | LTSM | <input checked="" type="checkbox"/> |
| <p>Project treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) could result in direct or indirect adverse effects to special-status wildlife species due to suitable habitat being present in the project area. The potential for adverse effects to special-status wildlife is within the scope of the activities and impacts addressed in the PEIR, because the treatment activities and intensity of disturbance are consistent with those analyzed in the PEIR. Special-status wildlife species with potential to occur were determined through a desktop review process that included a search of the USFWS Information Planning and Consultation tool (IPaC; USFWS 2023), a review of eBird sightings (Sullivan et al. 2009), and a CNDDDB search of the project area and surrounding 9 quads: Calistoga, Detert Reservoir, Aetna Springs, Walter Springs, Chiles Valley, Yountville, Ruthford, Kenwood, and St. Helena. Looking at historic occurrence data and habitat requirements, Sequoia biologists determined which species had potential to occur within the project area (Attachment B) and based on the Special-Status Species Tables found in Appendix BIO-3 of the PEIR for the Northern California Coast Ecoregion. These wildlife species consisted of: northern spotted owl, olive-sided flycatcher, golden eagle, purple martin, white-tailed kite, yellow-breasted chat, yellow warbler, Crotch’s bumblebee, California giant salamander, foothill yellow-legged frog, northwestern pond turtle, ringtail, American badger, pallid bat, western red bat, and Townsend’s big-eared bat.</p> <p>Implementation of SPR-BIO-1 determined that suitable habitat for northern spotted owl is present within the project area. With implementation of Mitigation Measures BIO-2a and SPR BIO-10, the residual effects of the treatments would be less than significant under CEQA because implementation of the treatment will maintain habitat function of the special-status wildlife species and the loss of individual nests of northern spotted owls will not occur. Northern spotted owl surveys will be conducted on the LPDSF prior to implementation per SPR-BIO-10. Additionally, disturbance or loss of northern spotted owl is unlikely to occur after implementation of buffers around roosts and through seasonal limitations for treatments (i.e., implementation of treatments outside of the sensitive breeding season, February 1 – July 31). Northern spotted owls roosting within treatment areas outside of the breeding season would be able to flee during a prescribed burn or if disturbed by manual or mechanical treatments, if needed. While SPRs would minimize impacts, treatment activities could still result in direct or indirect adverse effects on northern spotted owl if northern spotted owl nests or roost sites are not sufficiently avoided after identification and if they occur within areas that are not avoided by implementation of the SPRs.</p> | | | | | | |

Potential for golden eagle, olive-sided flycatcher, white-tailed kite, yellow-breasted chat, yellow warbler, and purple martin nesting exists within the project area. If project impacts are expected to occur within suitable habitat during avian nesting season, described as February 1 – September 15, then a qualified RPF or biologist will perform surveys in advance of treatment activities, per SPR-BIO-10. If active avian nests are found, protective buffers will be implemented by the qualified RPF or biologist, who will determine species-specific buffer sizes to ensure that the breeding process would not be disrupted during treatment activities, pursuant to SPR-BIO-10.

Additionally, potential habitat occurs for pallid bat, western red bat, and Townsend’s big-eared bat within the structures of the 4-H Camp, within tree cavities, or under exfoliating bark of trees. If project impacts are expected to occur within the bat maternity period, described as April 1 – August 31, then a qualified RPF or biologist will perform surveys in advance of treatment activities.

California giant salamander, foothill yellow-legged frog, and northwestern pond turtle have low potential for occurrence within the project area. Though their habitat, riparian areas with perennial waters, shall be avoided, the site contains suitable upland habitat where these species could take refuge in burrows. Therefore, mechanical treatments, prescribed burning, or prescribed herbivory will not occur with 200 feet of suitable aquatic habitat for these species unless focused surveys are conducted pursuant to SPR BIO-10. Manual treatment will be permitted by personnel who have received training outlined in SPR BIO-2.

Following the above measures, the project would avoid any incidental disturbance or loss of listed individuals, and thus would not substantially reduce the number or restrict the range of the species. This is consistent with the determination in the PEIR.

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function | Impact BIO-3, 3.6 | PS | <u>SPR BIO-1, 2, 3, 4, 5, 6, 8, 9</u> <u>SPR HYD-4, 5</u> <u>MM BIO-3a, 3b, 3c</u> | Yes | LTSM | <input checked="" type="checkbox"/> |

Project treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) could result in direct and/or indirect impacts on sensitive habitats, including sensitive natural communities, as evaluated in the PEIR. Treatment activity and intensity are consistent with those evaluated in the PEIR, as are the resulting potential impacts. Several Sensitive Natural Communities were identified by referencing the California Wildlife Habitat Relationships (CWHR) classifications within treatment boundaries, in conjunction with Table 3.6-16 in the PEIR, followed by field verification, which revealed multiple sensitive communities and riparian habitat locations. Through implementation of Mitigation Measure BIO-3a, habitat function will be maintained and impacts from treatments will result in less than significant impact under CEQA.

Riparian habitat is present adjacent to streams in all the treatment areas. Under SPR HYD-4, watercourse and lake protection zones (WLPZs) ranging from 50 to 150 feet would be established adjacent to all Class I and Class II streams for herbivory, herbicide, manual, mechanical, and broadcast burning treatments, which would limit the extent of treatment activities within riparian habitat.

While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the treatment areas has not been mapped, and riparian habitat may be present outside of the areas incorporated within WLPZs. As a result, prior to implementation of treatment activities, SPR BIO-3 will need to be implemented to identify and map the extent of riparian habitat within the treatment areas. As required under SPR HYD-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory on the LPDSF. Vegetation Treatment of native riparian vegetation and would largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants).

Chaparral habitat (i.e., chamise chaparral, common manzanita chaparral) is present in the treatment areas. As required under SPR BIO-5, treatments implemented in chaparral will be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function. This will include determining appropriate treatment based on current fire return interval departure and condition class of the chaparral vegetation on-site, retaining at least 35 percent relative final density of mature chaparral vegetation, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Ecological restoration treatments will not be implemented in stands of chaparral vegetation that are within their natural fire return interval unless LPDSF demonstrates with substantial evidence that the habitat function of the chaparral vegetation would be improved.

| | PEIR specific | | | Project specific | | |
|---|--|--|---|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact BIO-4: Substantially Affect State or Federally Protected Wetlands | Impact BIO-4, 3.6 | PS | <u>SPR BIO-1</u> <u>SPR HYD-1, 3, 4,</u> <u>MM BIO- 4</u> | Yes | LTSM | <input checked="" type="checkbox"/> |

Project treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) are not proposed to occur in any state of federally protected wetlands; however, a potential for indirect adverse effects to protected wetlands may occur. The potential for adverse effects to state or federally protected wetlands is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Through implementation of Mitigation Measure BIO-4, impacts to protected wetlands are mitigated to less than significant under CEQA.

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| Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries | Impact BIO-5, 3.6 | PS | <u>SPR BIO-1, 4, 5, 10, 11</u> <u>SPR HYD-1, 4</u> <u>MM BIO- 5</u> | Yes | LTS | <input checked="" type="checkbox"/> |
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The potential for the proposed treatments (prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) to result in direct or indirect impacts on wildlife movement corridors and nurseries was evaluated in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation, as are the resulting potential impacts. Data and field review did not identify major corridors or nursery sites; however, suitable habitat does exist and treatment areas may be used for movement and cover by common wildlife species. Habitat function within the treatment areas would be maintained because treatment activities would not result in removal of trees (e.g., conifers, hardwoods) or snags greater than 12 inches diameter at breast height (DBH). Additionally, WLPZs ranging from 50 to 150 feet will be implemented adjacent to all aquatic habitat in the

treatment areas, which could function as wildlife movement corridors, pursuant to SPR HYD-4. SPRs BIO-1 and BIO-4 will be implemented to ensure habitat function and wildlife movement corridors remain intact.

The proposed treatment areas may contain essential connectivity areas for some ungulate species and mountain lions (*Puma concolor*) as well as habitat for breeding sites or cover. This project proposes the use of mechanical treatment outside of the WLPZ and will comply with overstory cover requirements in riparian areas (SPR BIO-4). Mitigation Measure BIO-5 will be implemented to retain and avoid nursery habitat through the establishment of buffers where necessary. Based on the implementation of SPRs and MMs, it is likely that any impact to wildlife movement corridors and nurseries would be less than significant.

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife | Impact BIO-6, 3.6 | LTS | SPR BIO-1, 2, 3, 4, 5, 12 | Yes | LTS | <input checked="" type="checkbox"/> |

Project treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because suitable habitat is present in the project area. The potential for adverse effects to common wildlife, including nesting birds, is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

Additionally, it is likely that common native birds may be present within or in proximity to the treatment areas. If it is infeasible for operations to occur outside of the active nesting season of common native birds, including raptors, that may be present in the vicinity of the project site, then a survey will be conducted prior to operations (SPR BIO-12). Nesting bird surveys will be conducted between 7 and 14 days prior to the operations when treatments are proposed from February 1st to August 31st by adhering to the standards below:

- (b) Nest tree(s), designated perch tree(s), screening tree(s), and replacement tree(s) shall be left standing and unharmed.
- (c) Operations shall be planned and operated to commence as far as possible from occupied nest trees.
- (d) A 100-foot no-disturbance buffer would be enacted around any active special-status bird nest (MM BIO-2a and MM BIO-2b). The 100-foot no-disturbance may be adjust by an RFP or biologist based on site and species-specific information including but not limited to species sensitivity to noise and visual disturbance, vegetation cover, topography, and nest location. as determined by a qualified RFP or biologist.

The implementation of these survey protocols and the retention and planned improvement of suitable habitat for common wildlife will prevent a substantial reduction of any common species; therefore, any impact to the abundance of common wildlife would be less than significant.

| | PEIR specific | | | Project specific | | |
|--|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources | Impact BIO-7, 3.6 | Np Impact | <u>SPR AD- 3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The potential for the proposed treatments (including prescribed burning, pile burning, mechanical treatment, manual treatment, prescribed herbivory, herbicide treatment) to result in conflict with local policies or ordinances was examined in the PEIR. The proposed treatments are within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3.</p> <p>The CalVTP Standard Project Requirements and Mitigation Measures address environmental concerns that could occur due to mechanized removal of vegetation for forest health and climate resiliency.</p> <p>Applicable local ordinances relevant to biological resources are:</p> <ul style="list-style-type: none"> • Napa County Water Quality Ordinance • Napa County Tree Protection Ordinance <p>The Napa County Water Quality and Tree Protection Ordinance requires retention of 70 percent of canopy cover for oak woodlands, riparian oak woodlands, and conifer forests (Napa County 2019). However, this ordinance specifically exempts landowners who are creating or maintaining defensible space or fire management practices that are consistent with the adopted Napa County Defensible Space Guidelines (Napa County 2019). The Defensible Space Guidelines were designed in consultation with CAL FIRE and generally discourage removing vegetation associated with wet areas or water, removing all trees and shrubs, or creating areas with bare soils. Treatment objectives would be consistent with these guidelines. Thus, there would be no conflict with local ordinances as a result of implementation of treatment activities.</p> | | | | | | |
| Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan | Impact BIO-8, 3.6 | No Impact | N/A | No | N/A | <input checked="" type="checkbox"/> |
| <p>Implementation of the proposed vegetation treatment and treatment maintenance would not result in conflict with adopted habitat conservation plans (HCP) or natural community conservation plans (NCCP). The LPDSF project site is not located within any HCP or NCCP areas.</p> | | | | | | |
| Other Impacts to Biological Resources: Would the project result in other impacts to biological resources that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR. Therefore, no new impact related to biological resources would occur that is not analyzed in the PEIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>SPR BIO-1: Review and Survey Project-Specific Biological Resources.</p> <p>Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.</p> <p>Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.</p> <p>This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> <p>Yes</p> <p>Yes</p> | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>A CNPS Rare Plant Inventory 9-quad search and a CNDDDB BIOS 9-quad search were conducted on October 30, 2023. The project area is within the 7.5' USGS Saint Helena quadrangle map. A review of Appendix BIO-3, Table 9b in the PEIR for special-status plants and wildlife that could occur based on results of a desktop analysis of historic occurrences in and around the project site was conducted. Complete lists of species with potential to occur in the treatment site are included in Attachment B.</p> <p>Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, and habitat present within the treatment site, 35 special-status plants (CNPS Rare Plant Rank groups 1 and 2) and 16 special-status wildlife species could occur within the treatment areas. The Species Status Summary Table (Attachment B) contains the compiled list of special-status species, including each species' scientific name, common name, federal and state listing status, preferred habitat description, and potential to occur within the project area.</p> | | | |
| <p>SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The implementation of this SPR will minimize the risk of an impact occurring to biological resources during operations.</p> | | | |
| <p>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
| <p>Through implementation of SPR BIO-1, it was determined that the project area contains sensitive natural communities of Oregon white oak (S3), redwood-Douglas fir (S3), tanoak (S3), ultramafic mixed chaparral (S3), and willow (riparian scrub, S2). Several of these habitats are suitable for plant species listed under CNPS Rare Plant Rank groups 1 and 2. Protocol-level surveys in accordance with CDFW Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) will be required prior to treatments. In treatment areas where multiple age classes are represented, the proposed treatment will promote heterogeneity, resiliency, and health in the residual stand by</p> | | | |

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| <p>creating different influences of sunlight through the canopy to the forest floor, adding to a mosaic of diversity in the understory. Refer to Impact BIO-3 for more information.</p> | | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
| <p>SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions. This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE Prior-During | CAL FIRE | <ul style="list-style-type: none"> Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well-distributed, multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat [e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service; Wilson et al. 2018]). Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment objectives and would result in effects to the Beneficial Functions of Riparian |

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| <p>Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, including different protection measures and design standards, will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
| <p>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. These SPR requirements apply to all treatment activities and all treatment types.</p> <p>Additional measures will be applied to Ecological Restoration treatment types.</p> | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| <p>Ecological Restoration, WUI Fuel Reduction, and Fuel Break (along roadside buffers) are included in the project description that intersect potential chaparral habitat types. Surveys conducted under SPR-BIO-1 determined that habitat for special-status plants was present onsite, including chaparral habitat. During the botanical surveys conducted under SPR-BIO-7 or immediately prior to project treatment, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area.</p> <p>For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist, will:</p> <ul style="list-style-type: none"> Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. <p>Additional measures will be applied to Ecological Restoration treatment types:</p> <ul style="list-style-type: none"> For Ecological Restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. | | | |

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| <ul style="list-style-type: none"> • A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include, but are not limited to, soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. • If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. | | | |
| <p>SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.</p> | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| <p>When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), gold spotted oak borer, shot hole borer, bark beetle):</p> <ul style="list-style-type: none"> • Clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk. • Include training on <i>Phytophthora</i> diseases and other plant pathogens in the worker awareness training. • Minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment. • Minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination. • Clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low-risk areas or between widely separated portions of a treatment area; and • Follow the procedures listed in Guidance for Plant Pathogen Prevention When Working at Contaminated Restoration Sites or with Rare Plants and Sensitive Habitat” (Working Group for <i>Phytophthoras</i> in Native Habitats 2016). | | | |
| <p>SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by</p> | Yes | <u>CAL FIRE</u> Prior | <u>CAL FIRE</u> |

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| <p>a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (2018). This SPR applies to all treatment activities and treatment types.</p> | | | |
| <p>Reconnaissance surveys conducted under SPR BIO-1 determined that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (2018).</p> <p>Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status.</p> <p>If potentially occurring special-status plants are listed under the California Endangered Species Act (CESA) or the Federal Endangered Species Act (ESA), protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:</p> <ul style="list-style-type: none"> • If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. • If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual life cycle without conducting presence/absence surveys, provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs, and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. | | | |
| <p>SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs. This SPR applies to all treatment activities and only the ecosystem restoration treatment type.</p> | <p>No</p> | <p>N/A</p> | <p><u>N/A</u></p> |
| <p>The project area is outside of the Coastal Zone.</p> | | | |
| <p>SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project area contains French broom (<i>Genista monspessulana</i>) and star thistle. More information can be found in the Initial Treatment Description section under Item #8, Treatment Activities, "Herbicides" and under "Invasive Species" in the same section.</p> <p>CAL FIRE will take the following actions to prevent the spread of invasive plants and noxious weeds:</p> <ul style="list-style-type: none"> • Clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife. | | | |

- For all heavy equipment and vehicles traveling off-road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species.
- Inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas.
- Stage equipment in areas free of invasive plant infestations unless there are no uninfected areas present within a reasonable proximity to the treatment area.
- Identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles.
- Treat invasive plant biomass on-site to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass off-site at an appropriate waste collection facility (if not kept on-site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport.
- Implement Fire and Fuel Management BMPs outlined in Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers (Cal-IPC 2012, or current version).

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE Prior | CAL FIRE |
| <p>Suitable nesting habitat for northern spotted owl occurs (NSO) within the LPDSF. Treatment activities within 0.25-mile of active NSO nests or nesting habitat will be adjusted so that operations are outside the breeding season when breeding species could be present and affected by operations. The breeding period for northern spotted owl is defined as February 1 – July 31. If treatment were to occur within potential nesting habitat during the breeding period, protocol-level surveys would be performed by a qualified RPF or biologist prior to the implementation of treatment activities, or suitable nesting habitat would be mapped and avoided during the NSO nesting season. Any observed nests would be provided with a 0.25-mile no-disturbance buffer, clearly demarcated by high-visibility flagging tape, fencing, or stakes. If protocol-level surveys occur and determine that northern spotted owl nests are not present, mechanical treatments may occur during the February 1 – July 31 period (USFWS 2012). Treatments will not convert habitat to another habitat type nor change its suitability for special-status species.</p> | | | |

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| <p>Suitable roosting habitat occurs within LPDSF for pallid bat, western red bat, and Townsend’s big-eared bat. If work is expected to occur within the bat maternity period of April 1 – August 31 (Caltrans 2004), then surveys by a qualified RPF or biologist would be performed prior to manual, mechanical, or prescribed burning treatment activities. A no-disturbance buffer of 250 feet would be provided for any pallid bat, western red bat, or Townsend’s big-eared bat roosting site.</p> | | | |
| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
| <p>SPR BIO-11: Install Wildlife-Friendly Fencing (Prescribed Herbivory). This SPR applies only to prescribed herbivory and all treatment types.</p> | Yes | During | <u>N/A</u> |
| <p>If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards:</p> <ul style="list-style-type: none"> • Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing always electrified or laid down while not in use. • Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. • Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. • Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. | | | |
| <p>SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special-status in the CalVTP PEIR. The active nesting season or peak nesting season will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types.</p> | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| <p>If operations are proposed during the migratory bird nesting season, defined as February 1 to September 15, and potential for nesting birds within the project area exists, the following measures will be taken:</p> <ul style="list-style-type: none"> • An RPF or representative of the RPF will perform a cursory/visual search of the project area for nesting birds prior to operations. • If an active nest of a listed species is identified, CDFW will be contacted to develop an avoidance strategy. The RPF or biologist will determine the appropriate buffer size depending on the species. • A buffer of 100 feet will be implemented if an active passerine nest is found. Activities within 500 feet of raptor nests will not occur until the nest has been determined to have fledged by the qualified RPF or biologist. • See entire SPR for complete avoidance strategies identified in EIR (Establish Buffer, Modify Treatment, Defer Treatment, Monitor Active Raptor Nest During Treatment, Retention of Raptor Nest Trees), Attachment A. | | | |

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA. If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).</p> | No | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>Review of the ecoregion tables, a California Native Plant Society (CNPS) Rare Plant Inventory 9-quad search and a CNDDDB 9-quad search of the project area determined the historic presence of four (4) species protected under the ESA in the project vicinity: Clara Hunt's milk vetch (<i>Astragalus claranus</i>), Calistoga popcornflower (<i>Plagiobothrys strictus</i>), Keck's checkerbloom (<i>Sildacea keckii</i>), and two-fork clover (<i>Trifolium amoenum</i>). Rare plant surveys, appropriately timed to capture the blooming period, will be conducted prior to any treatments across all subunits. Per SPR BIO-1, following the rare plant survey, and in the event a special-status listed species is found within the proposed project, MM BIO-1a will be implemented to avoid loss of and protect each species with potential to occur</p> | | | |
| <p>MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA. If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement measures to avoid loss of individuals and maintain habitat function of occupied habitat.</p> | No | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>A CNPS 9-quad search determined the potential presence of 17 special-status non-listed species within the property and/ or project boundaries. Rare plant surveys, appropriately timed to capture the blooming period, will be conducted prior to any treatments across all subunits. Per SPR BIO-1, following the rare plant survey, and in the event a special-status non-listed species is found within the proposed project, MM BIO-1b will be implemented to avoid loss of and protect that species.</p> | | | |
| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |

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| <p>MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants. If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and BIO-1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.</p> | <p>No</p> | <p><u>CAL FIRE</u> N/A</p> | <p><u>CAL FIRE</u></p> |
| <p>Treatments being proposed for this project are designed to mimic natural disturbance and stimulate the regeneration of oak woodlands and native chaparral communities. The WUI Fuel Reduction is intended to promote natural resilience to the ecotones found on-site at the LPDSF. No unavoidable loss is expected, as this treatment will focus on the overall health of each system within the ownership. The Fuel Break treatments are designed to mitigate fire spread through the permeant road network of the property. A systematic reduction of fuel loading will allow fire resources a tactical opportunity to engage a wildfire and maintain adequate ingress and egress.</p> <p>If rare or special-status plant species are found during the surveys or during operations, SPR BIO-1 will apply. Rare plant surveys will be performed by a qualified RPF or botanist prior to treatment activities. Rare plant populations will be provided with a no-disturbance buffer clearly demarcated by high-visibility flagging tape, fencing, or stakes. Due to the scope of treatments and the objectives of this project, Mitigation Measure BIO-1c does not apply.</p> | | | |
| <p>MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>A CNDDDB search was conducted for the project site and surrounding 9-quads: Calistoga, Detert Reservoir, Aetna Springs, Walter Springs, Chiles Valley, Yountville, Ruthford, Kenwood, St. Helena. Two (2) wildlife species protected under the CESA and/or the ESA were determined to have potential to occur within the project vicinity: northern spotted owl (<i>Strix occidentalis caurina</i>) and Crotch's bumble bee (<i>Bombus crotchii</i>). Four (4) California fully protected species are known to occur within the project vicinity: Bald eagle (<i>Haliaeetus leucocephalus</i>), white-tailed kite (<i>Elanus leucurus</i>), ringtail (<i>Bassariscus astutus</i>), and golden eagle (<i>Aquila chrysaetos</i>). Bald eagle nesting or foraging is not anticipated to occur within the project area; therefore, it is not expected to be impacted by project activities. Ringtail, golden eagle and white-tailed kite may nest or forage on the LPDSF, and therefore surveys during the avian nesting and ringtail denning season pursuant to SPR-BIO-12 would be needed to ensure no impacts would be incurred. Crotch's bumble bee is discussed under MM BIO-2g.</p> <p>If listed wildlife species or California fully protected species are observed prior to or during implementation of treatments, Mitigation Measure BIO-2a will be implemented where appropriate.</p> <p>Based on the CNDDDB findings and site-specific review during SPR-BIO-1 reconnaissance surveys, potential nesting habitat for northern spotted owl is present in the project area. Protocol-level northern spotted owl surveys would be required in suitable habitat if work should occur there during the breeding season of February 1 – July 31. Should any nests be observed during protocol surveys, a 0.25 mile no-disturbance buffer would be provided.</p> | | | |

Should work occur within the breeding season for nesting birds (February 1 – September 15), surveys for nesting birds would be performed by a qualified RPF or biologist. If golden eagle nesting is detected, a 1 mile no-disturbance buffer would be provided around the nest site. If an active nest is detected for white-tailed kite, a no-disturbance buffer will be placed around each nest at 500 feet.

Adverse effects to ringtail may be avoided by limiting treatment within suitable denning habitat during the maternity period. Mechanical treatment and prescribed burning would pose the highest risk of inadvertent impact to dens within the maternity period and potential loss or abandonment of young. Therefore, these treatment activities will not be implemented within suitable denning habitat from April 15 to July 31.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |

A CNDDDB search was conducted for the project site and surrounding 9 quads. A total of twenty-eight (28) special-status wildlife species were analyzed. Eleven (11) other special-status wildlife species were observed to have potential to occur within the project area: northwestern pond turtle (*Emys marmorata*), California giant salamander (*Dicamptodon ensatus*), foothill yellow-legged frog (*Rana boylei*), olive-sided flycatcher (*Contopus cooperi*), yellow-breasted chat (*Icteria virens*), purple martin (*Progne subis*), yellow warbler (*Setophaga petechia*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western red bat (*Lasiurus blossevillii*), and American badger (*Taxidea taxus*). Three (3) of these species are known to occur within the project site based on prior historic observations: northwestern pond turtle, California giant salamander, and olive-sided flycatcher.

If non-listed special-status wildlife species are observed prior to or during implementation of treatments, Mitigation Measure BIO-2b will be considered and implemented where appropriate.

Based on the CNDDDB findings, site-specific review, biological surveys, and the determination of qualified RPFs, any potential impact during initial and maintenance treatments that could cause mortality, injury, loss of habitat function, or disturbance to any listed wildlife species would be less than significant. Under direction from the qualified biologist or RPF, appropriate, species-specific buffers will be implemented for any special status species observed during pretreatment surveys under MM-BIO 2b.

Should work occur within the bat maternity period (April 1 – August 31), surveys for roosting sites would be performed by a qualified RPF or biologist. Any roost sites of pallid bat, western red bat, or Townsend's big-eared bat would be provided with a 250-foot no-disturbance buffer.

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| <p>Should work occur within suitable American badger habitat (grasslands, open woodlands), a focused survey for the species and for potential dens will be conducted prior to implementing treatments. If American badger dens are detected, a no-disturbance buffer to be determined by the qualified RPF or biologist will be implemented.</p> <p>Should work occur within suitable habitat for California giant salamander, foothill yellow-legged frog, or northwestern pond turtle habitat, a 200-foot buffer would be provided to ensure no harm to individuals within upland refugia. Should a 200-foot no-disturbance buffer not be feasible, a qualified RPF or biologist will perform focused pre-treatment surveys and will be available to advise crews if they encounter individuals or potential burrows during treatment activities. If work within suitable habitat occurs, only manual treatment may be performed within any corresponding WLPZ, per SPR HYD-4.</p> | | | |
| <p>MM BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measures BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.</p> | <p>Applicable</p> <p>No</p> | <p>Implementing Entity & Timing Relative to Implementation</p> <p><u>CAL FIRE</u> N/A</p> | <p>Verifying/ Monitoring Entity</p> <p><u>CAL FIRE</u></p> |
| <p>Based on the CNDDDB findings, site-specific review, biological surveys, and the determination of qualified RPFs, it is unlikely that initial and maintenance treatments will cause mortality, injury, loss of habitat function, or disturbance to any special-status wildlife species that would necessitate compensatory mitigation; therefore, this Mitigation Measure does not apply.</p> | | | |
| <p>MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)</p> | <p>No</p> | <p><u>CAL FIRE</u> N/A</p> | <p><u>CAL FIRE</u></p> |
| <p>Valley elderberry longhorn beetle is not known to exist within the project area.</p> | | | |
| <p>MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly would benefit from treatment in the occupied habitat area even though some may be killed, injured, or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.</p> | <p>No</p> | <p><u>CAL FIRE</u> N/A</p> | <p><u>CAL FIRE</u></p> |
| <p>Special-status butterfly host plants were not observed during reconnaissance surveys and are not expected to be removed completely from the site should they make up some of the naturally occurring vegetative cover of the project area. The vegetation treatments (WUI Fuel Reduction, Ecological Restoration, and Fuel Breaks) have allowance to retain critical components of the ecotones in which they will be applied. No significant impact is expected on special-status butterfly host plants if they are found on-site.</p> | | | |

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) | No | CAL FIRE N/A | CAL FIRE |
| Reconnaissance-level field surveys determined no suitable habitat for special-status beetles, flies, grasshoppers, or snails exists within the project area, and a CNDDDB search of the project area and a 3-mile buffer did not produce evidence that any of these species have occurred within the proximity of the proposed treatment sites; therefore, this mitigation measure does not apply. | | | |
| MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required. | Yes | CAL FIRE During | CAL FIRE |
| Special-status bumble bee species were not observed within the project area during reconnaissance surveys. Based on site specific findings under SPR BIO-1 western bumble bee has historically occurred within Napa County. The most recent occurrence within Napa County was 1962 and the species range has receded from the coast, with LPSDF occurring outside of the current range (CDFW 2023b). Though no historic occurrences were observed for Crotch's bumble bee, LPSDF occurs within the current range for the species (CDFW 2023c). Adverse effects to Crotch's bumble bee will be avoided by limiting prescribed burning and herbicide application during dispersal and nesting season (March through September) in accordance with the 2019 Program EIR. Additionally, treatments will be conducted in a patchy pattern to retain suitable floral resources, as feasible. Where suitable Crotch's bumble bee habitat is present, pre-treatment surveys would combine a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify burrows and suitable habitat within the project site. CDFW (2023) issued "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" which offers a survey methodology for western bumble bee among others. In lieu of or in addition to surveys, the Project proponent may choose to assume presence and rely on habitat as an indicator of presence. If burrows or nesting individuals are detected, they will be avoided by a buffer determined by the qualified RPF or biologist. | | | |
| MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory) | Yes | CAL FIRE Prior-During | CAL FIRE |
| The project area is outside the habitat range of special-status ungulates. No impact from domestic livestock will occur. | | | |
| MM BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands. The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required. | Yes | CAL FIRE Prior-During | CAL FIRE |

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| <p>Where sensitive natural communities and oak woodlands exist within the project area, they will be rehabilitated to the extent feasible. In the treatment type specifically designed for the ecological restoration of oak woodlands, emphasis will be on removing encroaching conifer species in this habitat type. The licensed RPF or biologist may design the work so diseased and infested trees will be removed to spare the residual stand of oak woodland from extended inoculation of the forest pathogen.</p> <p>WUI Fuel Reduction as well as Fuel Break treatment types will further enhance sensitive natural communities and oak woodlands to the extent feasible. Ecological Restoration treatment is deigned to achieve this goal as the primary objective while providing the range of ecological benefits discussed throughout the project.</p> <p>Treatment activities within these habitats will adhere to the relevant restrictions specified in this Mitigation Measure. These include:</p> <ul style="list-style-type: none"> • Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval as defined in the California Manual of Vegetation or in the scientific literature. • Treatments will not remove more than 20 percent of the native vegetation relative cover from a stand of a sensitive natural community. | | | |
| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
| <p>MM BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands. If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects.</p> | No | CAL FIRE N/A | CAL FIRE |
| <p>All treatment types will aid in the restoration of oak woodlands. The result of the treatments implemented within this project will not contribute to the loss of sensitive natural communities or oak woodlands. This Mitigation Measure does not apply because signifc impacts to sensitive natural communities can be avoided.</p> | | | |
| <p>MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.</p> | No | CAL FIRE N/A | CAL FIRE |
| <p>This project proposes the use of mechanical and hand treatments outside of the WLPZ and will comply with overstory cover requirements in riparian areas.</p> | | | |
| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
| <p>MM BIO-4: Avoid State and Federally Protected Wetlands</p> | Yes | CAL FIRE During | CAL FIRE |

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| This project will avoid state and federally protected wetlands. No wetlands were identified within the project area during reconnaissance surveys. If wetlands are observed during subsequent surveys or during treatment activities they would be avoided. | | | |
| MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| This project will retain nursery habitat and implement buffers to avoid nursery sites. | | | |

Please refer to Attachment B for guidance on the project-specific review and survey procedures for biological resources.

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EC-6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil | Impact Geo-1, 3.7 | LTS | <u>SPR GEO-1</u> , 2, 3, 4, 5, 6, 7, 8, <u>SPR HYD-3</u> , 4 <u>SPR AQ- 3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Soils within the treatment areas are mainly dominated by Kidd loam and Boomer gravelly loam, volcanic bedrock, (30 to 75% and 14 to 60%, respectively). Additional soil types present include forward silt loam, moderately steep to very steep, (12 to 57 percent), and Henneke gravelly loam, (30 to 75 percent slopes) (National Resource Conservation Service [NRCS] 2024). The parent material for these soils consists of rhyolite, metavolcanic and basic igneous rocks, and ultramafic serpentinite rocks. These soils are classified as well drained and excessively drained (NRCS 2024). The erosion hazard classifications for the dominant soils range from moderate to very severe (NRCS 2024). The treatment areas classified as severe and very severe will include revegetation and erosion control measures discussed below.</p> <p>The proposed project would include mechanical treatments, manual treatments, prescribed herbivory, herbicide application, and prescribed burning. These treatment activities would result in vegetation removal and soil disturbance, which has the potential to increase rates of erosion and loss of topsoil. The potential for these treatment activities to result in substantial erosion or loss of topsoil was examined in the PEIR and found to be less than significant. The potential impacts are within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. The implementation of the following SPRs would further minimize the risk of soil disturbance and loss of topsoil associated with treatment activities: SPR GEO-1, which requires the suspension of soil disturbing treatment activities during precipitation; SPR GEO-2, which limits high ground pressure vehicles that could cause soil disturbance or compaction on wet or saturated soils; SPR GEO-3, which requires stabilization of disturbed soil areas during treatment activities; SPR GEO-4, which requires inspection of the treatment area for proper erosion control measures prior to the rainy season and immediately following the first large rainfall event; SPR GEO-5, which requires stormwater to be drained via water breaks to decrease the potential for channelized erosion down linear treatment areas; SPR GEO-6, which minimizes the burn pile size to minimize the spatial extent of soil damage; SPR GEO-7, which minimizes erosion from use of heavy equipment and prescribed herbivory on slopes; SPR GEO-8, which will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils (soil with moderate to high erosion hazard); SPR HYD-3, which requires environmentally sensitive areas to be identified and excluded from prescribed herbivory; SPR HYD-4, which requires establishment of WLPZs to reduce erosion near streams; and SPR AQ-3, which requires preparation of a burn plan and minimization of soil burn severity to reduce the potential for runoff and soil erosion; and SPR AQ-4, which requires wetting of unpaved dirt roads to control dust.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the slopes and soil characteristics of the project area are essentially the same within and outside the treatable landscape and SPRs would be implemented as described above. Therefore, the potential impact related to soil erosion is also the same, as described</p> | | | | | | |

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| above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. | | | | | | |
| Impact GEO-2: Increase Risk of Landslide | Impact Geo-2, 3.7 | LTS | SPR GEO-1, 3, 4, 7, 8, SPR AQ- 3 | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project area is in Napa County, which lies within the northern section of the California Coast Range Geomorphic Province. The general northwest-southeast trending alignment of the valleys and ridgelines reflects the tectonic structure of the region. The Coast Ranges are primarily composed of Jurassic- to Cretaceous-age (about 65-150 million years old) marine sedimentary and volcanic rocks of the Franciscan assemblage. The Franciscan assemblage consists of partially metamorphosed greenstone, basalt, chert, and graywacke that originated as sea floor sediments. The California Department of Conservation Landslide Inventory map was reviewed to identify unstable areas within or in proximity to the treatment areas. One confirmed landslide, one probable landslide (75% confident according to the inventory map), and one questionable landslide (50% confident according to the inventory map) have been documented within the treatment areas (CDC n.d.). The confirmed and probable landslides are mapped in the southeast most portion of the treatment area, east of Uncle John creek, and the questionable landslide is in the northwest portion, just south of Moore Creek. The majority of the treatment areas are rated as having very high landslide susceptibility (CDC n.d.).</p> <p>The proposed project would include treatment activities that would result in the reduction of vegetative cover and affect root structure, decreasing the stability of slopes, which could increase the risk of landslides. In the southeastern portion of the project area, some of the treatment areas overlap places which were found to have previous landslide activity. There are two locations east of Uncle John Creek, in the southeastern portion of the project area, that have previously recorded landslide activity (one that is a confirmed landslide, and one that is a probable landslide) (CDC n.d.). Due to the varying topography across certain sections of the treatment area, coupled with steep terrain and wet winter conditions, the possibility of landslides exists throughout the treatment areas. The potential for treatment activities to increase the risk of landslides was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR. In addition, the implementation of SPRs, including SPR GEO-1, which requires the suspension of soil disturbing treatment activities during precipitation; SPR GEO-3, which requires the stabilization of disturbed soil during treatment activities; SPR GEO-4, which requires inspections for proper erosion control measures; SPR GEO-7, which minimizes erosion by prohibiting heavy equipment and prescribed herbivory on steep slopes; SPR GEO-8, which will require an RPF or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils; and SPR AQ-3, which minimizes soil burn severity resulting in some vegetation remaining with root structures, would minimize the potential for landslides from treatments.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Other Impacts to Geology, Soils, Paleontology, And Mineral Resources: Would the project result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |

The proposed treatments are consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and has determined they are consistent with the environmental and regulatory settings discussed in the PEIR. The project proponent has also determined that the inclusion of the portion of the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions pertinent to geology and soils that are present within the treatable landscape are essentially the same as those areas outside the treatable landscape. Therefore, the impacts of the proposed project are also consistent with those covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact to geology and soils would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| <p>The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. This SPR applies only to mechanical treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| <p>The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p> | | | |

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| <p>SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During-Post</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During-Post</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (CAL FIRE 2019). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |

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| <p>The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse, Hubbert, and Moghaddas 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads. This SPR applies to all treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During-Post | <u>CAL FIRE</u> |
| <p>(1) Prohibit use of heavy equipment where any of the following conditions are present:</p> <ul style="list-style-type: none"> (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. <p>(2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to:</p> <ul style="list-style-type: none"> (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. <p>(3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope.</p> <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). This SPR applies only to mechanical treatment activities and WUI Fuel Reduction, Non-Shaded Fuel Breaks, and Ecological Restoration treatment types.</p> | Yes | <u>CAL FIRE</u> Prior | <u>CAL FIRE</u> |
| <p>The project proponent will require a qualified RPF or geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, or other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI Fuel Reduction, Non-Shaded Fuel Breaks, and Ecological Restoration treatment types, including treatment maintenance.</p> | | | |

EC-7 GREENHOUSE GAS EMISSIONS

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact GHG-1: Conflict with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs | Impact GHG-1, 3.8 | LTS | <u>SPR AD-3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Vegetation treatments would involve manual and mechanical vegetation removal, prescribed herbivory, and herbicide application, and biomass disposal would include chipping and pile burning as well as broadcast burning, all of which would generate some greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR and found to be less than significant. The project would be consistent with the applicable policies, plans, and regulations to reduce GHG emissions as described in California’s 2022 Climate Change Scoping Plan (CARB 2022), the California Forest Carbon Plan (Forest Climate Action Team 2018), and the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (CARB 2019). Since the project is consistent with the latest Climate Change Scoping Plan measures, it is on target to achieve the legislated GHG emission target for 2030 and substantially advance toward the 2050 climate goals. Additionally, it would be consistent with the Napa County General Plan (Napa County 2008), which contains goals and policies relating to fire protection and wildland fire prevention through the use of controlled burns, fuel removal, and fire breaks. Napa County is currently in the process of drafting a comprehensive climate action plan for unincorporated areas of Napa County, therefore, there is not a climate action plan applicable to the proposed project. SPRs applicable to this treatment are AD-3. SPR AD-3 requires that the treatment design be consistent with local plans, policies, and ordinances. Impacts related to GHG emissions from these types of treatment activities are within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions are consistent with those analyzed in the PEIR. SPR GHG-1 is not applicable to the proposed project, as the project is not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection’s AB 1504 Carbon Inventory Process because this project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. However, within the boundary of the Project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape as well as in areas within the treatable landscape; therefore, the GHG impact is also the same as described above.</p> | | | | | | |
| Impact GHG-2: Generate Greenhouse Gas Emissions through Treatment Activities | Impact GHG-2, 3.8 | PSU | <u>SPR AQ- 3</u> | Yes | SU | <input checked="" type="checkbox"/> |
| <p>The use of vehicles and mechanical equipment, prescribed herbivory, herbicide application, and prescribed burning during initial and maintenance treatments would result in GHG emissions. However, these treatments would have relatively low GHG emissions compared to GHG emissions from catastrophic wildfires. Wildfire hazards, including wildfire intensity and rate of spread could be somewhat reduced through implementation of the Project. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR and found to be potentially significant and unavoidable. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and</p> | | | | | | |

the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire, are consistent with those analyzed in the PEIR. MM GHG-2 would be implemented and would reduce GHG emissions associated with pile burning by burning when fuels have a higher fuel moisture content, reducing the total area burned by mosaic burning and isolating and leaving large fuels unburned, and by scheduling burns before new fuels appear. Treatment activities would contribute to annual GHG emissions generated under the CalVTP, and this impact would fall within the finding of the PEIR of potentially significant and unavoidable. Methods for reducing GHG emissions from burns would be integrated into SPR AQ-3 (Burn Plan) as described in MM GHG-2.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, GHG emissions and associated climate change impacts are global in nature and are not contained within the boundary of the treatable areas. Therefore, the GHG impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Other Impacts to related to Greenhouse Gases: Would the project result in other impacts related to greenhouse gases that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (Section 3.8.1, Regulatory Setting, and Section 3.8.2, "Environmental Setting" in Volume II of the Final PEIR).

The inclusion of land that is outside of the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape as within it. Likewise, the climate conditions are the same within the treatable landscape as they are just outside of it for this project. Therefore, impacts of the proposed project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape since the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year would not give rise to any new significant impacts. No new impact related to GHG emissions would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types. | No | N/A | <u>N/A</u> |
| The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net | | | |

change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

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| <p>MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
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When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in NWCG (2020):

- Reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned;
- Reduce the total area burned through mosaic burning;
- Burn when fuels have a higher fuel moisture content;
- Reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and
- Schedule burns before new fuels appear.

As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces bio-oil that can be used as liquid fuel and/or syngas that can be used to generate electricity.

The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.

EC-8 ENERGY

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy | Impact ENG-1, 3.9 | LTS | N/A | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The use of vehicles and mechanical equipment during initial treatment and treatment maintenance activities would result in the consumption of energy in the form of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR and found to be less than significant. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. Diesel and petroleum-based fuels, such as gasoline, would be consumed from the use of heavy-duty equipment and trucks, mechanical equipment, and the transport of personnel and equipment to and from and within the project site. The project would support fire prevention and suppression. Wildfire response requires an immediate response from emergency personnel and mobilization of equipment from across the state and even across the nation, which often results in inefficient consumption of energy. Implementation of treatment activities would reduce wildfire risk and the intensity of fire responses.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions are essentially the same within and outside the treatable landscape, and the types of treatment activities and associated use of energy are of the same scale and scope as analyzed in the PEIR; therefore, the energy impact is also the same. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.</p> | | | | | | |
| Other Impacts to Energy Resources: Would the project result in other impacts to energy resources that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
| <p>The project proponent has considered the site-specific characteristics of the proposed treatment project both inside and outside the treatable landscape and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (Sections 3.9.1, "Regulatory Setting" and 3.9.2, "Environmental Setting" in Volume II of the Final PEIR) since the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. Therefore, the impacts of the proposed project are consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to energy resources would occur.</p> | | | | | | |

EC-9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials | Impact HAZ-1, 3.10 | LTS | <u>SPR HAZ- 1</u> <u>SPR HYD-4</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project would involve mechanical treatments, manual treatments, prescribed herbivory, herbicide application, and prescribed burning. Prescribed burning treatments would include prescribed pile burning and prescribed broadcast burning. These activities would require the use of various types of equipment and vehicles, which require the use of fuels, oils, and lubricants, which are hazardous materials. Accelerants would be used to implement prescribed burns; however, fire ignition (including use of accelerants) would not occur in the protection zones for watercourses (SPR HYD-4); therefore, water quality would not be affected. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was analyzed in the PEIR and the impacts were found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. All equipment associated with the proposed project would comply with SPR HAZ-1, which ensures that equipment is properly maintained to minimize leaks. Herbicide application impacts are discussed under Impact HAZ-2, below.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, regulatory conditions and the use of hazardous materials are essentially the same within and outside the treatable landscape. Therefore, the impact related to the use of hazardous materials is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides | Impact HAZ-2, 3.10 | LTS | <u>SPR HAZ- 5, 6, 7, 8, 9</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project would include herbicide application to control species that increase wildfire hazards and promote ecological restoration. Herbicide application would involve transportation, use, storage, and disposal of herbicides, which could result in risks related to human exposure when applied in areas in close proximity to areas accessed by the public. However, Las Posadas Forest is not open to the public, and herbicide application would not result in risks related to human exposure. Additionally, only ground-level application would occur; no aerial spraying of herbicides would occur. The potential for treatment activities to create a significant health hazard from the use of herbicides was analyzed in the PEIR and the impacts were found to be less than significant. The potential impacts related to the use of herbicides during treatment activities are within the scope of the activities and impacts discussed within the PEIR because the types of herbicides and application methods that would be used, are limited to ground-based applications, which are consistent with those analyzed in the PEIR. Herbicides may be applied directly (by hand or backpack sprayer) to invasive plants and noxious weeds to minimize the spread and eliminate re-sprouting of invasive species to reduce wildfire risk within the treatment areas. Under the CalVTP, herbicide treatment application must comply with all EPA label directions as well as be applied by licensed applicators in compliance with all laws and regulations. The project would comply with SPR HAZ-5 through HAZ-9, which requires preparation of a Spill Prevention and Response Plan prior to any herbicide treatment activities to provide protection to workers, the public, and the environment from accidental spills or leaks of herbicides; compliance with herbicide application regulations to protect worker and public safety; triple rinsing herbicide containers and disposal of rinsed materials</p> | | | | | | |

at an approved site and disposal of all herbicides following label requirements and waste disposal regulations; minimization of herbicide drift into public areas through application parameters such as limitations for nozzle pressure and nozzle distance from vegetation; and notification of herbicide application within 500 feet of public areas by posting signs at herbicide treatment areas.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential exposure to herbicides is essentially the same within and outside the treatable landscape. Therefore, the impact related to the potential for the project to result in a significant health hazard from the use of herbicides is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites | Impact HAZ-3, 3.10 | PS | <u>MM HAZ-3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
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The project would include mechanical treatments such as the use of tractors, loaders, skid steers, and masticators but would not involve digging or tree stump removal. These mechanical treatments could, however, potentially result in some degree of ground disturbance, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. Additionally, prescribed burning activities could lead to unexpected ignitions should ignitable hazardous waste be present, which could expose workers to risks associated with unexpected fire or explosions. The potential for the treatment activities to encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR and was identified as potentially significant. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards. In evaluating the potential for effects related to the proposed project, database searches for hazardous materials sites within the project area were conducted as directed by MM HAZ-3 (Department of Toxic Substances Control [DTSC] 2024, State Water Resources Control Board [SWRCB] 2024a). There are no sites located within the Project area. However, four hazardous materials sites were identified within 1 mile of the treatment project area, as listed below.

- PUC Heating Plant (T0605500127) was identified on Angwin Avenue approximately 0.9 miles northwest of the project area. A leaking underground storage tank (LUST) was identified on-site, potentially contaminating the soil with waste oil, motor oil, hydraulic fluid and lubricating fluids; however, the site was cleaned up and the case was closed in 1994 (SWRCB 2024b).
- Pacific Union College heating Plant (T0605591456) was identified on Angwin Avenue within approximately 0.9 miles northwest of the project area. A LUST was identified on-site, potentially releasing gasoline; however, the site was cleaned up and the case was closed in 1994 (SWRCB 2024c).
- Parrett Field – Pacific Union College Airport (T0605591457) was identified on Angwin Avenue within approximately 0.9 miles northwest of the project area. A LUST was identified on site, potentially releasing gasoline; however, the site was cleaned up and the case was closed in 2001 (SWRCB 2024d).
- Pacific Union College Physical Science (T0605500267) was identified on Highland Oaks Drive within approximately 0.8 miles northwest of the project area. A LUST was identified on-site, potentially contaminating groundwater (used for purposes other than drinking) and soil with diesel. However, the site was cleaned up and the case was closed as of 2002 (SWRCB, 2024e).

None of the listed hazardous sites are located within the treatment areas and all the sites have been cleaned up and the cases closed. In addition, the proposed project would not involve ground disturbance outside of the project area that would have the potential to disturb contaminated sites. Therefore, this impact is less than significant. No SPRs are applicable to this impact and no additional mitigation is required.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the hazardous materials impact related to exposing the public or environment to hazards from disturbance of known hazardous material sites is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Other Impacts to Hazardous Materials, Public Health and Safety: Would the project result in other impacts to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed project and determined that they are in compliance with the applicable environmental and regulatory setting conditions presented in the CalVTP PEIR (Volume II, 3.10.1 and 3.10.2). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts are the same and the impacts of the proposed project are also consistent with those covered in the PEIR. No changed circumstances would create new significant impacts not addressed in the PEIR and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. This SPR applies to all treatment activities and treatment types. | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. | | | |
| SPR HAZ-2 Require Spark Arrestors: This SPR applies only to manual treatment activities and all treatment types | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |

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| <p>The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent's crews will carry one fire extinguisher per chainsaw and vehicles will be equipped with one long-handled shovel and one axe or Pulaski. All applicable laws and regulations regarding operations in private or state-owned timberlands during fire season will be followed. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HAZ-4 Prohibit Smoking in Vegetated Areas. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. This SPR applies only to herbicide treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent or licensed Pest Control Advisor will prepare a Spill Prevention and Response Plan prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The Spill Prevention and Response Plan will include (but not be limited to):</p> <ul style="list-style-type: none"> • A map that delineates staging areas, and storage, loading, and mixing areas for herbicides; • A list of items required in an onsite spill kit to be maintained throughout the life of the activity; • Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p> <p><i>Project-Specific Implementation</i></p> <p>Herbicide application will not occur within protective buffers for special-status plants to prevent drift and non-target application.</p> | | | |
| <p>SPR HAZ-6 Comply with Herbicide Application Regulations. This SPR applies only to herbicide treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |

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| <p>The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will ensure all herbicide applications adhere to the following:</p> <ul style="list-style-type: none"> • Be implemented consistent with recommendations prepared annually by a licensed Pest Control Advisor. • Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. • Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. • Be applied by an applicator appropriately licensed by the State. <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance</p> | | | |
| <p>SPR HAZ-7 Triple Rinse Herbicide Containers. This SPR applies only to herbicide treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During-Post | <u>CAL FIRE</u> |
| <p>The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HAZ-8 Minimize Herbicide Drift to Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| <p>The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas:</p> <ul style="list-style-type: none"> • Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); • Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; • Low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and • Spray nozzles will be kept within 24 inches of vegetation during spraying. <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| <p>For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The</p> | | | |

signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.

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| <p>MM HAZ-3: Identify and Avoid Known Hazardous Waste Sites. Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior</p> | <p><u>CAL FIRE</u></p> |
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Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (<https://www.envirostor.dtsc.ca.gov/public/>) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.



EC-10 HYDROLOGY AND WATER QUALITY

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning | Impact HYD-1, 3.11 | LTS | <u>SPR HYD- 1, 4</u> <u>SPR AQ- 3</u> <u>SPR BIO- 5</u> <u>SPR GEO- 4, 6</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project's initial and maintenance treatments would include prescribed broadcast burning and pile burning. High intensity fires can result in high severity burns where soils become water repellent and increased runoff carries ash, sediment, and debris into downstream watercourses. However, the patchwork of low and moderate intensity fire in a prescribed burn would preserve vegetated islands to capture runoff and sediment and WLPZs would be persevered to act as buffers around watercourses. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the use of pile burning and low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-3, HYD-1, HYD-4, BIO-4, GEO-4, GEO-6. SPR AQ-3 requires a Burn Plan using the CAL FIRE burn plan template for all prescribed burns. SPR HYD-1 requires that the treatments comply with the water quality regulations. SPR HYD-4 establishes watercourse and Lake Protection Zones (WLPZ) ranging from 50 to 150 feet be implemented for watercourses that are within treatment areas, and burn piles are located outside of WLPZs. SPR BIO-5 will ensure that the design of the treatment activities will be timed to mimic the natural fire return interval and avoid type conversion where native coastal sage scrub and chaparral is present. SPR GEO-4 requires erosion monitoring after the first large storm or rainfall event and SPR GEO-6 limits burn pile length, width, or diameter to not exceed 20 feet. These SPRs would avoid and minimize the risk of substantial water quality degradation by implementation of prescribed burning and pile burning, making the impact less than significant.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. A portion of the proposed treatment area also includes a portion of Las Posadas Forest, at high elevation, located within the vicinity of Moore Creek, which is outside the CalVTP treatable landscape (California Board of Forestry and Fire Protection, 2024). Other portions of Moore Creek both upstream and downstream from this location are included in the CalVTP treatable landscape. The surface water conditions in the proposed treatment area are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities | Impact HYD-2, 3.11 | LTS | <u>SPR HYD- 1, 4, 5</u> <u>SPR BIO- 1</u> <u>SPR GEO- 1, 2, 3, 4, 5</u> <u>SPR HAZ- 1, 5</u> | Yes | LTS | <input checked="" type="checkbox"/> |

This project would include mechanical and manual treatments. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the use of heavy equipment and handheld tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are BIO-1, GEO-1 through GEO-5, GEO-7, GEO-8, HYD-1, HYD-4, HYD-5, HAZ-1, and HAZ-5. SPRs HYD 1, HYD-4, and GEO-4 are described under Impact HYD-1. SPRs GEO-1 through GEO-5 require limitations to ground disturbance during precipitation or heavy equipment operation over saturated soils, stabilization of highly disturbed areas, inspection of treatment areas for erosion and remediation prior to the rainy season and following the first large storm or rainfall even. SPRs GEO-7 and GEO-8 limit equipment operation on steep or unstable slopes to prevent erosion. SPR BIO-1 requires the review and survey of specified biological resources by an RPF or biologist to conduct surveys no more than one year prior to the submittal of the PSA. SPR HAZ-1 requires that all equipment be maintained and regularly inspected for leaks. SPR HAZ-5 requires preparation of a Spill Prevention and Response Plan (SPRP) and having a spill kit on site. These SPRs would avoid and minimize the risk of substantial water quality degradation by implementation of mechanical and manual treatments, making the impact less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. As described in Impact HYD-1, a small portion of the proposed treatment area located along Moore Creek is outside the CalVTP treatable landscape. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| <p>Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory</p> | <p>Impact HYD-3, 3.11</p> | <p>LTS</p> | <p><u>SPR HYD- 3</u> <u>SPR GEO-3</u></p> | <p>Yes</p> | <p>LTS</p> | <p><input checked="" type="checkbox"/></p> |
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Project treatments would include prescribed herbivory to reduce fuel loads and may be used for treatment maintenance or as a pre-treatment before implementation of other methods. The prescribed herbivory livestock used as part of the proposed project would involve use of cattle, goats, or sheep and would require the installation of temporary fencing where natural barriers are not present. The use of temporary water facilities for the livestock and guard animals and/or shepherd, as well as other temporary infrastructure (e.g., tanks, corrals, fences), would be required with the use of prescribed herbivory as a treatment method. The potential for prescribed herbivory treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR and was found to be less than significant. SPRs applicable to this treatment are HYD-3 and GEO-3. SPR HYD-3 includes best practices to avoid impacts to water quality caused by grazing animals, including providing water outside of environmentally sensitive areas, herding grazing animals out of an area if accelerated soil erosion is observed, and implementing an approximate 50ft buffer between sensitive and actively grazed areas using temporary fencing or active herding. SPR GEO-3 requires stabilization of soil disturbed during prescribed herbivory treatments. These SPRs avoid and minimize the risk of substantial water quality degradation by implementation of prescribed herbivory treatment, making the impact less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. As described in Impact HYD-1, a small portion of the proposed treatment area located along Moore Creek is outside the CalVTP treatable landscape. However, within the boundary of the Project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed herbivory treatments is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| <p>Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides</p> | <p>Impact HYD-4, 3.11</p> | <p>LTS</p> | <p><u>SPR HYD- 5</u> <u>SPR BIO- 4</u> <u>SPR HAZ- 5, 7</u></p> | <p>Yes</p> | <p>LTS</p> | <p><input checked="" type="checkbox"/></p> |
| <p>Project treatments could include targeted herbicide application to kill, or prevent regrowth of, invasive plants, target species, and noxious weeds. No aerial spraying of herbicides would occur. Herbicides would be applied in adherence with all US EPA, California Environmental Protection Agency (CalEPA), and California Department of Pesticide Regulation regulations. The use of herbicides has the potential to violate water quality standard regulations or degrade water quality, which was examined in the PEIR, and was found to be less than significant. SPRs applicable to this treatment are HYD-5, BIO-4, HAZ-5, and HAZ-7. All applicable SPRs listed, except SPR HAZ-7, are described in Impacts HYD-1 through Impact HYD-3. SPR HAZ-7 ensures that herbicide containers are triple rinsed. Any used containers will be rendered unusable by puncturing the top and the bottom unless the containers are a part of a manufacturers recycling program. Containers will be disposed at legal dumpsites and disposal of all herbicides will follow label requirements and waste disposal regulations. These SPRs avoid and minimize the risk of substantial water quality degradation by implementation of herbicide treatment, thereby making the impacts less than significant.</p> <p>The inclusion of land in the project that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. As described in Impact HYD-1, a small portion of the proposed treatment area located within the vicinity of Moore Creek is outside the CalVTP treatable landscape. However, within the boundary of the Proposed treatment area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they have similar environmental conditions and the same regulatory setting. Potential impacts outside the treatable area are within the scope of the activities and impacts addressed in the PEIR because the methods of herbicide application, transportation, storage, and disposal are consistent with those analyzed in the PEIR with implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| <p>Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area</p> | <p>Impact HYD-5, 3.11</p> | <p>LTS</p> | <p><u>SPR HYD- 4, 6</u> <u>SPR GEO- 5</u></p> | <p>Yes</p> | <p>LTS</p> | <p><input checked="" type="checkbox"/></p> |
| <p>Some of the project treatments could cause ground disturbance and minor erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatments to violate water quality standard regulations or degrade water quality was examined in the PEIR, and the impacts were found to be less than significant. As described in the PEIR, these activities would have minor impacts to on-site drainage with the implementation of SPRs. The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment and treatment activities are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are GEO-5, HYD-4, and HYD-6. All applicable SPRs listed are described in Impacts HYD-1 through HYD-4, except HYD-6. SPR HYD-6 provides protection for existing drainage systems during ground-disturbing activities to maintain pre-project drainage conditions. If any drainage or filtration system is inadvertently disturbed or modified, the project proponent will meet with the owner of the system to repair any damage. These SPRs would avoid and minimize the risk of substantially altering of the existing drainage pattern, thereby making the impacts less than significant.</p> <p>The inclusion of land that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed treatment area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, and existing drainage patterns pass through both areas. Therefore, the impact related to the alteration of site drainage patterns is also the same. The potential for those treatments to substantially alter the existing drainage patterns of a</p> | | | | | | |

project site was evaluated in the PEIR and was found to be less than significant with implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Other Impacts to Hydrology and Water Quality: Would the project result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The proposed treatments are consistent with the treatment types and activities addressed in the PEIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (Sections 3.11.1, "Regulatory Setting" and 3.11.2, "Environmental Setting" in Volume II of the Final PEIR). The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the hydrology, water quality, and treatment methods are consistent with those analyzed in the PEIR; thus, they are also within the scope of the PEIR. Additionally, the existing environmental and regulatory conditions pertinent to hydrology and water quality are also consistent within, as well as outside, of the treatable landscape included in this project area. No changed circumstances would create new significant impacts not addressed in the PEIR and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impacts related to hydrology and water quality would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
|--|------------|---|-----------------------------|
| <p>SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>Project proponents must also conduct proposed vegetation treatments in conformance with appropriate Nonpoint Source Pollution (NPS) Vegetation Treatment General Order, RWQCB timber, vegetation, and land disturbance-related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general WDRs and WDR waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDRs and Waivers of WDRs for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> <p><i>Project-Specific Implementation</i></p> <p>Vegetation treatment activities may result in discharges to waters of the state; therefore, compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code</p> | | | |

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| <p>compliance for projects that prepare a PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.</p> | | | |
| <p>SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> <p><i>Project-Specific Implementation</i></p> <p>No new roads will be created as part of Project implementation.</p> | | | |
| <p>SPR HYD-3 Water Quality Protections for Prescribed Herbivory: This SPR applies to prescribed herbivory treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will include the following water quality protections for all prescribed herbivory treatments:</p> <ul style="list-style-type: none"> • Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. • Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. • Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. <p>This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916 .5 of the California Forest Practice Rules on either side of watercourses. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will establish WLPZs on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (CAL FIRE 2019). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.</p> <p>All watercourses will have established WLPZ buffers identified in PEIR (See below for specific classifications)</p> | | | |

Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)

| Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths | | | | |
|--|---|--|--|--|
| Water Class | Class I | Class II | Class III | Class IV |
| Water Class Characteristics or Key Indicator Beneficial Use | 1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning. | 1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters. | No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations. | Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use. |
| WLPZ Width (ft) – Distance from top of bank to the edge of the protection zone | | | | |
| < 30 % Slope | 75 | 50 | Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis. | |
| 30-50 % Slope | 100 | 75 | | |
| >50 % Slope | 150 | 100 | | |

The following WLPZ protections will be applied for all treatments:

- Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
- Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
- Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.
- WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.

- Burn piles will be located outside of WLPZs.
- No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.
- Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, riprap, grass seeding, or chemical soil stabilizers.
- Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse.
- Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes.
- Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

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| <p>SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: This SPR applies to herbicide treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
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- The project proponent will implement the following measures when applying herbicides:
- Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.
 - Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.
 - No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including but not limited to protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA.
 - No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools.
 - For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray.

- Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative);
- No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities.

This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.

SPR HYD-6 Protect Existing Drainage Systems: This SPR applies to all treatment activities and treatment types.

Yes

CAL FIRE
During-Post

CAL FIRE

If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

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EC-11 LAND USE AND PLANNING, POPULATION AND HOUSING

| | PEIR specific | | | Project specific | | |
|--|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation | Impact LU-1, 3.12 | LTS | <u>SPR AD-3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Initial treatment and treatment maintenance activities would take place on public lands within the Las Posadas Demonstration State Forest in Napa County. SPR AD-3 (Consistency with Local Plans, Policies, and Ordinances) requires that the Project proponent design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans), policies, and ordinances to the extent the Project is subject to them. While the project is not located within the jurisdiction of Napa County, it borders land on all sides which is under the jurisdiction of Napa County and the treatment area itself is classified as a "Agriculture, Watershed & Open Space" land use, and "Agricultural Watershed" and "Airport Compatibility" zones by Napa County (Napa County 2008). The potential for treatment activities to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the PEIR and was found to be less than significant. The potential for vegetation treatment activities to cause a significant environmental impact is within the scope of the PEIR because the treatment types and activities are consistent with those evaluated in the PEIR. SPR AD-3 is applicable to the proposed project, and it requires proposed project treatments to be consistent with local plans, policies, and ordinances.</p> <p>The inclusion of land in the proposed treatment area that are outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, because the land uses in the project area are generally the same within and outside the treatable landscape, the land use impact is also the same. No conflict would occur because the project proponent would adhere to SPR AD-3. This determination is consistent with the PEIR and would not constitute a more severe impact than that which is described in the PEIR.</p> | | | | | | |
| Impact LU-2: Induce Substantial Unplanned Population Growth | Impact LU-2, 3.12 | LTS | N/A | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The PEIR evaluated the potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees, which was found to be less than significant. Impacts associated with a short-term increase in the demand for workers during construction of the treatment project are within the scope of the PEIR because the number of workers required for the proposed project is consistent with the crew size analyzed in the PEIR for the types of treatments proposed.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape is considered a change to the geographic extent presented in the PEIR. However, because the population and housing characteristics of the project area are basically the same within and outside the treatable landscape, the population and housing impact is also the same, as described above. There are no SPRs applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than that which was evaluated in the PEIR.</p> | | | | | | |

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| <p>Other Impacts related to Land Use and Planning, Population and Housing: Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the CalVTP PEIR?</p> | | | | No | N/A | ☑ |
| <p>The proposed project is consistent with the treatment types and activities described in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed project and determined they are consistent with the applicable environmental and regulatory conditions described in the CalVTP PEIR (refer to Sections 3.12.1, “Environmental Setting” and 3.12.2, “Regulatory Setting” in Volume II of the Final PEIR). The project proponent has also determined that including land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the Project area boundary, the existing conditions relevant to land use and planning, population, and housing that are present in the areas outside the treatable landscape are very similar to those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those disclosed in the PEIR. No changed circumstances are present and the inclusion of lands outside the CalVTP treatable landscape would not result in any new significant impacts. In conclusion, no new impact related to land use and planning, population, and housing would occur.</p> | | | | | | |

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EC-12 NOISE

| | PEIR specific | | | Project specific | | |
|--|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation | Impact NOI-1, 3.13 | LTS | <u>SPR NOI-1, 2, 3, 4, 5, 6</u> <u>SPR AD-3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project treatment activities that have the potential for a short-term increase in ambient noise level include manual treatments and ground-based mechanical treatments. All treatments except herbivory would be expected to take place during daylight hours of 8 A.M to 5 P.M. and would be implemented by CAL FIRE teams under the discretion of the CAL FIRE Forest Manager. While the project is not located within the jurisdiction of Napa County, it borders land on all sides which is under the jurisdiction of Napa County and the project would comply with Napa County Code of Ordinances Section 8.16 (Napa County, 2024). If implementation of non-herbivory treatments is required on weekends or holidays, work will occur between 7:00 am and 7:00 pm to operate within County Noise Municipal Code threshold. During prescribed burning, crews, and cultural practitioners would potentially conduct some maintenance burning on weekends to manage overall smoke impacts. Noise-generating treatments would comply with the local noise regulations.</p> <p>As noted in the PEIR, prescribed herbivory would not require the use of heavy off-road equipment and noise generated by this treatment type would be negligible. However, prescribed herbivory would potentially occur 24-hours per day outside of the County Noise Municipal Code threshold. Furthermore, the Napa County Municipal Code outlines specific animal noise ordinances on agricultural land which prohibit keeping animals which make any frequent or long-continued noise, or any noise which is audible continuously for ten minutes or intermittently for thirty minutes that would cause annoyance or discomfort to two or more reasonable persons (Napa County, 2024). However, due to the topography, density of vegetation cover on site, and distance from sensitive off-site receptors, prescribed herbivory would be unlikely to cause an audible disturbance, discomfort, or annoyance to nearby noise sensitive receptors. Given this, impacts related to animal noises as a result of prescribed herbivory would comply with Napa County Code of Ordinances Section 8.16, and would be negligible, consistent with the PEIR.</p> <p>Work would commence upon acceptance of the PSA and addendum. Multiple crews may be working at the same time and using mechanical and manual methods that may generate varying noise levels, temporarily increasing ambient noise in the vicinity. Due to the nature of the proposed project, as well as the distance of private residences and other noise-sensitive land uses, noise exposure would be minimal and temporary. The proposed project would be implemented on State land located in the Los Posadas Forest within Napa County. The potential for treatment activities to cause substantial short-term increases in exterior ambient noise level was addressed in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment, and thus the noise generated, are consistent with those analyzed in the PEIR. SPRs applicable to the proposed project include AD-3, which requires the treatments to be consistent with local plans, policies, and ordinances. Manual and mechanical treatments would be within the Napa County Code of Ordinances construction noise requirements, which outlines noise thresholds for construction activities at the affected property type. Property types are separated into residential, commercial, and industrial. During the hours of 7 a.m. to 7 p.m. thresholds for construction are 75 dBA, 80 dBA, and 85 dBA respectively. Residents located approximately 450 feet from the treatment activities will be below the 75 dBA threshold. Commercial facilities located approximately 250 feet from the treatment activities will be below the 80 dBA threshold. Industrial facilities located approximately 150 feet from the treatment activities will be below the 85 dBA threshold. Based on aerial images, it does not appear that there will be any residents or facilities within this distance of specific treatment areas.</p> | | | | | | |

This demonstrates that all work would be within the allowable limits, per SPR AD-3. Additional SPRs applicable to the proposed project include NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6. SPRs NOI-1 through NOI-6 would require that heavy equipment be used only during daytime hours, all equipment be properly maintained, engine shrouds be closed during mechanical equipment operation and idle time be restricted to 5 minutes, all staging areas be placed away from noise sensitive land types, and any noise sensitive receptors be notified ahead of work to ensure impacts to ambient noise levels would be less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. The added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. The existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they would be subject to the same noise ordinances and would have similar noise-sensitive receptors. Therefore, the noise impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities | Impact NOI-2, 3,13 | LTS | SPR NOI-1, 2, 3, 4, 5, 6 SPR AD- 3 | Yes | LTS | <input checked="" type="checkbox"/> |
|--|-----------------------|-----|---------------------------------------|-----|-----|-------------------------------------|

Project treatment activities would require large trucks to haul equipment and crews to the Project site. While trucks would pass residential sensitive receptors, it is not anticipated that project traffic would result in a substantial increase in truck-generated noise along local roads. These large trucks have the potential for a substantial short-term increase in single event noise levels (SENL), but trucks would only be in use during work hours from 8:00 a.m. to 5:00 p.m., or if outside those hours, in compliance with local noise ordinances (see Impact NOI-1). The SENL describes a receiver's cumulative noise exposure from a single impulsive noise event (e.g., an automobile passing by or an aircraft flying overhead), which is defined as an acoustical event of short duration and involves a change in sound pressure above some reference value. The impacts are within the scope of the PEIR because the treatment activities and methods are the same as those analyzed in the PEIR. Vegetation treatment activities under the CalVTP would be required to adhere to SPR NOI-1, which limits vegetation treatment to daytime hours and would not generate SENLs associated with vehicle trips that would result in sleep disturbance. SPRs applicable to this treatment are AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6, described under Impact NOI-1. The potential for a substantial short-term increase in SENL during the Project treatments was evaluated in the PEIR and was found to be less than significant with the implementation of these SPRs.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. For much of the project area, the existing roadway network and access roads used by the worker vehicles and trucks for hauling would be the same to reach the treatable landscape inside the CalVTP as outside the CalVTP. The portions of the project Area that are not within the treatable landscape are within close vicinity of CalVTP treatable landscape areas, the types of sensitive receptors located along existing roads and access roads would be the same as those covered in the PEIR. Therefore, the noise impact is also the same as described above and would be less than significant with the application of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Other Impacts Related to Noise: Would the project result in other impacts related to noise that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (Sections 3.13.1, “Environmental Setting” and 3.13.2, “Regulatory Setting” in Volume II of the Final PEIR).

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as previously described. The proposed project is consistent with the types of projects covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not analyzed in the PEIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| <p>SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| <p>The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR NOI-2 Equipment Maintenance: All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. This SPR applies to all activities and all treatment types.</p> | Yes | <u>CAL FIRE</u> During | <u>CAL FIRE</u> |
| <p>The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.</p> | | | |

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| <p>SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses. This SPR applies to all treatment activities and treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. This SPR applies only to mechanical treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> During</p> | <p><u>CAL FIRE</u></p> |
| <p>For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p> | | | |

EC-13 RECREATION

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas | Impact REC-1, 3.14 | LTS | <u>SPR REC- 1</u> <u>SPR AD- 3</u> | Yes | N/A | <input checked="" type="checkbox"/> |
| <p>Initial treatment and treatment maintenance activities would be implemented and managed by Cal FIRE and would take place on land entirely within the Las Posadas Demonstration State Forest. The on-site general plan land use category is Agriculture, Watershed, and Open Space and the appropriate zoning designations are (AC) Airport Compatibility in the north portion and (AW) Agricultural Watershed in the southern portion. There are multiple recreational trails in the vicinity of the project site.</p> <p>Access to some treatment areas would rely on trails, which are not used recreationally. The LPDSF is not open for public recreation. Additionally, the Proposed Project may affect recreational activities near the Pacific Union College or the adjacent open scape parcel. The potential for treatment activities to directly or indirectly disrupt recreational activities within designated recreation areas was evaluated in the PEIR and was found to be less than significant. The potential for vegetation treatment and maintenance activities to cause a significant environmental impact is within the scope of the PEIR because the treatment types and activities are consistent with those evaluated in the PEIR. SPR AD-3 is applicable to the proposed project, and it requires proposed Project treatments to be consistent with local plans, policies, and ordinances relevant to recreation, which include general plans, zoning ordinances, and adopted policies to avoid conflicts with recreational uses. SPR REC-1 is not applicable to the proposed project. The potential for the proposed treatment project to impact recreation is within the scope of the PEIR and would be less than significant because the treatment activities and intensity are consistent with those analyzed in the PEIR.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the availability of recreational resources within the Project area is essentially the same as outside the treatable landscape because the areas are near to each other, and the recreational users would be the same. Impacts to recreation would be the same as previously described and would be less than significant. Implementation of SPRs AD-3 and REC-1 would minimize disruption to recreational activities within the Project area. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.</p> | | | | | | |
| Other Impacts to Recreation: Would the project result in other impacts to recreation that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
| <p>The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.14.1, "Environmental Setting" and 3.14.2, "Regulatory Setting" in Volume II of the Final PEIR).</p> <p>The inclusion of land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the existing environmental conditions pertinent to recreation that are present in the areas</p> | | | | | | |

outside the treatable landscape are essentially the same as those within the treatable landscape, as described previously. The proposed Project is consistent with the types of projects covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
|---|------------|---|-----------------------------|
| <p>SPR REC-1 Notify Recreational Users of Temporary Closures. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure approximately 2 weeks prior to the commencement of the treatment activities. This SPR applies to all treatment activities and treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located.</p> | | | |

EC-14 TRANSPORTATION

| | PEIR specific | | | Project specific | | |
|---|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact TRAN-1: Result in temporary traffic operations impacts by conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures | Impact TRAN-1, 3.15 | LTS | <u>SPR TRAN- 1</u> <u>SPR AD- 3</u> | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project would require the use of public roadways to access existing roads and trails leading to the specific treatment areas. Project-related traffic would include heavy-vehicle trips to haul equipment and materials and worker commute trips to and from the treatment areas. Crew sizes may vary depending on the treatment activity but would be consistent with the CalVTP Table 3.15-4 and would not be typically more than 45 workers for the most labor-intensive vegetation treatments. The number of truck trips and worker vehicle trips to and from the Project area would vary based on the size of the area being treated, the type of treatment being implemented, and the duration of the vegetation treatments. No road closures would be necessary for the implementation of this project. The potential for a temporary increase in vehicle traffic associated with the proposed project work to conflict with a program, plan, ordinance, or policy addressing roadway facilities, or for prolonged road closures, was examined in the PEIR and found to be less than significant. The proposed temporary increases in traffic related to the project is within the scope of the PEIR because the treatment duration and limited number of vehicles (e.g., fire engine, water tender, masticator transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the PEIR. The proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed on multiple roads, including local roads. Furthermore, except for the established evacuation route on-site for the Town of Angwin, the site is not open to the general public. It is unlikely the evacuation route would be impacted as equipment, vehicles, and personnel would not block the evacuation route during treatment activities. Furthermore, the reduction in vegetation adjacent to the route as a result of treatment would improve the line of sight for any users of the road. Therefore, once on-site there will be limited transportation related impacts to the general public. SPRs applicable to this treatment are AD-3 and TRAN-1. Implementing SPR AD-3 requires the treatments to be consistent with local plans, policies, and ordinances, and SPR TRAN-1 would require that the project proponent implement a traffic management plan (TMP) and that traffic control measures be placed on affected roadways during Project treatment activities, should those activities result in obstructions, delays or hazards exceeding applicable jurisdictional standards. This will work to minimize potential traffic obstructions, hazards, and service level degradation along affected roadway facilities, including the evacuation route.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing transportation conditions (e.g., roadways, road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they continue beyond the treatable landscape and are under the same jurisdictions and would be subject to the same programs, plans, ordinances, or policies regarding roadway facilities and closures. Therefore, the transportation impact is also the same and would be less than significant with the implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Impact TRAN-2: Substantially increase hazards due to a design feature or incompatible uses | Impact TRAN-2, 3.15 | LTS | <u>SPR TRAN- 1</u> <u>SPR AD-3</u> | Yes | LTS | <input checked="" type="checkbox"/> |

The project treatment activity that would have the potential to increase transportation hazards during proposed treatment and maintenance activities would be the use of prescribed burning, due to the smoke produced, which could temporarily affect visibility on nearby roadways. The potential for smoke to affect visibility along roadways during implementation of prescribed burning was examined in the PEIR and was found to be less than significant. Prescribed burning would be conducted in compliance with the local authority having jurisdiction or with the Fuel Reduction Burn Permit or LE-5 issued by the local CAL FIRE Battalion Chief. It would also be coordinated with resource agencies such as the Bay Area Air Quality Management District (BAAQMD). CAL FIRE would report site conditions and request approval to burn through PFIRS, which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California. The previously mentioned evacuation route is existing, and project treatments will not alter the location nor condition of the road. Additionally, no project-related equipment, vehicles, or personnel would block or impede traffic on the escape route at any time. Moreover, project treatments will reduce the density of vegetation along the road, improving line of sight and safety of motorists. SPRs applicable to this treatment are AD-3 and TRAN-1, described above under Impact TRAN-1. Under this SPR, The project proponent would prepare and implement a TMP to avoid and minimize temporary transportation impacts under this SPR. Direct and indirect smoke impacts related to roadway visibility driver distraction would also be considered during this process. Therefore, the project treatment activities would not substantially increase hazards due to a design feature or incompatible uses, and impacts would be less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The project area includes land that is outside the CalVTP treatable landscape. While this constitutes a change to the geographic area considered in the PEIR, the existing environmental conditions for the land outside the treatable landscape and on the land inside the treatable landscape are essentially the same. The existing transportation conditions (e.g., roadways, road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they continue beyond the treatable landscape. Therefore, the potential to increase hazards is the same for project areas outside the CalVTP treatable landscape as for areas within the treatable landscape. As a result, the impact to increased hazards is also the same and within the scope of the PEIR. The project would result in a less-than-significant impact related to increasing road hazards and would not result in a more significant impact than covered in the PEIR.

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| Impact TRAN-3: Result in a net increase in VMT for the proposed CalVTP | Impact TRAN-3, 3.15 | PSU | N/A | Yes | LTS | <input checked="" type="checkbox"/> |
|---|---------------------|-----|-----|-----|-----|-------------------------------------|

The project treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the project access locations are in semi-remote locations along fire roads and other small, local roadways. Therefore, vehicle trips would be required to access the treatment areas which would increase the total VMT in the area. Project-related traffic would include heavy-vehicle trips to haul equipment and materials as well as worker commute trips to and from the treatment areas. The number of truck trips and worker vehicle trips to and from the project area would vary based on the size of the area being treated, the type of treatment being implemented, and the duration of the vegetation treatments. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as stated in Impact TRAN-3 of the PEIR, individual projects under the CalVTP are likely to generate fewer than 110 trips per day, which is expected to cause a less-than-significant transportation impact for specific later activities, as described in the *Technical Advisory on Evaluating Transportation Impacts* published by the Governor’s Office of Planning and Research (Governor’s Office of Planning and Research 2018). According to the analysis methodologies presented in the PEIR, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. As presented in the PEIR, this amount would allow for up to 50 vehicles bringing crews and equipment to and from the project site and hauling materials away in a single day. Because of the small sizes of the crews needed for the proposed project, the limited equipment needed, and the limited materials to be hauled in any one day, it is not expected that VMT would typically exceed 110 trips per day. Initial treatment would likely involve more vehicle trips than subsequent maintenance. Additionally, all vehicle trips would be dispersed across multiple roadways and would likely only utilize particular roadways a few times and for short durations. Hiring local contractors would be encouraged where feasible to reduce the amount of VMT. In the event of a burn, it is possible for up to 100 personnel to be required on-site. While during this activity trips would exceed the VMT

assumed in the CalVTP, due to the temporary short-term nature of the activity, it is not expected to result in a substantial increase in VMT. As a result, impacts related to a potential increase in VMT would be less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing transportation conditions (e.g., roadways, road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the transportation impact identified in the PEIR for individual projects is also the same, as described above, and would be less than significant.

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| Other Impacts to Transportation: Would the project result in other impacts to transportation that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
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The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.15.1, "Environmental Setting" and 3.15.2, "Regulatory Setting" in Volume II of the Final PEIR).

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the existing environmental conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as previously described. The proposed Project is consistent with the types of projects covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to transportation would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
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| SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. This SPR applies to all treatment activities and treatment types. | Yes | <u>CAL FIRE</u> Prior-During | <u>CAL FIRE</u> |
| <p>Prior to initiating vegetation treatment activities, the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include but are not limited to construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities.</p> | | | |

If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP, which will include measures to monitor smoke dispersion onto public roadways, and traffic control operations that will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.

DRAFT

EC-15 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

| | PEIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the Project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs | Impact UTL-1, 3.16 | LTS | N/A | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The project would involve manual treatment; mechanical treatment (including mastication, mowing, chipping, and broadcasting), prescribed herbivory, prescribed (broadcast) burning, and targeted herbicide use. Water would be provided from available water supplies. A minimal amount of water would be required for fire suppression during prescribed and pile burning activities and for dust control during mechanical treatments, which would come from the municipal supply. The potential increased demand for water associated with the proposed treatments was examined in the PEIR and was found to be a less than significant impact. This impact is within the scope of the activities and impacts addressed in the PEIR because the amount of water needed for prescribed burning, pile burning, and dust control would be consistent with the PEIR, and the water source type would be consistent with the PEIR. Due to the size of the treatment area, and the minimal amount of water required for treatment activities, there would be a minimal demand on local water providers. Implementation of the project treatments would not result in a physical impact associated with provision of sufficient water supplies, including related infrastructure needs, and this impact would be less than significant. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> <p>The proposed project includes land in the proposed treatment area that is outside the CalVTP treatable landscape, which constitutes a change to the geographic extent presented in the PEIR. Within the boundary of the project area, the existing conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because the water service providers would be the same. This impact would also be less than significant and within the scope of the PEIR because the water use and the water providers are essentially the same within and outside the treatable landscape. The treatment activities and intensity of the treatments would be consistent with those analyzed in the PEIR. Therefore, the impact to water providers is also the same and would be less than significant, as previously described. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.</p> | | | | | | |
| Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity | Impact UTL-2, 3.16 | PSU | SPR UTIL- 1 SPR AD- 3 | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Manual and mechanical treatments would generate biomass as a result of vegetation removal within the project treatment areas. Methods for managing biomass include natural decomposition (e.g., chip and broadcast, lop and scatter), hauling off site, and pile burning. Whenever feasible, pile burning would be the preferred method, followed by lopping, chipping, and spreading on site. If vegetation cannot be treated on-site and needs to be moved offsite, it would be hauled to the nearest appropriate facility. Any biomass that includes invasive species or is infested with pests would not be hauled off site. The potential to generate solid waste in excess of state standards was examined in the PEIR and was found to be a less-than-significant impact. SPRs AD-3 and UTIL-1 would apply to this potential impact. SPR AD-3 requires the project proponent to design and implement the project consistent with local plans and ordinances, and SPR UTIL-1 requires the project proponent to prepare a Solid Organic Waste Disposition Plan to guide</p> | | | | | | |

biomass disposal. The potential biomass impact is within the scope of the activities and impacts identified in the PEIR as the conditions for removing biomass are consistent with the analysis in the PEIR.

The PEIR found that while some localities within the state may currently have the requisite infrastructure to process woody biomass or may develop this capacity in the near future, it cannot be guaranteed that all localities across the state would develop the capacities to process excess solid organic waste produced from treatment activities within the timeframes of the proposed activities. Therefore, because feasible mitigation is not available, and to not risk understating potential future impacts in light of uncertainties about market response, the PEIR classified this impact as potentially significant and unavoidable, notwithstanding the possibility that capacity could increase with the scale of treatments such that it would not be exceeded for most or all individual treatments. Project treatments would primarily involve on-site biomass disposal. Vegetation moved offsite would be hauled to the nearest appropriate facility. If off-site disposal is needed, a Solid Organic Waste Disposition Plan would be prepared, in compliance with SPR UTIL-1, that would clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. Therefore, the impact on solid waste disposal is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included has essentially the same environmental conditions as those assessed within the treatable landscape, and so would result in a similar amount of biomass material for disposal and would use the same local facilities for disposal. The same SPRs would be implemented to ensure consistency with local plans and ordinances and ensure implementation of a Solid Organic Waste Disposition Plan. Therefore, the impact generated from solid waste in excess of state standards outside the treatable landscapes is less than significant. This proposed project reflects a lesser impact than the statewide program, and the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

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| Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste | Impact UTL-3, 3.16 | LTS | SPR UTIL- 1 SPR AD- 3 | Yes | LTS | <input checked="" type="checkbox"/> |
|--|--------------------|-----|--------------------------|-----|-----|-------------------------------------|

Project treatments as a result of vegetation removal within the project site would generate biomass, which would be disposed of by natural decomposition (e.g., chipping and lop and scatter), prescribed burning and potentially hauling off site. The potential to conflict with federal, state, and local waste management requirements was examined in the PEIR and was found to be a less-than-significant impact. The project would be in compliance with federal, state, and local goals related to solid waste, as required by SPR AD-3. If off-site disposal is required, the project would apply SPR UTIL-1, which requires implementation of a Solid Organic Waste Disposition Plan. The project is within the scope of activities and impacts identified in the PEIR.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape because they are near or adjacent to the treatable landscape, would generate a similar amount of solid waste, and would use the same waste disposal facilities. Therefore, the impact related to compliance with federal, state, and local goals and regulations regarding solid waste is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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| Other Impacts to Public Services, Utilities, and Service Systems: Would the project result in other impacts to public services, utilities, and service systems that are not evaluated in the CalVTP PEIR? | | | | No | N/A | <input checked="" type="checkbox"/> |
|--|--|--|--|----|-----|-------------------------------------|

The proposed treatments are consistent with the treatment types and activities considered in the PEIR. The site-specific characteristics of the proposed treatments have been considered and found to be consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.16.1, "Environmental Setting" and 3.16.2, "Regulatory Setting" in Volume II of the Final PEIR). The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as described above. Therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to public service, utilities, and service systems would occur that is not covered in the PEIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
|---|------------|---|-----------------------------|
| <p>SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. This SPR applies only to mechanical and manual treatment activities and all treatment types.</p> | Yes | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.</p> | | | |

EC-16 WILDFIRE

| | PEIR specific | | | Project specific | | |
|--|--|--|--|--|--|-------------------------------------|
| | Identify location of impact Analysis in the PEIR | Identify impact Significance in the PEIR | SPRs & MMs applicable to the impact analysis in PEIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire | Impact WIL-1, 3-17 | LTS | <u>SPR HAZ-2</u> , 3, 4 | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>The goals of the proposed project are to reduce fire risk in the Las Posadas Demonstration State Forest (LPDSF) by creating fuel breaks, minimizing the buildup of dangerous fuels, reestablishing the natural role of fire using controlled burning, promoting wildfire preparation in the community, and establishing and maintaining reliable evacuation routes for residents. In the event of a wildfire, equipment, vehicles, and personnel associated with treatments would not impede ingress and egress evacuation routes. Vegetation removal treatments on either side of evacuation routes would potentially increase the line of sight, thus providing safer access for fire engines and firefighting personnel, supporting the creation of fire lines, increasing safety for evacuees, and potentially slowing the spread and lowering fire intensity.</p> <p>Initial and maintenance treatments would include pile burning, prescribed (broadcast) burning, and mechanical treatments, which could result in temporary risks associated with uncontrolled wildfire, accidental wildfire ignition, or risk of a prescribed fire escaping its control lines. The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR and found to be less than significant. Increased wildfire risk associated with prescribed pile burning, prescribed burning, and use of heavy equipment in vegetated areas is within the scope of the PEIR. SPRs HAZ-2, HAZ-3, and HAZ-4 would be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors on mechanical hand tools, requiring crews to carry one fire extinguisher per chainsaw, and prohibiting smoking in vegetated areas. Based on the implementation of the SPRs, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.</p> <p>The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.</p> | | | | | | |
| Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides | Impact WIL-2, 3-17 | LTS | <u>SPR AQ-3</u> , <u>SPR GEO-3</u> , 4, 5, 8 | Yes | LTS | <input checked="" type="checkbox"/> |
| <p>Initial and maintenance treatments would include prescribed pile burning, mechanical treatment using heavy equipment, and prescribed herbivory. The potential for post-fire flooding and erosion, including landslides, was examined in the PEIR and found to be less than significant. Mechanical treatment activities would occur predominantly on slopes below 40 percent grade and along ridges and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or another stable operating surface. Mechanical treatments would not be applied on slopes above 50 percent grade unless the conditions met in SPR GEO-8 are met, thus limiting the potential for post-fire flooding and erosion in treatment areas with unstable soils.</p> | | | | | | |

Implementation of SPRs AQ-3, GEO-3 through GEO-5 and GEO-8 would reduce the risk of erosion and landslides post-prescribed burn and/or post-fire, in the event that a wildfire occurred as a result of the proposed treatments or an unrelated occurrence. Implementation of SPR AQ-3 would minimize soil burn severity during prescribed burns, which would help to retain vegetation to stabilize the soil. SPR GEO-3 requires stabilization of disturbed soil areas during treatment activities, SPR GEO-4 requires inspection of the treatment area for proper erosion control measures prior to the rainy season and immediately following the first large rainfall event, and SPR GEO-5 requires stormwater to be drained via water breaks to decrease the potential for channelized erosion within linear treatment areas. SPR GEO-8 requires the input of an RPF or licensed geologist to evaluate treatment areas with a 50% grade or more that are unstable or have unstable soils. As described in Impact WIL-1, this project intends to reduce wildfire risk, in part by creating and maintaining a fuel break that would serve as an opportunity for fire resources to stop or slow the spread of wildfire, which may lead to smaller burn scars, or less area susceptible to post-fire flooding or erosion.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the post-fire landslide risk of the project area is essentially the same within and outside the treatable landscape due to similar slopes, soils, hydrological and geological conditions. Therefore, the wildfire impact outside the treatable landscape is also the same and less than significant, as described above, with implementation of the same SPRs. The impact outside the treatable landscapes would be consistent with the lands analyzed in the PEIR.

Other Impacts related to Wildfire: Would the project result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?

No

N/A

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to wildfire risk would occur.

EC-17 ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/Monitoring Entity |
|---|------------|---|-----------------------------|
| <p>SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE would meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable Mitigation Measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE Prior-During | CAL FIRE |
| <p>For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources on site; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the Burn Plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE Prior-During | CAL FIRE |
| <p>The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent would design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types.</p> | Yes | CAL FIRE Prior-During | CAL FIRE |
| <p>The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> | | | |

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| <p>SPR AD-4 Public Notifications for Prescribed Burning: At least three days prior to the commencement of prescribed burning operations, the project proponent would: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>At least 3 days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; and 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the Project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent would post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During</p> | <p><u>CAL FIRE</u></p> |
| <p>One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p> | | | |

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| <p>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. This SPR applies to all treatment activities and all treatment types.</p> | <p>Yes</p> | <p><u>CAL FIRE</u> Prior-During-Post</p> | <p><u>CAL FIRE</u></p> |
| <p>For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism.</p> <p>Information on proposed Projects (PSA in progress):</p> <ul style="list-style-type: none"> • GIS data that include project location (as a point); • Project size (typically acres); • Treatment types and activities; and • Contact information for a representative of the project proponent. <p>The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent’s own website).</p> <p>Information on approved projects (PSA complete):</p> <ul style="list-style-type: none"> • A completed PSA Environmental Checklist; • A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); • GIS data that include a polygon(s) of the Project area, showing the extent of each treatment type included in the project (Ecological Restoration, Fuel Break, WUI Fuel Reduction). <p>Information on completed projects:</p> <ul style="list-style-type: none"> • GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (Ecological Restoration, Fuel Break, WUI Fuel Reduction) • A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes: <ul style="list-style-type: none"> ○ Size of treated area (typically acres); ○ Treatment types and activities; ○ Dates of work; ○ A list of the SPRs and mitigation measures that were implemented; and | | | |

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| <ul style="list-style-type: none"> ○ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE would include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types.</p> | Yes | CAL FIRE N/A | CAL FIRE |
| <p>For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> | | | |
| <p>SPR AD-9. Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent would contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. This SPR applies to all treatment activities and all treatment types.</p> | No | CAL FIRE N/A | CAL FIRE |
| <p>When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the Project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit [CDP] is required). If a CDP is required, the treatment project will be designed to meet the following conditions:</p> <ul style="list-style-type: none"> i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Project activities will not occur within the coastal zone.</p> | | | |

MANDATORY FINDINGS OF SIGNIFICANCE

| | New Impact that is Significant or Potentially Significant | New Impact that is Less Than Significant with Mitigation Incorporated | New Impact that is Less Than Significant Impact | No New Impact |
|---|---|---|---|-------------------------------------|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

No additional comments.

Additional Information

- List of Standard Project Requirements (SPRs) and Mitigations Measures (MMs). (See Attachment A)
- Vicinity map on a USGS quad map (SPR AD-2)
 - Aerial imagery of subsequent activity area (see vicinity and location maps)
 - Subsequent activity location on Treatable Landscape & Ecoregions Map (See Attachment B)
 - Parcel map with APN's covering all ownerships within subsequent activity area
 - Soil survey map of subsequent activity area
- Smoke Management Plan/Burn Plan (SPR AQ-2 & 3) – **SMP will be submitted/approved prior to burning**
 - Public Notice for Prescribed Burning - **Will be posted prior to burning**
 - Model run of FOFEM, BEHAVE, or other appropriate fire behavior modeling simulation
 - Burn Unit Maps – Ortho and Topographic - **Will be submitted prior to burning & with completion report**
- Air District Asbestos Dust Control Plan (SPR AQ-5) – **Not Applicable**
- Incident Action Plan (IAP) (SPR AQ-6) – **Will be submitted with completion report**
- Archaeological reviews/surveys (Confidential addendum) (EC-4) - **Confidential**
- Biological review/surveys (EC-5)
 - CNDDDB Records Search
 - Biologist Consultation/Notification
 - Water Quality consultation – **WQ did not respond to request for comment**
 - Consult Attachment C (and Cal VTP Appendix BIO-3)
- Biological Compensation Plan (MM BIO-1c, 2c, 2d, 2e, 2f, 3b, 3c,) –
- Geological Review (MM GHG-2)
- Spill Prevention & Response Plan (SPR HAZ-5)
- Traffic Management Plan (SPR TRAN-1)
- Organic waste Disposal Plan (SPR UTIL-1)
- Air Quality and GHG Emissions Estimates (SPR GHG-1)
 - Air Quality consultations - **SMP will be submitted/approved prior to burning**
- Off-Site Noise-Sensitive Receptors Notification (SPR NOI-6) – **Not Applicable**
 - Other _____

DELIVERABLES POST APPROVAL

- Public Notification (News/Press Release)
- Authorized PFIRS Ignition Request
- Live Fire Notification
- Approved FC 400
- Public Notifications to neighbors
- Weather Forecasts/Spot weather Forecasts
- Go NO Go Checklist
- Incident Action Plans (IAP's, Prescribed burn activities)
- Completion Reports to Region
- Other: FC 33, Project Photos

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DRAFT

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