Appendix PD-3

Project-Specific Analysis

PD-3: PROJECT-SPECIFIC ANALYSIS

PD-3.1: INTRODUCTION

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CAL FIRE's) State Responsibility Area (SRA) to serve as one component of the state's range of actions to reduce wildfire risk, reduce fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. The Program Environmental Impact Report (PEIR) for the CalVTP evaluates the environmental impacts of the CalVTP. The CalVTP is described in Chapter 2, "Program Description" of the PEIR. The PEIR has been prepared under the direction of CEQA lead agency, California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The document functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities consistent with the CalVTP.

Using the Project-specific Analysis (PSA) in reliance on the PEIR, CAL FIRE or other project proponents will evaluate each vegetation treatment project intended to implement the CalVTP as a later activity addressed by the PEIR to determine whether the later activity qualifies as within the scope of this PEIR or requires additional environmental documentation or its own independent environmental review. Such evaluations will ascertain whether a later vegetation treatment project is consistent with the description of activities contained in the CalVTP and whether the effects on the environment were covered in the PEIR. Also, a project proponent will evaluate whether the later vegetation treatment project would (1) cause any new impact, (2) cause any substantially more severe significant impact than was addressed in the PEIR, or (3) reveal a mitigation measure or alternative that is substantially different from those in the PEIR or found infeasible in the PEIR, but that is now is feasible, and that the project proponent declines to implement. If none of those outcomes are determined, and the effects on the environment were covered in the PEIR, the impacts of the later vegetation treatment project can be found to be within the scope of this PEIR, and no additional environmental documentation would be required (State CEQA Guidelines Section 15168[c][1], [2] and [4]). The determination that a project is within the scope of the PEIR is a factual determination that should be supported by substantial evidence. The substantial evidence underpinning the finding is developed using the PSA checklist provided in this section. If a project is within the scope of this PEIR, the project proponent may act on the project using the PSA and PEIR without public circulation of any additional environmental document. If the project is approved, the project proponent would file a Notice of Determination.

Under this CEQA compliance approach, a project proponent must incorporate from the PEIR into the later vegetation treatment project all standard project requirements (SPRs) relevant to the proposed project and all feasible mitigation measures in response to significant impacts caused by the later project. A "within the scope" finding for later vegetation treatment projects would facilitate an increase in the pace and scale of project approvals in a manner that includes environmental protections.

If a later vegetation treatment project would have impacts that were not covered by the PEIR (and therefore would not qualify for a within the scope finding), then additional documentation may need to be prepared that accompanies the PEIR to demonstrate the project's CEQA compliance (State CEQA Guidelines Section 15168(c)(1)). If additional documentation is needed, it may be a Negative Declaration, Mitigated Negative Declaration, or an EIR, depending on the environmental impact differences encountered. In this situation, the PSA serves the same function as an initial study to identify which impacts were not covered by (and are therefore not within the scope of) the PEIR and, therefore, must be addressed in a Negative Declaration, Mitigated Negative Declaration, or an EIR, as well as documenting those impacts that are within the scope of the PEIR. Refer to Section PD-3.2.4 (under Checklist Answers) for additional explanation regarding the function of the PSA checklist.

PD-3.1.1: Project Proponents – Lead and Responsible Agency Roles

CAL FIRE is in charge of preventing and extinguishing wildfires within the SRA (PRC Sections 4113 and 4125). The treatable landscape within the SRA primarily encompasses private land (approximately 92 percent) on which CAL FIRE or counties under contract with CAL FIRE would implement vegetation treatments in coordination with the landowner. Additionally, there are many local, regional, and state agencies with land ownership or land management roles in the remainder of the treatable landscape (i.e., on public land) that will seek to implement vegetation treatments consistent with the CalVTP to reduce wildfire risks.

For the purposes of this PEIR and PSA, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. If through the PSA a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

PD-3.1.2: Treatments Addressed in the PEIR

Proposed treatment projects qualifying as within the scope of the PEIR must be consistent with the treatments covered in the CalVTP, which are summarized in this section, and the geographic extent of the CalVTP, which is encompassed in the boundaries of the treatable landscape. Refer to PEIR Chapter 2, "Program Description" for a detailed description of the CalVTP.

TREATMENT TYPES

The CalVTP treatment types are:

- Wildland-Urban Interface Fuel Reduction: Located in WUI-designated areas, fuel reduction would 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.
- 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.
- Ecological Restoration: Generally, outside of the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

TREATMENT ACTIVITIES

The WUI fuel reduction, fuel break, and ecological restoration treatment types would be implemented using various treatment "activities" that may be applied singularly or in combination. The CalVTP treatment activities are:

- Prescribed Burning: Includes pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment) and broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire-adapted plant communities; would be conducted under specific conditions related to fuels, weather, and other variables).

- Mechanical Treatment: Use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation.
- Manual Treatment: Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species.
- Prescribed Herbivory: Use of domestic livestock to reduce a target plant population thereby reducing fire fuels or competition of desired plant species.
- Herbicides: Chemical application designed to inhibit growth of target plant species.

TREATABLE LANDSCAPE

Approximately 20.3 million acres within the 31 million-acre SRA were identified that may be appropriate for vegetation treatments. This area is called the "treatable landscape." CAL FIRE's Fire and Resource Assessment Program (FRAP) modeled the areas where each of the three proposed treatment types could be implemented within the treatable landscape. Multiple treatment types can be implemented where modeled treatment areas for treatment types overlap. Qualifying treatments under the CalVTP would occur within the 20.3 million acres of treatable landscape. The boundaries of the treatable landscape are available on the Board's website.

PD-3.2: EVALUATION OF ENVIRONMENTAL IMPACTS

The PSA provided herein is to be used to determine whether later vegetation treatment projects in the treatable landscape have been covered in the PEIR to allow for approval without further environmental review and documentation (beyond what is needed to complete the PSA), or whether additional CEQA documentation is required (i.e., a Negative Declaration, Mitigated Negative Declaration or EIR). Environmental effects are not necessarily limited to those identified in the PSA checklist, which encompass all effects disclosed in the PEIR. For this reason, the checklist includes a row for "Other Impacts" under each resource area.

The determination as to whether an ND, MND, or EIR is required for impacts that are not within the scope of the PEIR is subject to the "fair argument" standard, which requires preparation of an EIR when there is a fair argument, based on substantial evidence in the record, that the proposed treatment project may have a significant effect on the environment.

PD-3.2.1: Determining Whether a Proposed Treatment is Within the Scope of the PEIR

The purpose of the PSA is to guide CAL FIRE and other project proponents in their determination of whether a proposed vegetation treatment project is within the scope of the CalVTP PEIR. A proposed vegetation treatment project is within the scope of the PEIR when it meets all of the following qualifications:

- Treatment Methods. The proposed treatment methods are consistent with the treatment types and activities described in Chapter 2, "Program Description" of the PEIR.
- Geographic Area. The proposed treatment site is within the geographic limits of the CalVTP's treatable landscape.
- Environmental Impacts. The environmental effects of the proposed treatment have been covered in the PEIR and none of the criteria for preparation of subsequent CEQA documentation are met (State CEQA Guidelines Sections 15168(c)(2), 15162).

PD-3.2.2: Documenting Whether Impacts of a Proposed Treatment Projects are Within the Scope of the PEIR

For the PSA to adequately document the impacts that are within the scope of this PEIR and do not require additional CEQA review and documentation, the PSA must identify the following:

- Relevant PEIR analysis. Identify the specific sections, impact numbers, and page numbers from this PEIR that contain information relevant to the proposed treatment project.
- Additional Studies Prepared and References Cited. Attach to the PSA site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the PEIR. Include copies of references cited in the PSA, which will be made available to the public by the project proponent upon request.
- Standard Project Requirements. Identify each standard project requirement (SPR) that is relevant to the treatment, which will demonstrate that the SPR will be integrated into treatment design. Some SPRs allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.
- Environmental Impacts. Identify which impacts in the PEIR would occur from implementation of the proposed vegetation treatment project. Because the intent of the PEIR is to disclose potentially significant impacts that are reasonably foreseeable to occur from any of the treatments within the extent of the treatable landscape, it is expected that, due to site-specific conditions, proposed vegetation treatment projects may result in impacts less severe than those identified in the PEIR. A project proponent may rely on the impact significance determination in the PEIR, and for significant impacts, apply the relevant mitigation measures. Alternatively, if an impact identified as significant in the PEIR would be less than significant for the later treatment project, the project proponent may demonstrate with substantial evidence in the PSA that the project impact is less than significant and mitigation measure(s) are not needed. Similarly, potentially significant environmental effects identified in the PEIR may be minimized or found to be less than significant without mitigation in the future due to technological advances, further research, or industry response (e.g., air quality, greenhouse gas emissions, utilities and service systems); these effects and the reasons they are less severe than those identified in the PEIR will be documented in the PSA.
- Mitigation Measures. Identify each mitigation measure from the PEIR that is relevant to the proposed treatment project. In the PSA, explain any components of the mitigation measures that are not applicable to the treatment, and for any significance determination that is different than the PEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed vegetation treatment project. Some mitigation measures allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.

PD-3.2.3: Providing Substantial Evidence

The impact determinations and within-the-scope findings in the PSA, as well as any explanation for planned deviations, identified parameters, or feasibility determinations associated with SPR and mitigation measures, must be based on substantial evidence (defined in the CEQA Guidelines as "facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts"). Therefore, the PSA will include analytical discussions of the conclusions reached. Portions of the PEIR relied on for conclusions should be identified by section number and page number. Ancillary information (e.g., site-specific surveys) not included in the PEIR but relied on for conclusions or required by

PEIR measures will be attached to the PSA. A list of references cited in the PSA will be included with the PSA and copies of such references made available to the public by the proponent agency upon request.

PD-3.2.4: Project-Specific Analysis

STANDARD PROJECT REQUIREMENTS, MITIGATION MEASURES, AND MONITORING AND REPORTING

The analysis must consider the measures identified in the PEIR that will avoid, reduce, or otherwise mitigate potential impacts of the project. These measures take the form of SPRs and mitigation measures. Some SPRs and mitigation measures apply to all projects, while others only apply to projects that include specific treatment types, treatment activities, or locations. Attachment A to this checklist provides a comprehensive list of SPRs and mitigation measures applicable to each project type. The project proponent should complete Attachment A and verify that all applicable SPRs and mitigation measures will be implemented, the timing of implementation, and identify the entity responsible for implementing and verifying or enforcing each measure. In effect, a completed Attachment A to the PSA will function as the Mitigation Monitoring and Reporting Program for the vegetation treatment project.

RESOURCE AREAS

The environmental resource areas in the PSA checklist are the same as those analyzed in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures", of the PEIR. The project proponent will review the environmental analysis in the PEIR for each corresponding resource area in the PSA checklist. The project proponent will consider whether required SPRs and mitigation measures would be effective in avoiding, reducing, or mitigating environmental impacts of the project considering the proposed activities and site-specific characteristics. SPRs are intended to be integrated into treatment design and implementation; therefore, project proponents should determine if it is necessary to implement the SPR during preparation of the PSA, prior to treatment, or during treatment implementation. For example, implementation of SPR BIO-1 is intended to be carried out during PSA preparation; it will identify potentially affected biological resources and assess whether they can be avoided, which will determine whether other SPRs and mitigation measures must be implemented prior to or during treatments.

Written explanations supporting all conclusions should be provided in the discussion following the checklist questions for each resource area.

CHECKLIST ANSWERS

After verifying that the proposed treatment activities, treatment types, and geographic location of the treatment project are consistent with the PEIR, the primary functions of the checklist are to determine:

- whether any of the significant impacts of the later treatment project would be substantially more severe than those covered in the PEIR;
- whether the later treatment project would result in any new impacts that were not covered in the PEIR; and
- the type of CEQA document, if any, that is appropriate to examine impacts that are not within the scope of the PEIR.

Accordingly, the checklist questions presented for each resource area identify, for each impact addressed in the PEIR, whether the impact applies to the treatment project and if so, identify the SPRs and mitigation measures that are applicable to the treatment project. The checklist is also intended to identify whether the impact significance determination for the treatment project is different than the impact significance determination in the PEIR; if it is different, the checklist will identify whether the difference constitutes a substantially more severe significant impact and is therefore not within the scope of the PEIR. If it is determined that a substantially more severe significant impact

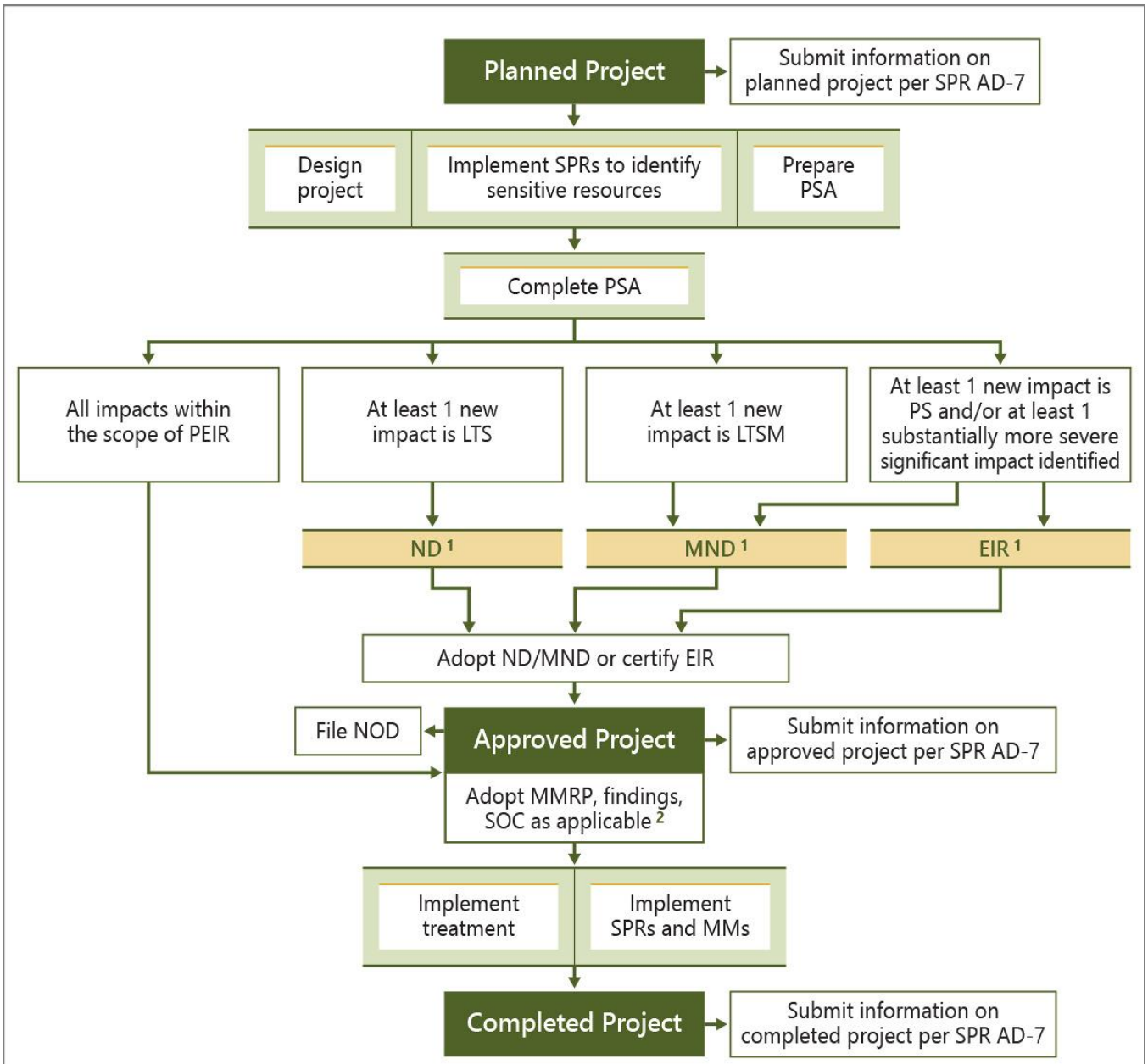
that cannot be mitigated down to the same level as, or lower level than, identified in the PEIR would result from a later treatment project, an EIR must be prepared, unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate The MND or EIR may be limited to examining the impacts that are not within the scope of the PEIR.

"New" impacts are effects on the environment that were not addressed in the CalVTP PEIR.

For each new impact listed in the checklist, the project proponent should indicate whether the impact would be one of the following:

- New Impact that is Less Than Significant: The project would result in a new adverse impact that is not analyzed in the CalVTP PEIR; however, the impact would not be significant. In this case, the impact is not "within the scope" of the CalVTP PEIR and preparation of a Negative Declaration could be prepared. Pursuant to CEQA Guidelines Section 15168(d), a subsequent negative declaration could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Less Than Significant with Mitigation Incorporated: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR, but due to the project proponent's willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not "within the scope" of the CalVTP PEIR and a Mitigated Negative Declaration could be prepared, consistent with CEQA Guidelines Section 15168(d), which allows for use of a subsequent negative declaration to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Potentially Significant: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR (which would be subject to the "fair argument" standard as a new impact), the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not "within the scope" of the CalVTP PEIR and preparation of an Environmental Impact Report (EIR) is required. The EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the PEIR, which are documented in the PSA.

In summary, when additional environmental documentation is needed to augment the PEIR for CEQA compliance, the PSA checklist and accompanying analysis would serve the same function as an initial study that defines the topics to be addressed in the EIR, MND, or ND to cover the impacts that are not within the scope of the PEIR, as directed by State CEQA Guidelines Section 15168(d)(1). Pursuant to State CEQA Guidelines Section 15168(d), a later ND could be prepared, if the new impact would be less than significant, or MND, if the new impact or substantially more severe significant impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist. Refer to the CalVTP PSA Process flowchart presented in Figure 1.



1 The CEQA document will be limited to impact(s) not within the scope of PEIR. Impacts within the scope of PEIR will be documented in PSA. PSA will function as an Initial Study for new impacts.

2 Findings are required for any LTSM or SU impacts identified in an EIR, including impacts within the scope of PEIR. SOC is required for any SU impact identified, including impacts within the scope of PEIR. MMRP is required if any SPRs or MMs are identified as applicable in the PSA or CEQA document.

Note: This figure illustrates the process to implement later vegetation treatment projects under the CalVTP. It may not identify every detail of the steps required for CEQA compliance. Please refer to the relevant sections of the PSA and PEIR for additional information.

EIR: environmental impact report
LTS: less than significant
LTSM: less than significant with mitigation incorporated
MM: mitigation measure
MMRP: mitigation monitoring and reporting program
MND: mitigated negative declaration
ND: negative declaration
PEIR: Program EIR
PS: potentially significant
PSA: Project-specific Analysis
SOC: statement of overriding considerations
SPR: Standard Project Requirement

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Source: Ascent Environmental Inc. 2019

Figure 1 CalVTP PSA Process

AGENCY-SPECIFIC CEQA IMPLEMENTATION PROCEDURES

This PSA may be used by CAL FIRE, another public agency funded by grants from CAL FIRE or other state agencies, or a public agency with land ownership, land management, or other regulatory responsibilities in the treatable landscape that is proposing to implement, fund, or issue any approval for vegetation treatments consistent with the CalVTP PEIR. Each project proponent should follow their agency's CEQA implementation procedures, including filing of a Notice of Determination through the State Clearinghouse and/or applicable County Clerk's office.

PROJECT-SPECIFIC CEQA FINDINGS AND OVERRIDING CONSIDERATIONS

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must still adopt CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. Although each responsible agency must adopt its own findings (see CEQA Guidelines section 15096(h)), such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. A findings template intended to assist responsible agencies to formulate their own findings is attached to this PSA as Attachment B.

REPORTING REQUIREMENTS

Planned Projects

To assist with tracking actions under the CalVTP, project proponents will submit information to CAL FIRE on planned projects when beginning preparation of this PSA. The submittal will include the following:

- 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.

Approved Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

- 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)

Completed Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents will submit the following information to CAL FIRE after implementation of the treatment:

- 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

- Size of treated area (typically acres);
- Treatment types and activities;
- Dates of work;
- A list of the SPRs and mitigation measures that were implemented
- 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).

ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1.	Project Title:	Click or tap here to enter text.
2.	Project Proponent Name and Address:	Coastal Conservancy
3.	Contact Person Information and Phone Number:	Julia, Julia.elkin@scc.ca.gov, (510) 286-0736
4.	Project Location:	PO Box 577, Stinson Beach, CA, 94970 Township 1N, Range 7W, Section 19 APN(s) Project is located between Hwy 101 and Bolinas-Fairfax Road approximately 2.5 miles north of the town of Stinson Beach along Bourne Ridge and Garden Club Ridge. Click or tap here to enter text.
5.	Total Area to be Treated (acres)	50 acres

6. Description of Project: The proposed project is located on Martin Griffin Preserve (MGP), a property privately owned by Audubon Canyon Ranch (ACR), approximately 2.5 miles north of the City of Stinson Beach and adjacent to Bolinas Lagoon (Appendix 1). The general purpose of this project is to perform ecological restoration and conservation within a historically coastal grassland system that is heavily encroached upon by coyote brush (*Baccharis pilularis* subsp. *consaguinea*) and Douglas fir (*Pseudotsuga menziesii*). More specifically, this project is designed to focus on the conservation of exant native bunchgrass stands, characteristic of native coastal prairie, that remain despite heavy encroachment. The conservation of these remnant native grasslands requires the restoration of grassland structure that will promote a return to historic fire regimes consistent with grassland ecology. Restoration will primarily be achieved using chainsaws to manually remove coyote brush and Douglas fir trees encroaching upon extant native brunchgrass meadows. All biomass generated from this treatment will be piled and burned on site.

a. Initial Treatment

The Project Area, based on historic extent of grasslands along Bourne and Garden Club Ridges, comprises 206 acres (Appendix 1). The 206 acre Project Area represents the total area that is being analyzed in this PSA document. The proposed Treatment Area, a fraction of the Project Area, is approximately 50 acres and will be treated over the course of two years. The estimated 50 acres of manual treatment is based on labor resources and a preliminary estimation of extant native grassland on-site by fire ecologists and biologists. The Project Area represents a general target area on MGP where a successional vegetation process is changing historic grassland into coyote brush and Douglas fir forest. In contrast, the smaller Treatment Area represents locations within the Project Area that are considered conservation priorities based on presence of remnant native bunchgrass stands.

This project will be performed in multiple phases; they include:

Phase 1: Pile Burn, Winter 2020, 2021, & 2022

- Burning of pre-existing burn piles of manually cut coyote brush and Douglas fir trees. Spreading of native seed in burned areas.

Phase 2: Coastal Prairie Mapping, Spring 2020

- Survey 206 acre Study Area and map all extant native coastal prairie.

Phase 3: Treatment Planning/Monitoring/Seed Collection, Summer 2021, 2022, & 2023

- Utilize mapping results to plan out priority areas for treatment; Conduct monitoring to measure/quantify success; CEQA due diligence surveys; Collection of native grass seed for later dispersal into burned areas.

Phase 4: Treatment Implementation, Summer 2021 & 2022

- Manual cutting/thinning of encroaching Douglas fir and coyote brush using chainsaws and piling for later (following winter) burning.

Following the mapping of extant coastal prairie and prioritization of treatment areas, the initial treatment would include manual removal of small Douglas fir trees and coyote brush in select areas to open and enhance coastal prairie habitat. The initial treatments will be implemented over the course of two years in the summers of 2021 and 2022 at proximately 25 acres per year. Fuels generated from these cutting/thinning activities would be piled and burned on-site the winter following the treatment.

Equipment used to implement the manual treatment would include chainsaws. A crew size of 5-6 and their associated transportation vehicles would be required to implement the project. The description of manual treatment activities and associated impacts as described in the PEIR (Chapter 2: Project Descriptions: Section 2.5.2, pages 24-25) are consistent with the manual treatments proposed for this project and thus are covered by analysis in the PEIR.

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Initial Treatment*]

☐ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☒ Ecological Restoration

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Initial Treatment*]

☐ Prescribed Burning (Broadcast), _____ acres

☒ Prescribed Burning (Pile Burning)

☐ Mechanical Treatment, _____ acres

☒ Manual Treatment, ____50__ acres

☐ Prescribed Herbivory, _____ acres

☐ Herbicide Application, _____ acres

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Initial Treatment*]

☐ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Potential maintenance treatments include manual treatments, prescribed fire (pile and broadcast burning) and prescribed herbivory. Maintenance treatments of one of the above should occur every three to six years to prevent establishment of coyote brush and Douglas fir seedlings.
Equipment used to implement potential maintenance treatments include:

- Manual: Chainsaws
- Prescribed Fire: Fire truck, water tender, drip torches.
- Prescribed Herbivory: Livestock, temporary fencing.

The description of treatment activities and associated impacts as described in the PEIR (Chapter 2: Project Descriptions: Section 2.5.2, pages 18-28) are consistent with the potential manual treatments , prescribed fire (pile and broadcast burning) and prescribed herbivory proposed as potential maintenance treatments for this project, and thus are covered by analysis in the PEIR.

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☐ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☒ Ecological Restoration

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Treatment Maintenance*]

☒ Prescribed Burning (Broadcast), __50-292_____ acres

☒ Prescribed Burning (Pile Burning)

☐ Mechanical Treatment, _____ acres

☒ Manual Treatment, _____50-292_ acres

☒ Prescribed Herbivory, 50-292 acres

☐ Herbicide Application, _____ acres

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

Prior to implementing a maintenance treatment, the project proponent will verify that the expected site conditions as described in the PSA are present in the treatment area. As time passes, the continued relevance of the PSA will be considered by the project proponent in light of potentially changed conditions or circumstances. Where the project proponent determines the PSA is no longer sufficiently relevant, the project proponent will determine whether a new PSA or other environmental analysis is warranted.

In addition to verifying that the PSA continues to provide relevant CEQA coverage for treatment maintenance, the project proponent will update the PSA at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA or the latest PSA update. For example, the project proponent may conduct a reconnaissance survey to verify conditions are substantially similar to those anticipated in the PSA. Updated information should be documented.

7. Regional Setting and Surrounding Land Uses: (Briefly describe the project's surroundings) The Project Area is situated in west Marin County just east of Bolinas Bay. The study area comprises two ridges with northeast to southwest orientation within the California Coast Range (CALFIRE PEIR) spanning 100 to 950 feet in elevation. Vegetation comprises heavily encroached grassland that largely consists of coyote brush scrubland and young Douglas fir forest. The surrounding land includes wildland owned and managed by the Golden Gate Recreational Area.

8. Other Public Agencies Whose Approval is Required: (e.g., permits)

A smoke management plan will be drafted and submitted to Bay Area Air Qualtiy Management District for their review and approval and subsequent acreage allocation.

Coastal Act Compliance

☐ The proposed project is NOT within the Coastal Zone

☒ The proposed project is within the Coastal Zone (*check one of the following boxes*)

☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable

☒ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

9. Native American Consultation. *For treatment projects that are within the scope of the CalVTP PEIR, AB 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the PEIR. For treatment projects with impacts not within the scope of the PEIR, pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, project proponents preparing a new negative declaration, mitigated negative declaration, or EIR must notify any California Native American tribe who has submitted written request for notification of a project in the area of the treatment site. Upon written request for consultation by a tribe, the project proponent must begin consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.*

   [insert text here]

DETERMINATION (To be completed by the project proponent)

On the basis of this PSA and the substantial evidence supporting it:

☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures 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 proposed project will have effects that were not covered 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 covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, 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 significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Sam Schuchat — 11/30/2020

Signature — Date

Sam Schuchat — Executive Officer

Printed Name — Title

CA State Coastal Conservancy

Agency

Click or tap here to enter text.

EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the CalVTP PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any "new impacts".
3. The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:
   - Briefly describe the impact of the proposed vegetation treatment project.
   - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in PEIR.
   - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed treatment is consistent with the treatment types and activities addressed in the PEIR as well as the associated intensity (i.e., duration).
   - Identify SPRs and MMs applicable to the treatment project.
   - (If applicable) Explain which components of the MM or SPR would be applied. This circumstance exists if the MM or SPR allows for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility. A site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination must be provided in the PSA.
   - (If applicable) Explain why the impact significance in the PSA is different than that found in the PEIR; substantiate the different (new) significance conclusion.
   - (If applicable) Explain why MM or SPRs identified for this impact in PEIR do not apply to this project. This circumstance may exist where a PS impact was identified in the PEIR, but the impact severity would be less for the treatment project or the MM does not otherwise apply.
4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. A ND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.
6. 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.

PD-3.3: AESTHETICS AND VISUAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
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	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	No	None	NA	No Impact	No	Yes
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	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	No	None	NA	No Impact	No	Yes
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	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	NA	None	No Impact	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact AES-1

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to cause short-term damage to the aesthetics of natural vegetation is evaluated in the PEIR. The Project Area is located on private property and is visible from scenic Highway 101. However, the Treatment Areas are not directly visible from the highway. All prescribed burning will be conducted utilizing a smoke management plan (SMP) approved by the air quality district and will adhere to all SMP elements outlined in the PIER. Given these factors there is no potential for the project to result in substantial short-term degradation of the visual character of the project site or surrounding area. No impact would occur.

Impact AES-2

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to cause a long-term visual impact is evaluated in the PEIR. As stated above, the Treatment Area is not visible from scenic Highway 101. Further, based on the treatments and design of this project visual character of the wildland area will not be altered significantly or dramatically from its current condition. Given these factors there is no potential for the project to result in substantial long-term degradation of the visual character of the project site or surrounding area. No impact would occur.

Impact AES-3

Fuels breaks are not included in the design of the proposed project. This impact does not apply.

New Aesthetic and Visual Resource Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR.

PD-3.4: AGRICULTURE AND FORESTRY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result 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	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact AG-1

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in loss of forest land was examined in the PEIR. The Project Area includes non-native grassland, native coastal prairie, redwood and early successional Douglas fir and coyote brush. This project aims to maintain historical grassland systems and does not propose to reduce upper canopy cover to below 10% in established forest, thus remaining consistent with the definition of forest land as defined in Public Resource Code 12220(g). Treatments will primarily work to remove small trees on meadow edges to promote and maintain grassland structure surrounding native bunch grass stands. The treatment is designed to promote a mosaic of grassland, shrubland, and forest and would not result in conversion to non-forest use. The proposed vegetation management project has the potential to improve ecological and fire risk conditions by creating a more diverse habitat structure, maintaining legacy grasslands and creating a more fire resilient landscape. No SPR's are applicable to this impact. This impact is less than significant.

New Agriculture and Forestry Resource Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR.

PD-3.5: AIR QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4, AQ-1-AQ-4 & AQ-6	AQ-1	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1, NOI-4-5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	NA	NA	No Impact	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4, AQ-2, & AQ-6	NA	SU	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	Haz-1, NOI-4-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4, AQ-2 & AQ-6	NA	SU	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Ensuring compliance with standards set in the PEIR, the following will be completed before any broadcast prescribed fire treatment: 1) smoke management plan with Bay Area Air Quality District (BAAQMD), 2) burn plan for the project that includes a fire behavior model and is approved and implemented by a qualified burn boss, and 3) Incident Action Plan (IAP) that includes burn date(s), burn hours, weather limitations, burn prescription, communication plan, medical plan, traffic plan and any other special considerations. Prior to burning, air district contacts will be notified and acreage allocation obtained, notifications posted/made, and weather monitoring conducted prior to, during, and after burning. For pile burning outside of the season that requires a burn permit, a smoke management plan will still be submitted.

Impact AQ-1

The potential of the proposed initial and maintenance treatments to result in emissions of pollutants that could exceed California Ambient air quality standards (CAAQS) or National ambient air quality standards (NAAQS) thresholds is evaluated in the PEIR. Emission producing activities for this project include use of vehicles, manual gasoline powered tools and prescribed burning. The relevant SPRs for these treatments include AD-4, AQ-1-4 and AQ-6. There is no naturally occurring asbestos in mapped in the treatment area, therefore SPR AQ-5 does not apply. Mitigation Measure AQ-1 would apply in this situation and the impacts are unavoidable. Feasible mitigation measures aimed at reducing emissions within MM AQ-1 for the proposed treatments include encouraging carpooling to site and using best available control technology for reducing NOx and PM emissions on equipment. Equipment meeting Tier 4 emission standards and use of renewable fuel will be used if available. This impact is significant and unavoidable and requires the implementation of MM AQ-1.

Impact AQ-2

Use of vehicle and equipment associated with the proposed initial and maintenance treatments have the potential to expose people to diesel particulate matter emissions. Such potential exposure associated with proposed treatments were evaluated in the PEIR. Applicable SPRs include, HAZ-1 and NOI-4-5. Given the SPRs listed above, this impact is less than significant.

Impact AQ-3

This impact does not apply to this project because there is no naturally occurring asbestos in the mapped treatment area.

Impact AQ-4

Prescribed burning used during the initial and maintenance treatments for this project has the potential to expose people to toxic air contaminants. Potential exposure to toxic air contaminants from prescribed burns is covered in the PEIR. SPRs relevant to this project include AD-4, AQ-2 and AQ-6. No additional mitigation measures are feasible nor impacts unavoidable, thus this impact is significant and unavoidable.

Impact AQ-5

Equipment used during initial and maintenance phase of the project could expose people to objectionable odors from diesel exhaust. This potential is analyzed in the PEIR. Proposed treatment activities and associated risk are consistent with those evaluated in the PEIR because of associated equipment, duration of use and distance from sensitive receptors. SPRs applicable to this project include HAZ-1 and NOI-4-5. Given the SPRs listed above, this impact is less than significant.

Impact AQ-6

Prescribed burning during initial treatment (pile burning) and maintenance treatment (broadcast burning) could expose people to objectional odors. Potential exposure to objectionable odors was evaluated in the PEIR. The duration parameters of prescribed burns are within the scope of activities addressed in the PEIR. SPRs relevant to this project include AD-4, AQ-2 and AQ-6. All reasonable measures to prevent and minimize exposure are included in the SPRs. No additional mitigation measures are feasible. This impact is significant and unavoidable.

New Air Quality Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR.

PD-3.6: ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	No	NA	NA	No Impact	NA	NA
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	No	NA	NA	No Impact	NA	NA
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL-3	NA	No Impact	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	No	NA	NA	No Impact	NA	NA

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Based on the archeological report no cultural resource a iteratue review identified no cultural resources within the project area. Two recorded resources were identified within 0.25 miles of the Project Area. The pedestrian survey locted a single historica-era cultural resource within the Project Area where soil disturbance should be avoided. The survey area for the archeological report is larger than the most recent Project Area. The orginal Project Area that the archeological survey was based on was reduced to avoid redwood habitat and thus this historic-era cultural resource is no longer within the boundaries of the project area.

Impact CUL-1

No built resources are presen in the Project Area. This Impact does not apply.

Impact CUL-2

No mechanical treatments are planned for the project. Treatments planned would not result in soil disturbance. This impact does not apply.

Impact CUL-3

No cultural resources are within the project area. This impact does not apply.

Impact CUL-4

No mechanical treatments are planned for the project. Treatments planned would not result in soil disturbance. This impact does not apply.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR.

PD-3.7: BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR BIO-1-3 SPR BIO-6-9 SPR GEO-1 SPR GEO-3-7	MM BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO-1-3 SPR BIO-9 SPR BIO-10-12	MM BIO-2b	LTSM (Bats & Badger) LTS(All Other taxa)	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO-1-3 SPR BIO-6 SPR BIO-8-9 SPR GEO-7	MM BIO-3a	LTMS	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	None	None	No Impact	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO-1 SPR BIO-3	None	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	SPR BIO-1-3 SPR BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	SPR AD-3	NA	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	Yes	NA	NA	No Impact	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

In compliance with SPR BIO-1 a reconnaissance level survey of the Project Area was completed on April 18th, 2020 by biologist Brian Peterson. Brian Peterson has a Masters of Science in Ecology and Conservation Biology and has over 10 years of experience working as a consulting biologist on CEQA projects. During the reconnaissance level survey habitats in the project area were evaluated to determine vegetation type, presence of sensitive natural communities and habitat suitability for special status taxa. In addition, a review of relevant databases and literature was performed regarding project-specific biological resources including sensitive natural communities, wetland resources and special status plant and wildlife species.

An initial review of potential vegetation types within the project area was performed using CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer. Based on these data, four different vegetation types are present including; coastal scrub, Douglas fir, redwood and annual grassland. Further, to determine the potential of sensitive natural communities to occur within the project area, table 3.6-16 in the PEIR was reviewed as well a nine-quad CNDDB search of sensitive natural communities. Results included 6 potential sensitive natural communities in the area; Coastal Brackish Marsh, Coastal Terrace Prairie, Northern Maritime Chaparral, Serpentine Bunchgrass (CNDDB 2020) and redwood forest (PEIR 2020). Based on environmental conditions observed during the reconnaissance level survey, two of these sensitive natural communities have the potential to occur on site: Coastal Terrace Prairie and redwood forest. Results of the reconnaissance level survey are discussed in detail under the Impact BIO-3 section. Results of database searches and table 3.6-16 in the PEIR can be found in Appendix 3.

A list of special status plant and wildlife species with potential to occur within the project area was compiled by completing a query of the California Natural Diversity Database (CNDDB; 1-mile buffer), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database (9-quad search; CNDDB 2020, CNPS 2020) and a review of Appendix BIO-3 in the PEIR for special-status taxa found in the Northern Coastal California ecoregion. Based on the habitat documented during the reconnaissance survey, a review of occurrence data, ranges and habitat requirements of each species, eight special status plant taxa and four special status wildlife taxa have the potential to occur within the project area (Table 2). These species are discussed in detail under the Impact BIO-1 (plants) and Impact BIO-2 (wildlife) sections. Database results for all species can be found in Appendix 3.

Treatments proposed for this project are consistent with treatment types and associated activities covered in the CALVTP PEIR. Site-specific characteristics and circumstances have been evaluated by the project proponent and determined to be consistent with applicable with regulatory conditions covered in the CALVTP PEIR. Thus, no substantial increase in severity of identified potential impacts would result from changed circumstances.

Species	CRPR		Life History	Habitat	Potential for Occurrence
	Federal	State			
Special-Status Plants					
Amsinckia lunaris bent-flowered fiddleneck	–	1B.2	Annual	Coastal bluff scrub, Cismontane woodland, Valley and foothill grassland. Found in ALA, CCA, COL, LAK, MRN, NAP, SBT, SCL, SCR, SMT, SON, SUT, YOL counties between 5-1640 feet in elevation. Blooms Mar-Jun.	May occur. Suitable vegetation associations are present. The closest occurrence is CNDDB record (EONDX 109734) from 2013 approximately 2.3 miles southeast.
Dirca occidentalis western leatherwood	–	1B.2	Perennial	Broadleafed upland forest, Closed-cone coniferous forest, Chaparral, Cismontane	May occur. Project site contains potentially suitable habitat. The closest occurrence is CNDDB

				woodland, North Coast coniferous forest, Riparian forest, Riparian woodland. In mesic environments. Found in ALA, CCA, MRN, SCL, SMT, SON counties between 80-1395 feet in elevation. Blooms Jan-Mar(Apr).	record (EONDX 29989) from 2017 approximately 1.2 miles to the east.
Elymus californicus California bottle-brush grass	–	4.3	Perennial	Broadleafed upland forest, Cismontane woodland, North Coast coniferous forest, Riparian woodland. Found in MRN, SCR, SMT, SON counties between 45-1540 feet in elevation. Blooms May-Aug(Nov).	May occur. Project site contains potentially suitable habitat. The closest know occurrence is a herbarium voucher (GH361967) from 1958 approximately 3 miles east of the project area.
Fritillaria lanceolata var. tristulis Marin checker lily	–	1B.1	Geophyte	Coastal bluff scrub, Coastal prairie, Coastal scrub. Found in MRN, SMT counties between 45-490 feet in elevation. Blooms Feb-May.	May occur. Project site contains potentially suitable habitat. The closest occurrence is CNDDB record (EONDX 15011) from 1951 approximately 0.6 mile north west.
Hemizonia congesta ssp. congesta congested-headed hayfield tarplant	–	1B.2	Annual	Valley and foothill grassland sometimes roadsides. Found in LAK, MEN, MRN, SFO, SMT, SON counties between 65-1835 feet in elevation. Blooms Apr-Nov.	May occur. Project site contains potentially suitable habitat. The closest occurrence is CNDDB record (EONDX 109900) from 1967 approximately 2.3 miles to the east.
Leptosiphon acicularis bristly leptosiphon	–	4.2	Annual	Chaparral, Cismontane woodland, Coastal prairie, Valley and foothill grassland. Found in ALA, BUT, CCA, FRE, HUM, LAK, MEN, MRN, NAP, SCL, SMT, SON counties between 180-4920 feet in elevation. Blooms Apr-Jul.	May occur. Project site contains potentially suitable habitat. The closest known occurrence is herbarium voucher (UC73627) from 1904 approximately 5.8 miles southeast from the project area.
Quercus parvula var. tamalpaisensis Tamalpais oak	–	1B.3	Perennial	Lower montane coniferous forest. Found in MRN counties between 325-2460 feet in elevation. Blooms Mar-Apr.	May occur. Project site contains potentially suitable habitat. The closest known occurrence is CNDDB record (EONDX 46538) from an unknown date approximately 1.25 mile east of the project area.
Ribes victoris Victor's gooseberry	–	4.3	Perennial	Broadleafed upland forest, Chaparral. In mesic, shady environments. Found in MEN, MRN, NAP, SOL, SON counties between 325-2460 feet in elevation. Blooms Mar-Apr.	May occur. Project site contains potentially suitable habitat. The closest known occurrence is herbarium voucher (POM141902) from 1890 approximately 4.5 miles east of the study area.
Special-Status Wildlife					
Amphibians and Reptiles					
California giant salamander *Dicamptodon ensatus*	–	SSC		Moist and mesic coastal forests near or in clear cold streams including permanent, semi-permanent and seepages. Terrestrial habitat includes under logs, rock or debris piles usually near water. Found from Santa Cruz county to far southern Mendocino and Lake counties.	May occur. The project area does not contain aquatic or riparian habitat necessary for breeding, however upland habitat associated with the study area may be used for foraging. The closest occurrence is CNDDB record (EONDX 100742) from 1963, and is directly adjacent to the project area. CNDDB record (EONDX 100573) from 2001 is located approximately 0.5 miles to the southeast. Further, this species has been observed by Martin Griffin

					Preserve staff in all three drainages associated with the preserve.
California red-legged frog *Rana draytonii*	FT	SSC		Breeds in slow moving streams and freshwater wetlands. Larval development requires 11-20 weeks of permanent water. Aestivation habitat can include oak woodland and grasslands and can be up to a mile away from breeding habitat.	May Occur. The project area does not contain aquatic or riparian habitat necessary for breeding, however upland habitat associated with the study area may be used for foraging and Aestivation. The closest occurrence is CNDDB record (EONDX 76517) from 2008 and is approximately 0.5 miles west of the project area.
Mammals					
American badger *Taxidea taxus*	–	SSC		Most common in drier open habitats of early shrub succession, grasslands and forest. Requires friable soils to dig and maintain burrows.	May occur. Suitable vegetation soils are present within the project area. however shrub succession is leaving the "early successional" stage making a majority of the habitat marginal. The closest occurrence is CNBBD record (EONDX 56881) from 1930 in the Bolinas. Observations have been sited with Martin Griffin Preserve manger as well as other locals currently.
Hoary bat *Lasiurus cinereus*	–	S4		Solitary rooster in the foliage of trees. Habitats include woodlands, forests, and riparian habitats with dense forests. Ideally trees for roosting are adjacent to canopy openings for ease of aerial access. Typically winters along the coast and breeds inland and north of winter habitat.	May occur. Suitable vegetation associations in the form of Doulas fir forest does exist within the project area. Most trees are young in high density because the forest is newly established replacing historic grasslands making the habitat marginal.

Legal Status Definition

Federal Listing

Rare Plant Ranks:
- FE Federally listed as Endangered
- FT Federally listed as Threatened

State
- SSC: Species of Concern (No formal protection)
- S1: critically Imperiled
- S2: Imperiled
- S3: Vulnerable
- S4 : Apparently Secure
- S5: Secure

California Rare Plant Ranks
- 1A Presumed extinct in California
- 1B Rare or Endangered in California and elsewhere
- 2 Rare or Endangered in California, more common elsewhere
- 3 Plants for which we need more information - Review list
- 4 Plants of limited distribution - Watch list

California Native Plant Society Threat Codes
- .1 Seriously Endangered in California (over 80% of occurrences Threatened / high degree and immediacy of threat)
- .2 Fairly Endangered in California (20-80% occurrences Threatened)
- .3 Not very Endangered in California (<20% of occurrences Threatened or no current threats known)

California Natural Diversity Database (CNDDB)

EONDX # is the CNDDB Element Occurrence Index Number which corresponds to unique records in the California Natural Diversity Database

Impact BIO-1

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct and indirect impacts on special-status plant species is analyzed in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting

potential impacts. SPRs related to biological resources that are relevant for this project include; SPR BIO-1-3, SPR BIO-6-9, SPR GEO-1, and SPR GEO 3-7.

Per SPR BIO-7, protocol-level surveys will not be required for four of the eight target taxa because they are geophytes or annuals (Table 1). They include bent-flowered fiddleneck (*Amsinckia lunaris*), Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), congested-headed hayfield tarplant (*Hemizonia congesta* subsp. *congesta*) and bristly leptosiphon (*Leptosiphon acicularis*). Treatment activities, intensity and work plan are consistent with SPR BIO-7 in that: treatments will not result in ground disturbance and will be implemented during the dormant season of relevant species after they have completed their life-cycle, and that treatment activities do not alter the environment so that special-status taxa have the ability reestablish after the treatment.

Of the eight target species that may occur, three are woody perrenials and one an herbaceous perennial, and thus cannot be avoided using the SPR guidelines for annual herbaceous species. The woody perrenials include western leatherwood (*Dirca occidentalis*), Tamalpais oak (*Quercus parvula* var. *tamalpaisensis*) and Victor's gooseberry (*Ribes victoris*). The herbaceous perennial is California bottle-brush grass (*Elymus californicus*). Based on ranges of the three woody perennial taxa and quality of habitat, presence of these taxa is unlikely. Further, a thorough plant list already exists for MGP that does not include these woody perrenial special status species. However, marginal habitat is present and previous botanical surveys do not have documented methodology and thus no way to assess the level of effort. California bottle-brush grass is known from the property from numerous locations. This species prefers heavely forested habitat which is not the focus of planned treatments, however forest edge habitat will be subject to treatment. Though marginal, habitat is present for all four special status perennial species. Given these factors and in compliance with SPR BIO-7, focused surveys are required for these species before implementation of treatments. If any special-status taxa are observed during these focused surveys, Mitigation Measure BIO-1b will be implemented. It has been determined by biologist Brian Peterson that based on taxonomic features of the above woody perennial species surveys may be done in the spring, summer or fall. The California bottle-brush grass becomes cryptic in the late summer and fall and therefore requires a spring or early summer survey. Given the SPRs listed above, this impact is less than significant.

<u>Impact BIO-2</u>

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in in direct and indirect impacts on special-status wildlife species was evaluated in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting potential impacts. SPRs related to wildlife biological resources that are relevant for this project include; SPR BIO-1-3, SPR BIO -9 and SPR BIO-10-12.

Hoary Bat

Habitat suitable for hoary bat is present on site in the patches of Douglas fir forest. Douglas fir forest within the Project Area is young early successional and thus does not contain the preferred hoary bat habitat of larger trees or snags, making habitat marginal. Further, treatment design specifically avoids removal of large Douglas fir trees (20+ inches in diameter), snags or hardwoods. Though the habitat is marginal and treatment design retains high value habitat, hoary bat uses a wide range of habitat and preferred habitat is not considered a strong correlate for potential presence. Hoary bat roost in tree foliage, which could include the smaller trees that will be removed. Given this potential impact, the project proponent will comply with SPR Bio-10 and focused surveys for hoary bat roost within the treatment area will be conducted before treatments are implemented. If roosts are identified, Mitigation Measure BIO-2b will be implemented, where a no-disturbance buffer of 250 feet will be established within which no work will be performed around the observed roost.

Hoary bat habitat function will remain intact and potentially improved after treatments are implemented. A majority of Douglas fir trees will be left standing and no tree greater than 20 inches in diameter will be removed. Thinning of the dense Douglas fir stands will improve aerial access for Hoary bats. Given the SPRs listed above, this impact is less than significant.

American Badger

Suitable American badger habitat is present within the project area in the form of grassland and early successional shrubland. Though vegetation treatments would not negatively impact American Badger habitat, work activity may

disturb and negatively impact an individual. In compliance with SPR Bio-10, focused surveys for signs of American badger (predominately burrows) within the treatment area will be conducted before treatments are implemented. If American badger signs of any kind including burrows are identified, Mitigation Measure BIO-2b will be implemented and a no-disturbance buffer of 100 feet around the sign will be established within which no work will be performed. American badger habitat function will remain intact and potentially improved after treatments are implemented. Improvement of grassland habitat will favor American badger preferred habitat by opening up shrub and tree canopies. Given the SPRs listed above, this impact is less than significant.

Impact BIO-3

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct and indirect impacts on sensitive habitats including sensitive natural communities (CDFW 2019) was evaluated in the PEIR. Treatment activity and intensity are consistent with those evaluated in the PEIR, as are the resulting potential impacts. SPRs related to biological resources that are relevant for this project include; SPR BIO-1-3, SPR BIO-6, SPR BIO-8-9, and SPR GEO-7.

Review of available and relevant literature and databases and a field reconnaissance survey of project-specific biological resources were performed according to SPR BIO-1. Based on the CNDDB search, communities in Table 3.6-16, and reconnaissance survey, Coastal Terrace Prairie (California Oat Grass Prairie alliance) and Redwood Forest have the potential to occur on site. During the reconnaissance survey species indicative of California Oat Grass Prairie were observed including California oatgrass (*Danthonia californica*), California brome (*Bromus carinatus* var. *carinatus*), blue wild rye (*Elymus glacus*) and purple needlegrass (*Stipa pulchra*). However, patches were small and often under the threshold cover of 25% absolute cover or 50% relative cover of California oatgrass required to be categorized as Coastal Terrace Prairie.

Under requirements stated in SPR BIO-3, if sensitive natural communities have the potential to exist, a protocol-level survey and mapping is required. Mapping native bunchgrass stands is an integral part of the project and will cover this requirement. All redwood forest found within the project area will be avoided. Proposed treatment activities are focused on restoration of the Coastal Terrace Prairie community. Proposed thinning treatments are targeting the removal of coyote brush and Douglas fir trees encroaching on Coastal Terrace Prairie. This active management approach will shift fuel and species structure promoting the restoration of the natural fire regime (or surrogate fire regime) for Coastal Terrace Prairie. Thus Mitigation Measure BIO-3a would apply where treatment activities restore a natural fire regime. With implementation of Mitigation Measure BIO-3a, habitat function will be maintained or improved by treatments resulting in a determination as less than significant under CEQA.

Impact BIO-4

Proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) would not cause impacts to state or federally protected wetlands. During the data review process and reconnaissance survey it was determined that none of these features are within the project area.

Impact BIO-5

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) 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.

Based on a data review and reconnaissance survey, the Project Area does contain large natural habitat areas. No known observed wildlife nursery sites, deer fawning habitat, or rookery trees were identified. Historically, egret and blue heron rookeries have been identified adjacent to the Project Area. These rookeries had total nest failure in 2012 and colony abandonment in 2013. Habitat within the project area may be used for movement and cover by wildlife species. Based on the proposed treatments, potential adverse impacts evaluated in the PEIR are consistent with proposed treatments. SPR BIO-1 and SPR BO-3 would be implemented to ensure habitat function and wildlife movement corridors remain intact. Given the SPRs listed above, this impact is less than significant.

Impact BIO-6

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct or indirect reduction of habitat or abundance of common wildlife including nesting birds was evaluated in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting potential impacts. SPRs that apply are SPR BIO-1-3 and SPR BIO-12.

Suitable habitat for common wildlife, including nesting birds, is present within the Project Area. SPR BIO-12 would be implemented by scheduling treatment activities to avoid bird nesting season. Nesting season will be determined by a qualified biologist and will include common birds, native birds and raptors. Given the SPRs listed above, this impact is less than significant.

Impact BIO-7

Proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) could conflict with local ordinances or policies. The potential for these types of conflict are examined in the PEIR. All CALVTP project must comply with local ordinances and policies of a county or city that apply to protection of biological resources. Based on the analysis in the PEIR the project would result in no impact. The relevant SPR to this impact is SPR AD-3.

Impact BIO-8

Proposed initial and maintenance treatments would not conflict with any habitat conservation plans (HCP) or natural community conservation plans (NCCP), because the treatment site is not within a plan area. Consistent with the determination in the PEIR, the proposed project would result in no impact.

New Biological Resource Impacts

The project proponent has considered relevant environmental and regulatory conditions that apply to the project area and are consistent with those covered in the PEIR. Further, treatment activities are likewise consistent with those covered in the PEIR. Thus, no new impacts on biological resources would occur that are not covered in the PEIR.

PD-3.8: GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1-GEO-3-8, AQ-3	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-3, GEO-4, GEO-8, HYD-3 & AQ-3	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact GEO-1

Proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) include vegetation removal and could cause soil disturbance. Potential impacts of these treatments are evaluated in the PEIR and proposed treatment activities and intensity are consistent with those evaluated in the PEIR. The potential for soil erosion and loss of top soil due to the proposed treatment activities were analyzed in the PEIR. A full USGS soils report can be found in Appendix 4. SPRs that will be applied for this project include AQ-3, GEO-1 and GEO-3-8. Given the SPRs listed above, this impact is less than significant.

Impact GEO-2

Proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) would be implemented in some areas with 50% slope or greater. No active or recently active landslides were observed during the reconnaissance survey. Potential for the proposed treatments to impact soil stability was evaluated in the PEIR. No mechanical treatments are proposed and potential impacts related to prescribed burning or prescribed herbivory are consistent with those discussed in the PEIR. SPRs applicable to these treatments include GEO-3, GEO-4, GEO-8, HYD-3 and AQ-3. Given the SPRs listed above, this impact is less than significant.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments for this project and environmental conditions are consistent with those evaluated in the PEIR and are consistent with regulatory conditions present in the PEIR. Further, the circumstances within which treatment activities are to be implemented are also consistent with those evaluated in the PEIR. Thus, no new impact related to geology, soil, paleontology, or mineral resources would arise that is not covered in the PEIR.

PD-3.9: GREENHOUSE GAS EMISSIONS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	GHG-1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	SU	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact GHG-1

Use of vehicles, gas powered tools and prescribed burning associated with the initial and maintenance treatments would result in GHG emissions. The proposed treatments are consistent with applicable plans, policies, and regulations aimed at reducing GHG emissions covered in the PEIR. Similarly, proposed treatments and treatment intensity are consistent with resulting GHG impacts analyzed in the PEIR. SPR GHG-1 is applicable and the project proponent will record and submit the necessary data to CAL FIRE's FRAP in support of fulfilling AB 1504 requirements.

Impact GHG-2

Use of vehicles, gas powered tools and prescribed burning associated with the initial and maintenance treatments would result in GHG emissions. The proposed treatments and their intensity are consistent with those evaluated in the PEIR. Relevant SPR's include GHG-1 and AQ-3. Mitigation Measure GHG-2 will be implemented to reduce emission impacts associated with prescribed burning. This impact is significant and unavoidable.

New Impacts Related to GHG Emissions

The proposed treatments for this project and environmental conditions are consistent with those evaluated in the PEIR and are consistent with regulatory conditions present in the PEIR. Further, the circumstances within which

treatment activities are to be implemented are also consistent with those evaluated in the PEIR Thus, no new impact related to GHG emissions would arise that is not covered in the PEIR.

PD-3.10: ENERGY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1, pp. 3.9-7 – 3.9-8	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact ENG-1

Use of vehicles, gas powered tools and prescribed burning associated with the initial and maintenance treatments would result in energy consumption. The proposed treatments and their resulting energy use are within the scope of the PEIR. Thus, expected impacts from energy use covered in the PEIR relate to those expected from the proposed project. No SPRs are applicable to this impact.

New Energy Resource Impacts

The proposed treatments for this project and environmental conditions are consistent with those evaluated in the PEIR and are consistent with regulatory conditions present in the PEIR. Further, circumstances which treatment activities are to be implemented are also consistent with those evaluated in the PEIR. Thus, no new impacts on energy resources would arise that are not covered in the PEIR.

PD-3.11: HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	No	NA	NA	No Impact	NA	NA
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ-3	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact HAZ-1

Proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) included activities that use fuels and accelerants that are hazardous materials. The potential for these hazardous materials to cause significant health hazards under set circumstances is evaluated in the PEIR. Treatment activities and intensity are consistent with those covered in the PEIR. SPR HAZ-1 is applicable to this treatment. Given the SPRs listed above, this impact is less than significant.

Impact HAZ-2

No herbicide use is proposed for this project. This impact does not apply.

Impact HAZ-3

Though no initial treatments proposed here have the potential to disturb soils, prescribed burning as a maintenance treatment presents potential to cause soil disturbance and thus expose workers to hazardous materials if they are

present on site. The potential for workers to be exposed to hazardous materials due to soil disturbance resulting from prescribed burns is evaluated in the PEIR. The project site is private property managed and owned by the non-profit Audubon Canyon Ranch. In compliance with Mitigation Measure HAZ-3 the preserve manager was consulted and a review of historical land use was preformed, leading to the determination that no hazardous materials are stored on site. No SPRs are applicable and no further mitigation required. This impact is less than significant.

New Hazardous Materials, Public Health and Safety Impacts

The proposed treatments for this project and environmental conditions are consistent with those evaluated in the PEIR and are consistent with regulatory conditions present in the PEIR. Further, circumstances which treatment activities are to be implemented are also consistent with those evaluated in the PEIR. Thus, no new impacts on hazardous materials, public health and safety would arise that are not covered in the PEIR.

PD-3.12: HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
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	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	GEO-4, GEO-6 & AQ-3	NA	LTS	No	Yes
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	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	GEO-1-GEO-3-4, GEO-7-8 &HAZ-1	NA	LTS	No	Yes
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	LTS	Impact HYD-3, p. 3.11-29	Yes	GEO-1, GEO-3-4, GEO-7-8 & HAZ-1	NA	NA	No	Yes
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	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	NA	NA	NA	NA	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact HYD-1

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct or indirect impacts to Water Courses or Lake Protection Zones is analyzed in the PEIR. However, the proposed project site does not include Watercourse and Lake Protection Zones. Potential for pile and broadcast burning to impact soil runoff and thus waterways was evaluated in the PEIR. Proposed treatments are consistent with those analyzed in the PIER. SPRs applicable to treatments associated with this project include GEO-4, GEO-6 and AQ-3. Given the SPRs listed above, this impact is less than significant.

Impact HYD-2

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in violation of water quality regulations or impact water quality was evaluate in the PEIR. No Watercourse and Lake Protection Zones were associated with the project site. Relevant SPRs include GEO-1, GEO 3-4, GEO-7-8 and HAZ-1. Given the SPRs listed above, this impact is less than significant.

Impact HYD-3

Prescribed herbivory is a potential maintenance treatment for this project. The potential for prescribed herbivory to substantially degrade surface and ground water quality is evaluated in the PEIR. The type and intensity of prescribed herbivory proposed for a potential maintenance treatment is consistent with those analyzed in the PEIR and thus the potential impacts analyzed in the PEIR apply to the proposed prescribed herbivory treatment. The SPR relevant to this treatment is SPR HYD-3, BIO-1, GEO -1, GEO-3-5 and GEO-7. Given the SPRs listed above, this impact is less than significant.

Impact HYD-4

This impact does not apply to the initial treatment or treatment maintenance because herbicides would not be used as a treatment type on the project site.

Impact HYD-5

The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in ground disturbance is evaluated in the PEIR. The proposed treatment activities and their intensity are consistent with those covered in the PEIR. No SPRs are relevant to this treatment. No impact will occur.

New Hydrology and Water Quality Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on hydrology and water quality would arise that are not covered in the PEIR.

PD-3.13: LAND USE AND PLANNING, POPULATION AND HOUSING

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	AD-3	NA	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact LU-1

The proposed treatment is on private property. Potential for treatment activities to conflict with local land use plan, policy or regulation is evaluated in the PEIR. Activities proposed for this project do not conflict with known local ordinances. SPR AD-3 applies to this project. Given the SPRs listed above, this impact is less than significant.

Impact LU-2

Implementation of proposed treatments would require approximately 5-7 crew members. The potential for population increase associated with required personal was evaluated in the PEIR. Crew size required to complete the project is consistent with those analyzed in the PEIR. No SPRs are applicable to this impact. This impact is less than significant.

New Land Use and Planning, Population and Housing Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on landuse planning, population and housing would arise that are not covered in the PEIR.

PD-3.14: NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3, NOI-1 & NOI-4-5	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact NOI-1

Initial proposed treatments require the use of chainsaws. The PEIR evaluated the potential impacts of short-term increase in ambient noise from manual treatments. Equipment and use duration required for the proposed treatment are consistent with activities covered in the PEIR. Further, all work activities will be limited to daylight hours. SPRs relevant to this impact include AD-3, NOI-1 and NOI-4-5. There ar no off-site sensitive receptors in proximity to the project area. Given the SPRs listed above, this impact is less than significant.

Impact NOI-2

Proposed treatment would include vehicles for crew transportation. The potential for increase in short-term SENL was analyzed in the PEIR and associated impacts evaluated. The number of vehicles and frequency and duration of use are consistent with conditions covered in the PEIR. Further, vehicles used for transposition do not present conditions that are out of the norm for Hwy 101 in the area outside of Stinson Beach. Finally, all travel will be during daylight hours. SPR NOI-1 is applicable to this impact. Given the SPRs listed above, this impact is less than significant.

New Noise Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on noise would arise that are not covered in the PEIR.

PD-3.15: RECREATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	No	NA	NA	No Impact	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact REC-1

The project area is within private property and thus would not impact public recreation. This impact does not apply.

New Recreation Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on recreation would arise that are not covered in the PEIR.

PD-3.16: TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
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	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3 & TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	AD-3, HYD-2 & TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact TRAN-1

Initial treatments would increase traffic along Hwy 101 for approximately five days a year for two years by an estimated five vehicles. The proposed treatment would be short-term and are consistent with the amount of increased traffic associated with treatments covered in the PEIR. SPRs AD-3 and TRAN-1 are applicable to this impact. Given the SPRs listed above, this impact is less than significant.

Impact TRAN-2

Initial treatments would not require construction or alteration of road that would impede traffic. The potential maintenance treatment of prescribed burning however, could affect visibility along the road with smoke. Temporary smoke impact along roadways is evaluated in the PEIR and proposed maintenance treatments of prescribed burning are consistent with activities covered. SPRs relevant to this impact include AD-3, HYD-2 and TRAN-1. Given the SPRs listed above, this impact is less than significant.

Impact TRAN-3

Vehicle traffic associated with the proposed treatments could increase vehicle miles traveled (VMT) in the short term because the site is relatively remote. Increase in vehicle miles traveled associated with treatments was evaluated in the PEIR and determined to be a potentially significant and unavoidable impact. However, transportation associated with this project is going be far lower than the fewer than 110 trips a day considered less than significant in the Technical Advisory on evaluating Transportation Impacts (OPR 2018). Mitigation Measure AQ-1 aimed at reducing VMT is relevant for this impact. Given the SPRs listed above, this impact is less than significant.

New Transportation Impacts

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on transportation would arise that are not covered in the PEIR.

PD-3.17: PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	NA	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 -3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	NA	NA	No Impact	NA	NA
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact UTIL-1

Initial treatment would not require water resources. However, the potential maintenance treatment of prescribed burning could require water resources if the burn was out of prescription. Increased use of water for treatments and its potential impact is evaluated in the PEIR. No SPRs are relevant to this impact. This impact is less than significant.

Impact UTIL-2

The proposed treatments would generate biomass. All biomass from this project will be burned in piles. No biomass will be hauled off site, and thus, this will not have any impact on capacity of existing infrastructure.

Impact UTIL-3

Proposed initial and maintenance treatments will produce biomass. However, no biomass will be hauled off site; biomass will be burned in piles on-site. This activity is within the scope covered in the PEIR. Disposal of biomass on-site would comply with statutes, regulations and goals evaluated in the PEIR. This impact is less than significant.

New Impacts to Public Services, Utilities and Service Systems

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on public services, utilities and service systems would arise that are not covered in the PEIR.

PD-3.18: WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	HAZ-2-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	AQ-3, GEO-2-5, GEO-8	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Click or tap here to enter text.

Impact WIL-1

Initial treatment will include manual thinning and will not increase exposure to fire risk. However, the potential for prescribed burning as maintenance treatment would increase exposure to wildfire risk due to the potential of escape. The potential for prescribed burning to expose people to increased wildfire risk is covered in the PEIR. Potential maintenance activities of prescribed burns are consistent with those evaluated in the PEIR. SPRs applicable to this impact include HAZ-2-4. Given the SPRs listed above, this impact is less than significant.

Impact WIL-2

Potential maintenance treatments include prescribed burning. However the treatments are not on steep slopes so would not increase exposure to post-fire landslides. The severity of prescribed burning for this project is consistent with severity evaluated in the PEIR. SPRs for this impact include AQ-3, GEO-2-5 and GEO-8. Given the SPRs listed above, this impact is less than significant.

New Impacts to Wildfire

The treatments associated and conditions of their implementation within the proposed project are consistent with those covered in the PEIR. Further, no foreseeable changed circumstances would create new impacts not covered in the PEIR. Thus, no new impacts on wildfire would arise that are not covered in the PEIR.

ATTACHMENT A – STANDARD PROJECT REQUIREMENTS AND MITIGATION MEASURES CHECKLIST

Instructions: Review the standard project requirements and mitigation measures and verify that those that are applicable will be implemented. Provide information for each column as follows:

- Applicable (Yes/No). Document whether the SPR or mitigation measure is applicable to the initial treatment and/or treatment maintenance (Yes or No), and whether it is applicable to initial treatment and/or treatment maintenance. The applicability should be substantiated in the Environmental Checklist Discussion.
- Timing. This column identifies the time frame in which the SPR or mitigation measure will be implemented (e.g., prior to treatment, during treatment, etc.).
- Implementing Entity. The implementing entity is the agency 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. The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: 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 onsite; 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	Project Proponent	Project Proponent
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, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	Project Proponent	Project Proponent
SPR AD-4 Public Notifications for Prescribed Burning: At least 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; 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
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	Initial Treatment: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Treatment Maintenance: Yes			
SPR AD-6 Public Notifications for Treatment Projects. 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
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. Information on proposed projects (PSA in progress): ▶ 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. 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). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist);	Initial Treatment: Yes Treatment Maintenance: Yes	Prior, During & Post	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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). Information on completed projects: ▶ 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 ■ Size of treated area (typically acres); ■ Treatment types and activities; ■ Dates of work; ■ A list of the SPRs and mitigation measures that were implemented ■ 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). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
SPR AD-8 Request Access for Post-Treatment Assessment. 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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 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	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions: 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. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AES-2 Avoid Staging within Viewsheds: 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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AES-3 Provide Vegetation Screening: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Air Quality Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, 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. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
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. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and 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.	Initial Treatment: No Treatment Maintenance: Yes	Prior	ACR	Project Proponent
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ 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 ARB, 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-5 Avoid Naturally Occurring Asbestos: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP 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 onsite 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.	Initial Treatment: No Treatment Maintenance: Yes	During	ACR	Project Proponent
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	Sonoma State University	Project Proponent
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	Sonoma State University	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	Sonoma State University	Project Proponent
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	ACR	Project Proponent
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. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	ACR	Project Proponent
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist	Initial Treatment: Yes	Prior	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Yes			
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. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures;	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Sensitive Natural Communities and Other Sensitive Habitats				
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, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
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 by implementing the following within riparian habitats: ▶ 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	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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). ▶ 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. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ 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 goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, 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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, 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. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: ▶ Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ▶ 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. ▶ 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				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.				
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., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ 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 *Phytopthora* 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	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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 *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Special-Status Plants				
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 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." 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. If potentially occurring special-status plants are listed under CESA or 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: ▶ 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 lifecycle 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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Environmentally Sensitive Habitat Areas				
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts: ▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA. ▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ 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	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 uninfested 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 onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite 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; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
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, monarch overwintering sites) 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). 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: ▶ 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 electrified at all times 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. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: Yes	Prior	ACR	Project Proponent
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 will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g.,	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▶ Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. 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.	Initial Treatment: No Treatment Maintenance: Yes	During	ACR	Project Proponent
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. 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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. 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.	Initial Treatment: No Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During & Post	ACR	Project Proponent
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 (February 2019 version). 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During & Post	ACR	Project Proponent
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. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (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. (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: (i) Existing tractor roads that do not require reconstruction, or	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
(ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
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). 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, of 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent
Greenhouse Gas Emissions Standard Project Requirements				
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, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Post	ACR	Project Proponent
Hazardous Material and Public Health and Safety Standard Project Requirements				
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. 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.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior & During	ACR	Project Proponent
SPR HAZ-2 Require Spark Arrestors: 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
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 onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will 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. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR HAZ-6 Comply with Herbicide Application Regulations: 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 prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-7 Triple Rinse Herbicide Containers: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ 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. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: 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 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	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
Hydrology and Water Quality Standard Project Requirements				
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. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements 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. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/Monitoring Entity</th></tr>
<tr><td>This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (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 (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>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.</td><td>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.</td><td>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.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</td></tr>
<tr><td>< 30 % Slope</td><td>75</td><td>50</td><td rowspan="3" colspan="2">Sufficient to prevent the degradation of downstream beneficial uses of water.</td></tr>
<tr><td>30-50 % Slope</td><td>100</td><td>75</td></tr>
<tr><td>>50 % Slope</td><td>150</td><td>100</td></tr>
</table>
</td><td>Initial Treatment:
No
Treatment Maintenance:
No</td><td>Click or tap here to enter text.</td><td>Click or tap here to enter text.</td><td>Click or tap here to enter text.</td></tr>
</table>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity

			Determined on a site-specific basis.

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

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, rip-rap, 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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR NOI-2 Equipment Maintenance: 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses: 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
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. 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Recreation Standard Project Requirements				
SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent to 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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Transportation Standard Project Requirements				
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	Initial Treatment: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be 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 be 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. 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.	Treatment Maintenance: No			
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. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Public Services and Utilities Standard Project Requirements				
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. 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	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Air Quality				
Mitigation Measure 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. 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 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.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Techniques for reducing emissions may include, but are not limited to, the following: ▶ 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: ▪ 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.				
Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure 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 archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.				
Biological Resources				
Mitigation Measure 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), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer 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 buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.				
Mitigation Measure 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 the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure 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 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. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. 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. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. 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.				
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA 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 adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. ▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.				
Mitigation Measure 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 by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. ▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed 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. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.				
Mitigation Measure 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 Measure 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. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms,	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. ▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. 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.				
Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities) If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle: ▶ If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required. ▶ If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented: ▪ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g., damage to root system) that could damage or kill the plant, with the exception of the following activities: – Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle. – Manual or mechanical vegetation treatment within the drip-line of any elderberry shrub will be limited to the season when adults are not active (August - February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry. ▪ A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.				
Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: ▶ Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). ▶ Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. ▶ Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. ▶ Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c. CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. 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 species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity

Table 3.6-34 Special-status Butterflies and Associated Host Plants

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*)
Behren's silverspot butterfly	blue violet (*Viola adunca*)
callippe silverspot butterfly	California golden violet (*Viola pedunculata*)
Carson wandering skipper	salt grass (*Distichlis spicata*)
El Segundo blue butterfly	seacliff buckwheat (*Eriogonum parvifolium*)
Hermes copper butterfly	spiny redberry (*Rhamnus crocea*)
Kern primrose sphinx moth	plains evening-primrose (*Camissonia contorta*), field primrose (*Camissonia campestris*)
Laguna Mountains skipper	Cleveland's horkelia (*Horkelia clevelandii*), sticky cinquefoil (*Drymocallis glandulosa*)
Lange's metalmark butterfly	naked-stemmed buckwheat (*Eriogonum nudum*)
lotis blue butterfly	seaside bird's foot trefoil (*Hosackia gracilis*)
Mission blue butterfly	lupine (*Lupinus* spp.)
Myrtle's silverspot butterfly	blue violet
Oregon silverspot butterfly	blue violet
Palos Verdes blue butterfly	Santa Barbara milkvetch (*Astragalus trichopodus*), common deerweed (*Acmispon glaber*)
San Bruno elfin butterfly	broadleaf stonecrop (*Sedum spathulifolium*), manzanita (*Arctostaphylos* spp.), huckleberry (*Vaccinuum* spp.)
Smith's blue butterfly	seacliff buckwheat, seaside buckwheat (*Eriogonum latifolium*)
Quino checkerspot butterfly	dwarf plantain, purple owl's clover

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail, Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species. If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area).	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. 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 species 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. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory) The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: ▶ Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007). ▶ Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Mitigation Measure 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: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. 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. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.				
Mitigation Measure 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 implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				
Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: ▪ restoring riparian habitat functions and acreage within the treatment area; ▪ restoring degraded riparian habitat outside of the treatment area; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. 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.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures).	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer ▪ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment ▶ Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF,	Initial Treatment: No Treatment Maintenance: No	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.				
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns 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 the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ 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 and spread with compost 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 biooil 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.	Initial Treatment: Yes Treatment Maintenance: Yes	During	ACR	Project Proponent
Hazardous Materials, Public Health and Safety				
Mitigation Measure 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. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the	Initial Treatment: Yes Treatment Maintenance: Yes	Prior	ACR	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				

ATTACHMENT B – PROJECT-SPECIFIC CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

Template Available for Use by Proponents of Vegetation Treatment Projects Within the Scope of the CalVTP Program EIR.

INTRODUCTION

The [Note to Template User: INSERT NAME of Project Proponent[1]], referred to herein as "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the [Note to Template User: NAME OF TREATMENT PROJECT], referred to herein as "vegetation treatment project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same section provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (Pub. Resources Code, Section 21002.) Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(CEQA Guidelines, Section 15091, subd. (a); Pub. Resources Code, Section 21081, subd. (a).) Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." (See also *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 565.)

[1] For the purposes of implementing the CalVTP, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. If through the Project Specific Analysis (PSA) a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Sections 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).) The California Board of Forestry and Fire Protection (the Board), adopted Findings and a Statement of Overriding Considerations on December 30, 2019.

Here, as explained in the Board's Findings and the Draft Program Environmental Impact Report (Draft PEIR) and the Final PEIR (collectively, the "PEIR"), the CalVTP would result in significant and unavoidable environmental effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. For reasons set forth in the Board's Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must adopt its own CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. (See CEQA Guidelines section 15096(h).) According to case law, a responsible agency's findings need only address environmental impacts "within the scope of the responsible agency's jurisdiction." (*Riverwatch v. Olivenhain Municipal Water District* (2009) 170 Cal.App.4th 1186, 1202.) Although each responsible agency must adopt its own findings, such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. The following document sets forth the required findings for an agency's project-specific approval that relies on and implements the CalVTP PEIR.

The Project Proponent adopts these findings to document its exercise of its independent judgment regarding the potential environmental effects analyzed in the PEIR and to document its reasoning for approving the vegetation treatment project under the CalVTP in spite of these effects.

BACKGROUND AND PROJECT DESCRIPTION

[Note to Template Users: PROVIDE PROJECT DESCRIPTION FROM PROJECT-SPECIFIC ANALYSIS]

ENVIRONMENTAL REVIEW PROCESS

The Project Proponent followed the evaluation and reporting process outlined in the PSA and required under the CalVTP.

On [Note to Template User: DATE], Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

- GIS data that included project location (as a point);
- project size;
- planned treatment types and activities; and
- contact information for a representative of the project proponent.

Upon adoption of these findings and approval of the project, Project Proponent will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

- The completed PSA Environmental Checklist;
- The 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)

As required under the CalVTP, Project Proponent will submit the following information to CAL FIRE after implementation of the treatment:

- 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
  - 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
  - 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.

RECORD OF PROCEEDINGS

In accordance with Public Resources Code Section 21167, subdivision (e), the record of proceedings for the Project Proponent's decision to approve the vegetation treatment project under the CalVTP includes the following documents at a minimum:

- The certified Final PEIR for the CalVTP, including the Draft PEIR, responses to comments on the Draft PEIR, and appendices;
- All recommendations and findings adopted by the Board in connection with the CalVTP and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the Project Proponent, consultants to the Project Proponent, or responsible or trustee agencies with respect to the Project Proponent's compliance with the requirements of CEQA and with respect to the Project Proponent's action on the CalVTP;
- Matters of common knowledge to the Project Proponent, including but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

Pursuant to CEQA Guidelines section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at [Note to Template User: WHERE]. The custodian of these documents is [Note to Template User: TITLE, NAME].

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was adopted by the Board for the CalVTP, and the applicable mitigation measures for this treatment project have been identified in the PSA. The Project Proponent will use the MMRP to track compliance with the CalVTP mitigation measures. The MMRP will remain available for public review during the compliance period. The Final MMRP is attached to and is approved in conjunction with the approval of the treatment project and adoption of these Findings.

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the Final PEIR and the treatment project PSA, which were presented to the [Note to Template Users: INSERT NAME of Project Proponent decisionmaker or decision-making body] and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment project.

The Project Proponent concurs with the conclusions in the Final PEIR and treatment project PSA that all of the following impacts will be less than significant:

AESTHETICS AND VISUAL RESOURCES

- 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-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

AGRICULTURAL AND FORESTRY RESOURCES

- Impact AG-1: Directly Result 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

AIR QUALITY

- Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk
- Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

- Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources
- Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource
- Impact CUL-4: Disturb Human Remains

BIOLOGICAL RESOURCES

- Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife
- Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources
- Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan

GEOLOGY, SOILS, AND MINERAL RESOURCES

- Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil
- Impact GEO-2: Increase Risk of Landslide

GREENHOUSE GAS EMISSIONS

- Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

ENERGY RESOURCES

- Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

- Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials
- Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides

HYDROLOGY AND WATER QUALITY

- 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-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-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
- 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
- Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

LAND USE AND PLANNING, POPULATION AND HOUSING

- Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation

- Impact LU-2: Induce Substantial Unplanned Population Growth

NOISE

- Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation
- Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities

RECREATION

- Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas

TRANSPORTATION

- 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-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses

PUBLIC SERVICES, UTILITIES, AD SERVICE SYSTEMS

- Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs
- Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

WILDFIRE

- Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire
- Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides

CUMULATIVE

- Agriculture and Forestry Resources
- Biological Resources
- Geology, Soils, Paleontology, and Mineral Resources
- Energy Resources
- Hazardous Materials, Public Health and Safety
- Hydrology and Water Quality
- Population and Housing
- Noise
- Recreation
- Wildfire

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The PEIR identified a number of significant and potentially significant environmental effects (or impacts) that the CalVTP will contribute to or cause. The Board determined that some of these significant effects can be fully avoided through the application of feasible mitigation measures. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives and thus will be significant and unavoidable. For reasons set forth in Section 10.2 of the Board's Findings and Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

The Board adopted the findings required by CEQA for all direct and indirect significant impacts. The findings provided a summary description of each impact, described the applicable mitigation measures identified in the PEIR and adopted by the Board, and stated the Board's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final PEIR; and the Board incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board ratified, adopted, and incorporated into the findings the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

Not every individual treatment project will have all of the significant environmental impacts that the CalVTP was determined to contribute to or cause. Additionally, some of the environmental impacts predicted by the CalVTP PEIR to be significant and unavoidable or less than significant after mitigation may be determined in a PSA to be less severe for an individual treatment project than determined in the statewide PEIR. The impacts and mitigation measures identified in Sections 8.1 and 8.2 below reflect the conclusions of the PSA by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the Project Proponent's decisionmaker or decisionmaking body is hereby making the required findings under CEQA regarding the application or feasibility of mitigation measures to reduce those impacts.

FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The Project Proponent finds that changes or alterations have been required in, or incorporated into, the treatment project which avoid or substantially lessen the significant environmental effects indicated below, as identified in the Final PEIR and the PSA. Implementation of the mitigation measures indicated below to be applicable to the treatment project, which have been required or incorporated into the project, will reduce these impacts to a less than significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

BIOLOGICAL RESOURCES

☒ Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications

- ☒ Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA
- ☒ Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA
- ☐ Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Tree-Nesting and Cavity-Nesting Wildlife)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Shrub-Nesting Wildlife)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ground-Nesting Wildlife)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Burrowing and Denning Wildlife)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
- ☐ Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)
- ☐ Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)
- ☐ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Bats)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ungulates)

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Fish and Aquatic Invertebrates (in wetlands, vernal pools))

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Amphibians and Reptiles (in wetlands, vernal pools, associated riparian))

- ☐ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☐ Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function

☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☐ Impact BIO-4: Substantially Affect State or Federally Protected Wetlands

☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☐ Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries

☐ Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

☐ Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites

☐ Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP PEIR determined that some impacts of the program would be significant and unavoidable, even after implementation of all feasible mitigation. The Project Proponent finds that the treatment project would contribute to or cause the following significant and unavoidable impacts as indicated. Incorporating and implementing the following mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted. The Project Proponent therefore finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR and PSA.

The Project Proponent finds that fully mitigating these impacts are not feasible; there are no feasible mitigation measures beyond the mitigation measures indicated below to reduce these impacts. [Alternative to preceding sentence: The Project Proponent has reviewed any suggested mitigation measures and finds these suggestions infeasible.] These impacts will remain significant and unavoidable. The Project Proponent concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant unavoidable impacts of the Program and treatment project, as set forth in the Board's Statement of Overriding Considerations the Project Proponent's own Statement of Overriding Considerations, if any].

AESTHETICS AND VISUAL RESOURCES

☐ 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

☐ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

AIR QUALITY

☒ Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that Would Exceed CAAQS Or NAAQS and Conflict with Regional Air Quality Plans

☒ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

☒ Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk

☒ No feasible mitigation is available.

☒ Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning

☒ No feasible mitigation is available.

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

☐ Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources

☐ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

BIOLOGICAL RESOURCES

☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates - Bumble Bees)

☐ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

GREENHOUSE GAS EMISSIONS

☒ Impact GHG-2: Generate GHG Emissions through Treatment Activities

☒ Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns

TRANSPORTATION

☐ Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP

☐ No feasible mitigation is available.

PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

☐ Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity

☐ No feasible mitigation is available.

CUMULATIVE

Aesthetics

☐ Cumulative Aesthetics Impact related to Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway

☐ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

Air Quality

☐ Cumulative Air Quality Impact related to On-Road Vehicle and Off-Road Equipment Exhaust Emissions

☐ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

Archaeological, Historical, and Tribal Cultural Resources

☐ Cumulative Archaeological, Historical, and Tribal Cultural Resources Impact related to Inadvertent Discoveries of Unique Archaeological Resources

☐ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

Biological Resources

☐ Cumulative Biological Resources Impact related to Bumble Bees

☐ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

Transportation

☐ Cumulative Transportation Impact related to Vehicle Miles Travelled

☐ No feasible mitigation is available.

Public Services, Utilities and Service Systems

☐ Cumulative Public Services, Utilities, and Service Systems Impact related to Disposal of Biomass

☐ No feasible mitigation is available.

STATEMENT OF OVERRIDING CONSIDERATIONS[2]

As set forth in the Board's adopted Findings, the Board determined that the CalVTP will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives that would mitigate or substantially lessen the impacts. Despite these effects, however, the Board, in accordance with CEQA Guidelines Section 15093, chose to approve the CalVTP because, in its view, the benefits to life, property, and other resources, and the other benefits of the CalVTP, will render the significant effects acceptable.

In the Board's judgment, the CalVTP and its benefits outweigh its unavoidable significant effects. The Board's Findings were based on substantial evidence in the record. The Board's Statement of Overriding Considerations identified the specific reasons why, in the Board's judgment, the benefits of the CalVTP as approved outweigh its unavoidable significant effects.

[2] If the PSA indicates that the project proponent's treatment project will not contribute to or cause any of the significant and unavoidable impacts determined in the PEIR, the proponent need not adopt a statement of overriding considerations.

Exercising its independent judgment and review, the Project Proponent concurs that the benefits of the CalVTP and the treatment project outweigh the significant environmental effects and hereby incorporates by reference and adopts the Board's Statement of Overriding Considerations for the CalVTP.

Any one of the reasons listed in the Statement of Overriding Considerations is sufficient to justify approval of the treatment project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Project Proponent would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and the documents found in the Record of Proceedings, which are described and defined in Section 5, above.

- The CalVTP will reduce dire risks to life, property, and natural resources in California.
- The CalVTP reflects the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- The CalVTP reflects the Board's and CAL FIRE's goals. The CalVTP will help the Board and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- The CalVTP will help implement Executive Orders, including:
  - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state;
  - EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed fire; and
  - EO N-05-19: Governor Newsom's order directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires.
- The Board is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The CalVTP will bring the Board into compliance with these requirements.
- The Board is required by law to comply with SB 632, signed into law by Governor Newsom in October 2019, which requires the Board to certify a Final PEIR, pursuant to CEQA, for the vegetation treatment program filed with the State Clearinghouse under Number 2019012052 in January 2019. The CalVTP will bring the Board into compliance with this requirement.
- The CalVTP will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.

[Note to Template Users OPTIONAL: The Project Proponent hereby also finds that the following local and/or regional issues are sufficient individual reasons to approve the treatment project, in spite of its significant environmental effects:…]

ATTACHMENT C – PROJECT-SPECIFIC REVIEW AND SURVEY GUIDANCE FOR BIOLOGICAL RESOURCES

The following presets a stepwise guide for using the PEIR to determine the potentially affected resources in a project treatment area and the applicable SPRs and mitigation measures.

1) Pre-Treatment Review

a. Determine the ecoregion in which the treatment area is located.

i. Reference Figure 3.6-1

Special-Status Species

b. Determine which special-status plants, wildlife, and fish may be present within the ecoregion.

i. Refer to Appendix BIO-3

1. Central California Coast
    a. Table 1a: Special-Status Plants
    b. Table 1b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
2. Central California Coast Ranges
    a. Table 2a: Special Status Plants
    b. Table 2b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
3. Colorado Desert
    a. Table 3a: Special-Status Plants
    b. Table 3b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
4. Great Valley
    a. Table 4a: Special-Status Plants
    b. Table 4b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
5. Klamath Mountains
    a. Table 5a: Special-Status Plants
    b. Table 5b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
6. Modoc Plateau
    a. Table 6a: Special-Status Plants
    b. Table 6b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
7. Mojave Desert
    a. Table 7a: Special-Status Plants
    b. Table 7b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
8. Mono
    a. Table 8a: Special-Status Plants
    b. Table 8b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
9. Northern California Coast
    a. Table 9a: Special-Status Plants

b. Table 9b: Special-Status Wildlife
c. Table 19: Special-Status Fish

10. Northern California Coast Ranges
    a. Table 10a: Special-Status Plants
    b. Table 10b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
11. Northern California Interior Coast Ranges
    a. Table 11a: Special-Status Plants
    b. Table 11b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
12. Northwestern Basin and Range
    a. Table 12a: Special-Status Plants
    b. Table 12b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
13. Sierra Nevada
    a. Table 13a: Special-Status Plants
    b. Table 13b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
14. Sierra Nevada Foothills
    a. Table 14a: Special-Status Plants
    b. Table 14b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
15. Southeastern Great Basin
    a. Table 15a: Special-Status Plants
    b. Table 14b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
16. Southern California Coast
    a. Table 16a: Special-Status Plants
    b. Table 16b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
17. Southern California Mountains and Valleys
    a. Table 17a: Special-Status Plants
    b. Table 17b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
18. Southern Cascades
    a. Table 18a: Special-Status Plants
    b. Table 18b: Special-Status Wildlife
    c. Table 19: Special-Status Fish

ii. Obtain an updated review of CNDDB and CNPS databases, relevant Biogeographic Information and Observation System (BIOS) queries, and relevant general and regional plans by a qualified RPF or biologist. Wetlands, Waters of the United States or State, Riparian Habitat, Sensitive Natural Communities

c. Determine whether there are wetlands or other aquatic resources within the ecoregion, and how many acres of each is present.
   i. All ecoregions - Table 3.6-2
d. Determine which habitat types and sensitive natural communities are present within the ecoregion, and how many acres of each is present.
   i. Central California Coast – Table 3.6-3

ii. Central California Coast Ranges – Table 3.6-5
iii. Colorado Desert – Table 3.6-7
iv. Great Valley – Table 3.6-9
v. Klamath Mountains – Table 3.6-11
vi. Modoc Plateau – Table 3.6-12
vii. Mojave Desert – Table 3.6-13
viii. Mono – Table 3.6-15
ix. Northern California Coast – Table 3.6-16
x. Northern California Coast Ranges – Table 3.6-18
xi. Northern California Interior and Coast Ranges – Table 3.6-20
xii. Northwestern Basin and Range – Table 3.6-21
xiii. Sierra Nevada – Table 3.6-22
xiv. Sierra Nevada Foothills – Table 3.6-24
xv. Southeastern Great Basin – Table 3.6-26
xvi. Southern California Coast – Table 3.6-27
xvii. Southern California Mountains and Valleys – Table 3.6-29
xviii. Southern Cascades- Table 3.6-31

e. Review descriptions of each CWHR habitat type.
   i. All ecoregions - Appendix BIO-1

Habitat Conservation Plans, Local Plans, and Policies

f. Identify Habitat Conservation Plans within the Ecoregion
   i. Central California Coast – Table 3.6-4
   ii. Central California Coast Ranges – Table 3.6-6
   iii. Colorado Desert – Table 3.6-8
   iv. Great Valley – Table 3.6-10
   v. Mojave Desert – Table 3.6-14
   vi. Northern California Coast – Table 3.6-17
   vii. Northern California Coast Ranges – Table 3.6-19
   viii. Sierra Nevada – Table 3.6-23
   ix. Sierra Nevada Foothills – Table 3.6-25
   x. Southern California Coast – Table 3.6-28
   xi. Southern California Mountains and Valleys – Table 3.6-30
g. Identify Local Plans and Policies Pertaining to Biological Resources within the Ecoregion
   i. The PEIR assumes that any vegetation treatments proposed by local agencies under the CalVTP would be consistent with local plans, policies, and ordinances as outlined in SPR-AD-3. The PEIR does not discuss specific local plans, policies, or ordinances; thus, determining relevant plans, policies, or ordinances would be the responsibility of the project proponent.

2) Reconnaissance-Level Survey of Treatment Area

A qualified RPF or biologist will conduct a reconnaissance-level survey for biological resources within the treatment area, focusing on the following resource areas:

a. Potential habitat for special-status wildlife and plants;
b. Riparian habitat or other sensitive natural communities;
c. State or federally protected wetlands; and
d. Potential wildlife nursery sites.

3) Focused or Protocol-level Surveys of Treatment Area (Where Protocol Exists)

If the qualified RPF or biologist determines that a special-status plant or wildlife species, riparian habitat, other sensitive natural community, or state or federally protected wetlands may be present based on the presence of suitable habitat, a focused or protocol-level survey for the resource will be conducted.

4) Determine Potential Impact Mechanisms and Relevant Mitigation Measures for Sensitive Biological Resources Determined to Be Present of Likely to Be Present

- a. Special-Status Plants
  - i. Refer to Impact BIO-1
    1. Refer to the relevant treatment activity(ies)
- b. Special-Status Wildlife
  - i. Group special-status wildlife determined to be present or likely to occur by life history characteristics.
    1. Refer to Impact BIO-2: Table 3.6-32
  - ii. Determine potential residual impact for each life history group after implementation of SPRs.
    1. Refer to Impact BIO-2: Table 3.6-33
  - iii. Refer to the relevant treatment activity(ies)
- c. Riparian Habitat and Other Sensitive Natural Communities
  - i. Refer to Impact BIO-3
    1. Refer to the relevant treatment activity(ies)
- d. State or Federally Protected Wetlands
  - i. Refer to Impact BIO-4
- e. Wildlife Movement Corridors or Wildlife Nurseries
  - i. Refer to Impact BIO-5

Certificate Of Completion

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