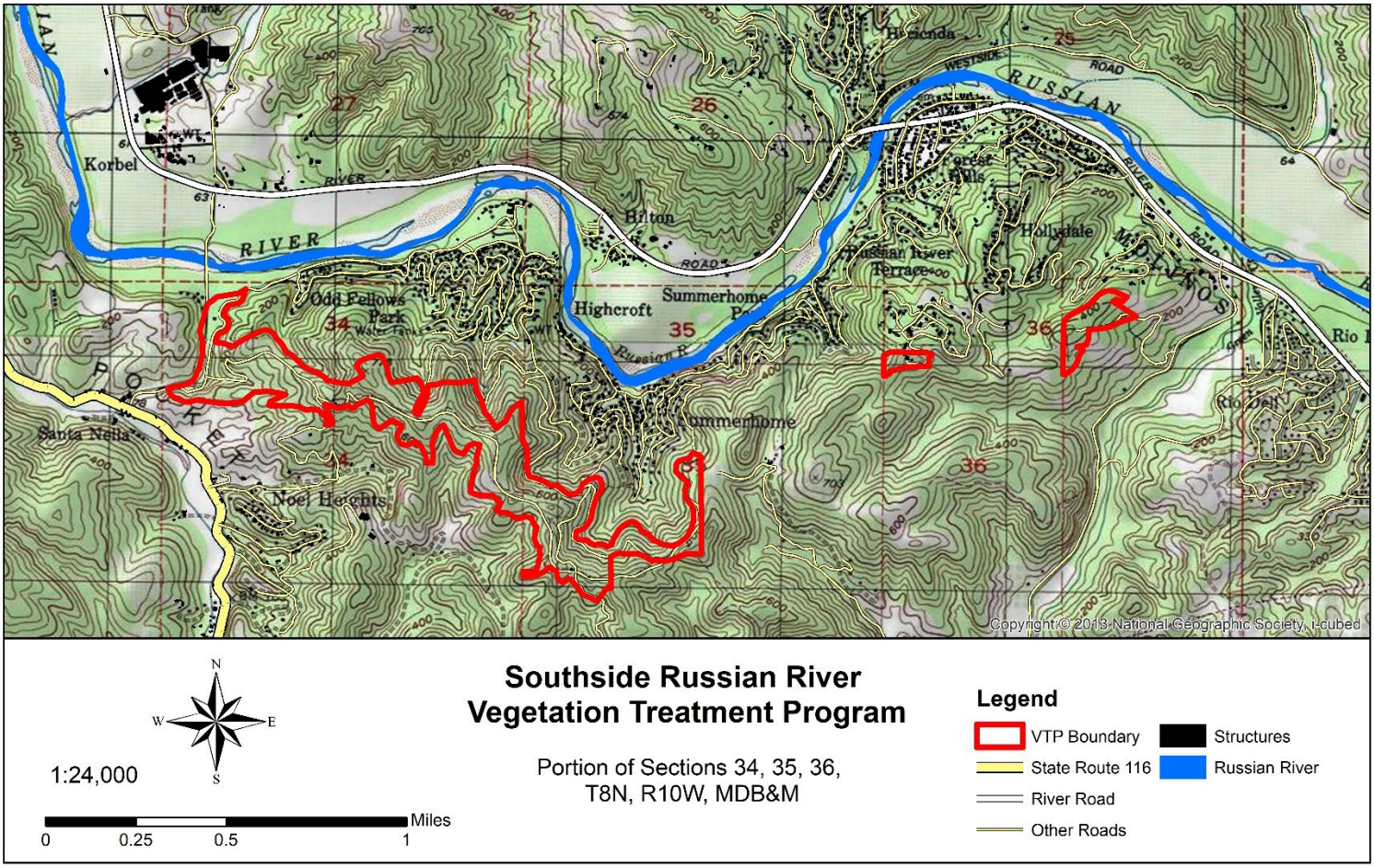
ENVIRONMENTAL
RESOURCE
SOLUTIONS, INC.
Forestry & Land Management
707-566-7510

PROJECT-SPECIFIC ANALYSIS



Prepared for:

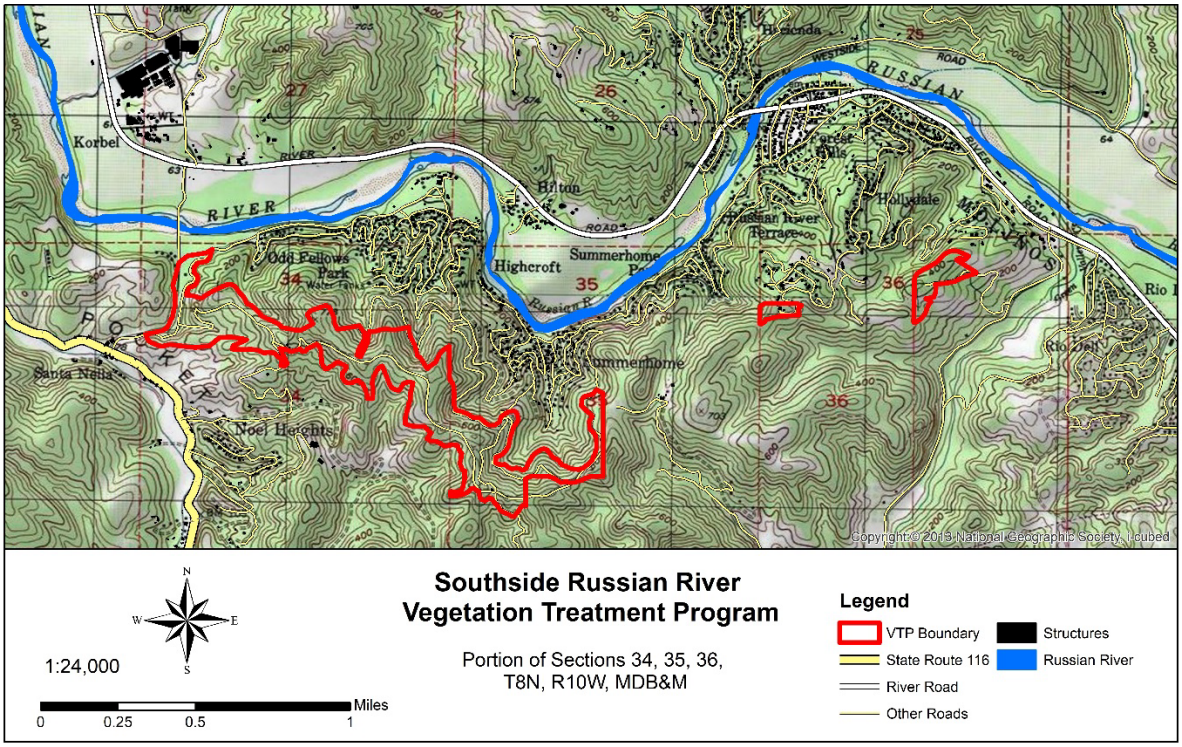
permit SONOMA

County of Sonoma

January 2023

PROJECT-SPECIFIC ANALYSIS

Southside Russian River Vegetation Treatment Program



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January 2023

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LIST OF ABBREVIATIONS

Board	California Board of Forestry and Fire Protection
CAAQS	California ambient air quality standards
CAL	California Department of Forestry and Fire Protection
Cal-IPC	California Invasive Plant Council
CalVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
dbh	diameter at breast height
ELZ	Equipment Limitation Zone
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
IPaC	Information for Planning and Consultation
LTS	Less Than Significant
LTSM	Less Than Significant with Mitigation
MMRP	mitigation monitoring and reporting program
NA	Not Applicable
NAHC	Native American Heritage Commission
NI	No Impact
NWIC	Northwest Information Center
PEIR	Program Environmental Impact Report
PS	Potentially Significant
PSA	Project-Specific Analysis
SENL	single event noise levels
SPR	standard project requirements
SR	state route
SRA	State Responsibility Area
SU	Significant and Unavoidable
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTV	utility task vehicle
VMT	vehicle miles traveled
WLPZ	Watercourse and Lake Protection Zones

1 INTRODUCTION

1.1 PROJECT OVERVIEW

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 potential environmental impacts of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area (SRA) in California. 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. It was designed for use by many state, special district, regional, and local agencies to accelerate the approval of vegetation treatment projects found to be within the scope of the PEIR. If needed for CEQA compliance, the PEIR can be supplemented with minor technical infomation about a proposed project in the form of an addendum.

The California Board of Forestry and Fire Protection (Board) is supporting the preparation of Project-Specific Analysis (PSA) documents to create a library of example projects that help guide state and local agencies in preparing their own PSAs under the CalVTP PEIR, as well as to achieve California Environmental Quality Act (CEQA) compliance for the proposed project. The Board has provided approved PSAs that provide CEQA compliance for project approval, implementation, and serves as example PSAs for other agencies seeking to use the CalVTP PEIR to accelerate approval of their own vegetation treatment projects.

For the purposes of the CalVTP PEIR and this 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. This document is being prepared for the County of Sonoma to comply with CEQA for the implementation of vegetation treatments that require a discretionary action by a state or local agency. The CEQA lead agency is CALFIRE and the responsible agency using the CalVTP as a project proponent is the County of Sonoma.. In this PSA, the project parcel owners and their project partners are referred to as the "implementing entity" reflecting their role as the lead implementer of treatments.

1.1.1 CEQA Responsible Agency and Proposed Project

County of Sonoma is the project proponent and CEQA responsible agency, and the project parcel owners and their project partners are the implementing entity for vegetation treatments on up to 165 acres of land (proposed project) on an east-west trending ridgetop between Pocket Canyon and the Russian River in western Sonoma County (Figure 1-1). The proposed treatment types (i.e., wildland-urban interface fuel reduction and fuel breaks) and the treatment activities (i.e., mechanical and manual treatments, prescribed herbivory, prescribed burning (pile and broadcast), and herbicide application are consistent with those evaluated in the CalVTP PEIR. Ongoing maintenance of initial treatments (referred to as "retreatment/treatment maintenance" or "maintenance" in this PSA) would involve the same vegetation treatment types and activities used in the original treatment.

The County proposes to fund the initial proposed treatments through the award of a grant from the Sonoma County Vegetation Management Grant Program. Additional grant funding from the County or other entities could be used to fund subsequent treatments or maintenance treatments. The actual treatment work will be conducted by grantees. Grantee responsibilities under the mitigation measures adopted will be enforced through grant agreements.

1.1.2 Purpose of This Document

This document serves as a PSA to evaluate whether the proposed treatments would be within the scope of the CalVTP PEIR. As stated above, the treatment types and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the CalVTP PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

This document serves as the PSA for review and analysis under CEQA for the proposed vegetation treatments within the CalVTP treatable landscape. The project-specific mitigation monitoring and reporting program (MMRP), which identifies the CalVTP standard project requirements (SPRs) and mitigation measures applicable to the proposed project, is presented in Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

Figure 1-1 General Location

2 TREATMENT DESCRIPTION

Proposed treatment types are wildland-urban interface fuel reduction and fuel breaks. Proposed treatment activities include mechanical and manual treatments, prescribed herbivory, prescribed burning (piles and broadcast), and herbicide application. Locations of treatment types are shown in Figures 2-1 and 2-2. Proposed vegetation treatments would occur within three distinct management units and are referred to as "management units" in this PSA. Tables 2-1 and 2-2 provide summaries of treatments.

2.1 MANAGEMENT UNIT DESCRIPTIONS

2.1.1 POCKET CANYON RIDGE UNIT

The Pocket Canyon Ridge unit is a 149-acre forested unit situated in the hills between Pocket Canyon/Hwy 116 and the Russian River, located 1.8 miles to 3.2 miles east of the town of Guerneville, California. The management unit includes elevations from approximately 80 feet up to 740 feet above mean sea level.

This unit has multiple landowners, cooperating together, to achieve fuel reduction goals. The landowners of this unit include:

- Odd Fellows Recreation Club (Sonoma County APN 085-060-006, 085-060-012, 085-060-013)
- Summer Home Park (Sonoma County APN 081-240-008)
- Valerie Madrid (Sonoma County APN 085-080-005)
- Alan and Sandra Bertolani Trust (Sonoma County APN 083-240-024)
- County of Sonoma (Sonoma County APN 085-100-001)

The slopes drain south from tributaries into Pocket Canyon Creek, and north via tributaries into the Russian River. This management unit is primarily forested and includes a mix of conifers and hardwoods, including redwood, Douglas-fir, oaks, bays, big-leaf maples and madrones.

Past forestry practices, lack of management, and fire suppression have resulted in forest stands that are overstocked with small diameter trees and that contain excess fuel load related to tanoak mortality caused by the Sudden Oak Death pathogen (*Phytophthora ramorum*), and understory species such as tanoak, California bay, Madrone, Coast live oak, Oregon white oak, California hazelnut, California coffeeberry, poison oak, coyote brush, toyon, common manzanita, evergreen huckleberry, and French broom that are contributing to ladder fuel.

2.1.2 SAKIN/TALBERT UNIT

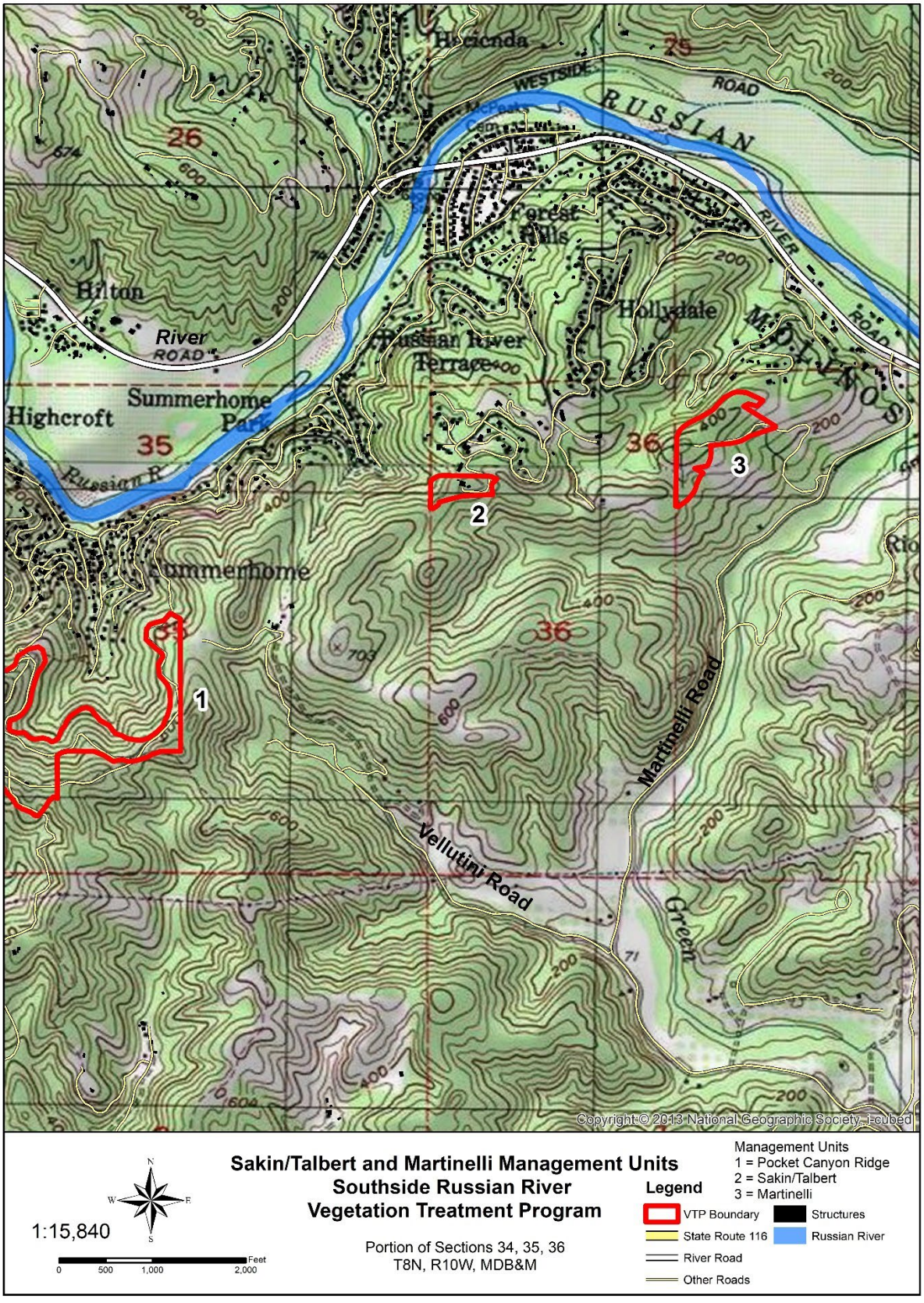
The Sakin/Talbert management unit is located approximately 3.75 miles east of Guerneville, California. This 4-acre privately owned management unit, Sonoma County APN 081-210-008, is located on a ridgetop above a rural subdivision. Elevations of the management unit range from 520 to 560 feet above mean sea level. This management unit will provide a pre-treated staging point for fire suppression efforts in the area, and provide protection to the river community of Russian River Terrace, located to the north. This small management unit is composed of mixed conifer forests and similar species composition as the abovementioned Pocket Canyon Ridge unit.

2.1.3 MARTINELLI UNIT

The Martinelli management unit is located approximately 4.25 miles east of Guerneville, California. The 13-acre privately owned management unit, Sonoma County APN 083-180-024, is located on a ridgetop above a rural subdivision. Elevations of the management unit range from 340 to 400 feet above mean sea level. This management unit will provide a pre-treated staging point for fire suppression efforts in the area, and provide protection to the river community of Hollydale and residents of Canyon Road, located to the north, and more distant protection to the community of Rio Dell. This small management unit is composed of mixed conifer forests and includes some open shrub type habitat and similar species composition as the abovementioned Pocket Canyon Ridge unit.

Figure 2.1-1 Pocket Canyon Ridge Management Unit

Figure 2.1-2 Sakin/Talbert and Martinelli Management Units



2.2 PROPOSED TREATMENTS

The proposed project involves two treatment types: wildland-urban interface fuel reduction and shaded fuel breaks. The vegetation treatment activities proposed to implement each of these treatment types are mechanical treatment, manual treatment, prescribed herbivory, prescribed burning (pile and broadcast), and targeted ground application of herbicides. The treatment types and treatment activities are described below.

2.2.1 Treatment Types

Proposed treatment types consist of shaded fuel breaks and wildland-urban interface fuel reduction. Each treatment type is described in more detail below and is consistent with the treatment types described in the CalVTP. Both treatment types would occur on all three management units. Refer to Figures 2-1 and 2-2 for the location of each treatment type within the management units. Table 2-1 provides the acres of treatment in each management unit and Table 2-2 provides a summary of treatments.

FUEL BREAKS

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They can also provide safe emergency egress during wildfires. Only shaded fuel breaks would be implemented in the treatment areas. In forested areas, the tree canopy would be thinned to reduce the potential for a crown fire to move through the canopy; however, trees greater than 12 inches dbh would remain. The shade of the retained canopy also helps reduce the potential for rapid regrowth of shrubs and sprouting hardwoods. The shaded fuel breaks also provide important control lines for prescribed fire activities.

Shaded fuel breaks would be established on all three management units along strategic topographic locations (e.g., on ridge tops); adjacent to existing roads and skid trails, as shown in Figures 2-1 and 2-2. Shaded fuel breaks will occur up to 100 feet on each side of existing ridgeline roads and skid trails, or the main ridgeline if the existing road travels off the ridge. To create shaded fuel breaks, equipment or crews will remove excessive small trees and shrubs to reduce woody ladder fuels, remove excessive standing dead wood, masticate, chip or lop woody debris to less than 18" height, prune trees a minimum of 10 feet above ground, control nonnative trees and shrubs (such as English ivy, French broom, and Himalaya berry), and retain the largest and best trees to provide shade which helps to reduce vegetation regrowth and overall understory occupancy. Trees observed with wildlife nests will be retained.

WILDLAND-URBAN INTERFACE FUEL REDUCTION

Wildland-urban interface fuel reduction treatments would be implemented outside of the 200-foot shaded fuel break treatment corridor (100 feet each side of ridgeline/seasonal road. Treatments would seek to reduce the fuel load and fire danger to adjacent communities in the Wildland Urban Interface (WUI). This project has multiple communities located to the north along the Russian River and include Odd Fellows Recreation Club, Summer Home Park, Russian River Terrace, and Hollydale. The communities of Santa Nella and Noel Heights are located to the southwest of the project area. Vegetation treatments will help to create a calming zone adjacent to the ridgetop fuel break aiding fire-fighting suppression activities during a wildfire.

The wildland-urban interface fuel reduction treatment type is proposed on all three management units, as shown on Figures 2-1 and 2-2. Wildland-urban interface fuel reduction treatments would focus on thinning small diameter trees from overstocked forest units and/or post-fire resprouts to promote the continued growth of mature trees, a healthy forest structure, and improve wildlife habitat. This treatment type involves removing excessive small trees and shrubs to reduce woody ladder fuels, removing excessive standing dead wood, masticating, chipping or lopping woody debris to less than 18" height, pruning trees a minimum of 10 feet above ground, controlling nonnative trees and shrubs, and retaining the largest and best trees to provide shade which helps to reduce vegetation regrowth and overall understory occupancy. Trees observed with wildlife nests will be flagged and retained.

Table 2.2-1 Proposed Treatment Size by Management Unit

Management Unit	CalVTP Treatment Type	Maximum Treatment Area within CalVTP Treatable Landscape (acres)	Maximum Treatment Area Outside CalVTP Treatable Landscape (acres)	Maximum Total Treatment Area (acres)
Pocket Canyon Ridge	Shaded Fuel break	55	0	55
	WUI	94	0	94
Sakin/Talbert	Shaded Fuel break	3	0	3
	WUI	1	0	1
Martinelli	Shaded Fuel break	7	0	7
	WUI	5	0	5
Total acres (approximately)				165

Source: Data provided by Environmental Resource Solutions, Inc. GIS data, 2022

Figure 2.2-1 Pocket Canyon Ridge Management Unit Treatment Type

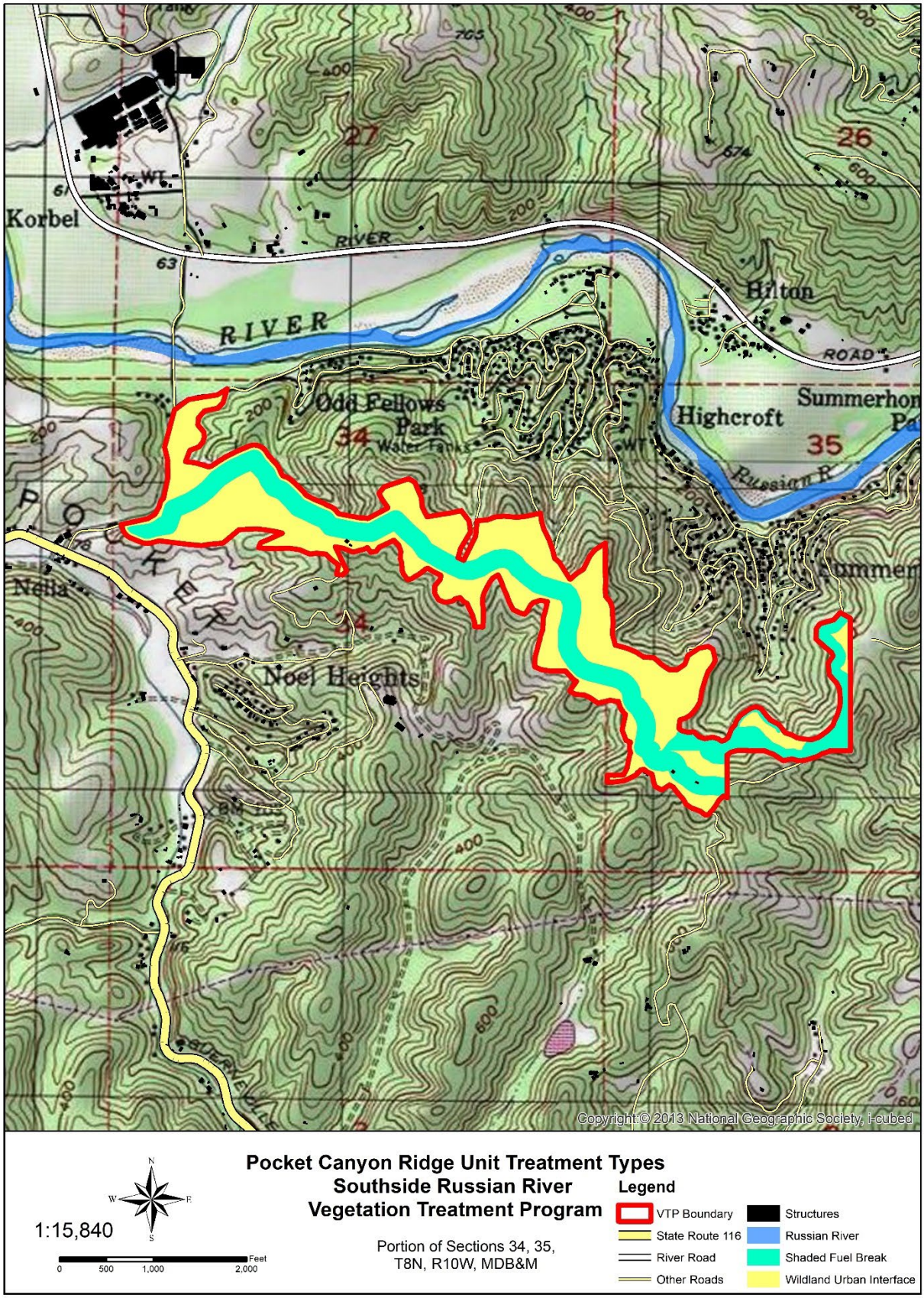
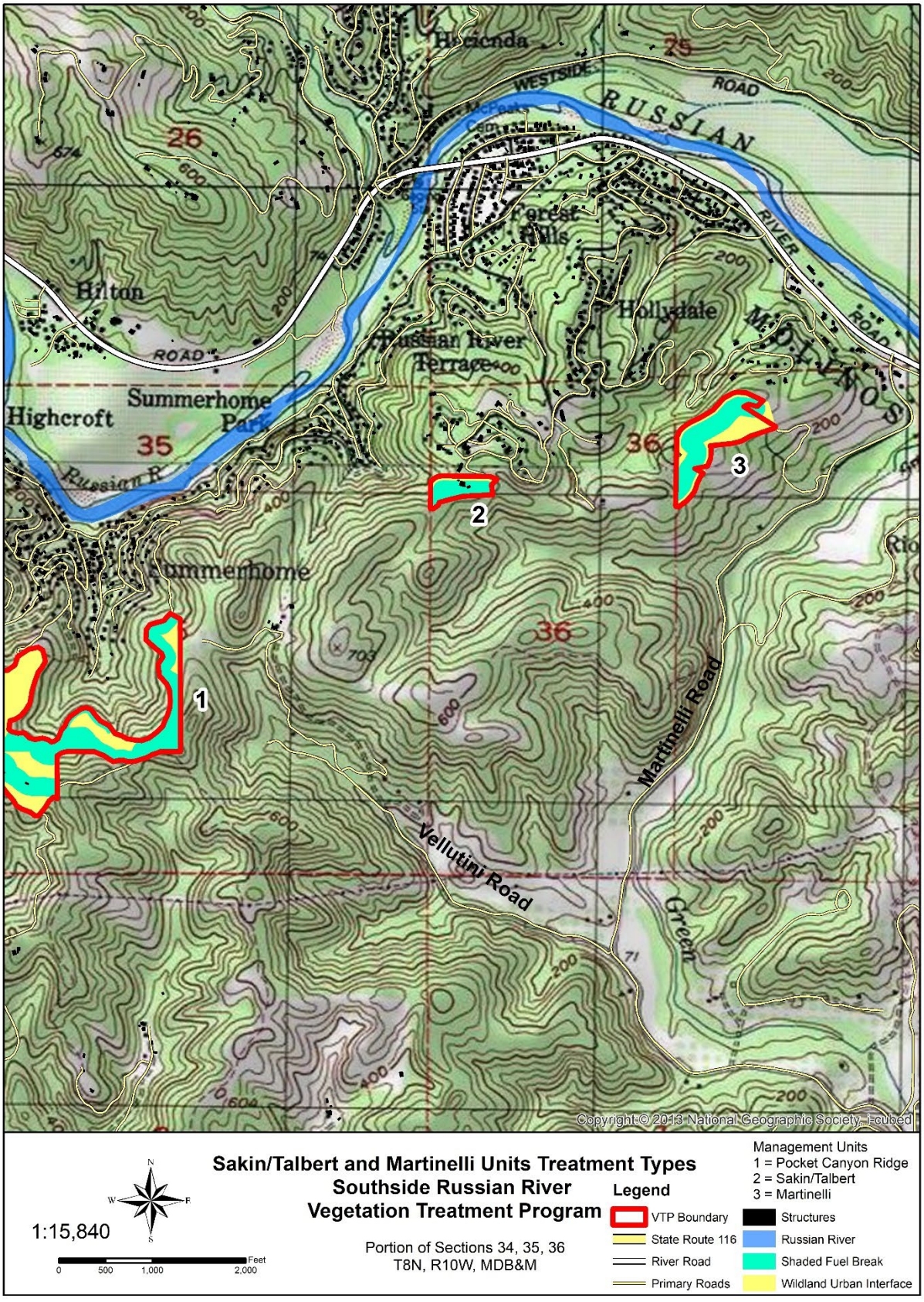


Figure 2.2-2 Sakin/Talbert and Martinelli Management Units Treatment Types



2.2.2 Treatment Activities

The proposed vegetation treatment activities are mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides. Each of these treatment activities is described in more detail below and consistent with the treatment activities described in the CalVTP. All treatment activities could occur on all three management units. Table 2-1 provides the maximum acres of treatment per management unit and Table 2-2 provides a summary of treatments.

Treatment activities could occur during any time of year, although the nesting bird season would be avoided when feasible for mechanical and manual treatments, and wet periods will be avoided if applying herbicides.

Although there is the potential for prescribed burning to occur during nighttime and weekend hours, all treatment activities using equipment would be limited to daytime hours on Monday through Saturday.

MECHANICAL VEGETATION TREATMENT

Mechanical treatments would primarily include masticating target vegetation and chipping biomass from mechanical and manual treatment activities. Equipment would include masticators, chippers, and may include tractors/skidders. Up to four crews may operate at the same time throughout the management units. Typically, treatments would require several days to several weeks to complete. Equipment would be operated on or within 100 feet of roads or skid trails in fuel break treatment areas and on existing roads or skid trails or on flat to moderate slopes (0-35% slope) in wildland-urban interface fuel reduction treatment areas.

Small-diameter trees, downed woody debris, and woody shrubs would be masticated to increase tree spacing and reduce fire fuel loads in targeted areas. The biomass would be disposed of via the process of mastication (which essentially mulches the vegetation). In some areas, prescribed burning may be used to dispose of chipped and masticated materials.

The vegetation treatment specifications are:

- Remove ladder fuels in order to prevent the spread of fire from ground to crown;
- Remove SOD infected/dead trees
- Leave the biggest and best trees that exhibit full crowns, dominant/co-dominant position, and representing best phenotypes;
- Remove 80% of hardwood (tanoak, bay, madrone) trees 10" diameter and smaller;
- Remove 90% of brush;
- Trimmings and slash material to be cut/lopped or chipped to a maximum height of 18" above the ground;
- Prune leave trees a minimum of 10 feet above the ground or ½ of the live crown ratio;
- Prefer to retain redwood trees greater than 4 inches;
- Prefer to retain Douglas-fir 6 inches and larger with 20 foot spacing where feasible;
- Prefer to retain trees over 12 inches;
- Retain trees with active wildlife nests.

MANUAL VEGETATION TREATMENT

To implement manual treatments, crews of approximately 8 to 20+ members would use hand tools and hand-operated power tools, including chainsaws, hand saws, brush cutters, and loppers, to cut, clear, and/or prune trees, herbaceous vegetation, woody shrubs, and small trees to increase space between trees. Typically, treatments would require several days to several months to complete, depending on the treatment size, steepness of terrain, and type and density of vegetation. Trees would be removed, thinned, and pruned and woody shrubs would be cut and cleared.

Cut vegetation would primarily be left on site by lopping and scattering on the landscape, but chipping may occur along roads, areas with favorable topography for a chipper, and within 100 feet of habitable structures. In some areas, removed vegetation would be piled for later pile burning or broadcast burning.

The vegetation treatment specifications are (same as for mechanical treatment):

- Remove ladder fuels in order to prevent the spread of fire from ground to crown;
- Remove SOD infected/dead trees
- Leave the biggest and best trees that exhibit full crowns, dominant/co-dominant position, and representing best phenotypes;
- Remove 80% of hardwood (tanoak, bay, madrone) trees 10" diameter and smaller;
- Remove 90% of brush;
- Trimmings and slash material to be cut/lopped or chipped to an maximum height of 18" above the ground;
- Prune leave trees a minimum of 10 feet above the ground or ½ of the live crown ratio;
- Prefer to retain redwood trees greater than 4 inches;
- Prefer to retain Douglas-fir 6 inches and larger with 20 foot spacing where feasible;
- Prefer to retain trees over 12 inches;
- Retain trees with active wildlife nests.

PRESCRIBED BURNING

Prescribed burning consists of two general types, pile burning and broadcast burning (underburning).

- **Pile burning:** Biomass from manual and mechanical treatment would be piled primarily using hand crews, or by equipment (e.g., skid steer, tractor, bulldozer or excavator) and burned appropriately. If equipment is used to create piles, typically dozers are equipped with a brush rake to reduce soil displacement and create "clean" piles, or piles are created with an excavator or backhoe to create clean piles. Pile burning would occur in an understory or in areas with little to no live overstory, and during the winter period conditions to reduce fire hazard.

- **Broadcast burning:** Broadcast burning would be used to promote forest health and native flora and reduce biomass and fuel loading in woodland and forest vegetation. Pretreatment of vegetation using mechanical and manual activities or herbicide application would occur in areas proposed for prescribed burning. Prescribed burning would help control nonnative plant species and reduce fine fuels. These treatments would also promote a more natural, sustainable, and wildfire resilient native landscape.

  CalVTP participating landowners, in cooperation with CAL FIRE and local organizations (Prescribed Burn Association), would implement an understory burn to partially remove understory and groundcover vegetation during periods when weather and vegetation conditions allow the desired fire intensity to meet treatment objectives and do not create fire behavior jeopardizing control of the prescribed fire (e.g., relatively high humidity and high fuel moisture content). The goal is to conduct a low intensity burn that burns only targeted ground and litter fuels, creating a mosaic of existing habitat types. Prescribed burning may require the construction of new control lines or enhancement of existing control lines using manual or mechanical treatments, primarily through mastication or using hand tools but use of equipment may be required.

  Prescribed burning would require between 10 and 50 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 day to 1 week. Equipment could include water trucks, fire engines, and chainsaws. All burning would occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a burn plan that includes a smoke management plan and necessary permits.

PRESCRIBED HERBIVORY

Prescribed herbivory would be used to reduce fuel loads, typically in shrubland and forest understory. To implement prescribed herbivory, a grazing contractor will typically import livestock (goats, sheep, cattle, horses) to graze on herbaceous and shrub vegetation in favorable areas. Prescribed herbivory may require the installation of temporary fencing where natural barriers are not present, and temporary water facilities and other infrastructure (e.g., tanks, corrals, fences) as well as the deployment of guard animals and/or a shepherd.

Prescribed herbivory, or grazing, would involve transporting a herd of animals to the designated prescribed herbivory sites. Site preparation would involve installation of a portable fence for containment, often an electric fence that is battery charged by a generator or solar panels, and a water trough. The herder would determine the area to be grazed based on site conditions, and would typically range from 1 to 5 acres at one time for goats and sheep, or a much larger area (larger than 5 acres) for

other types of livestock, such as cattle or horses.

HERBICIDE APPLICATION

Herbicides are optional and would be used sparingly to control vegetation that threatens the native biodiversity and/or increases wildfire hazards. Post-wildfire invasive plant and noxious weed infestations may be treated to prevent their establishment and growth. Consistent with the definitions applied in the CalVTP, invasive species are those plant species identified as invasive by the California Invasive Plant Council (Cal-IPC) or defined as noxious weeds under California law by the California Department of Food and Agriculture. The optional use of herbicides to treat invasive plant species and to control regrowth of native tree species (e.g., resprouting, multiple-stemmed tanoak, bay laurel, and madrone) may be implemented to promote native biodiversity.

The following herbicides, which are consistent with those considered for use in the CalVTP, may be applied:

- glyphosate and
- other species-specific herbicides analyzed and included in the CalVTP PEIR.

Only ground-level application would occur; no aerial spraying of herbicides would occur. The least impactful method would be used at any given site. Several herbicide application methods are available for use by on-the-ground personnel, including hack-and-squirt, paint-on stumps, and using backpack hand-applicators. For large treatment areas, herbicide treatments would typically use a one to eight-person crew, a 4x4 pickup truck, a passenger vehicle to transport crew, a utility task vehicle (UTV) with a sprayer/reservoir tank, and backpack sprayers. Treatment would involve removing invasive plant species (e.g., French broom) and noxious weeds through herbicide application. Herbicide application would comply with the U.S. Environmental Protection Agency label directions, as well as California Environmental Protection Agency and California Department of Pesticide Regulation label standards. All herbicide application would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations. Herbicide application is not proposed as an initial treatment and would be performed by contractors complying with integrated pest management (IPM) requirements and BMPs.

BIOMASS DISPOSAL

The proposed vegetation treatments described above would be disposed of primarily by the following means:

- masticating (mulching) vegetative debris and placing it on the ground concurrently with vegetation removal (approximately 20 percent of biomass), and the biomass remaining after mastication would be no more than 6 inches deep;
- chipping (approximately 10 percent of biomass); materials within 50 feet on either side of a road, and chipped biomass would be broadcast spread over treatment areas and would not exceed 6 inches in depth;
- lopping and scattering within the treatment boundaries (approximately 50 percent) and would be left within 18 inches of the ground to promote decomposition;
- pile burning (approximately 10 percent of biomass), which may be used to dispose of slash, chipped, and masticated materials; or
- broadcast burning (approximately 10 percent of biomass).

Invasive plant and noxious weed biomass would be treated onsite to eliminate seeds and propagules or would be disposed of off-site at an appropriate waste collection facility to prevent seed dispersal, reestablishment, or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds would not be chipped and spread, or mulched onsite.

Sudden Oak Death infested material may be chipped and spread, but shall not be transported from the project site to destinations outside the Board of Forestry identified Zone of Infestation. Project equipment (such as chainsaws, hand saws, brush cutters, loppers, gloves, boots, etc.) that are used on Sudden Oak Death infected material shall be disinfected with Lysol spray or a 10% bleach solution prior to working on this project, prior to working in different project units, at the completion of the project, and/or prior to working on other lands not included in this CalVTP PSA.

Table 2.2-2 Proposed CalVTP Treatments

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Equipment used for Treatments	Typical Duration of Treatments
Shaded Fuel break	200 foot wide corridor (100 foot each side of ridgeline and/or road/skid trails),	Mechanical	Masticators, chippers, tractor, excavator, skidder, dozer, skid steer	1 week to 3 months
		Manual	Chainsaws, loppers, hand saws	1 week to 6 months
		Pile Burning	Water tender, tractor, excavator	1 day to 1 week
		Broadcast Burning	Fire engines, water tender, tractor, skidder, excavator, dozer	1 day to 1 week
		Prescribed Herbivory	Pickup truck, trailer, fencing, water trough	1 week to 3 months
		Herbicide	Backpack sprayer, UTV with sprayer, pickup truck	Several days to 2 weeks
Wildland-Urban Interface Fuel Reduction	Fuel reduction treatments adjacent to and extending beyond fuel break corridor, remainder of VTP project area.	Mechanical	Masticators, chippers, tractor, excavator, skidder, dozer, skid steer	1 week to 3 months
		Manual	Chainsaws, loppers, hand saws	1 week to 6 months
		Pile Burning	Water tender, tractor, excavator	1 day to 1 week
		Broadcast Burning	Fire engines, water tender, tractor, skidder, excavator, dozer	1 day to 1 week
		Prescribed Herbivory	Pickup truck, trailer, fencing, water trough	1 week to 3 months
		Herbicide	Backpack sprayer, UTV with sprayer, pickup truck	Several days to 2 weeks

2.3 RETREATMENT/TREATMENT MAINTENANCE

Retreatment for maintenance of desired vegetation conditions (referred to as "treatment maintenance" in the CalVTP PEIR and referred to as "retreatment/treatment maintenance" or "maintenance" in this PSA) in the areas initially treated for the proposed project would be based on real-time monitoring of site conditions. In forested and woodland areas, retreatment is anticipated to occur every 2-5 years. In brush-dominated areas, retreatment is anticipated to occur every 5 years. In areas where initial treatment included removing multiple stems from stump-sprouting vegetation (e.g., madrone, California bay) retreatment would occur every 2-5 years. Retreatment/treatment maintenance methods would involve the same vegetation treatment activities used in the original treatment; and anticipate the use of more hand crews than mechanical equipment in comparison to initial treatments.

Retreatment/treatment maintenance would typically be implemented between approximately August and January, outside of the nesting bird season. If required to occur during nesting bird season, pretreatment surveys will occur prior to treatment activities. Periodic retreatment/treatment maintenance will occur as needed, determined by qualified staff who would monitor vegetation growth conditions in the management units.

Figure 2.3-1 Pocket Canyon Ridge Unit Treatment Activities

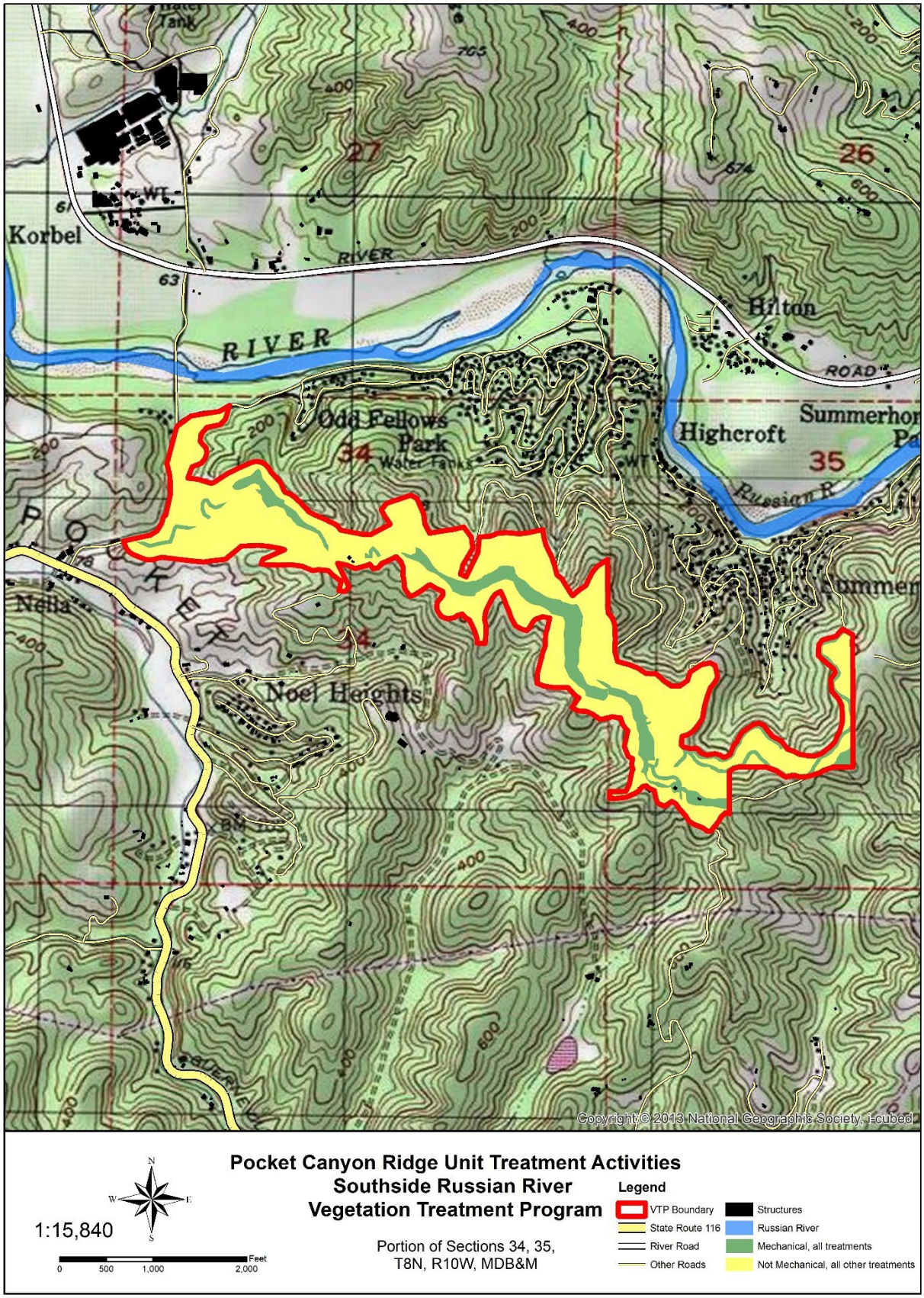
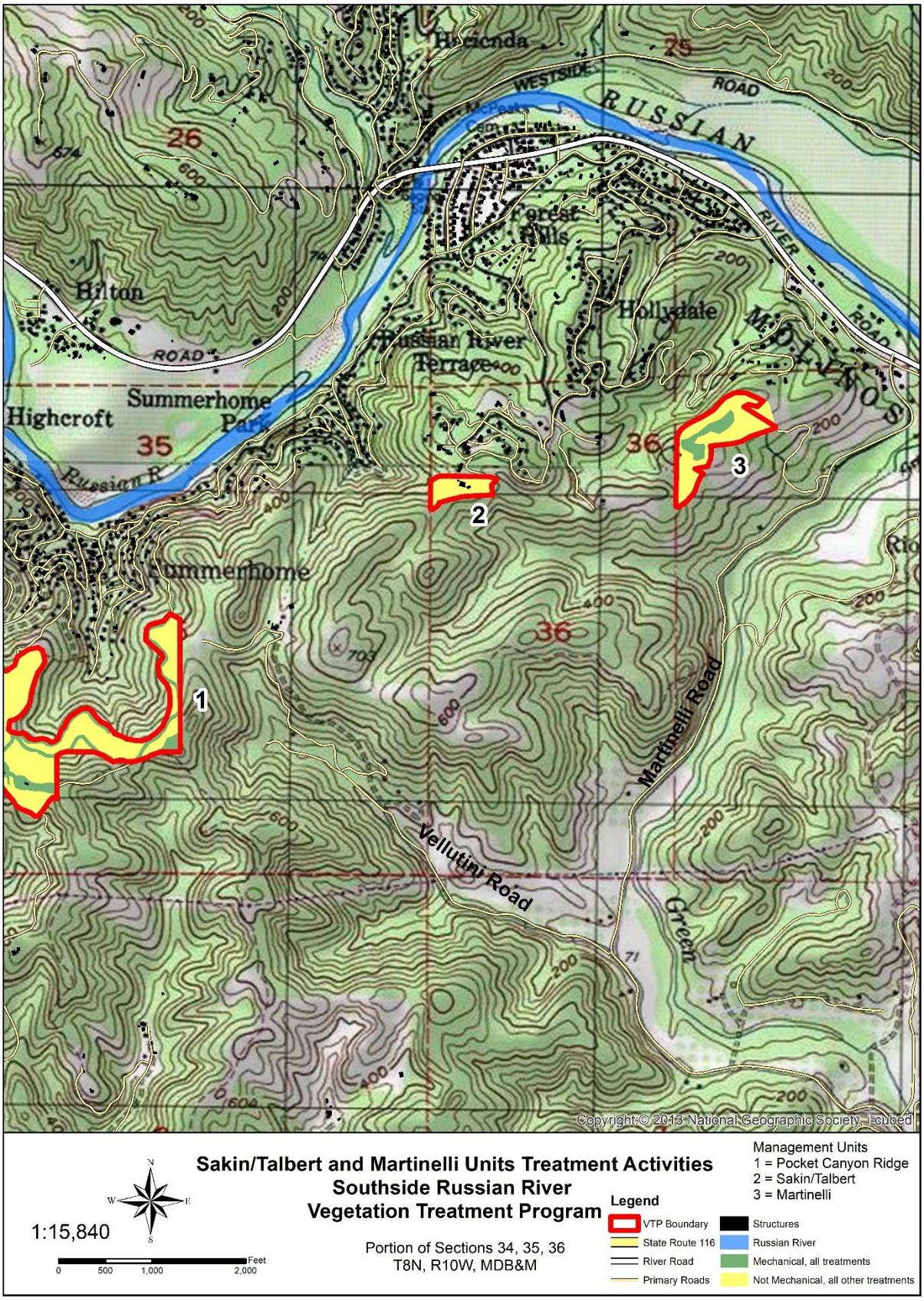


Figure 2.3-2 Sakin/Talbert and Martinelli Units Treatment Activities



3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title:	Southside Russian River Vegetation Treatment Project
2. CalVTP I.D. Number:	2022-21
3. Implementing Entity's Name and Address:	Odd Fellows Recreation Club 13522 Riverside Drive Guerneville, CA 95446 Summer Home Park Corporation 11885 Summer Home Park Road Forestville, CA 95436 Valerie Madrid 11757 Hwy 116 Guerneville, CA 95446 Alan and Sandra Bertolani Trust 9627 Hwy 116 Forestville, CA 95436 County of Sonoma Transportation and Public Works 2550 Ventura Ave Santa Rosa, CA 95403 Scott Sakin and Philip Talbert 11145 Canyon Road Forestville, CA 95436 Lee and Pam Martinelli 9693 Martinelli Road Forestville, CA 95436
4. Contact Person Information and Phone Number:	Mitchell Haydon, RPF# 2810 (707) 566-7510 MHaydon@eResourceSolutions.com
5. Project Proponent Name and Address:	County of Sonoma 2550 Ventura Ave Santa Rosa, CA 95403
6. Contact Person Information and Phone Number:	Robert Aguero, Senior Environmental Specialist (707) 565-3718 Robert.Aguero@sonoma-county.org
7. Project Location:	Sonoma County, Portions of Sections 34, 35, 36, T8N, R10W, MDB&M Westerly Coordinant 38 29' 52.0" N, 122 57' 47.0" W Central Coordinant 38 29' 45.0" N, 122 56' 50.0" W Easterly Coordinant 38 30' 6.0" N, 122 54' 53.0" W
8. Total Area to Be Treated (acres):	Up to 165 acres

9. Description of Proposed Treatments

a. Initial Treatment

Treatments would involve prescribed burning, mechanical and manual treatments, prescribed herbivory, and herbicide application. See Section 2.2, for additional details.

The County of Sonoma proposes to fund the initial treatment of up to 165 acres of treatable landscape (ref. PEIR Section 2.4, page 2-4) along 2.6 cumulative length miles of ridgeline that separates Pocket Canyon from the communities of Odd Fellows Park, Summer Home Park, Russian River Terrace, and Hollydale. The project includes 100 acres of Wildland Urban Interface Fuel Reduction treatments and 65 acres of Shaded Fuel Break (ref PEIR Section 2.5.1, page 2-7) using a combination of mechanical, manual, prescribed fire (both pile burn and broadcast burn), prescribed herbivory, and herbicide use (ref PEIR Section 2.5.2, page 2-18). The VTP project area includes three management units, due to land ownership boundaries and adjacency. The western unit (Pocket Canyon Ridge Unit) is the largest contiguous area of 149 acres, the disconnected central unit (Sakin/Talbert Unit) includes one property of 4 acres, and the disconnected eastern unit (Martinelli Unit) is 12 acres.

The long-term objectives for these vegetation treatments are to:

- Create a pre-treated fuel reduction zone as fire prevention for the surrounding communities and to assist fire-fighting efforts to contain wildfire spread;
- Reduce understory fuel loading by removing ladder fuels, dead trees, brush, and pruning;
- Reduce understory tree stocking, while leaving the largest conifer trees that exhibit full crowns, dominant/co-dominant position, and representing best phenotypes;
- Maintain and improve wildlife habitat and forest health;
- Reduce and control invasive non-native species;
- Increase forest resilience to natural disturbances and changes in climate.

The project will occur in multiple phases, with initial treatment being approximately 65 acres of Shaded Fuel Break being funded by the County of Sonoma's Vegetation Management Grant program. This initial treatment area includes approximately 100 feet on each side of a ridgeline (total of 200 foot wide fuel break zone), mostly along an existing ridgeline seasonal road. Initial treatments will occur in all three management units. Initial mechanical treatment will occur on 27 acres of ground with suitable slopes for mechanical equipment operation. Initial manual treatment will occur on 38 acres of ground where mechanical equipment cannot safely operate due to slope.

Initial Treatments:

Treatment Types

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☐ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), up to 165 acres

☒ Prescribed Burning (Pile Burning), up to 165 acres

☒ Mechanical Treatment, up to 45 acres

☒ Manual Treatment, up to 165 acres

☒ Prescribed Herbivory, up to 165 acres

☒ Herbicide Application, up to 165 acres

Fuel Type

☐ Grass Fuel Type
☒ Shrub Fuel Type
☒ Tree Fuel Type

b. Retreatment/Treatment Maintenance

Treatments would involve prescribed burning, mechanical and manual treatments, prescribed herbivory, and herbicide application. See Section 2.3, for additional details.

Maintenance Treatment:

Treatment Types

☒ Wildland-Urban Interface Fuel Reduction
☒ Fuel Break
☐ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), up to 165 acres
☒ Prescribed Burning (Pile Burning), up to 165 acres
☒ Mechanical Treatment, up to 45 acres
☒ Manual Treatment, up to 165 acres
☒ Prescribed Herbivory, up to 165 acres
☒ Herbicide Application, up to 165 acres

Fuel Type

☐ Grass Fuel Type
☒ Shrub Fuel Type
☒ Tree Fuel Type

10. Regional Setting and Surrounding Land Uses:

The project area is located in western Sonoma County, two miles east of Guerneville, CA, on the south side of the Russian River, and north of Pocket Canyon. The surrounding land uses are dominated by forested landscapes, vineyards, rural subdivisions, few scattered rural residences, and a County operated waste transfer station. The project area surroundings include the communities of Noel Heights, Odd Fellows Recreation Club, Summer Home Park, Russian River Terrace, and Hollydale. Main vineyard lands surrounding the property include Korbel Vineyards, Summer Home Park vineyards, and Martinelli Vineyards. Forest lands are mostly unoccupied, however there are several rural residential residences in or near the project area and include landowners: Madrid Trust, Bertolani, Gross, and Sakin/Talbert.

11. Other Public Agencies Whose Approval Is Required: (e.g., permits)

- Pesticide application permit would be obtained from the Sonoma County Agricultural Commissioner.
- Smoke Management Plans would be prepared for the Northern Sonoma County Air Pollution Control District, as required.
- Burn permits would be obtained from CALFIRE and the Northern Sonoma County Air Pollution Control District, as required.

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

12. Native American Consultation. *The Board of Forestry and Fire Protection completed consultation pursuant to Public Resources Code Section 21080.3.1 during preparation of the PEIR; however, CalVTP SPR CUL-2 includes for a requirement for further tribal coordination during PSA preparation.*

    Pursuant to CalVTP SPR CUL-2, Native American tribal contacts in Sonoma County were contacted on July 18, 2022 using the updated contact list from July 2022 and included:

    - Native American Heritage Commission, notification and sacred lands file search;
    - Patricia Hermosillo, Chairperson, Cloverdale Rancheria of Pomo Indians;
    - Chris Wright, Chairperson and Tom Keegan DEP contact, Dry Creek Rancheria Band of Pomo Indians;
    - Greg Sarris, Chairperson, Federated Indians of Graton Rancheria;
    - Gene Buvelot, Council Member, Federated Indians of Graton Rancheria;
    - Buffy McQuillen, Tribal Historic Preservation Officer, Federated Indians of Graton Rancheria; Marjorie Mejia, Chairperson, Lytton Rancheria;
    - Lisa Miller, Tribal Administrator, Lytton Rancheria;
    - Dianne Albright, Environmental Planner, Lytton Rancheria;
    - Jose Simon III, Chairperson, Middletown Rancheria of Pomo Indians;
    - James Rivera, Tribal Historic Preservation Officer, Middletown Rancheria of Pomo Indians;
    - Michael Rivera Jr, Tribal Cultural Advisor, Middletown Rancheria of Pomo Indians;
    - Mike Shaver, EPA Director, Middletown Rancheria of Pomo Indians;
    - Scott Gabaldon, Chairperson, Mishewal-Wappo Tribe of Alexander Valley;
    - Reno Franklin, Chairman, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
    - Anthony Macias, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
    - Ya-Ka-Ama.

    Responses were received from:

    - Kashia Band of Pomo Indians of Stewarts Point Rancheria, July 22, 2022, project area not within aboriginal territory and no comment or concerns at this time.

As a result of the NAHC sacred lands file request, received on September 27, 2022, the response indicated to contact seven additional Native American contacts that were not included in the NAHC July 2022 contact list for Sonoma County. Letters were sent on October 18, 2022 to the following additional Native American contacts as suggested by the NAHC sacred lands file response:

- Dino Franklin, Chairperson, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Loren Smith, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Benjakem Cromwell, Chairperson, Robinson Rancheria of Pomo Indians;
- Leona Williams, Chairperson, Pinoleville Pomo Nation;
- Donald Duncan, Chairperson, Guidiville Indian Rancheria;
- Erica Carson, Tribal Historic Preservation Officer, Pinoleville Pomo Nation;
- Sally Peterson, Tribal Historic Preservation Officer, Middletown Rancheria of Pomo Indians;

No other responses were received as of December 30, 2022.

Additional contact was conducted by the County in January 2023. The contact list included:

- Native American Heritage Commission, notification and sacred lands file search;
- Patricia Hermosillo, Chairperson, Cloverdale Rancheria of Pomo Indians;
- Chris Wright, Chairperson and Tom Keegan DEP contact, Dry Creek Rancheria Band of Pomo Indians;
- Greg Sarris, Chairperson, Federated Indians of Graton Rancheria;
- Gene Buvelot, Council Member, Federated Indians of Graton Rancheria;
- Buffy McQuillen, Tribal Historic Preservation Officer, Federated Indians of Graton Rancheria;
- Donald Duncan, Chairperson, Guidiville Indian Rancheria
- Lisa Miller, Tribal Administrator, Lytton Rancheria;
- Dianne Albright, Environmental Planner, Lytton Rancheria;
- Jose Simon III, Chairperson, Middletown Rancheria of Pomo Indians;
- James Rivera, Tribal Historic Preservation Officer, Middletown Rancheria of Pomo Indians;

- Michael Rivera Jr, Tribal Cultural Advisor, Middletown Rancheria of Pomo Indians;
- Mike Shaver, EPA Director, Middletown Rancheria of Pomo Indians;
- Scott Gabaldon, Chairperson, Mishewal-Wappo Tribe of Alexander Valley;
- Reno Franklin, Chairman, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Anthony Macias, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Leona Williams, Chairperson, Pinoleville Pomo Nation
- Erica Carson, Tribal Historic Preservation Officer, Pinoleville Pomo Nation
- Beniakem Cromwell, Chairperson, Robinson Rancheria of Pomo Indians
- Ya-Ka-Ama.

Responses were received from:

- Kashia Band of Pomo Indians of Stewarts Point Rancheria, July 22, 2022, project area not within aboriginal territory and no comment or concerns at this time.
- Kashia Band of Pomo Indians of Stewarts Point Rancheria, January 19, 2023, project area not within aboriginal territory and no comment or concerns at this time.

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.

See Board of Supervisors Resolution 23-0379

☐ 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.

Robert C. Aguero
Signature

8/1/2023
Date

Robert Aguero
Printed Name

Senior Environmental Specialist, RPF #3062
Title

Sonoma County Permitting and Resource Management Department
Agency

4 PROJECT-SPECIFIC ANALYSIS

4.1 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	Yes	AD-3 AD-4 AES-2 AQ-2 AQ-3	NA	LTS	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 Wildland Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-2	NA	LTS	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 Nonshaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	None	None	--	--	--

[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

IMPACT AES-1

Initial and maintenance treatments would include wildland urban interface fuel reduction and shaded fuel break treatment types. Treatment activities include prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and targeted ground application of herbicides. The potential for these treatment activities to result in short-term degradation of the visual character of a treatment area was examined in the PEIR. Short term visual impacts will be related to staging of equipment, tree and vegetation removal, and visual impacts of smoke from prescribed burning. Visual impacts from project equipment and smoke from prescribed burning will only last for the duration of the treatment activities. The tree canopy structure is not expected to be significantly altered, as fuel reduction treatments will primarily remove understory vegetation and some co-dominant trees, while simultaneously retaining the redwood/Douglas-fir canopy across the project. Aesthetic conditions, or the ability to see the forest from the ridgeline road, are anticipated to improve throughout the shaded fuel break.

The designated state scenic highway nearest to the project is SR 116 (Caltrans 2022). SR 116 is located approximately 440 feet southwest from the western project boundary of the Pocket Canyon Ridge Management Unit. Visual impacts would be obscured by distance, intervening topography and vegetation. Although the project is not visible from SR 116, smoke from prescribed burning could be visible from public viewpoints and the state scenic highway.

The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. SPRs applicable to the proposed treatments are AD-3, AD-4, AES-2, AQ-2, and AQ-3. The implementation of these SPRs will result in a less than significant impact and no mitigation measures are required. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. SPRs AES-1 and AES-3 are not applicable to the proposed treatments because visual access of treatment areas is limited, and treatment areas that may be seen from public viewpoints would maintain an intact canopy with patches of native trees and shrubs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-2

Initial and maintenance treatments would include wildland urban interface fuel reduction and shaded fuel break treatment types. Treatment activities include prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and targeted ground application of herbicides. The potential for these treatment types and activities to result in long-term degradation of the visual character of an area was examined in the PEIR. Public viewpoints could include public recreation trails, adjacent residences, and SR 116. The project area is not visible from SR 116 and no vegetation will be removed immediately adjacent to the highway. There are no public trails in the project area. Project treatments will be planned for aesthetic and visual impacts when located adjacent to existing residences on privately owned land in the project area. The landowners are cooperating to implement this project and understand forest thinning will occur near their residences.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. SPR applicable to the proposed treatments is AES-2. The implementation of this SPR will result in a less than significant impact and no mitigation measures are required. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. SPRs AES-1 and AES-3 are not applicable to the proposed treatments because visual access of treatments is limited, and treatment areas that may be seen from public viewpoints would maintain an intact canopy with patches of native trees and shrubs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-3

This impact does not apply to the proposed project because non-shaded fuel breaks are not proposed.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and consistent with the treatment types and treatment activities covered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

4.2 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.

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

IMPACT AG-1

Initial and maintenance treatments would include wildland urban interface fuel reduction and shaded fuel break treatment types. Treatment activities include prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and targeted ground application of herbicides. The potential for these treatment types and treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the PEIR.

The treatment area includes forested lands and to a limited extent shrub lands. Non-commercial tree and brush removal would occur under the project. The project area is comprised primarily of redwood and Douglas-fir forestlands with a bay and tanoak understory. The dominant conifer components of the stand will be retained and enhanced by removing small hardwoods, overstocked conifer species, and brush in the understory. All treatments that occur in the landscape will be designed and overseen by a Registered Professional Forester. Consistent with the PEIR, the vegetation remaining after treatments would meet the definition of forestland as defined in Public Resources Code Section 12220(g), which defines "forest land" as land that can support 10-percent native tree cover of any species under natural conditions, and no substantial loss of forestland or conversion to non-forest uses would occur. A shaded fuel break will typically retain a minimum of 30% canopy cover. Therefore, the potential for the project to result in the loss or conversion of forestland is within the scope of the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The project will not impact any farmland.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

4.3 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	Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4 AQ-1 AQ-2 AQ-3 AQ-4 AQ-6	AQ-1	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Impact AQ-2, pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1 NOI-4 NOI-5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Impact AQ-3, pp. 3.4-34 – 3.4-35	No	NA	NA	NA	NA	NA
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4 AQ-2 AQ-3 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 NOI-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Impact AQ-6; pp. 3.4-38	Yes	AD-4 AQ-2 AQ-3 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

The project is located in Sonoma County and is within the jurisdiction of the Northern Sonoma County Air Pollution Control District. Pursuant to SPR AQ-2, a Smoke Management Plan will be prepared and submitted to the air district before implementing a prescribed burning treatment, if required. Pursuant to SPR AQ-3, a Burn Plan will be prepared for broadcast burning, will include fire behavior modeling, and will be implemented by a state-certified burn boss, as required. An Incident Action Plan, which identifies burn dates, burn hours, weather limitations, specific burn prescription, the communication plan, the medical plan, the traffic plan, and other special instructions will also be prepared for all proposed prescribed burning treatments. The Incident Action Plans will also identify the contact personnel to coordinate on-site briefings, posting notifications, and weather monitoring during burning.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standard (CAAQS) or national ambient air quality standard (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR. Emissions of criteria air pollutants related to the proposed treatments are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed in the PEIR. The SPRs applicable to this treatment project are AD-4, AQ-1 through AQ-4, and AQ-6. SPR AQ-5 would not apply because no naturally occurring asbestos is mapped within the treatment area.

Emission reduction techniques included in Mitigation Measure AQ-1 would be infeasible for the project proponent to implement. Project implementation is anticipated to be contracted with other companies to implement the vegetation treatments. It is cost prohibitive to procure or require equipment meeting the latest efficiency standards, including meeting the U.S. Environmental Protection Agency's (EPA) Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. The project proponent will encourage, but not require, use of these emission reduction techniques by contractors. Work crews are anticipated to utilize carpooling, however carpooling may not be feasible to implement during the lingering COVID-19 pandemic and various sub-variants. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable.

IMPACT AQ-2

Use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR.

SPR HAZ-1, SPR NOI-4, and NOI-5 are applicable. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-3

This impact does not apply to the treatment project because no naturally occurring asbestos, asbestos mines or prospects, or ultramafic rock is mapped in the treatment area (CGS Map Sheet 59, 2011).

IMPACT AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants, which was examined in the PEIR. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, therefore, the potential for exposure to toxic air contaminants is also within the scope the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the PEIR.

IMPACT AQ-5

Use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. This impact is within the scope of the PEIR because the exposure potential and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR.

SPR HAZ-1, SPR NOI-4, and NOI-5 are applicable. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-6

Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR. The duration and parameters of the prescribed burn and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR.

SPRs that are applicable to this treatment project are AD-4, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the PEIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are within the CalVTP treatable landscape and consistent with the treatment types and activities covered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to air quality would occur that is not covered in the PEIR.

4.4 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	Yes	CUL-1 CUL-7 CUL-8	NA	LTS	No	Yes
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	Yes	CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-8	CUL-2	LTSM	No	Yes
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-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-6 CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

Consistent with SPR CUL-1, a complete records search of the treatment area was performed by the Northwest Information Center (NWIC) on July 8, 2022 (NWIC File No. 21-1996). The records search included the project site and a 0.50-mile buffer beyond the project boundaries. The results of the records search indicate that no cultural resources have been recorded within the VTP boundary and that one cultural resource (P-49-003156) and one informally documented resource (C-1192) have been recorded within the 0.50-mile search area. The nearest recorded precontact resource is more than a mile outside the project boundary and to the southeast. Five previous cultural studies are within the VTP boundary, and 19 cultural studies and two sub studies have occurred within the 0.50-mile buffer of the project area.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). The NAHC updated list was dated July 1, 2022. On July 18, 2022, letters and emails were mailed to the Sonoma County representatives indicated by NAHC. One response was received on July 22, 2022 from the Kashia Band of Pomo Indians of Stewarts Point. The response indicated that the proposed project is out of their aboriginal territory and they have no comment or concerns at this time.

On July 18, 2022, a request was sent to NAHC's for a sacred lands file check. A response was received on September 27, 2022, indicating that the sacred lands file search results were negative. The sacred lands file recommended Native American consultation with tribes, some of which were not included in the July 18, 2022 mailing. On October 18, 2022, Native American contact letters were sent to additional Native American tribes as recommended by the sacred lands file search. No response was received as of December 30, 2022.

The County conducted additional tribal outreach in January 2023. As of February 2023, no additional information was received from tribal contacts.

IMPACT CUL-1

Proposed treatment activities could damage historical resources. Historic features have not been evaluated for eligibility for listing in the California Register of Historical Resources (CRHR), therefore, it is not known whether these sites are considered resources under CEQA. Nevertheless, structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historical significance and are present in the treatment areas will be avoided pursuant to SPR CUL-7, which provides a 100 foot buffer where mechanical equipment and prescribed burning are not allowed. Buffers of less than 100 feet may be used after consultation and written approval from a qualified archaeologist. The potential for treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR, because treatment activities and the intensity of ground disturbance of the treatments are consistent with those analyzed in the PEIR.

SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-2

Vegetation treatment would include mechanical treatments using heavy equipment that could disturb the surface of the ground during treatment as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was examined in the CalVTP PEIR. Treatment activities and extent of ground disturbance of the treatment project are consistent with those analyzed in the CalVTP PEIR.

SPRs applicable to this treatment include CUL-1 through CUL-5 and CUL-8.

A records search, Native American Tribal notifications, pre-field research and archaeology survey will be conducted prior to treatment pursuant to SPR CUL-1 through CUL-4. All identified resources will be avoided according to the provisions of SPR CUL-5. SPRs and Mitigation Measure CUL-2 would require identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse change in the significance of any unique archaeological resources or subsurface historical resources. Therefore, this impact would be less than significant.

Mitigation Measure CUL-2 would apply to this treatment which indicates that if any prehistoric or historic-era subsurface archaeological features or deposits are discovered during ground-disturbing activities that all ground disturbing activities within 100 feet of the resource will be halted and a qualified archaeologist consulted. This determination is consistent with the CalVTP PEIR and would not constitute a substantially more severe significant impact than what was covered in the CalVTP PEIR.

IMPACT CUL-3

Native American contacts in Sonoma County were contacted on July 18, 2022, and included

- Native American Heritage Commission, notification and sacred lands file search;
- Patricia Hermosillo, Chairperson, Cloverdale Rancheria of Pomo Indians;
- Chris Wright, Chairperson and Tom Keegan DEP contact, Dry Creek Rancheria Band of Pomo Indians;
- Greg Sarris, Chairperson, Federated Indians of Graton Rancheria;
- Gene Buvelot, Council Member, Federated Indians of Graton Rancheria;
- Buffy McQuillen, Tribal Historic Preservation Officer, Federated Indians of Graton Rancheria;

- Marjorie Mejia, Chairperson, Lytton Rancheria;
- Lisa Miller, Tribal Administrator, Lytton Rancheria;
- Dianne Albright, Environmental Planner, Lytton Rancheria;
- Jose Simon III, Chairperson, Middletown Rancheria of Pomo Indians;
- James Rivera, Tribal Historic Preservation Officer, Middletown Rancheria of Pomo Indians;
- Michael Rivera Jr, Tribal Cultural Advisor, Middletown Rancheria of Pomo Indians;
- Mike Shaver, EPA Director, Middletown Rancheria of Pomo Indians;
- Scott Gabaldon, Chairperson, Mishewal-Wappo Tribe of Alexander Valley;
- Reno Franklin, Chairman, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Anthony Macias, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Ya-Ka-Ama.

Responses were received from:

- Kashia Band of Pomo Indians of Stewarts Point Rancheria, July 22, 2022, Project area not within aboriginal territory and no comment or concerns at this time.

As a result of the NAHC sacred lands file request, received on September 27, 2022, the response indicated to contact seven additional Native American contacts that were not included on the NAHC July 2022 contact list for Sonoma County. Letters were sent on October 18, 2022 to the following Native American contacts as suggested by the NAHC sacred lands file response:

- Dino Franklin, Chairperson, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Loren Smith, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians of Stewarts Point Rancheria;
- Benjakem Cromwell, Chairperson, Robinson Rancheria of Pomo Indians;
- Leona Williams, Chairperson, Pinoleville Pomo Nation;
- Donald Duncan, Chairperson, Guidiville Indian Rancheria;
- Erica Carson, Tribal Historic Preservation Officer, Pinoleville Pomo Nation;
- Sally Peterson, Tribal Historic Preservation Officer, Middletown Rancheria of Pomo Indians;

No other responses were received as of November 7, 2022.

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the PEIR. This impact is within the scope of the PEIR, because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the PEIR. As explained in the PEIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource.

SPRs applicable to this treatment include SPRs CUL-1 through CUL-6 and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use skid steers, excavators, dozers, and masticators, which could uncover human remains. The NWIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. Additionally, consistent with the PEIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery.

No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in

the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to cultural resources would occur that is not covered in the PEIR.

4.5 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	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	BIO-1 BIO-2 BIO-6 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-4 HYD-5	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) SU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-9 BIO-10 GEO-1 HYD-4	BIO-2a BIO-2b	LTSM	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	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-6 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HAZ-5 HAZ-6 HYD-4 HYD-5	BIO-3a BIO-3b	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 BIO-2 BIO-3 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5	BIO-4	LTSM	No	Yes

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?
				GEO-6 GEO-7 HAZ-5 HAZ-6 HYD-1 HYD-4 HYD-5				
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-2 BIO-3 HYD-4	NA	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	BIO-1 BIO-2 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	--	--	--	--	--

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

Pursuant to SPR BIO-1, A Biological and Special Status Plant and Natural Communities Report was completed by Salix Natural Resource Management Inc. in 2022, a consulting botanist to review project-specific special status plant and natural communities with potential to occur in the treatment areas. A list of special status plants and natural communities with potential to occur in the treatment area was compiled by completing a review of aerial photographs, the California Natural Diversity Database, the California Native Plant Society Electronic Inventory, A Manual of California Vegetation Online, Preliminary Descriptions of the Terrestrial Natural Communities, USFWS Information for Planning and Consultation, Appendix BIO-3 (Table 9a, Table 9b, Table 10a, Table 10b, and Table 19) in the CalVTP PEIR (Volume II) for special status plants and wildlife that could occur in the Northern California Coast and Northern California Coast Ranges ecoregions, and a field visit.

The special status plant scoping list identified 281 sensitive and special status plant species and 24 species were determined to have a high potential to exist within the VTP assessment area. One special status plant species, Napa false-indigo (*Amorpha californica var. napensis)* was discovered throughout much of the western portion of the VTP assessment area. The 24 species with high potential to occur in the project area are identified in Table 4.5-1.

A list of sensitive natural communities with potential to occur within the treatment areas was compiled by completing a CNDDB search of twelve USGS quads surrounding the treatment areas and reviewing Table 3.6-16 (pages 3.6-65 – 3.6-66) in the CalVTP PEIR (Volume II) for sensitive natural communities that could occur in the Northern California Coast and Northern California Coast Ranges ecoregions in the vegetation types mapped in the treatment areas. Eighty-four (84) sensitive natural communities were included in the scoping list, 12 were determined to have high potential to exist within the VTP assessment area, and 2 were present within the project area: Redwood Forest Alliance and Douglas-fir-Tanoak Alliance. The two sensitive natural communities are identified in Table 4.5-2. Two additional non-sensitive communities also occur in the VTP assessment area.

Vegetation types within the Pocket Canyon Ridge management unit include Redwood Forest Alliance, Douglas-fir-Tanoak Forest Alliance, Douglas-fir Forest Alliance, and Coast Live Oak Forest and Woodland Alliance. The Sakin/Talbert management unit has a vegetation types of Redwood Forest Alliance and Douglas-fir-Tanoak Forest Alliance. The vegetation type in the Martinelli management unit include the Redwood Forest Alliance.

BIO-1 will also be implemented via enforceable terms in grantee contracts stating:

> Mechanical and manual treatment activities shall occur between September 1st and January 31st if feasible. If operations occur during the breeding season (February 1st through August 31st):
>
> If mechanical or manual treatment activities are anticipated to occur between February 1st and August 31st; a nesting bird survey shall occur as required by SPR BIO-10 and SPR BIO-12. A qualified surveyor shall conduct the surveys, which shall determine through field inspection whether occupied nests are present within the treatment area. Surveys shall be conducted for nesting raptors and also nesting song birds (purple martins, Vaux's swifts) and potential maternal bat roost trees.Follow Northern spotted-owl survey protocol, to the extent feasible noting variations, in completing a one-year six visits prior to operations As required for safety, the following adjustment may be made: Perform Continuous Walking Surveys: Completed during the day, walk the ridge road playing the electronic caller and pause at prominent points and at regular intervals throughout the area to conduct informal stations that are at least 3 minutes in duration.
>
> The final survey shall be conducted within 14 days prior to beginning operations.
>
> If operations are delayed or there is a break in operations of more than 14 days during the breeding season, then a follow-up nesting bird survey shall be performed to ensure no new nests have been established in the interim.

If active nest/bat roost site is located and there is the potential to affect breeding success, the biologist shall establish and the grantee shall observe an appropriate exclusion zone around the nest (no less than 500 feet no disturbance buffer zone for raptors). This exclusion zone may be modified depending upon the species, nest location, disturbance history, and existing visual buffers, so long as the exclusion zone will avoid disturbance. This no-disturbance buffer zone will be effective until the end of the breeding season or until the qualified biologist determines that all the young have fledged or the nest has failed.

Pursuant to SPR BIO-2, a wildlife assessment was completed by Forest Ecosystem Management in 2022, a consulting wildlife biologist report conducted to review project-specific special status wildlife with potential to occur in the treatment areas. A list of special status wildlife species with potential to occur in the treatment areas was compiled by completing a review of aerial photographs, the California Natural Diversity Database (CNDDB), the CNDDB Special Animal List, the California Wildlife Habitat Relationships System (WHR), the Sonoma County Vegetation Map, the USFWS List of Federal Endangered and Threatened Species, California Bird Species of Special Concern, Spotted Owl Database, USFWS Information for Planning and Consultation, and National Marine Fisheries Service Essential Fish Habitat Mapper, and a field visit.

The Forest Ecosystem Management conducted reconnaissance surveys on June 1, 2022 to identify land cover types, document existing conditions and determine if suitable habitat exists for any special status wildlife species, determine if special status wildlife species are present, and determine if additional special status wildlife species surveys are required. The biological reconnaissance survey included examining the habitat within each treatment unit and searching for habitat elements associated with specific species (i.e. plant composition, vegetative structure, aquatic or riparian structures, topography and elevation, special features such as rock outcrops, downed logs, etc.), existing disturbance issues (i.e. roads, houses, powerlines), and the potential for nesting and/or roosting structures (i.e snags, cavity trees, mistletoe, stick structures). The biological report identified 14 listed or sensitive wildlife species with the potential to occur within the

project area. These species are identified in Table 4.5-1.

A complete scoping list of all plant and wildlife species with potential to occur in the vicinity of the proposed project was assembled (see Attachment B).

Twenty-four (24) sensitive plant species have a high likelihood to occur in the treatment areas (see Table 4.5-1)

Two (2) Sensitive Natural Communities were identified in the treatment areas (See Table 4.5.-2)

Fourteen (14) special status wildlife species were determined to have potential to occur in the treatment areas (see Table 4.5-1).

These species are discussed in detail under Impact BIO-1 (special status plants) and Impact BIO-2 (special status wildlife).

Table 4.5-1 Special Status Plant and Wildlife Species That Occur or May Occur in the Treatment Areas

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR[2]	Habitat	Potential for Occurrence
Special Status Plants					
Amorpha californica var. napensis (Napa false indigo)	-	-	1B.2	Broadleafed upland forest, Chaparral, Cismontane woodland. Openings in forest or woodland or in chaparral. Elevation: 50-2000ft. Blooms Apr-Jun	Present within project area per 2022 botanical survey
Calamagrostis bolanderi* (Bolander's reed grass)	-	-	4.2	Bogs and fens, Broadleafed upland forest, Closed-cone coniferous forest, Coastal scrub, Marshes and swamps, Meadows and seeps, North Coast coniferous forest Mesic Elevation: 0-455 ft. Blooms May-Aug	High
Ceanothus gloriosus var. exaltatus* (Glory brush)	-	-	4.3	Chaparral Elevation: 30-610 ft Blooms Mar-Jun(Aug)	High
Erigeron biolettii* (Streamside Daisy)	-	-	3	Broadleafed upland forest, Cismontane woodland, North Coast coniferous forest Mesic, Rocky Elevation: 30-1100 Blooms June-Oct	High

Erigeron greenei (Greene's narrowleaved Daisy)	-	-	1B.2	Chaparral Serpentine and volcanic substrates generally in shrubby vegetation. Elevation: 80-1005 Blooms May-Sept	High
Eryngium jepsonii** (Jepson's coyotethistle)	-	-	1B.2	Valley & foothill grassland Vernal pool. Clay. Elevation: 3-305 ft. Blooms Apr-Aug	High
Fritillaria roderickii** (Roderick's fritillary)	-	SE	1B.1	Coastal bluff scrub, Coastal prairie Valley & foothill grassland. Grassy slopes, mesas. Elevation: 20-610 Blooms Mar-May	High
Glyceria grandis** (American manna grass)	-	-	2B.3	Bog & fen, Marsh & swamp Meadow & seep, Wetland Wet meadows, ditches, streams, and ponds, in valleys and lower elevations in the mountains. Elevation: 60-2045 Blooms Jun-Aug	High
Helianthella castanea** (Diablo helianthella)	-	-	1B.2	Broadleaved upland forest Chaparral, Cismontane woodland Coastal scrub Valley & foothill grassland Usually in chaparral/oak woodland interface in rocky, azonal soils. Often in partial shade. Elevation: 45-1070 Blooms Mar-Jun	High
Hemizonia congesta ssp. Congesta (Congested-headed hayfield tarplant)	-	-	1B.2	Valley and foothill grassland Roadsides (sometimes) Elevation: 20-560 Blooms Apr-Nov	High
Iris longipetala* (Coast iris)	-	-	4.2	Coastal prairie, Lower montane coniferous forest, Meadows and seeps. Mesic Elevation 0-600 Blooms Mar-May(Jun)	High

Juglans hindsii** (Northern California black walnut)	-	-	CBR		Present within project area
Kopsiopsis hookeri (Small groundcone)	-	-	2B.3	North Coast coniferous forest Open woods, shrubby places, generally on Gaultheria shallon . Elevation: 90-1435 Blooms Apr-Aug	High
Leptosiphon acicularis* (Bristly leptosiphon)	-	-	4.2	Chaparral, Cismontane woodland, Coastal prairie, Valley and foothill grassland Grassy areas, woodland, chaparral. Elevation: 55-1500 Blooms Apr-Jul	High
Leptosiphon jepsonii (Jepson's leptosiphon)	-	-	1B.2	Chaparral, Cismontane woodland, Valley and foothill grassland. Open to partially shaded grassy slopes. On volcanics or the periphery of serpentine substrates. Elevation 55-885 Blooms Mar-May	High
Monardella viridis* (Green monardella)	-	-	4.3	Broadleafed upland forest, Chaparral, Cismontane Woodland Elevation: 100-1010 Blooms Jun-Sep	High
Perideridia gairdneri ssp. gairdneri* (Gairdner's yampah)	-	-	4.2	Broadleafed upland forest, Chaparral, Coastal prairie, Valley and foothill grassland, Vernal pools. Adobe flats or grasslands, wet meadows and vernal pools, under Pinus radiata along the coast; mesic sites. Elevation: 0-610 Blooms Jun-Oct	High
Piperia candida (White-flowered rein Orchid)	-	-	1B.2	Broadleafed upland forest, Lower montane coniferous forest, North Coast coniferous forest. Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. Elevation: 30-1615 Blooms (Mar)May-Sep	High

Ramalina thrausta** (Angel's hair lichen)	-	-	2B.1	North Coast coniferous forest On dead twigs and other lichens. Elevation 75-430	High
Tracyina rostrata** (Beaked tracyina)	-	-	1B.2	Chaparral, Cismontane woodland Valley & foothill grassland. Open grassy meadows usually within oak woodland and grassland habitats. Elevation 150-795 Blooms May-Jun	High
Trichostema ruygtii** (Napa bluecurls)	-	-	1B.2	Chaparral, Cismontane woodland Lower montane coniferous forest Valley & foothill grassland Vernal pool, Wetland Often in open, sunny areas. Also has been found in vernal pools. Elevation 30-680 Blooms Jun-Oct	High
Trifolium amoenum (Two-fork clover)	FE	-	1B.1	Coastal bluff scrub, Valley and foothill grassland. Sometimes on serpentine soil, open sunny sites, swales. Most recently cited on roadside and eroding cliff face. Elevation 5-415 Blooms Apr-Jun	High
Trifolium Buckwestiorum (Santa Cruz clover)	-	-	1B.1	Broadleafed upland forest, Cismontane woodland, Coastal Prairie. Moist grassland. Gravelly margins. Elevation 30-805 Blooms Apr-Oct	High
Usnea longissima (Methuselah's beard Lichen)	-	-	4.2	Broadleafed upland forest, North Coast coniferous forest Grows in the "redwood zone" on tree branches of a variety of trees, including big leaf maple, oaks, ash, Douglas-fir, and bay. Elevation 45-1465	High
Special Status Wildlife					
Accipiter cooperii (Cooper's Hawk)	-	WL	-	Patchy woodlands and edges with snags for perching. Dense stands with moderate crown-depths. Nest usually in 2nd growth conifer stands or deciduous riparian areas near streams.	May occur. Habitat is present within the treatment area; however, being on the ridge top and dense ladder fuels reduces habitat suitability.

Accipiter straitus (Sharp-Shinned Hawk)	-	WL	-	Dense forested stands in close proximity to open areas. Nest usually in dense pole and small-tree stands of conifers in cool, moist, well-shaded areas near streams	May occur. Habitat is present within the treatment area; however, being on the ridge top and dense ladder fuels reduces habitat suitability.
Ardea alba (Great Egret)	-	CDF:S	-	Groves of trees suitable for nesting and roosting, relatively isolated from human activities, near aquatic foraging areas. Colonial nester near open water in large trees. Feeds in shallow water and along shores of estuaries, lakes, ditches, and slow-moving streams; as well as irrigated cropland and pastures.	May occur. There are some large dominant trees with open branches within the VTP (primarily on Odd Fellows and WiConduit) that could provide roosting sites. These trees are within 1 mile of the Russian River.
Ardea herodias (Great Blue Heron)	-	CDF:S	-	Perch and roost in secluded tall trees isolated from human activities, near aquatic foraging areas. Colonial nester near water in large snags or large trees. Tallest trees used near shallow-water feeding areas.	May occur. There are some large dominant trees with open branches within the VTP (primarily on Odd Fellows and WiConduit) that could provide roosting sites. These trees are within 1 mile of the Russian River.
Chaetura vauxi (Vaux's Swift)	-	SSC	-	Forages over most terrains and habitats, often high in the air. Roosts often in flocks. Most important habitat requirements is appropriate nest-sites in large, hollow tree. Nests in redwood or Douglas-fir typically built on vertical inner wall or large, hollow tree or snag. Tall stubs charred by fire often used.	May occur. The treatment area contains large trees and snags that may provide nesting habitat for Vaux's swifts.
Haliaeetus leucocephalus (Bald Eagle)	Delisted	SE	-	Ocean shore, lake margins, and larger rivers for nesting and wintering. Large, stoutly limbed trees or snags near water. Nests within 1 mile of water. Nests in large, old growth, or dominant live tree with open branches.	May occur. There are some large dominant trees with open branches within the VTP (primarily on Odd Fellows and WiConduit) that could provide nesting/roosting sites along the ridge top. These trees are within 1 mile of the Russian River.
Pandion haliaetus (Osprey)	-	WL	-	Rivers, lakes, reservoirs, bays, estuaries and surf zones with large trees to nest. Nest in large trees, snags and dead topped trees in open forest habitats near fish bearing waters.	May occur. There are documented nest sites along the Russian River near the treatment area. Habitat is present within the VTP.
Progne subis (Purple Martin)	-	SSC	-	Valley foothills and montane hardwood, montane hardwood/conifer and riparian habitats. Prefer tall isolated tree or snag in open forest. Nests in snag, cavity tree, nesting box, under bridges, or in culvert.	May occur. The treatment area contains large trees and snags that may provide suitable nesting habitat; however, due to dense ladder fuels, habitat suitability is greatly reduced.

Strix occidentalis caurina (Northern Spotted Owl)	FT	ST	-	Requires large blocks of mature forests with suitable nesting sites, often near the lower slopes close to water. Nests in snags or larger trees with debris structures or broken tops.	May occur. The treatment area contains suitable nesting habitat; however, due to dense ladder fuels, habitat suitability is reduced.
Arborimus pomo (Sonoma Red-Tree Vole)	-	SSC	-	Mature and other stands of Douglas-fir, redwood, or mixed evergreen trees in fog belt. Specializes on needles of Douglas-fir and grand fir. Water is obtained from fog drip on needles.	May occur. There are some Douglas-fir trees that may provide nesting habitat suitable for this species; however, being near the ridge top (hotter and drier) conditions than near the river; decreases the habitat suitability. Stick structures were observed within the VTP but the tell-tale resin ducts were not noted.
Corynorhinus townsendii (Townsend's Big-Eared Bat)	-	SSC	-	Prefers mesic habitats, but found in all but subalpine and alpine habitats. Roosts in caves, mines, tunnels, buildings, or chimney trees. Extremely sensitive to human disturbance.	May occur. Roost sites would occur in cavity trees. There are some large chimney trees within the VTP (primarily on Odd Fellows and WiConduit) that could provide roosting; however, more suitable habitat is present closer to the river.
Lasiurus blossevillii (Western Red Bat)	-	SSC	-	Roosts in trees often along edge adjacent to streams, fields or urban areas. Family groups roost together. Prefers habitat edges and mosaics with trees that are protected from above and open below; with open areas for foraging.	May occur. Habitat is present; however, as the treatment area is along the ridge top and currently has dense ladder fuels; habitat will be less suitable. Habitat may be limited to closer to the edges of the rivers, creeks, and urban areas outside the VTP.
Lasiurus cinereus (Hoary Bat)	WB WG: M	-	-	May be found at any location in California. During migration, males found in foothills, deserts, and mountains; and females in lowlands and coastal valleys. Roost in dense foliage of medium to large trees. Preferred sites are hidden from above, with few branches below and have ground cover of low reflectivity. Females bear young while roosting in trees and may leave young in roosting site while foraging.	May cccur. There are trees that would provide roosting habitat suitable for Hoary Bats. The treatment area is along the ridge top and currently has dense ladder fuels. Surrounding the treatment area is forests with little recent timber management, so they are probably overstocked and dense with ladder fuels.
Myotis evotis (Long-Eared Myotis)	WB WG: M	-	-	All brush, woodland, and forest habitats from sea level to 9,000'. Coniferous woodlands and forests are preferred. Forages among trees, over water or shrubs. Roosts in buildings, crevices, spaces under bark, and in snags. Caves are primarily used as night roosts.	May occur. There are roosting sites (snags, spaces under bark, and cavity trees) available throughout the treatment area.

Notes:

*CNPS List Only

**CalVTP List Only

1) Legal Status Definitions:

FE Federally Listed as Endangered (legally protected by ESA)

FT Federally Listed as Threatened (legally protected by ESA)

FD Federally Delisted

SE State Listed as Endangered (legally protected by CESA)

ST State Listed as Threatened (legally protected by CESA)

SR State Listed as Rare (legally protected by NPPA)

C Candidate for Federal or State Listing

SSC Species of special concern (no formal protection other than CEQA consideration)

CDF:S CalFire Sensitive

FP CDF Fully protected

WL CDFW Watch list

BCC USFWS Birds of Conservation Concern

WBWG:M or H Western Bat Working Group

2) California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

Table 4.5-2 Sensitive Natural Communities Documented to Occur in the Treatment Areas

Species	Primary Lifeform	Global Rarity	State Rarity	Potential for Occurrence[2]
Sensitive Natural Communities				
Douglas-fir – Tanoak forest and woodland	Tree	G3	S3	Present within project area
Redwood forest and woodland	Tree	G3	S3.2	Present within project area

The Douglas-fir-Tanoak forest and woodland type is predominantly a Vegetation Condition Class of III.A High Vegetation Departure 67-83%, Class 5, with some small areas being Vegetation Condition Class I.B, Low to Moderate Vegetation Departure 17-33%, Class 2, and a fire return interval of short to medium (5-100 years).

The Redwood forest and woodland type is predominantly a Vegetation Condition Class of III.A High Vegetation Departure 67-83%, Class 5, with some small areas being Vegetation Condition Class I.B, Low to Moderate Vegetation Departure 17-33%, Class 2, and a fire return interval of short to long (no years specified).

Other natural communities that exist within the project area, but are not classified as sensitive, include:

Douglas-fir Forest Alliance, (G5, S4)
Coast Live Oak Forest and Woodland Alliance (G5, S4).

Notes:

Legal Status Definitions:

Global Rarity

The global rank (G-rank) is a reflection of the overall condition of an element throughout its global range.

G1 = Less than 6 viable element occurrences (EOs) OR less than 1,000 individuals OR less than 2,000 acres.

G2 = 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres.

G3 = 21-80 EOs OR 3,000-10,000 individuals OR 10,000-50,000 acres.

G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat.

G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

State Rarity

S1 (critically imperiled)

S2 (imperiled)

S3 (vulnerable)

S4 (No Threat Rank, apparently secure within California)

Older ranks may still contain a decimal "threat" rank of .1, .2, or .3, where:

1 indicates very threatened status

2 indicates moderate threat

3 indicates few or no current known threats

IMPACT BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on special status plant species that may occur in the treatment area. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments, because the same treatment activities would occur. However, treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatment that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors that can be beneficial for special status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special status plants.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments; it requires protocol-level surveys for special status plants to be conducted prior to implementation of mechanical, manual, prescribed burning, prescribed herbivory, and herbicide treatments. Pursuant to SPR BIO-7, surveys would not be required for those special status plants not listed under CESA or ESA, if the target special status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species, and the treatment may be carried out during the dormant season for that species or when the species has completed its annual life cycle, provided the treatment would not alter habitat in a way that would make it unsuitable for the special status plants to reestablish following treatment, or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts of special status plants.

Where protocol-level surveys are required (per SPR BIO-7) and special status plants are identified during these surveys, Mitigation Measures BIO-1a and BIO-1b would be implemented to avoid loss of identified special status plants. Per Mitigation Measures BIO-1a and BIO-1b, if special status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 20 feet will be established around the area occupied by the species within which mechanical and manual treatments, prescribed burning, prescribed herbivory, and herbicide application would not occur unless a qualified RPF or biologist determines that the species would benefit from treatment in the occupied habitat area. In the case of plants listed pursuant to CESA or ESA, the determination of beneficial effects would need to be made in consultation with the California Department of Fish and Wildlife (CDFW) and/or USFWS. If treatments are determined to be beneficial and would be implemented in areas occupied by special status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special status plants will be carried out by a qualified RPF or botanist. Therefore, habitat function for special status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance, maintain habitat function for the special status plant species present.

Botanical survey was conducted throughout the project area in 2022 by Salix Natural Resource Management, Inc.. During these survey's, the project area was visited four times throughout the growing season. All plants observed during site visits were recorded, and a list of plants that were observed is included in the botanical report. One special status plant species was observed (Napa false-indigo) in the western portion of the project area. Napa false indigo has a rare plant rank of 1B.2. Other potential special status plant species that have a high likelihood to occur within the project area are included in Table 4.5-1. The complete botanical report is provided in Appendix B.1.

Other special status plant species that may occur within the treatment areas are identified in the scoping list in Appendix B. Impacts on these species would be avoided by implementing non- ground-disturbing treatment activities (e.g., manual treatment activities) during the dormant season (i.e., when the plant has no aboveground parts), which would generally occur during the winter. Ground-disturbing treatment activities (e.g., mechanical treatments, construction of control lines for broadcast burning) may result in impacts on these plant species even when dormant, and would not be conducted without prior implementation of SPR BIO-7. If non-ground-disturbing treatments cannot be completed in the dormant season and would be implemented during the growing period of these annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented.

As a result of the 2022 botanical survey, Napa false indigo (a perennial shrub) has been identified to occur within treatment areas. If future botanical surveys for SPR BIO-7 determine the species is still present, implementation of Mitigation Measure BIO-1b would be required to avoid loss of individual plants by establishing a no-disturbance buffer around the area occupied by the 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 be a minimum of 20 feet from special status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist, in consultation with CDFW and/or USFWS, determines that a smaller buffer will be sufficient to avoid loss of or damage to special status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity.

Project specific implementation: To protect Napa false-indigo, individual plants have been flagged with white flagging with blue BOTANY written on the flagging. Groups of plants have been delineated with orange and white SPECIAL

TREATMENT AREA flagging. Napa false-indigo plants will not be removed during project treatments.

For mechanical and manual treatments – retain all specimens. Do not scatter slash or other residue on retained plants. Do not place burn piles on or near (within 20 feet) of retained plants. Do not deposit chips on plants.

For mechanical treatments – retain all specimens. Reduce fuels around plants (within 20 feet) with manual treatment prior to mastication. This should ensure a safe buffer from treatment with heavy equipment. Do not run over plants with heavy equipment.

For prescribed burning treatments – reduce fuels around plants (within 20 feet) by manual treatment. Do not pile slash or other residue on plants. A Broadcast burn through the populations will not harm them. Burning will increase vigor by reducing competition and releasing nutrients. Plants will recover by vigorous coppice sprouting.

Pursuant to SPR HYD-4, Watercourse and Lake Protection Zones (WLPZs) and Equipment Limitation Zones (ELZs) ranging from 30 to 100 feet adjacent to all aquatic habitat within the treatment areas would be implemented for mechanical, manual, prescribed burning, prescribed herbivory, and herbicide treatments, and would minimize some adverse effects on other species that could occur but were not observed in the 2022 botanical survey. Although WLPZs would avoid and minimize some adverse effects on special status plants typically associated with wet areas, all habitat potentially suitable cannot be avoided and establishing WLPZs and protective buffers may not fully prevent impacts on the species. As a result, SPR BIO-7 was implemented, or will be implemented for future projects.

The potential for treatment activities to result in adverse effects on special status plants was examined in the PEIR. This impact on special status plants is within the scope of the PEIR, because, within the boundary of the project area, habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance are consistent with those analyzed in the PEIR.

Biological SPRs that apply to project are SPRs BIO-1, SPR BIO-2, SPR BIO-6, SPR BIO-7, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR, GEO-5, SPR GEO-7, SPR HYD-4, and SPR HYD-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-2

Initial vegetation treatments and follow-up maintenance treatments could result in direct or indirect adverse effects on special status wildlife species and habitat suitable for these species within a treatment area, as described in the following sections. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities would occur.

Special Status Birds

Nine special status bird species have the potential to occur within the treatment area: Cooper's Hawk, Sharp-Shinned Hawk, Great Egret, Great Blue Heron, Vaux's Swift, Bald Eagle, Osprey, Purple Martin, and Northern Spotted Owl (Table 4.5-1).

Treatment activities, including mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application conducted during the nesting bird season could result in direct loss of active nests if trees or shrubs containing nests are removed or burned. For nests within vegetation that would not be removed, treatment activities including mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on special status birds was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special status birds can be clearly avoided by physically avoiding habitat suitable the species or conducting treatments outside of the season of sensitivity (i.e., nesting bird season), then no mitigation would be required. Adverse effects on nesting special status birds would be avoided for treatments that would occur outside of the nesting bird season (February 1–August 31).

If conducting some treatments outside of the nesting bird season is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and focused nesting bird surveys would be conducted prior to implementation of treatment activities. If no active bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for Bald Eagle, Great Blue Heron, Great Egret, Osprey, and Northern Spotted Owl) and BIO- 2b (for Cooper's Hawk, Sharp-Shinned Hawk, Vaux's Swift, and Purple Martin) would be implemented.

Under Mitigation Measures BIO-2a and BIO-2b, a no-disturbance buffer of 1,000 foot radius for Northern Spotted Owl, 372 foot radius for Bald eagle nests, 300 foot radius for Great Blue Heron and Great Egret, 265 ft radius for Osprey, and at least 100 feet around the nests of other special status birds, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified biologist. Additionally, trees containing Bald eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special status birds would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees. Additionally, treatments within a WLPZ would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Pursuant to Mitigation Measure BIO-2a, this determination for Bald Eagle, Great Blue Heron, Great Egret, Osprey, and Northern Spotted Owl must be made in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, Environmental Resource Solutions, Inc. would contact CDFW to seek technical input on the determination that habitat function would be maintained for Bald Eagle, Great Blue Heron, Great Egret, Osprey, and Northern Spotted. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Sonoma Tree Vole

Habitat potentially suitable for Sonoma tree vole is present in the project area, including Douglas-fir forest. Sonoma tree voles prefer old growth or mixed old growth and mature forest habitat; however, the species can occur in other types of forests. While it is possible that this species could nest in large trees (especially Douglas-fir) on the project site, treatment activities would not result in removal of living trees greater than 12 inches dbh. Adverse effects on Sonoma tree voles are unlikely to occur and mitigation would not be required.

Habitat function for Sonoma tree vole would be maintained because treatment activities and maintenance treatments would not result in removal of living trees greater than 12 inches dbh which would be the most likely features to be used by this species. The potential for treatment activities and maintenance treatments to result in adverse effects on Sonoma tree vole was examined in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Special Status Bats

Habitat potentially suitable for four special status bat species -- Townsend's Big-Eared Bat, Western Red Bat, Hoary Bat, and Long-Eared Myotis -- is present within forested habitat and human-made structures in the treatment areas. Per SPR BIO-1, if it is determined that adverse effects on special status bats can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special status bat maternity roosts would be avoided by conducting initial and maintenance treatments outside of the bat maternity season (April 1–August 31).

Treatment activities, including mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide treatments, conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chain saws, vehicles, personnel) or smoke (e.g., prescribed burning) potentially resulting in abandonment of the roost and loss of young. Herbicide treatments would be limited to ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems and would be conducted by crews of one to eight people; thus, these treatments would not be expected to result in substantial disturbance to special status bat roosts. The potential for treatment activities to result in adverse effects on special status bats was examined in the PEIR.

If conducting some mechanical or manual treatments, prescribed burning, prescribed herbivory, or herbicide treatments would occur during the bat maternity season, then SPR BIO-10 would apply, and focused surveys for these species would be conducted within suitable habitat areas prior to initiation of treatments. If special status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special status bats would be implemented.

Under Mitigation Measure BIO-2b, a no-disturbance buffer of a minimum of 100 feet would be established around active Townsend's Big-Eared Bat, Western Red Bat, Hoary Bat, or Long-Eared Myotis roosts and mechanical treatments, manual treatments, prescribed herbivory, and herbicide treatments would not occur within this buffer. If special status bat roosts are identified in a treatment area where prescribed burning is planned, prescribed burning activities would be implemented outside of the bat breeding season, which is April 1–August 31.

Habitat function for special status bats would be maintained because treatment activities and maintenance treatments would not result in significant removal of living trees greater than 12 inches dbh which would be the most likely features to be used by this species due to the cover provided by larger trees. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Conclusion

The potential for treatment activities to result in adverse effects on special status wildlife was examined in the PEIR. This proposed project's impact on special status wildlife is within the scope of the PEIR, because within the boundary of the project area habitat characteristics are essentially the same within and outside the treatable landscape and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

Biological resource SPRs that apply to project impacts under Impact BIO-2 are SPR BIO-1, SPR BIO-2, SPR BIO-9, SPR BIO-10, SPR GEO-1, and SPR HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-3

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed; however, retreatment at too great a frequency could result in additional adverse effects. The potential for treatment activities, including maintenance treatments to result in adverse effects on sensitive habitats was examined in the PEIR.

SPR BIO-3 requires a qualified biologist to identify potential sensitive natural communities using the most current edition of *A Manual of California Vegetation*. The vegetation classification was verified using aerial imagery analysis and field verification. The following sensitive natural communities are present in the treatment areas: Douglas-fir-Tanoak Forest Alliance and Redwood Forest Alliance (Table 4.5-2), and the full botanical survey report in Appendix B.1.

Riparian habitat is present adjacent to streams in the treatment areas. Under SPR HYD-4, WLPZs ranging from 50 to 100 feet would be established adjacent to all Class II streams, and buffers sufficient to prevent the degradation of downstream beneficial uses of water as determined on a site-specific basis adjacent to all Class III streams, for manual, mechanical, prescribed burning, prescribed herbivory, and herbicide treatments, which would limit the extent of treatment activities within riparian habitat. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized, as trees greater than 12 inches are not prescribed for removal. Within the riparian habitat, 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. If trees in the riparian habitat are generally smaller than 12 inches, the retention size parameter will be adjusted on a site specific basis to ensure retention of the largest trees. Additionally, prior to any treatments in riparian habitat, Environmental Resource Solutions, Inc. would notify CDFW pursuant to California Fish and Game Code 1602, when required, as explained in SPR BIO-4.

The sensitive natural communities within the treatment area are classified as rarity rank S3 (Douglas-fir-Tanoak Forest Alliance) and S3.2 (Redwood Forest Alliance). In these forest and woodland sensitive natural communities, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the sensitive natural community in the area. If treatment activities within identified sensitive natural communities or oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. If habitat function of sensitive natural communities or oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, then Mitigation Measure BIO-3b would apply, and unavoidable losses of these resources would be compensated through restoration or preservation of these vegetation types within or outside of the treatment areas.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. This impact on sensitive habitats is within the scope of the PEIR and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Biological resource SPRs that apply to project impacts under Impact BIO-3 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-6, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HAZ-5, SPR HAZ-6, SPR HYD-4, and SPR HYD-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-4

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally

protected wetlands. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), some portions of the treatment areas contain small segments of perennial, intermittent, and ephemeral streams that could be protected under federal and/or state government jurisdiction. The project area was designed to avoid most streams and riparian areas, however a few streams within the project area are tributaries to the Russian River, Pocket Canyon Creek, and Green Valley Creek.

Under SPR HYD-4, WLPZs ranging from 50 to 100 feet would be established adjacent to all Class II streams within the treatment areas, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III streams within the treatment areas for manual, mechanical, prescribed burning, prescribed herbivory, and herbicide treatments.

The locations of seasonal wetlands, springs, and seeps on the project site are generally known; however, these features have not been mapped or demarcated. Mitigation Measure BIO-4 would apply, and a qualified RPF or biologist would delineate the boundaries of these features, establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, and seeps, and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).

Broadcast burning may be implemented in all treatment areas and may occur within areas that contain seasonal freshwater emergent wetlands, springs, seeps, or stream habitat. Mitigation Measure BIO-4 would apply in treatment areas that contain state or federally protected wetlands where broadcast burning would occur. Under Mitigation Measure BIO-4, the boundary of jurisdictional features would be delineated, and broadcast burning may be implemented in wetland habitats if a qualified RPF or biologist determines that the wetland habitat does not support special status plants (i.e., through implementation of SPR BIO-7) or wildlife species (i.e., through implementation of SPR BIO-10), that wetland habitat function would be maintained, and that the broadcast burn is within the normal fire return interval for the wetland vegetation types present. Additionally, no fire ignition (and associated use of accelerants) will occur within wetland habitat or within WLPZs surrounding wetland habitats.

The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Biological resource SPRs that apply to project impacts under Impact BIO-4 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO- 5, SPR GEO-6, SPR GEO-7, SPR HAZ-5, SPR HAZ-6, SPR HYD-1, SPR HYD-4, and SPR HYD-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-5

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because habitat suitable for wildlife is present in treatment areas. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), the project area is entirely outside of the Coast Range-Marin Coast and Blue Ridge-Marin Coast critical habitat linkages (Conservation Lands Network 2021). The treatment area contains natural habitat and may be used as wildlife movement corridors to some degree, especially ridges and riparian corridors. Due to the nature of the proposed treatment activities, implementation of these treatment activities would not result in a substantial change in the existing conditions that facilitate wildlife movement through treatment areas. Treatments would seek to protect and restore native ecological function by thinning small diameter trees, removing excessive standing dead wood, and controlling nonnative trees and shrubs. These treatments would promote the establishment of mature trees and a healthy forest structure resulting in improved habitat for wildlife that would function better for wildlife movement post-treatment. Additionally, no known wildlife nursery sites or indications of nursery sites, such as deer fawning habitat or potential rookery trees with whitewash, were identified within any treatment areas during implementation of SPR BIO-1.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Habitat function within treatment areas would be maintained because treatment activities, including maintenance treatments, would not result in significant removal of living trees (i.e., conifers, hardwoods) greater than 12 inches dbh which will maintain connectivity of a mature

forest. Additionally, WLPZs ranging from 50 to 100 feet would be implemented adjacent to all Class II streams, and buffers will be established on Class III streams in treatment areas, which could function as wildlife movement corridors, pursuant to SPR HYD-4. Biological resource SPRs that apply to project impacts under Impact BIO-5 are SPR BIO-1, SPR BIO-2, SPR BIO-3, and SPR HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-6

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for these species is present throughout treatment areas. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application, conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the PEIR.

SPR BIO-12 would apply, and for treatments implemented during the nesting bird season, a survey for common nesting birds will be conducted within the treatment area by a qualified RPF or biologist prior to treatment activities. If no active bird nests are observed during focused surveys, then additional avoidance measures would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests will be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist.

The potential for treatment activities to result in adverse effects on these resources was examined in the PEIR. The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Biological resource SPRs that apply to project impacts under Impact BIO-6 are SPR BIO-1, SPR BIO-2, and SPR BIO-12. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-7

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the PEIR. Applicable local ordinances relevant to biological resources are the Sonoma County Tree Protection Ordinance, and the Sonoma County Heritage or Landmark Tree Ordinance (Sonoma County 1986; Sonoma County 1989). The Sonoma County Tree Protection Ordinance applies to development projects in the unincorporated County and requires submission of a site plan with the development permit depicting all protected trees (i.e., trees greater than 9 inches dbh) that would be removed (Sonoma County 1989). The project is not a development project and would not be required to submit a development permit. The Sonoma County Heritage and Landmark Tree Ordinance requires a tree permit for removal of a designated heritage or landmark tree (i.e., a tree or grove of trees so designated by the Sonoma County Board of Supervisors due to historical interest, significance, or outstanding characteristics in terms of size, age, rarity, shape, or location) in the unincorporated County (Sonoma County 1986). It is unlikely that any trees that would be removed during implementation of treatment activities would qualify as a Heritage or Landmark Tree. Further, this ordinance grants exemptions for removal of trees when such removal is authorized by CAL FIRE or where a tree is in a hazardous, dangerous, or unhealthy condition so as to endanger life, property, or other trees (Sonoma County 1989). There would be no conflict with local ordinances as a result of implementation of treatment activities.

The potential for the proposed treatments to conflict with local policies is within the scope of the PEIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the PEIR. In addition, all projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with them, per SPR AD-3. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-8

This impact does not apply to the proposed project because the treatment areas are not within the plan area of any adopted habitat conservation plan or natural community conservation plan. Therefore, this impact does not apply to the proposed project.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatments are within the treatable landscape, treatment types and treatment activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

4.6 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	AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AQ-3 GEO-1 GEO-3 GEO-4 GEO-7 GEO-8	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

The project area is located in central-western Sonoma County, approximately 10 miles east of the Pacific Ocean and is part of the Coast Range geomorphic province. Soil associations in the project area include:

- Hugo loam, 30-50% slopes;
- Hugo very gravelly loam, 50-75% slopes;
- Josephine loam, 30-50% slopes;
- Hugo-Josephine complex, 50-75% slopes;
- Hugo-Atwell complex, 50-75% slopes;
- Yorkville clay loam, 30-50% slopes;
- Yolo sandy loam overwash, 0-5% slopes.

Generally, soils within the project areas are well drained, have rapid runoff, and high erosion hazard rating. The project is anchored to a linear ridgetop and includes gently sloping to steeply sloping loam soils.

IMPACT GEO-1

Vegetation treatments would include manual and mechanical treatments, prescribed burning, prescribed herbivory, and ground-based herbicide application which could result in varying levels of soil disturbance and have the potential to increase rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the CalVTP PEIR. Mechanical treatments using heavy machinery such as a masticator or tracked chipper are the most likely treatment to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas containing steep slopes. Equipment used to create or maintain piles for burning, impacts to soil from animals, or reduced vegetation cover from use of herbicides may also increase the risk of soil disturbance. Prescribed burning can increase the risk of hydrophobicity (repellency) which can increase erosion. This impact is within the scope of the CalVTP PEIR because the use of and type of equipment proposed, extent of vegetation removal, and intensity of prescribed burning, prescribed herbivory, and herbicides are consistent with those analyzed in the Cal VTP PEIR.

SPRs applicable to this treatment project are GEO-1 through GEO-8, AQ-3, and AQ-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the CalVTP PEIR.

IMPACT GEO-2

Vegetation treatments would include manual and mechanical treatments, prescribed burning, prescribed herbivory, and ground-based herbicide application which could decrease the stability of slopes and increase the risk of landslides. No areas with known landslide activity are identified within the treatment areas. However, given the variable topography, risk of landslide activity remains. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the equipment proposed for use, the extent of vegetation removal, intensity of prescribed burning, prescribed herbivory and herbicides are consistent with those analyzed in the PEIR.

SPRs applicable to the proposed project are GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are within the treatable landscape, treatment types and treatment activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

4.7 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	None	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	SU	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

IMPACT GHG-1

Consistent with the goals of the proposed fuel treatments to decrease the occurrence of high-severity wildfires and increase the potential rates of carbon sequestration, implementation of the CalVTP could result in a cumulative net carbon benefit over the long term. However, there is uncertainty in predicting future wildfire occurrence, emissions, and carbon sequestration rates, which are highly variable depending on many factors. Use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. Consistent with the PEIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PEIR.

SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. As such, the requirement to inform reporting under Assembly Bill 1504 does not apply. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT GHG-2

Consistent with the goals of the proposed fuel treatments to decrease the occurrence of high-severity wildfires and increase the potential rates of carbon sequestration, implementation of the CalVTP could result in a cumulative net carbon benefit over the long term. However, there is uncertainty in predicting future wildfire occurrence, emissions, and carbon sequestration rates, which are highly variable depending on many factors. Use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the PEIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. However, emissions generated by the treatments would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the PEIR. SPR AQ-3 is also applicable to this treatment and will contain the description of feasible GHG reduction techniques implemented per Mitigation Measure GHG-2. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS RELATED TO GHG EMISSIONS

The proposed treatments are within the treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to GHG emissions would occur that is not covered in the PEIR.

4.8 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.

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

IMPACT ENG-1

Use of vehicles and mechanical equipment during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR.

No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are within the treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to energy resource would occur that is not covered in the PEIR.

4.9 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	Yes	HAZ-5 HAZ-6 HAZ-7 HAZ-8 HAZ-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	LTSM	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ-3	LTSM	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

IMPACT HAZ-1

Initial and maintenance treatments may include mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR.

SPR HAZ-1 is applicable to this treatment. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HAZ-2

Initial and maintenance treatments may include herbicide application to target plant species using ground-based methods, such as using a UTV, backpack sprayer, or painting herbicide onto cut stems or stumps. No aerial spraying of herbicides would occur. The potential for treatment activities to cause a significant health hazard from the use of herbicides was examined in the PEIR. This impact is within the scope of the PEIR because the types of herbicides (e.g., glyphosate) and application methods that would be used, which are limited to ground-based applications, are consistent with those analyzed in the PEIR. In addition, herbicides would be applied by licensed applicators in compliance with all laws, regulations, and herbicide label instructions, consistent with herbicide use described in the PEIR.

SPRs HAZ-5 through HAZ-9 are applicable to this treatment. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HAZ-3

Initial and maintenance treatments may cause burning/smoke and/or soil disturbance, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance or burning in a hazardous materials site was uncertain.

As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. No hazardous material sites were reported for the project area, see Attachment C. Therefore, after the implementation of Mitigation Measure HAZ-3, it was determined that no hazardous materials sites would be disturbed by treatments and this impact would be less than significant.

No SPRs are applicable to this impact, and no additional mitigation is required. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR.

Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 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	HYD-1 HYD-4 BIO-4 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	HYD-1 HYD-2 HYD-4 HYD-5 HYD-6 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 GEO-8 BIO-1 HAZ-1 HAZ-5	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	HYD-1 HYD-3 HYD-4 GEO-4	NA	LTS	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	Yes	HYD-1 HYD-5 BIO-4 HAZ-5 HAZ-7	NA	LTS	No	Yes

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?
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-4 HYD-6 GEO-1 GEO-2 GEO-4 GEO-5	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

The project area is within the Russian River Watershed. Hydrologic features in the project vicinity include the Russian River, Pocket Canyon Creek, and the lower reach of Green Valley Creek. The Pocket Canyon Ridge management unit has slopes that flow both north to the Russian River and south to Pocket Canyon Creek. The Sakin/Talbert unit and the Martinelli unit drain north into the Russian River and south into Green Valley Creek.

Several of the impacts below (i.e., HYD-1 through 4) evaluate compliance with water quality standards or waste discharge requirements. All include implementation of SPR HYD-1, which requires compliance with such water quality regulations. The State Water Resources Control Board is requiring all projects utilizing the CalVTP PEIR to follow the requirements of their Vegetation Treatment General Order, which would meet the requirements of SPR HYD-1. Users of the CalVTP PSA process are automatically enrolled in the General Order and are required to implement all applicable SPRs and mitigation measures from the PEIR. In addition, the General Order requires project proponents to comply with any applicable Basin Plan prohibitions.

IMPACT HYD-1

Initial and maintenance treatments may include prescribed burning. Ash and debris from treatment areas could runoff into adjacent drainages and streams. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 100 feet depending upon slope will be implemented for Class II streams, and ELZ's ranging from 30 to 50 feet depending upon slope will be implemented for Class III streams, that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR.

SPRs applicable to this treatment are HYD-1, HYD-4, BIO-4, GEO-4, GEO-6, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-2

Initial and maintenance treatments would include mechanical and manual treatments. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 100 feet depending upon slope will be implemented for Class II streams, and ELZ's ranging from 30 to 50 feet depending upon slope will be implemented for Class III streams

that are within treatment areas pursuant to SPR HYD-4. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the PEIR.

SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4, HYD-5, HYD-6, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, GEO-8, BIO-1, HAZ-1, and HAZ-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-3

Initial and maintenance treatments may include prescribed herbivory. Grazing animals will often congregate near water sources and in riparian areas and have potential effects to drainages and streams. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 100 feet depending upon slope will be implemented for Class II streams, and ELZ's ranging from 30 to 50 feet depending upon slope will be implemented for Class III streams, that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed herbivory activities to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR and associated impacts to water quality are consistent with those analyzed in the PEIR.

SPRs applicable to this treatment are HYD-1, HYD-3, HYD-4, GEO-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-4

Initial and maintenance treatments would include the use of herbicides to manage invasive plant species and resprouting native tree species. Herbicide application would be limited to ground-based methods, such as using targeted spray from a backpack or reservoir carried by a UTV, or painting herbicide onto cut stems or stumps. All herbicide application would comply with EPA and California Department of Pesticide Regulation label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of herbicides to remove vegetation and associated impacts to water quality are consistent with those analyzed in the PEIR.

SPRs applicable to this treatment are HYD-1, HYD-5, BIO-4, HAZ-5, and HAZ-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the PEIR. This impact to site drainage is within the scope of the PEIR because the types of treatments and treatment intensity are consistent with those analyzed in the PEIR.

SPRs applicable to this treatment are HYD-4, HYD-6, GEO-1, GEO-2, GEO-4, and GEO-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to hydrology and water quality would occur.

4.11 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.

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

The project area is within the Resources and Rural Development (RRD), Agriculture and Residential (AR), and Public Facilities (PF) zoning districts per the Sonoma County General Plan (County of Sonoma 2020). The Pocket Canyon Ridge management unit is within the RRD and PF zoning, the Sakin/Talbert management unit is within the AR zoning, and the Martinelli management unit is within the RRD zoning type.

IMPACT LU-1

SPR AD-3 requires the project comply with applicable Sonoma County plans, policies, and ordinances, such as those pertaining to noise, biological resources, and water resources. This impact is within the scope of the PEIR because proposed treatment types and activities are consistent with those examined in the PEIR.

No conflict would occur because the project proponent would adhere to SPR AD-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

IMPACT LU-2

The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the PEIR. Mechanical treatment activities typically utilize crews of 2 to 4 members. Manual treatment activities may be conducted by crews of 8 to 20 members either working together or as smaller crew units. Prescribed burning treatment activities would require between 10 and 50 crew members, depending on size of the burn unit. Herbicide treatments would typically use a one- to eight-person crew. Crew sizes would be consistent with those analyzed in the PEIR. Impacts associated with short-term increases in the demand for workers during

implementation of the treatment project are within the scope of the PEIR because the number of workers required for implementation of the treatments is consistent with the crew sizes analyzed in the PEIR for the types of treatments proposed.

No SPRs apply to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning, population and housing impacts would occur.

4.12 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-2 NOI-3 NOI-4 NOI-5 NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated Single-Event Noise Levels 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

IMPACT NOI-1

Initial and maintenance treatments would require heavy, noise-generating equipment. This equipment would include chainsaws, polesaws, masticators, all terrain vehicles, and other support equipment. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed, and the duration of equipment use, are consistent with those analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the PEIR. While there is the potential for some prescribed burning to occur during nighttime and weekend hours, all treatment activities using equipment would be limited to daytime hours (7am to 7pm), Monday through Friday, which would avoid the potential to cause sleep disturbance to residents during the more noise- sensitive evening and nighttime hours.

Sensitive receptors adjacent to the project area are rural residences. Some of the rural residences occur on participating project parcels. The communities of Odd Fellows Park and Summerhome Park are project participants, with a majority of their denser rural residences occurring over 1,000 feet downslope from the project ridgelines. These communities have sponsored recent vegetation management work closer to their rural residences than the proposed ridgeline fuel break. Treatment activities will not be located in one location for a long duration, as crews move along the length of the ridgeline

throughout the project to implement the treatment, resulting in noise generating activities not lasting long in one location.

The County General Plan has policies relating to noise generated from operational activities, however, it does not specifically address temporary noise from construction-related activities. The County's "Guidelines for the Preparation of Noise Analysis" (February 2019), provides guidance how to address temporary construction noise. The Guidelines discuss the use of BMP's to address noise from construction activities that occur for less than one year, such as this project. In order to reduce temporary construction-related noise, the following BMP's will be implemented as part of the project:

- Limiting hours of construction to avoid the early morning and evening hours (such as 7 am to 7 pm weekdays and 7 am to 5 pm weekends)
- Limiting work to non-motorized equipment on Sundays and holidays
- Siting construction staging areas as far as practical from nearby sensitive receptors
- Require street legal mufflers on all construction equipment

SPRs applicable to this treatment are AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment, crews, or livestock to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area, including SR 116, River Road, Odd Fellows Park Road, Martinelli Road, and Canyon Road. Vehicle traffic on area highways is not expected to generate a noticeable increase in traffic-related noise. Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the single event noise levels (SENL). The potential for a substantial short-term increase in Single-Event Noise Levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

SPR NOI-1 is applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise impacts would occur.

4.13 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	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	SU	Impact UTIL-2, pp. 3.16-10 – 3.16-12	No	NA	NA	NA	NA	NA
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Impact UTIL-2, p. 3.16-12	No	NA	NA	NA	NA	NA

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

IMPACT UTIL-1

Initial and maintenance treatments would include prescribed burning, which may require an on-site water supply if the burn goes out of prescription. If needed, water would be supplied from existing on-site groundwater wells that are pumped uphill to storage tanks that supply via gravity flow, and transported via water trucks, fire trucks, or water trailer. The potential increased demand for water was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed in the PEIR.

No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of with pile burning or mulching or lopping and scattering biomass in areas where material cannot safely be burned.

Invasive plant and noxious weed biomass will be treated onsite (e.g., prescribed or pile burning), when possible, to eliminate seed and propagules. Invasive plants and noxious weeds will not be chipped and spread or mulched onsite. If invasive plant biomass cannot be treated onsite, there is the potential for a small amount to be disposed of offsite at an appropriate waste collection facility. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, invasive plant waste is proposed to be piled and burned on site, therefore the amount of biomass generated is not expected to exceed the capacity of existing infrastructure. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. Implementation of this SPR would maintain impacts at less than significant, and mitigation is not required.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of with pile burning or mulching or lopping and scattering biomass in areas where material cannot safely be burned.

Invasive plant and noxious weed biomass will also be treated onsite, when possible. If invasive plant biomass cannot be treated onsite, there is the potential for a small amount to be disposed of offsite at an appropriate waste collection facility. If offsite disposal is required, the project will comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the PEIR

SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the CalVTP PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services, utilities and service systems would occur.

4.14 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	Yes	NA	NA	LTS	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

IMPACT REC-1

The proposed treatment would occur primarily within private property and not within public recreation areas. Privately owned properties intersecting the treatment area may be used for recreational activities by members of the Odd Fellows Recreation Club or Summer Home Park community. The Sakin/Talbert unit and the Martinelli unit are private property and not available for public recreation. Additionally, public recreation activities are not allowed and are not common on the small portion of project area owned by Sonoma County. Recreational impacts would primarily be related to dispersed recreation occurring on the Odd Fellows Recreation Club or Summer Home Park properties. Recreation activities include primarily hiking, swimming, and cycling activity. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The potential for the proposed treatment project to impact recreation is within the scope of the PEIR.

NEW RECREATION IMPACTS

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not covered in the PEIR.

4.15 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	Impact TRAN-1, pp. 3.15-9 – 3.15-10	No	NA	NA	NA	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	SU	Impact TRAN-3, pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	SU	No	Yes

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

IMPACT TRAN-1

The trips associated with the project will not conflict with a County plan to address Vehicle Miles Travelled or road closures.

IMPACT TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways, however, the proposed treatments would include prescribed burning, and would produce smoke that could potentially affect visibility along nearby roadways causing a transportation hazard. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the burn duration is consistent with that analyzed in the PEIR.

SPRs applicable to this treatment are AD-3, HYD-2, and TRAN-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT TRAN-3

Due to an intended decrease in the occurrence and severity of wildfires following achievement of the proposed treatment acreage targets under the CalVTP, implementation of the CalVTP could result in a net reduction in VMT in the long term because wildfire response travel could be reduced, resulting in a less-than-significant impact. However, because of the increase in treatment acreage under the CalVTP, VMT associated with treatment activities would increase in comparison to the existing condition.

Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the treatment areas are in remote locations and would require vehicle trips to access the treatment areas. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as noted under Impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate fewer than 110 trips per day, which would cause a less-than-significant transportation impact for specific later activities, as described in the *Technical Advisory on Evaluating Transportation Impacts*, published by the Governor's Office of Planning and Research (OPR 2018). Initial treatments are expected to require up to 50 crew members, which would not exceed 110 trips per day. Most of the emission reduction techniques included in Mitigation Measure AQ-1 would be infeasible for the project proponent to implement, however the project proponent will encourage, but not require, use of these emission reduction techniques by contractors. Carpooling of crews is typically feasible to implement for most of the workers, and crews often carpool in groups of 4 to 8 in crew trucks or crew vans, however carpooling may not always be feasible. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable. Temporary increases in VMT are within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips is consistent with that analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS TO TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not covered in the PEIR.

4.16 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	Impact WIL-1, pp. 3.17-14 – 3.17-15	Yes	HAZ-2 HAZ-3 HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Postfire Flooding or Landslides	LTS	Impact WIL-2, pp. 3.17-15 – 3.17-16	Yes	AQ-3 GEO-3 GEO-4 GEO-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.

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

IMPACT WIL-1

Vegetation treatment activities proposed would include mechanical, manual, prescribed burn, prescribed herbivory, and herbicide application treatments. Vegetation treatment involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burnings could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final PEIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of Burn Plans, Smoke Management Plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water containers and safety equipment would be staged on site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is within the scope of the PEIR because the types of equipment, treatment duration, and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the PEIR.

SPRs HAZ-2, HAZ-3, and HAZ-4, pertaining to preparation of burn plans in accordance with CAL FIRE requirements, equipment safety requirements, carrying fire extinguishers, and prohibiting smoking in vegetated areas, apply to the proposed treatments. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT WIL-2

Vegetation treatment activities proposed would include mechanical, manual, prescribed burn, prescribed herbivory, and herbicide application treatments which could exacerbate fire risk or expose people or structures to risks related to post-fire flooding or landslides. There are steep slopes in some areas of the treatment units. The potential for post-fire landslides and flooding was evaluated in the PEIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration, and methods of prescribed burn implementation are consistent with those analyzed in the PEIR.

SPRs applicable to this impact are AQ-3 GEO-3, GEO-4, GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads and skid trails, or on flat to moderate slopes, SPR GEO-8 would apply if mechanical activities occur in a treatment area that contains steep slopes. Because the treatments are intended to reduce wildfire risk, they could also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON WILDFIRE

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire would occur that is not covered in the PEIR

5 LIST OF PREPARERS

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Kim Batchelder ..... Vegetation Management Coordinator

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