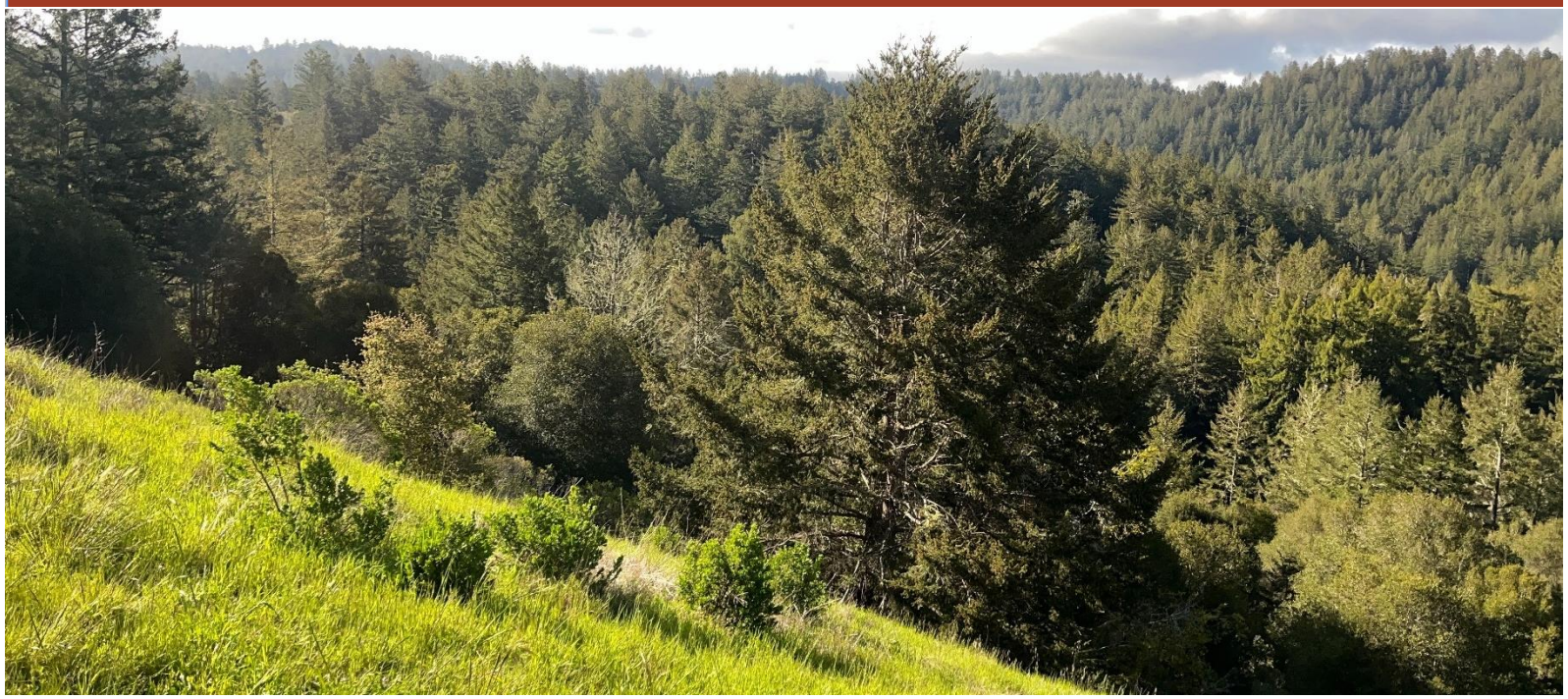
CalVTP Project-Specific Analysis and Addendum

April 2024

La Honda Fuel Break Project
San Mateo County, California

CalVTP ID 2023-40



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ATTACHMENTS

LIST OF ABBREVIATIONS

AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAAQS	California ambient air quality standards
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal-IPC	California Invasive Plant Council
CalVTP	California Vegetation Treatment Program
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CLHG	Cuesta La Honda Guild
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CWHR	California Wildlife Habitat Relationship
CWPP	Community Wildfire Protection Plan
DBH	diameter at breast height
EBMUD	East Bay Municipal Utility District
EBRPD	East Bay Regional Park District
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Federal Endangered Species Act
ESHA	Environmentally Sensitive Habitat Area
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GIS	Geographic Information Systems
HCP	Habitat Conservation Plan

LCP	Local Coastal Program
LHOSP	La Honda Open Space Preserve
LTMP	Long-Term Management Plan
LUST	leaking underground storage tank
MM	mitigation measure
MMRP	mitigation monitoring and reporting program
MROSD	Midpeninsula Regional Open Space District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOAA	National Oceanic and Atmospheric Administration
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OHP	Office of Historic Preservation
PEIR	Programmatic Environmental Impact Report
PFIRS	Prescribed Fire Information Reporting System
PG&E	Pacific Gas & Electric Company
PM	particulate matter
PRC	Public Resources Code
Project	La Honda Fuel Break Project
PSA	Project-Specific Analysis
RCD	Resource Conservation District
RPF	Registered Professional Forester
RWQCB	Regional Water Quality Control Board
SENL	single event noise level
SMCP	San Mateo County Parks
SOD	sudden oak death
SPR	standard project requirement
SR	State Route
SRA	State Responsibility Area
TMP	traffic management plan

US	United States
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
WDR	waste discharge requirement
WLPZ	Watercourse and Lake Protection Zone
WUI	wildland-urban interface

1.0 INTRODUCTION

1.1 Overview of the Proposed Project

The San Mateo Resource Conservation District (RCD) is proposing the La Honda Fuel Break Project (Project) in the south coast region of San Mateo County (Figures 1 and 2). The local Community Wildfire Protection Plan (CWPP) has identified the Project as a high priority for fire prevention work. This strategic fuel break surrounding the La Honda community was designed in collaboration with the San Mateo-Santa Cruz California Department of Forestry and Fire Protection (CAL FIRE) and the San Mateo RCD to support fire prevention and suppression. Treatment would occur on approximately 661 acres throughout the duration of Project implementation. Approximately 250 acres are prioritized for treatment during the first 3 years. In the event of a wildfire, the implemented Project would provide safe access for fire engines and firefighting personnel, support the creation of fire lines, and potentially slow the spread of fire and lower its intensity.

Recent fires, including the CZU Lightning Complex, have demonstrated that fuel breaks can be critical in providing firefighters with access to less developed areas without roads, and have been vital in creating fire lines for low-intensity fires to help stop wildfire spread. Project implementation would not stop fire from spreading during periods of strong, warm, downslope winds with low relative humidity (i.e., Foehn winds) when pieces of burning material can be blown across fuel breaks. However, the Project would provide points from which firefighting resources can “anchor” to conduct suppression activities, and it would increase the construction rate of fire lines while simultaneously reducing the amount of air-delivered fire retardant required to coat vegetation effectively. Slowing the spread of wildfire would provide additional time for an effective community evacuation.

Uncontrolled wildfire is associated with environmental degradation impacts such as increased greenhouse gas (GHG) emissions and habitat loss. This Project would reduce dangerous wildfire fuels in a deliberate manner designed to minimize environmental impacts. Strategic fuel removal would focus on areas of high fuel concentrations and would disrupt the horizontal and vertical continuity of fuel beds. Fuel treatments would aim to mimic conditions that existed prior to colonization, where fires would have occurred more frequently. Biological diversity in the area would be maintained by promoting conditions that favor native plant and animal species. Forest health would be improved by enhancing native, fire-resilient plant communities, primarily through ladder fuel and weed removal, which would open space for native plants to return. Healthy mature trees and scrub dominating the canopy would be thinned out and retained, reducing new brush and understory growth while preserving the carbon sequestration function. Biomass would be strategically diminished in open grassy areas.

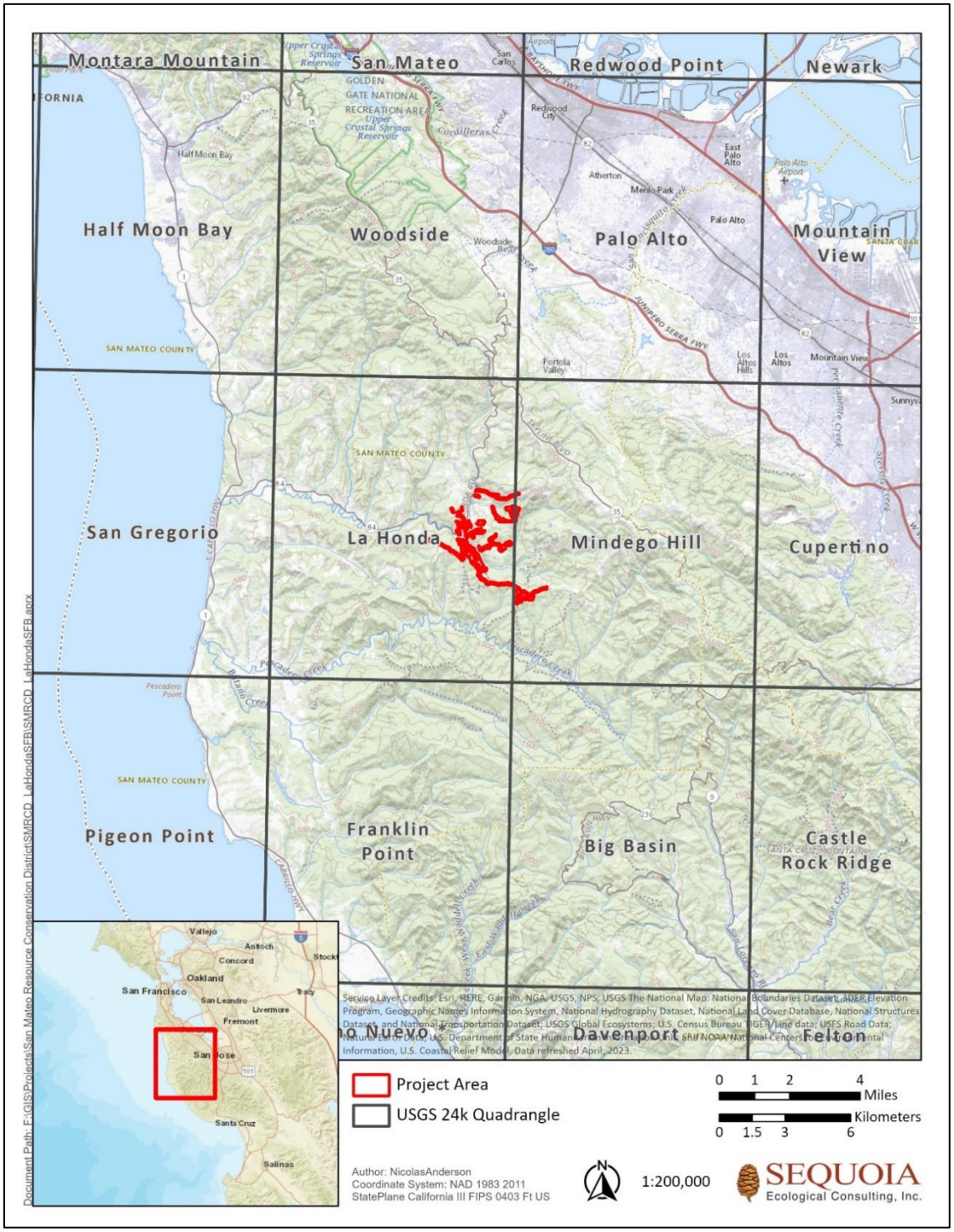

Figure 1. Regional Setting of the La Honda Fuel Break Project Site.

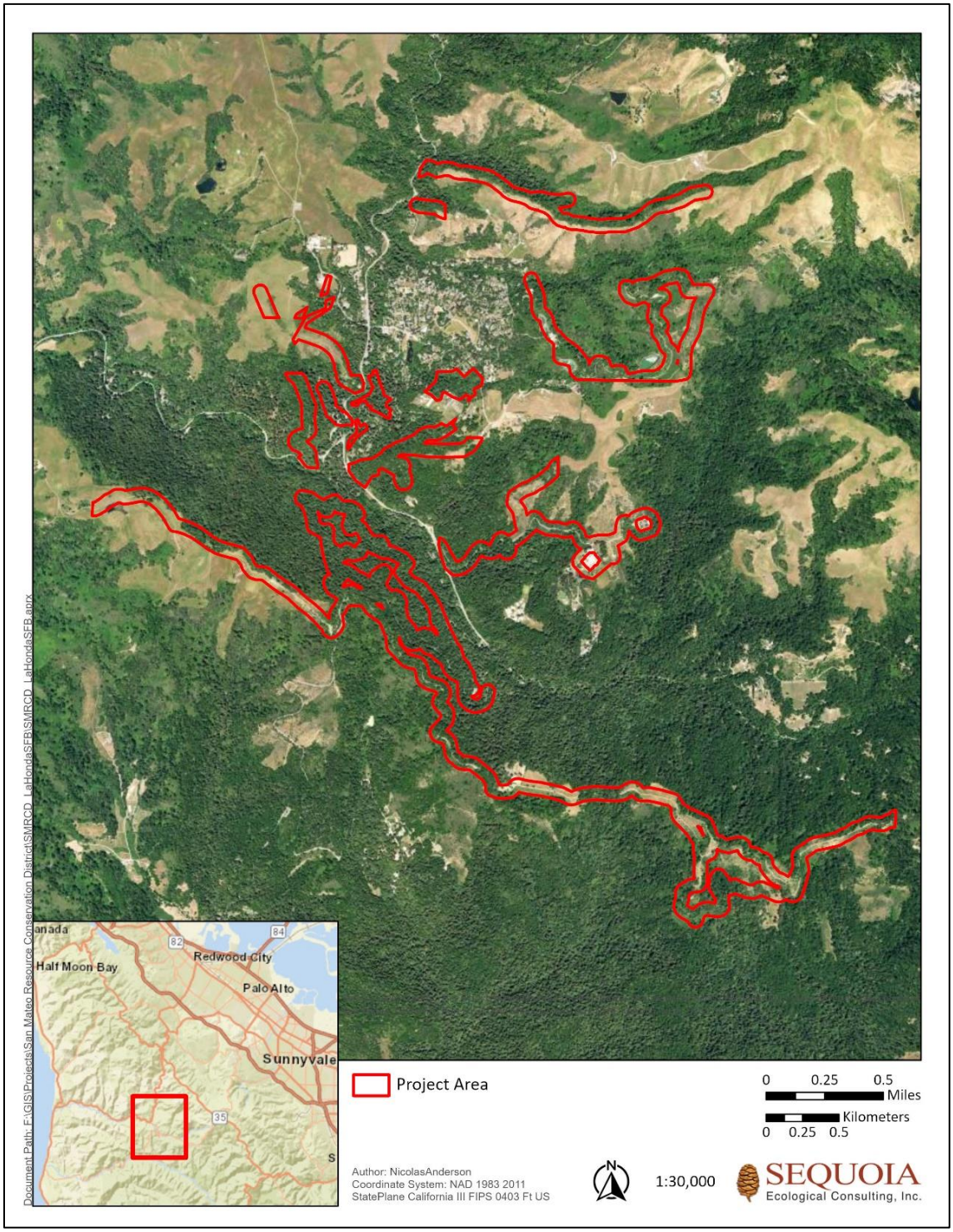

Figure 2. Project Location of the La Honda Fuel Break Project Site.

The Project would be implemented on public and private lands surrounding the community of La Honda. La Honda is an underserved community of approximately 979 residents located in the high fire risk south coast region of San Mateo County. There are approximately 600 homes and structures within the community and surrounding areas, including 250 homes in the largest residential community in the area, known as the Cuesta La Honda Guild (CLHG).

The outlying area comprises recreational lands, community services, and other rural community assets, ranches, and businesses. To the east, CLHG manages 450 acres of open space, which includes multiple water system assets with an emergency tank system, a critical asset for CLHG and adjacent communities. Log Cabin Ranch (a juvenile detention facility owned by the City and County of San Francisco), Peninsula Humane Society facilities, and YMCA Camp Jones Gulch are located along the perimeter of the residential community. North and south of the residential area, there are two large wineries. To the west is the La Honda Open Space Preserve (LHOSP), which is part of the Midpeninsula Regional Open Space District (MROSD). The LHOSP is a 6,142-acre property of historical value with more than 10,000 visitors per year. Through the Wildland Fire Resiliency Program Environmental Impact Report (EIR), MROSD has permitted 60,000 acres of fire fuels treatments adjacent to the proposed project. To the south, San Mateo County Parks (SMCP) owns and manages Sam MacDonald Park. The park encompasses 850 acres and averages 66,500 visitors per year. Adjacent to Sam McDonald Park, Alpine Ranch is owned and managed by the Peninsula Open Space Trust. The Project footprint also intersects with both California Department of Transportation and San Mateo County rights-of-way.

The Project treatments proposed in this Project-Specific Analysis (PSA) would reduce dangerous wildfire fuels in a deliberate manner designed to minimize environmental impacts to wildlife and protected plants consistent with the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR; Ascent Environmental 2019). For the entire state, the CalVTP PEIR identified 20.3 million acres within the 31-million-acre State Responsibility Area (SRA) that may be appropriate for vegetation treatments as part of the CalVTP. The PEIR calls this the “treatable landscape” or “treatable areas.” CalVTP recognizes that the treatable landscape represents areas suitable for CalVTP vegetation treatments, but projects will not necessarily occur in every location within the treatable landscape. The location and geographic extent of projects will be determined based on several factors, including environmental constraints and treatment objectives, which are analyzed for the proposed project within this PSA. Of the approximate 661-acre Project footprint, approximately 96 percent is located within the CalVTP treatable landscape (Figure 3). Because approximately 4 percent of the Project footprint occurs outside of the treatable landscape, this document serves as both a PSA and an Addendum to the CalVTP PEIR to provide California Environmental Quality Act (CEQA) compliance for the proposed vegetation treatments within and outside of the treatable landscape.

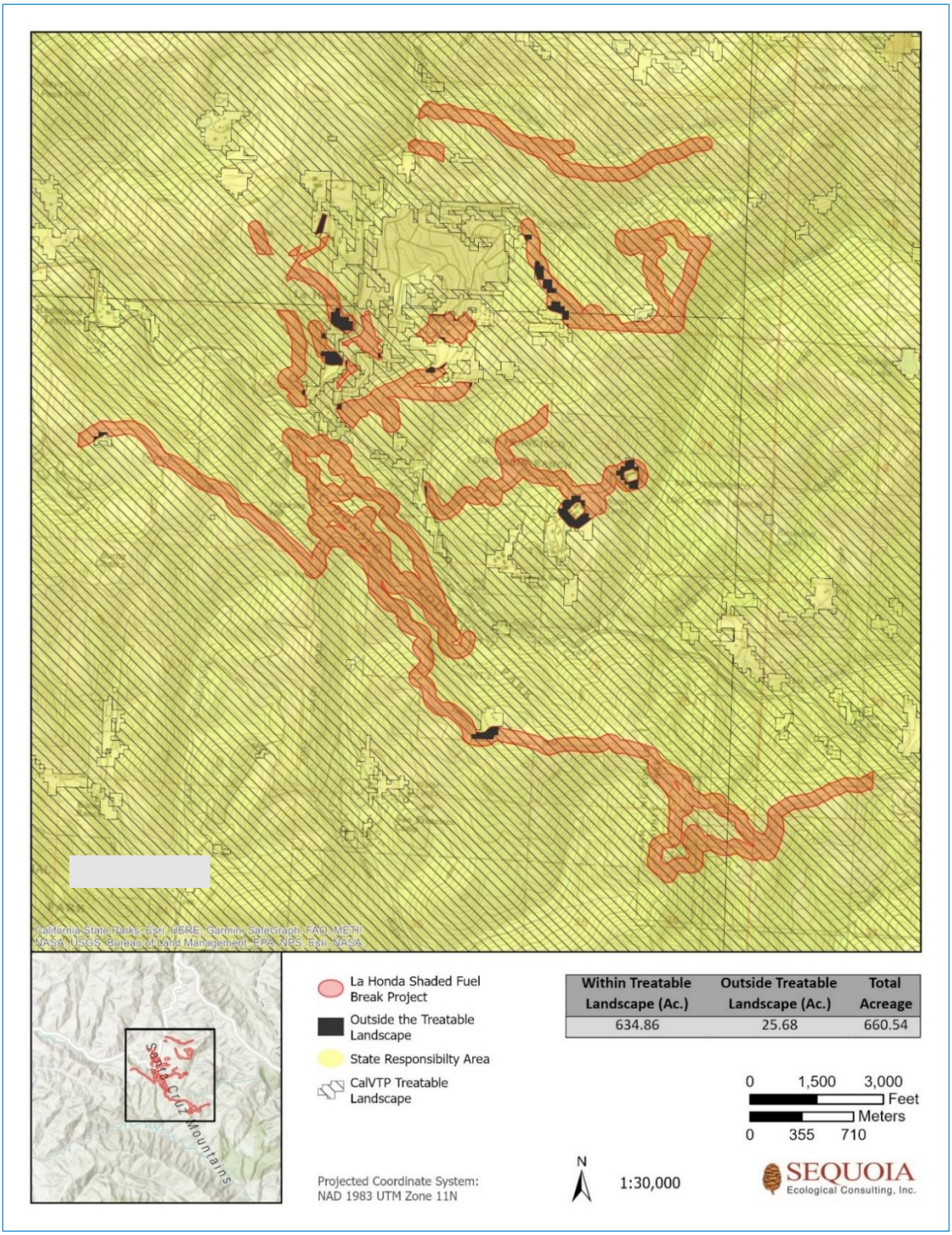

Figure 3. Acreage Inside and Outside of CalVTP's Defined Treatable Landscape.

1.2 California Environmental Quality Act

The CalVTP PEIR evaluated the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire within CAL FIRE's SRA. Serving as the lead agency under CEQA, the RCD is proposing vegetation treatments across 661 acres of land within San Mateo County. The proposed treatment types include fuel breaks and fuel reduction at the wildland-urban interface (WUI). The treatment activities and methods include manual vegetation management, mechanical treatment, prescribed herbivory treatment, herbicide application, and prescribed burning.

The RCD has evaluated the proposed treatments for CEQA compliance as later activities covered by the CalVTP PEIR using the PSA checklist herein. These treatment types and treatment activities are consistent with those covered in the CalVTP PEIR. Ongoing maintenance of the proposed vegetation treatments would involve the same activities as the original treatments (i.e., manual, mechanical, prescribed herbivory, herbicide, and prescribed burning treatments).

1.3 Purpose of this Project-Specific Analysis and Addendum

This document serves as the PSA to evaluate whether the proposed project is within the scope of the CalVTP PEIR. As described above, the treatment types and treatment activities are consistent with the CalVTP, which identifies the portion of the SRA that may be appropriate for vegetation treatments as "the treatable landscape." One criterion for determining whether a 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). Within the Project area, approximately 636 acres are within the treatable landscape, and 25 acres are outside of the treatable landscape (Figure 3).

The PSA checklist (see Section 4) includes the criteria to support an addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR. The Project-specific mitigation monitoring and reporting program (MMRP), which includes the CalVTP standard project requirements (SPRs) and mitigation measures (MMs) applicable to the proposed project, is presented in Attachment A. The SPRs and MMs have been tailored to the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In all cases, the additional Project-specific implementation instructions and clarifying edits to MMs maintain the SPRs and MMs as equivalent or more effective than those presented in the PEIR. Where applicable, the SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation of the proposed project.

This document also serves as an addendum to the CalVTP PEIR for the inclusion of the additional 25 acres outside of the treatable landscape. An addendum to an EIR is appropriate when a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts. In this case, there are no changed circumstances.

2.0 PROJECT DESCRIPTION

The San Mateo RCD has proposed this Project to create and maintain up to 661-acres of reduced hazardous fuel zone. The Project footprint and surrounding area have a wildfire hazard risk which is considered "high" to "very high" (CAL FIRE 2007). Multiple factors contribute to wildfire hazard risk, including widespread invasive, noxious, fire-hazardous vegetation; decades of accumulation of dead vegetation; over a century of fire suppression; and the increased risk of anthropogenic ignition associated with dense urban development (CAL FIRE 2022). The proposed project would reduce and maintain reduced fuel loads to more natural levels. The Project would reduce excess and ladder fuels within the fuel break. The Project follows a route throughout the landscape that supports a strategic approach to wildfires specific to the local topography and fuel load (Figure 2). The Project footprint is mostly characterized by valleys and a few ridges, and is characterized by annual grasslands, coastal oak woodland, coastal scrub, montane hardwood-conifer, chamise-redshank chaparral, urban, lacustrine, and redwood forest. Slopes range between 5 and 100 percent grade, often with an exposed lithic layer within grasslands and a deep layer of leaf duff under the canopy.

Treatment types and activities will be contingent upon existing site conditions, accessibility, and fuels management needs to achieve the fuel break. This Project proposes two treatment types consistent with the CalVTP: fuel breaks and WUI fuel reduction. The Project's proposed activities would be consistent with CalVTP-described treatment activities: manual treatment, mechanical treatment, prescribed burning (broadcast and pile), prescribed herbivory, and herbicide (spot treatment). While 96 percent of the Project footprint includes land mapped as treatable landscape by the CalVTP, 4 percent is not considered to be within treatable landscape. Treatment types and treatment activities explained in this Project Description would be consistent throughout the Project footprint regardless of whether it has been mapped as treatable landscape.

2.1 Treatment Types

The proposed project would use two treatment types in combination to create a linear break for firefighting resources to contain or stop a fire: WUI fuel reduction and fuel break. Strategic placement of the WUI fuel break would be based upon the prevailing vegetation types, topographic characteristics, environmental considerations, and surrounding land uses. Work would be completed with minimal

disturbance to the ground and remaining vegetation. Treatment activities by fuel type are described in more detail in Section 2.3.

Wildland-Urban Interface Fuel Reduction

WUI fuel reduction involves strategic removal of vegetation to prevent or slow the spread of non-wind-driven wildfire between structures and wildlands. In areas where wildland and manufactured structures overlap, higher intensity fuel reduction typical of defensible space would occur within 100 to 150 feet of manufactured structures, as determined by fire professionals, and based on site conditions. Beyond 100 to 150 feet from manufactured structures, vegetation treatments would be implemented with lower intensity. Fuel reduction would focus primarily on the removal of invasive plants, noxious weeds, fire hazardous vegetation, and dead and dying vegetation, as well as limbing up of trees.

Fuel Breaks

Fuel breaks give firefighters access to control wildfires and are useful in slowing fires before they grow beyond initial attack capabilities. Fuel breaks permit responders to reach the leading edges of a fire and to protect isolated communities, and they can stop or reduce the lateral spread of fires. In heavily wooded areas, a shaded fuel break would be implemented; the retained canopy shade would slow future growth of many grass and brush species and assist in future maintenance efforts. Development and maintenance of a fuel reduction zone within a 100-foot-wide fuel break would extend around community structures located adjacent to undeveloped open spaces. Portions of the fuel break would extend up to a width of 300 feet based on topography, site conditions, and land management constraints.

2.2 Treatment Activities

Treatment activities to achieve Project objectives would be applied singularly or in combination, depending on site conditions and site-specific goals of each treatment type. The Project's proposed treatment activities are consistent with CalVTP PEIR (Ascent Environmental 2019) and will include the following:

- **Prescribed Burning**: Includes broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire adapted plant communities conducted under specific conditions related to fuels, weather, and other variables) and pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment).
- **Mechanical Treatment:** Use of motorized equipment on stable operating surfaces to cut, uproot, crush/compact, or chop existing vegetation.
- **Manual Treatment**: Use of hand tools and hand operated power tools to cut, clear, or prune herbaceous or woody species.

- **Prescribed Herbivory**: Use of domestic livestock to reduce a target plant population, thereby reducing fire fuels or competition of desired plant species.
- **Herbicides**: Chemical application designed to inhibit growth of target plant species.

Prescribed Burning (Broadcast)

Prescribed understory fires would mimic periodic low intensity wildfires historically prevalent in the region and would create similar structural and habitat conditions that benefit many plant and wildlife species. Gradual reintroduction of fire presents an opportunity to improve forest health, reduce critical fuel loading, improve emergency access, and regenerate a healthy ecosystem. Prescribed low intensity surface fires (broadcast burning) would be used to control vegetation and manage fuel loads. Prescribed burning would reduce the volume of grass and thatch while removing encroaching brush and trees that are overtaking the grassland. Burning would be timed to control invasive non-native grasses where present. Prescribed burning would remain within a predetermined area and would occur only with specific fuels and in safe weather conditions. Perimeter fire lines would include existing roads and natural features where possible to maintain aesthetic values. Prescribed burns would be used for maintenance of treatments, and they would occur every five (5) years, or as appropriate.

Active burns would follow environmental safety guidelines, including burning only under consideration of specific weather conditions (e.g., appropriate humidity, wind direction, etc.) and coordinating with resource agencies such as the California Air Resources Board (CARB) and the Bay Area Air Quality Management District (BAAQMD). Specifically, active burns would include the preparation and implementation of a burn plan and a smoke management plan (SMP). The RCD would report site conditions and request approval to burn through the Prescribed Fire Information Reporting System (PFIRS), which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California. A prescribed burn SMP must be submitted to BAAQMD at least 30 days prior to burning. Additionally, the SMP must be approved by the air district prior to burning.

Prescribed burns would typically be ignited using various ignition devices, including, but not limited to, drip torches, fuzees, helitorches, vary pistols, and air curtain burners. Prescribed burns are typically completed in a single day, but under certain circumstances they could be maintained for up to 1 week. Ten (10) to fifty (50) or more workers, as feasible, would typically be present on-site for a prescribed burn. Heavy equipment would be operated from an existing road or stable operating surfaces with less than 50 percent slope.

Mechanical Treatment

Mechanical treatments would include mowing, chipping and broadcasting target vegetation above ground surface, with particular care to minimize ground disturbance. A variety of equipment including but not limited to mowers, masticators, and track chippers, would be used as appropriate. Broadcast

burning would use bulldozers to install control lines pre-emptively and in case of an emergency. Mechanical treatment activities would occur on slopes below 40 percent grade, along ridges, and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or other stable operating surfaces. No mechanical treatment would occur on slopes above 50 percent grade unless the above conditions are met.

Mechanical treatments would be limited to cutting or chopping above-ground vegetation with the intent of keeping masticating heads out of duff layers and minimizing direct disturbance to subsurface soil layers, allowing intact root systems to resprout. Mechanical activities would cut, crush/compact, or chop standing and downed vegetation using masticators and other methods. Small-diameter trees (6 inches or less diameter at breast height [DBH]), downed woody debris, and woody shrubs would be strategically masticated to increase tree spacing and reduce fire fuel loads. Native understory vegetation, brush, and shrubs under the drip lines of trees would be cut and masticated leaving root systems intact for resprouting. Mechanical treatments would avoid state or federally jurisdictional waters and riparian habitat by a minimum of 50 feet.

During typical mechanical treatments, work would require 1 crew with up to 20 workers and equipment such as bucket trucks, skid steers, tow chippers, track chippers, and masticators with swing arm attachments. Typical mechanical treatments would require several days to several months to complete, depending on the size of the treatment area, steepness of terrain, and type and density of vegetation.

Manual Treatment

Ground crews would use hand tools and hand-operated power tools, including but not limited to chainsaws, hand saws, pole saws, McLeods, Pulaskis, weed pullers, brush cutters, and loppers. Manual treatments would cut, clear, and/or prune trees, herbaceous vegetation, and woody shrubs to increase space between trees. Manual treatments would be used to treat dead, dying, and diseased trees and suppressed trees. Manual treatments may occur on slopes greater than 40 percent grade or where mechanical treatments are infeasible. Herbicides may be used in conjunction with manual treatments to prevent the spread and resprouting of invasive plant species within the treatment areas, along roads and other high-traffic areas. Manual treatment activities would avoid riparian habitat with a minimum of 50 feet and state or federally jurisdictional waters by a minimum of 50 feet from the ordinary high-water mark.

Manual treatments within the Project area would require several days to several months to complete, depending on the size of the treatment area, steepness of terrain, and type and density of vegetation. Manual treatment typically clears 0.3 acre or more per day per crew. Manual treatments typically require one or two hand teams with approximately 20 to 40 crew members to be present on-site.

Prescribed Herbivory

Prescribed herbivory involves transporting, releasing, herding, and moving grazing animals such as cattle, sheep, goats, or horses to designated sites. Herds would be installed strategically within areas with wildlife-safe fencing and with a professional shepherd who would coordinate animal movements to prevent excessive grazing and ground disturbance. Herds would be moved as often as every 1 to 3 days as appropriate, and one to two crews would be required on average to implement this treatment activity. Moving livestock from one grazing ground to another would occur at a frequency based on numerous site-specific factors, including slope, density and type of vegetation, stocking rate, type of livestock, and precipitation/moisture content of vegetation. Stocking rate would vary based on species of grazer (e.g., a herd of cattle would require a larger acreage than a herd of goats of the same size). Site conditions (e.g., relative density or quantity of the vegetation to be treated, etc.) would determine herd size and the grazing time to complete the job.

Prescribed herbivory would require temporary wildlife-safe fencing where natural barriers are not present, temporary water facilities and other infrastructure (e.g., corrals, fences), and would require guard animals and/or a shepherd to be present on-site. Any identified sensitive areas would be clearly marked on Project maps, and protection measures would be communicated to the herder and project manager, including a pre-vegetation removal field visit, as appropriate.

To prevent the undesirable introduction of invasive or noxious plant species to the site, consideration would be given to where animals come from and whether viable seeds of undesirable species are present. As necessary, the herd would be fed a weed-free diet for 3 days prior to being introduced to the grazing site. Any supplemental feed brought on-site would be free of noxious weeds.

Herbicide Application

Herbicides would be used strategically to supplement other treatment methods to prevent the spread and resprouting of invasive species within the treatment areas and along roads. Effective herbicides identified by the California Invasive Plant Council (Cal-IPC) and U.S. Department of Agriculture that are consistent with those described in CalVTP PEIR would be applied. On-the-ground application methods would include painting cut stems or stumps and using backpack sprayers or hand applicators to target specific invasive plants; no aerial spraying, broadcast spraying, or spraying from trucks would occur. No herbicide treatment would occur within 50 feet of aquatic habitat.

Herbicide application would comply with the U.S. Environmental Protection Agency (EPA) label directions and both California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation label standards. All herbicide application would be performed or supervised by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations. Herbicide application would not take place within 24 hours of a rain event.

Biomass Disposal

The goal of biomass disposal is to reduce ignitable material and associated air quality impacts from wildfire, reduce brood material for harmful insects and disease, and enhance aesthetics. By reducing the available fuel in the fuel break, the fuel continuity is disrupted which slows down the spread of wildfires and decreases potential fire intensity.

Methods for managing biomass include natural decomposition (e.g., chip and broadcast, lop and scatter), hauling off-site, and pile burning. Downed woody debris may be masticated where it creates a fire hazard. Whenever feasible, natural decomposition of biomass would be preferred because: (1) forestry mulch aids in mitigating erosion and excessive soil disturbance; (2) keeping material on-site prevents the spread of disease and pathogens to other sites, with sudden oak death (SOD; *Phytophthora ramorum*) being of particular concern in our region; and (3) greenhouse gas emissions are reduced by avoiding the transportation of material off-site. For all these reasons, the most climate-friendly option is to leave woody biomass on-site to decompose naturally. To mitigate brood stratum opportunities for beetles, downed pine logs will be mitigated in accordance with California Forest Practice Rules (CAL FIRE 2023) and best management practices.

Natural Decomposition

Cut vegetation may be retained on-site to decompose naturally via “chipping and broadcasting” and “lopping and scattering” across the landscape. Residual matter would be spread uniformly and would not exceed a depth of approximately 6 inches, with an average of approximately 3 inches.

Slash (i.e., fine and coarse woody debris) from cut trees or pre-existing would be chipped and broadcast across the landscape. Off-road trails may be mulched if compatible with landowner’s objectives. Where log removal is not possible, and equipment can access slopes less than 40 percent grade, masticators and/or chippers would be utilized to mulch target vegetation.

Lopping and scattering biomass would be used in areas where slopes exceed 50 percent grade and where mastication and pile burning would not be feasible. Any slash material from cut trees or pre-existing debris would be lopped to an appropriate length based on best management practices and distributed uniformly. Poison oak would be lopped and left in place or masticated.

Cut vegetation and chips would not be placed below the Ordinary High-Water Mark of aquatic features, within wetlands, or within riparian areas. Slash treatment should adhere to the standards of the California Forest Practice Rules for the Southern Subdistrict of the Coast District 14 CCR 917.4 (California Board of Forestry and Fire Protection N.D.):

> (a) To provide more efficient firebreaks the areas within fifty (50) feet of the edge of all Public Roads shall be kept free of Slash. Slash between fifty (50) feet and one hundred (100) feet of the edge of said roads and Slash between one hundred to two hundred (100-200) feet of all Approved and Legally Permitted Habitable Structures shall be treated by piling and burning,

chipping, removal, or lopping to within twelve (12) inches above the ground not later than April 1 of the year following its creation.

(b) All Slash and Woody Debris greater than one (1) inch but less than eight (8) inches in Diameter within one hundred (100) feet of Approved and Legally Permitted Habitable Structures shall be removed or piled and burned.

Hauling Off-Site

If vegetation is hauled off site, transported invasive plant materials would be stored in a closed container (any container that would prevent the spread of seeds or propagules from plant materials during transport) to prevent spreading during transport.

Pile Burning

Where materials cannot be chipped and scattered, hand-cut material between 1 inch and 10 inches in diameter would be piled as "feeder piles," with the cut stems facing in one direction in a manner to minimize any overstory scorch when the piles are restacked and burned. Most of the piles would be built in open areas. Suitable areas for pile burning are open areas away from tree canopies and power lines. Sites suitable for pile burning would depend on location of sensitive species habitat and safety guidelines (e.g., humidity, wind direction, etc.). General operations for pile burning will follow these guidelines:

- Multiple piles would be burned on a single day.
- Pile size would not exceed 20 feet in diameter by 20 feet high.
- Piles would not be placed atop roads, trails, logs, stumps, or watercourses.
- Piles would be kept sufficiently dry to allow for ignition when surrounding fuels are saturated when fire danger is low.

Pile burning would be conducted in compliance with the local authority having jurisdiction or a Fuel Reduction Burn Permit or LE-5 issued by the local CAL FIRE Battalion Chief. Burns would be coordinated with appropriate resource agencies (e.g., CARB) and would follow a burn plan that includes a smoke management plan. The RCD would report site conditions and request approval to burn through PFIRS, which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California.

2.3 Treatment Prescriptions by Fuel Type

Traditional fuel reduction methods adopt treatment activities that are typically determined by fuel type and will be categorized as tree, shrub, and grass fuel types. Vegetation types within the Project footprint have been classified by California Wildlife Habitat Relationship System (CDFW 2021) as a mosaic of conifer, hardwood, shrub, and herbaceous vegetation and includes developed areas and open water

(Mayer and Laudenslayer, eds. 1988). Treatment strategies combine multiple treatment activities within each fuel type. All treatment activities would be employed within each fuel type to achieve and maintain the fuel break.

The overarching treatment approach will follow these basic guidelines:

- Class I and II watercourses would be protected by a 50-foot mechanical treatment exclusion zone year-round.
- Biomass disposal methods would avoid watercourses, including cut and chipped vegetation and pile burning.
- For sites dominated with invasive plants, the removal of invasive plants and dead woody material would be prioritized over native plants.
- Hazardous trees (e.g., dead or dying trees) identified by a qualified professional would be removed.
- Equipment used for mechanical treatment would avoid operating on slopes greater than 50 percent grade.
- No cleared timber or other forest products would be removed for commercial purposes.
- All treatment activities and biomass distribution would avoid riparian habitat by a standard minimum buffer of 50 feet. Buffer size would increase if qualified biologist or registered professional forester recommends this based on factors such as slope, existing erosion, sensitivity of the vegetative habitat, or presence of sensitive resources.

Grassland Fuel Type Prescription

Grass fuel type would include habitat classified by as annual grassland by the California Wildlife Habitat Relationship (CWHR). Within grassland fuel type, treatment activities would cut grasses and herbaceous to achieve horizontal spacing and reduce overall fuel loading.

Dead, dying branches would be selectively pruned from native shrubs interspersed within grassland. Small, isolated trees (6 inches or smaller DBH) growing in the grassland would be cut flat to 6 inches maximum and piled for burning. Larger trees encroaching on or distributed sparsely throughout grasslands would be limbed up to reduce vertical fuel continuity or cut flat to 6 inches maximum and piled for burning. Trees, as identified by a qualified professional, would be strategically removed to maintain canopy cover and avoid habitat conversion. Cut vegetation would be left to naturally decompose, pile burned, or hauled off-site.

Shrub Fuel Type Prescription

Shrub fuel type would include habitat classified by CWHR as chamise-redshank chaparral and coastal scrub. Treatment activities would reduce the amount and continuity of vegetation and achieve horizontal spacing. The general approach to shrub fuel type retains shrub habitat through selective removal of invasive species and dead, woody vegetation and limbs, and removal of entire shrubs as identified as a qualified professional. Shrubs will be selectively removed or thinned until spacing between individual shrubs or shrub islands is more than double the height of the canopy (e.g., a 12-foot gap between shrubs would be created to maintain a canopy 6 feet high). Shrub removal and thinning would be accomplished primarily with manual treatments and mechanical treatments. Where cutting and masticating vegetation in shrub-dominated areas, root systems for desired plants would be left intact to permit resprouting. Shrub islands would be retained in a natural mosaic ideally at 50 percent but at a minimum of 35 percent. The results of shrub vegetation treatment would not convert the existing habitat type to a different habitat type.

Tree Fuel Type Prescription

Tree fuel types would include habitat classified by CWHR as redwood, montane-hardwood conifer, and coastal oak woodland. The general approach to tree fuel types would be designed to prevent fire from approaching or departing the fuel break, prevent fire from laddering into the tree canopy, and would promote the establishment of native trees. Selective thinning would result in a shaded fuel break that retains the tree canopy. This would be achieved through the removal of select trees, branches, shrubs, and both living and dead vegetation that could facilitate the upward spread of fire from surface fuels to the forest canopy. The shade of the retained canopy would reduce the potential for rapid re-growth of understory, and the selectively treated areas would provide firefighters an opportunity to access lower intensity ground fires should they occur.

The prescription within tree fuel-dominated areas would follow these guidelines.

- Retain healthy hardwoods and conifers greater than 16 inches DBH with appropriate canopy spacing.
- Strategically retain native trees, shrubs, herbaceous plants, grasses, and downed woody debris on the forest floor while reducing fuel connectivity.
- Retain small stands of untreated oak trees with a cluster diameter of approximately 50 feet, and approximately 75 to 100 feet apart depending on site conditions and fire risk.
- Strategically remove and thin understory trees, dead and dying trees to achieve separation between the ground and the tree canopy.
- Dead, dying, and diseased trees would be prioritized for removal over those with potential to contribute to the natural forest process would be retained.

- Healthy trees less than 16 inches DBH would be removed to achieve spacing 10 to 20 feet apart, as feasible, prioritizing those that do not contribute to canopy development.
- Remaining stumps would be cut flat or parallel to the ground with a smooth appearance and no frayed material visible.
- For all trees, lower tree limbs would be pruned up to 15 feet, retaining 50 percent of the live crown of the tree; for trees less than 24 feet in height, the lower one-third of tree branches less than 3 inches diameter would be removed, retaining 50 percent of the live crown.

Within redwood habitat, the general approach would thin understory small trees less than 8 inches DBH and to remove sprouts with less than 20 percent live crown, snags, and accumulated debris (e.g., fallen breathe inches). The remaining redwood trees would be limbed up to fifteen feet, retaining 50 percent of the canopy. Within coastal oak woodland and montane hardwood-conifer, the general approach would remove snags, thin brush species away from tree crowns retaining approximately 10 percent, and thin out small trees less than 8 inches DBH to a maximum of one stem per 20 feet.

Most ground vegetation would be removed to break up the horizontal and vertical continuity of flammable vegetation. Shrubs in the understory would be selectively removed or pruned to remove all branches (living or dead) less than 3 inches in diameter and less than 8 feet from the ground or three times the height of any understory shrub, whichever is greater. Understory vegetation outside of the dripline of retained trees will be cut, retaining intact root systems for resprouting. Where feasible, non-native understory vegetation would be removed by manual or mechanical methods and treated with herbicides as appropriate. The understory would be cut to achieve horizontal crown separation 50 to 100 feet between stands or individual plants, with approximately 10 percent retention per acre, for aesthetic and wildlife value.

Timing of Initial Treatment and Duration

Project implementation of initial treatments is expected to start in spring 2024 and to be completed by the end of 2025, which accommodates potential extended seasonal delays or unexpected disruptions. Seasonal delays could include an extended or extreme fire season, requiring redirection of resources to other projects, or an extended winter with wet soil conditions that temporarily halt large equipment use. Manual treatment activities would be permitted during saturated soil conditions.

Workers

The RCD, CAL FIRE crews, and/or subcontractors, and private landowners would conduct all treatment activities. Crew sizes would vary and would typically be fewer than 25 workers per site, per day. Multiple crews would work at the same time.

Site Access and Conditions

Treatment areas would be accessed via existing fire roads and trails. No new roads would be created. Private properties would be used as access points contingent on the landowner's consent. Vehicles and equipment would be staged at the contractor's yard daily or on-site with landowner consent. Throughout the course of project implementation, the RCD would maintain road integrity, including maintaining drainage features. Garbage and construction debris would be regularly removed from the work site.

Daily Treatment Schedule and Noise

All treatments except herbivory would occur primarily on weekdays between 7:00 am and 6:00 pm, and during daylight hours only. If implementation of non-herbivory treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. During prescribed burning, crews would need to conduct some maintenance burning on weekends to manage overall smoke impacts. Noise-generating treatments would comply with the local noise regulations. The Project will comply with San Mateo County Noise Ordinance, Ordinance No. 4.88.360 e).

2.4 Pests, Diseases, and Invasive Species

Without proper prevention, Project treatments have the potential to spread pathogens, diseases, pests, or invasive species. Invasive plants can be spread when crews and equipment travel between sites, transporting soil and mud contaminated with seeds. The goal of reducing invasive plant species within the Project area is in conformity with the overall Project goals of fuels reduction and wildfire prevention. Regularly updated, scientifically-established guidance for invasive plant control and treatments is located on the California Invasive Plant Council (Cal-IPC) website, (Cal-IPC 2020). Within the Project area, eight (8) invasive plant species and two (2) diseases were identified as occurring or having high potential to occur in the region and have potential to spread in the Project area from one work area to another, or from the Project area to off-site areas. If any additional pests, diseases, or invasive species are identified throughout the course of the Project, they will be treated according to the Cal-IPC or other scientifically available guidance. These species include:

- black acacia (*Acacia melanoxylon*)
- poison-hemlock (*Conium maculatum*)
- jubatagrass (*Cortaderia jubata*)
- Cape-ivy (*Delairea odorata* (=*Senecio mikaniodes*))
- panic veldtgrass (*Ehrharta erecta*)
- pitch canker (*Fusarium circunatum*)
- French broom (*Genista monspessulana*)

- English ivy (*Hedera helix*)
- English holly (*Ilex aquifolium*)
- Sudden oak death (*Phytophthora ramorum*; SOD)

Black Acacia

Black acacia is a coastal tree that favors disturbed areas, especially near buildings and agricultural sites. It can develop root suckers which can spread into large clonal populations.

Poison-Hemlock

Poison-hemlock is a biennial forb that has spread throughout California in elevations below 5,000 feet. It prefers disturbed areas and is commonly found along roadsides, fields, meadows, pastures, riparian forests, and floodplains. It spreads readily in areas that have been cleared or disturbed. Once established, it outcompetes most species and prevents native plants from establishing by providing an over-shaded environment.

Jubatagrass

Jubatagrass was introduced as an ornamental plant and for erosion control, and it quickly colonizes bare ground. Each seed-filled plume produces up to 100,000 seeds that are widely wind-dispersed. It establishes on bare ground, but typically does not colonize where other grasses and sedges dominate. Chemical and non-chemical control methods can be useful in removing jubatagrass (DiTomaso et al. 2013).

Cape-Ivy

Cape-ivy is a perennial vine that is problematic primarily in coastal riparian areas, though it may be found inland in riparian, moist forests, and oak woodlands. Vines form dense mats that kills plants growing underneath. It spreads primarily through stems, rhizomes, and stolons, and these will resprout if not completely removed.

Panic Veldtgrass

Panic veldtgrass prefers disturbed areas within riparian, scrub, grassland, urban areas, and turf. It spreads rapidly and outcompetes native grasses and herbaceous plants. Chemical and non-chemical control methods can be useful in removing panic veldtgrass (DiTomaso et al. 2013).

Pitch Canker

The fungal disease commonly referred to as pitch canker affects many pine species and can infect Monterey pine (*Pinus radiata*). Most California native pines are susceptible to pitch canker, but Monterey pine is the most widely affected host.

French Broom

French broom is a particularly ignitable invasive shrub known for its ability to shade out seedlings, replace native plant species, and carry fire into tree canopies. This species creates a large seed bank and readily resprouts from the root after cutting, freezing, or fire (Cal-IPC 2020).

English Ivy

English ivy is a perennial evergreen woody vine that grows vigorously in forests and outcompetes understory plants and can impact the health of native trees. Underground parts create runners which facilitates spreading.

English Holly

English holly is an evergreen shrub or small tree which has escaped and invaded moist forested areas throughout the west coast. It is slow-growing and may be controlled by removing plants before they start producing seed, between 5 and 12 years after germination.

Sudden Oak Death

Sudden oak death infects coastal forests throughout California and Oregon and kills susceptible species including valley oak (*Quercus lobata*), coast live oak (*Q. agrifolia*), California black oak (*Q. kelloggii*), canyon live oak (*Q. chrysolepis*), and madrone (*Arbutus menziesii*) saplings. Host species that are in the treatment area include California bay laurel (*Umbellularia californica*) and coast redwood (*Sequoia sempervirens*). To avoid the spread of this pathogen, all hand equipment and boots worn by treatment crews would be sanitized and heavy equipment hosed off prior to operations in areas where the spread of SOD is possible. The California Oak Mortality Task Force offers additional information regarding treatment and disposal measures for plants infected with SOD, which would be monitored for changes in SOD treatment recommendations (California Oak Mortality Task Force 2023).

2.5 Treatment Maintenance

Maintenance after the project will be managed by each individual landowner, with technical support and oversight from the RCD. The larger landowners (San Mateo County Parks, Midpeninsula Regional Open Space District, Peninsula Open Space Trust, and Cuesta La Honda Guild Homeowners' Association) collectively cover about half of the Project footprint. Each will maintain the fuel break through their

regular vegetation management plans. The RCD will collaborate with the smaller landowners to develop fuel break maintenance routines that align with the treatment activities of the Project. Because vegetation communities are dynamic, treatment activities would be modified to reflect changes. Maintenance treatments are anticipated to follow the same methods as initial treatments but are subject to change depending on-site response to initial treatment. At locations where intensive vegetation removal (e.g., prescribed burning) occurred, treatment maintenance may use more low intensity manual treatment activities in subsequent years.

The RCD would monitor the treated areas to maintain treatment of desired vegetation conditions. The RCD would work with the CALFIRE San Mateo - Santa Cruz Unit, Cuesta La Honda Guild, and other landowners to identify areas for priority in treatment maintenance to ensure that the defensible space is maintained for maximum benefit. In tree habitat type, treatment maintenance may occur every 3 to 5 years. In shrub habitat type, treatment maintenance such as herbivory may occur every 1 to 5 years. In grass habitat types and areas where initial treatments were primarily manual, treatment maintenance may occur annually.

Throughout the treatment maintenance period, the RCD would consider the continued relevance of the PSA. Where the RCD determines that the PSA is no longer sufficiently relevant, the RCD would determine whether a new PSA or other environmental analysis is warranted. If more than 10 years pass since approval of the latest PSA update, the RCD would update the PSA. For example, the RCD would conduct a reconnaissance survey to verify that conditions are comparable to those anticipated in the PSA. Any updates would be documented.

3.0 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** La Honda Fuel Break
2. **CalVTP ID Number:** 2024-40
3. **Project Proponent's Name and Address:** San Mateo Resource Conservation District
   80 Stone Pine Road, Ste 100
   Half Moon Bay, CA 94019
   (650) 712-7765
4. **Contact Person Information and Phone Number:** Eddie Sanchez, Project Manager
   (650) 712-7765 x 126
   eddie@sanmateoRCD.org
5. **Project Location:** La Honda and La Honda unincorporated
   7 S, 37.316060, -122.268705 (Figures 1 and 2)
6. **Total Area to Be Treated (acres)** 661 acres
7. **Description of Project:**

The proposed project would involve conducting fuel reduction vegetation management activities within 661 acres. See Section 2 for expanded Project Description.

a. Initial Treatment

See Section 2 for expanded Project Description.

Treatment Types

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

Treatment Activities

Multiple strategies will be utilized to achieve the fuel break and WUI fuel reduction, and therefore the acreage sum below will exceed the actual acreage of the Project area.

☒ Prescribed Burning (Broadcast), approximately 661 acres
☒ Prescribed Burning (Pile Burning), approximately 661 acres
☒ Mechanical Treatment, approximately 400 acres
☒ Manual Treatment, approximately 661 acres

☒ Prescribed Herbivory, approximately 661 acres
☒ Herbicide Application, approximately 1 acre

Fuel Type

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

b. Treatment Maintenance

Per Section 2.6: Treatment Maintenance, maintenance treatments are anticipated to follow the same methods as initial treatments but are subject to change depending on site response to initial treatment.

Treatment Types

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

Treatment Activities

Multiple strategies will be utilized to achieve the fuel break and WUI fuel reduction, and therefore the acreage sum below will exceed the actual acreage of the Project area.

Prescribed Burning (Broadcast), approximately 661 acres
☒ Prescribed Burning (Pile Burning), approximately 661 acres
☒ Mechanical Treatment, approximately 400 acres
☒ Manual Treatment, approximately 661 acres
☒ Prescribed Herbivory, approximately 661 acres
☒ Herbicide Application, approximately 1 acre

Fuel Type

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

8. Regional Setting and Surrounding Land Uses:

The Project would be implemented on public and private lands surrounding the community of La Honda. La Honda is an underserved community of approximately 979 residents located in the high fire risk south coast region of San Mateo County. There are approximately 600 homes and structures within the community and surrounding areas, including 250 homes in the largest

residential community in the area, known as the Cuesta La Honda Guild (CLHG). The outlying area comprises recreational lands, community services, and other rural community assets, ranches, and businesses. To the east, CLHG manages 450 acres of open space, which includes multiple water system assets with an emergency tank system, a critical asset for CLHG and adjacent communities. Log Cabin Ranch (a juvenile detention facility owned by the City and County of San Francisco), Peninsula Humane Society facilities, and YMCA Camp Jones Gulch are located along the perimeter of the residential community. North and south of the residential area, there are two large wineries. To the west is the La Honda Open Space Preserve (LHOSP), which is part of the Midpeninsula Regional Open Space District (MROSD). LHOSP is a 6,142-acre property of historical value with more than 10,000 visitors per year. Through the Wildland Fire Resiliency Program EIR, MROSD has permitted 60,000 acres of fire fuels treatments adjacent to the proposed project. To the south, San Mateo County Parks owns and manages Sam MacDonald Park. The park is 850 acres and averages 66,500 visitors per year. The Peninsula Open Space and Trust owns and manages Alpine Ranch, which is adjacent to Sam McDonald Park. The Project footprint also intersects with both California Department of Transportation and San Mateo County rights-of-way.

9. **Other Public Agencies Whose Approval Is Potentially Required (e.g., permits):**

- Pesticide application permit from San Mateo County Agricultural Commissioner
- Smoke management submitted to BAAQMD
- Open Burning Notification submitted to BAAQMD
- Burn permit from CAL FIRE
- Waste discharge requirement from the San Francisco RWQCB
- Encroachment permits from local public works departments
- Informal consultation with CDFW
- Informal consultation with USFWS

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 has 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.

10. Native American Consultation:

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

Pursuant to CalVTP SPR CUL-2, an updated Native American contact list and sacred lands file search was obtained from the Native American Heritage Commission (NAHC). The sacred lands data file indicated no sacred sites occur within the Project area or adjacent lands. On October 16, 2023, letters were sent via certified mail to each of the 7 Tribal contacts provide by the NAHC that requested any additional information regarding Tribal resources and to notify San Mateo RCD if they wished to initiate consultation regarding the Project actions. Tribes contacted included Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, Tamien Nation, The Ohlone Indian Tribe, and Wuksachi Indian Tribe/Eshom Valley Band. As of the filing date, no responses have been received. As planning proceeds, San Mateo RCD would continue to consult with interested Tribal representatives regarding the Project and incorporate their concerns into Project planning and mitigation as warranted.

DETERMINATION

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

☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the

CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.

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

☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Timothy Federal
Signature

5/6/2024
Date

Timothy Federal
Printed Name

Program Manager
Title

San Mateo Resource Conservation District
Agency

4.0 PROJECT-SPECIFIC ANALYSIS AND ADDENDUM

4.1 Aesthetics and Visual Resources

Table 1. Consistency of Project-Related Air Quality Impacts with Scope of CalVTP PEIR.

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	AES-2, AQ-2, AQ-3, REC-1	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	AD-3, AD-4, REC-1, AES-1, AES-2, AES-3	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	NA	None	NA	NA	NA

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

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**
	☐	☐	☐

4.1.1 Discussion

Impact AES-1

The Project would involve manual treatment; mechanical treatment (including mastication, mowing, chipping, and broadcasting), prescribed herbivory, prescribed (broadcast) burning, targeted herbicide

use; and biomass disposal (including chipping and broadcasting, lopping and scattering, hauling off-site, and pile burning). The potential for these treatment activities to result in short-term substantial degradation of visual character was examined in the PEIR and found to be less than significant.

Portions of the treatment area would be visible from scenic corridors in the area designated by San Mateo County and a significant portion of the treatment area is located within these scenic corridors (County of San Mateo 2010). The closest officially designated State Scenic Highway is State Route (SR) 35 (California Department of Transportation 2018). Additionally, the proposed treatments would occur within privately and publicly owned open space areas that contain public hiking trails that pass through or in close proximity to the treatment areas. Several roads within and in the vicinity of the treatment areas are locally designated as scenic corridors or routes, including Alpine Road, La Honda Road, Pescadero Creek Road, Portola State Park Road, and Skyline Boulevard (San Mateo County 2010). Portions of the treatment area would be visible from several of these roadways. The visual character in the vicinity of the treatment areas is characterized as recreational and open space areas dominated by grass, shrubs, or trees, as well as residential areas. Viewers in the vicinity of the treatment areas would be mostly residents, motorists, or recreationalists on existing trails that are within, overlook, or are adjacent to the treatment areas.

Consistent with the PEIR, the presence of large equipment could contrast with the natural environment where publicly visible, such as adjacent to a public trail or roadway. However, Project treatment would be temporary and would not dominate a view or block any views from scenic vistas or State Scenic Highways. Smoke from prescribed burning could also be visible from public viewpoints, scenic corridors, and SR 35. Project activities would also not substantially degrade the existing visual character or quality of an area given that the treatment activities would be limited in a geographic extent. The potential for the Project to result in short-term substantial degradation of the visual character of the Project area is within the scope of the PEIR because the proposed treatment activities and types of equipment proposed for use are consistent with those analyzed in the PEIR. SPRs applicable to the proposed treatments are AES-2, AQ-2, AQ-3, and REC-1, which require that treatment-related equipment be stored outside of the public viewshed, submittal of a Smoke Management Plan if the prescribed burning triggers the threshold (17 CCR Section 80160), creation of a Burn Plan, and notification of recreational users of any temporary recreation area closures.

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

Impact AES-2

Initial and maintenance treatments would include fuel break and WUI fuel reduction treatment types. The potential for these treatment types to result in long term degradation of the visual character of an area

was examined in the PEIR and found to be less than significant. Treatments would occur on both public and private lands and would be in compliance with the Visual Quality chapter of the San Mateo General Plan (County of San Mateo 1986). The fuel break treatment would retain canopy cover, and the WUI fuel reduction treatment would focus on limbing up trees and removing noxious or invasive plants, dead or dying vegetation, or otherwise hazardous vegetation. In grassland fuel type areas, plants will be cut to approximately 6 inches, and any trees with a 6-inch DBH or smaller will be cut. In shrub fuel type areas, vegetation will be removed or thinned, creating shrub islands in a natural mosaic of 35-50 percent. In tree fuel type area, trees less than 16 inches DBH would be removed as feasible to achieve 10- to 20-foot spacing, while healthy hardwood trees greater than 16 inches DBH would largely be retained. All trees greater than 24 feet in height will be pruned up to 15 feet, and all trees less than 24 feet will have the lower third of their branches which are less than 3 inches in diameter removed. These treatments, such as removal of dead or dying vegetation and hazardous trees, thinning of shrub dominated areas, and prescribed burning would result in a change in views. However, these methods would largely preserve the natural appearance of the area and would therefore not substantially affect views.

As described in the PEIR, prescribed burning would result in grasses temporarily changing color from green or brown to a dark gray/black. Grass would regrow during the following winter, so this adverse change would be temporary. Additionally, prescribed burning and wildfires occur in this area under existing conditions, so similar burned vegetation is already visible in the vicinity of the treatment areas. For example, the CZU Lightning Complex Fire boundary is approximately 1.45 miles to the south of the Project treatment area (CAL FIRE 2020). Finally, the Project would be designed to create a landscape that promotes the growth of native plants and could therefore result in long-term beneficial visual impacts in the future.

As described in Impact AES-1, portions of the treatment area are visible from SR 35, as well as other locally designated scenic corridors/routes. Public hiking trails are also present within and adjacent to the treatment areas. The aesthetic impacts of the proposed treatments would be temporary and short term, and the natural characteristics of the treatment areas would remain following treatment. SPRs applicable to the proposed treatments are SPRs AD-3, AD-4, AES-1, AES-2, and AES-3, and REC-1, which require that proposed project treatments be consistent with local plans, policies, and ordinances, that notifications would be made prior to the commencement of prescribed burning operations, that treatment-related equipment be stored outside of the public viewshed, that treatment area edges are feathered to create a natural transitional appearance, that vegetation screening is provided within and adjacent to treatment areas, and that recreational users be notified of any temporary recreation area closures. The proposed treatment activities are consistent with those analyzed in the PEIR, therefore, the potential for the Project to result in long-term substantial degradation of the visual character of the Project area is within the scope of the PEIR.

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

treatable landscape; therefore, the short-term aesthetic impact would also be the same, as described above. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-3

This impact does not apply to the proposed project because no non-shaded fuel breaks are proposed.

New Aesthetic and Visual Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (per Sections 3.2.1, “Environmental Setting” and 3.2.2, “Regulatory Setting” in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts would be the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

4.2 Agriculture and Forestry Resources

Table 2. Consistency of Project-Related Agriculture and Forestry Resources Impacts with Scope of CalVTP PEIR.

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	Yes	NA	NA	LTS	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.2.1 Discussion

Impact AG-1

The proposed project would involve manual treatment; mechanical treatment including mastication, crushing/compaction, and chipping; prescribed herbivory; pile burning; prescribed (broadcast) burning; and targeted herbicide use. Biomass disposal would include lopping and scattering, hauling off-site, and pile burning. The vegetation communities in the Project area include annual grasslands, coastal oak woodland, coastal scrub, montane hardwood-conifer, chamise-redshank chaparral, urban, lacustrine, and redwood forest. There is no farmland within the Project area. The potential for the proposed treatment to result in the loss of forest land was examined in the PEIR and found to be less than significant. Potential impacts resulting in the conversion of forest land are within the scope of the PEIR because the treatment activities are consistent with those addressed in the PEIR. The majority of vegetation within the treatment area consists of the tree fuel type. Implementation of the Project would alter forested land through selective thinning, resulting in a shaded fuel break that retains the tree canopy. This would be achieved through removal of select trees, branches, shrubs, and both living and

dead vegetation that could facilitate the upward spread of fire from surface fuels to the forest canopy. Tree cover within woodlands and forested areas remaining after treatment would be consistent with the definition of forest land used in PRC 12220(g): land that can support 10 percent native tree cover of any species under natural conditions. The proposed project would not remove trees for commercial purposes and would not result in conversion of the dominant vegetation types, therefore the proposed project would not result in loss of forest land or conversion of forest land to non-forest use. This impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. Within the Project area, existing conditions within forested land are essentially the same within and outside of the treatable landscape. Therefore, the impact to forested land is also the same. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present within the Project area (California Department of Conservation [CDC] 2023a); therefore, no conversion of farmland would occur. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

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

4.3 Air Quality

Table 3. Consistency of Project-Related Air Quality Impacts with Scope of CalVTP PEIR.

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	PSU	Table 3.4-1; Impact AQ-1, pp. 3.4-26–3.4-32; Appendix AQ-1	Yes	AD-1, AD-4, AQ-1 through AQ-4, AQ-6	MM AQ-1	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33–3.4-34; Appendix AQ-1	Yes	AQ-1, 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	Section 3.4.2; Impact AQ-3, pp. 3.4-34–3.4-35	No	None	NA	No Impact	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Section 3.4.2; Impact AQ-4, pp. 3.4-35–3.4-37	Yes	AD-4, AQ-1, AQ-2, AQ-3, AQ-6	NA (no feasible mitigation available)	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	PSU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4, AQ-1, AQ-2, AQ-3, AQ-6	NA (no feasible mitigation available)	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
	☐	☐	☐

4.3.1 Discussion

Impact AQ-1

The use of vehicles, mechanical equipment, prescribed herbivory, herbicides, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standard (CAAQS) or National Ambient Air Quality Standard (NAAQS) thresholds for the San Francisco Bay Area Air Basin. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR and was found to be potentially significant. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed in the PEIR.

The SPRs applicable to this treatment project are AD-1, AD-4, AQ-1 through AQ-4, and AQ-6, which require public notification for prescribed burning, compliance with applicable BAAQMD air quality requirements, submittal of a Smoke Management Plan and Burn Plan if the prescribed burning triggers the threshold (17 CCR Section 80160), minimizing dust, and following all safety procedures required of a CAL FIRE crews. SPR AQ-5 would not apply because no naturally occurring asbestos, ultramafic rock outcrops, or former asbestos mines are mapped in or near the treatment area and no serpentine soils or serpentine outcrops were observed during biological reconnaissance surveys (McCarten 1993, U.S. Geological Survey [USGS] 2017, USGS 2023, Sequoia 2023). The RCD would implement the emission reduction techniques included in MM AQ-1 to the extent feasible. However, because the treatments would be implemented by a public agency with limited funding, procuring or paying additional amounts for contractors that use equipment meeting the latest efficiency standards, including meeting the EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology may be cost prohibitive. Carpooling would be encouraged by the RCD, but because crews may not all be employed with the same company, carpooling may not be feasible to implement for most workers. The RCD will document the extent the agency and/or its contractors are able to implement MM AQ-1. Renewable diesel will be used by RCD and/or its contractors to the extent required by state regulations. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable. In addition to the CalVTP PEIR SPRs and MMs, additional Project-specific measures are described below for MM AQ-1.

MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

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

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

Impact AQ-2

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR and found to be less than significant. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5, which require complying with air quality regulations, maintaining equipment, locating staging areas away from sensitive receptors, and limiting equipment idling time, respectively.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. The inclusion of additional land does not impact the duration of treatment activities progress across treatment sites as described in the PEIR and thus diesel particulate matter (PM) generated by treatment activities would not take place near any single sensitive receptor for an extended period. However, within the boundary of the Project area, the air quality conditions and types of sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within or adjacent to the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-3

This impact does not apply to the treatment project, because no naturally occurring asbestos, ultramafic rock outcrops, serpentine soils, or former asbestos mines are mapped in or near the treatment area and no serpentine soils or serpentine outcrops were observed during biological reconnaissance surveys (McCarten 1993, USGS 2017, USGS 2023; Attachment B).

Impact AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants. The potential to expose people to toxic air contaminants from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the

prescribed burns are within the scope of the activities addressed in the PEIR, and within the San Francisco Bay Area Air Basin, air quality conditions are consistent with those analyzed in the PEIR for San Mateo County. Therefore, the potential for exposure to toxic air contaminants is also within the scope the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs, however this impact would remain significant and unavoidable, as explained in the PEIR.

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

Impact AQ-5

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the exposure potential and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are HAZ-1, NOI-4, and NOI-5, which would require equipment maintenance, limiting vehicle idling time to 5 minutes, and notification of off-site sensitive receptors.

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

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 and found to be potentially significant. The duration and parameters of the prescribed burn treatment and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to

smoke odors, are included in SPRs, however, this impact would remain significant and unavoidable, as explained in the PEIR.

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

New Air Quality Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Sections 3.4.1, “Regulatory Setting” and 3.4.2, “Environmental Setting” in Volume II of the Final PEIR). The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR, but the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. However, within the boundary of the Project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they are immediately adjacent to each other, the air basin is the same, and the treatment activities and associated air emissions are the same. Therefore, the impacts are the same and, for the reasons described above, the impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. No new impact related to air quality would occur that is not covered in the PEIR. Therefore, no new impact related to air quality would occur.

4.4 Archaeological, Historical, and Tribal Cultural Resources

Table 4. Consistency of Project-Related Archaeological, Historical, and Tribal Cultural Resources Impacts the Scope of CalVTP PEIR.

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
	☐	☐	☐

4.4.1 Discussion

A cultural resources assessment report is in preparation for the Project area, which includes the treatment areas. The methods performed for this report included a background record search consistent with SPR CUL-1, notifications to local Native American representatives consistent with SPR CUL-2, cultural resource research consistent with SPR CUL-3, and a stratified sampling-approach pedestrian survey of the Project area consistent with SPR CUL-4. A record search was requested at the Northwest Information Center (NWIC) to determine whether any portions of the Project area had been previously surveyed for cultural resources and to identify the presence of any previously recorded cultural resources within the Project area, as well as a 0.25-mile buffer (the search radius). The records

search was received on July 5, 2023 (NWIC File No. 22-1936). Other sources of information that were reviewed included, but were not limited to, the current listings of properties on the National Register of Historic Places (NRHP), California Historical Landmarks, California Register of Historical Resources (CRHR), California Points of Historical Interest as listed in the Office of Historic Preservation's (OHP's) Historic Property Directory, and the Built Environment Resource Directory for San Mateo County (OHP 2020).

No resources have been previously recorded within the Project area or search radius, and no CRHR- or NRHP-listed historical resources or properties have been recorded within the treatment area or the search radius.

According to the record search results, the boundaries of 12 previous studies intersect the Project area. Of the approximately 661 acres of land within the Project area, about 179 acres have been previously surveyed for cultural resources.

In addition to the above records search, a pedestrian survey was conducted by a Montrose Environmental (Montrose) senior archaeologist on November 13, 2023. Due to the extensive steep topography in the Project area, the survey strategy was stratified to take into account both slope and accessibility from a travel-cost perspective. That is, some portions of the Project area that represented slopes of 10 percent or lower, were over 2 acres in area, and were within proximity of a stream or confluence were subjected to more intensive survey techniques (transects of 20 meters or less). Not all areas that represent these flat slopes were surveyed due to their isolation within areas surrounded by steep hillsides. Other areas that represented slopes between 10 and 20 percent were surveyed, based on sensitivity and lacking isolation within steeper areas, using wider intervals, or 20- to 40-meter intervals. All other areas were not subject to pedestrian survey due to the steepness of the slopes (>20 percent) or, as mentioned above, were isolated within areas surrounded by steep mountainous areas where the travel costs on foot would minimize the potential for long-term habitation or settlement by prehistoric populations (Byrd et al. 2017). Due to the heavy vegetation and grass cover, 22 shovel test pits were dug in areas considered of higher sensitivity for archaeological resources, in order to better observe the subsurface conditions and inspect for evidence of archaeological deposits. No evidence of archaeological deposits was identified throughout the surveys.

A scattering of historic-era logging and ranching equipment, including a barn and dwelling, situated along the ranch road between the pasture and the forested area, was observed on the western portion of the Project footprint, estimated to be from the early twentieth century.

Consistent with CalVTP SPR CUL-2, an updated Native American contact list and sacred lands file search was obtained from the NAHC. The sacred lands data file indicated no sacred land had previously been recorded within the Project area or adjacent lands. On October 16, 2023, the RCD sent letters to 10 of the 11 tribal contacts provided by the NAHC. Per RCD policy, a particular contact was not notified due to their geographic location and representation is not for projects that are north of Pescadero, California; therefore, a letter was not sent to this contact. The letters requested information regarding Tribal

resources and asked the tribes to notify the RCD if they wished to initiate consultation regarding the Project actions. Two letters were returned to the sender with insufficient address. On November 14, 2023, the RCD sent emails to those who did not receive the initial letter via USPS. To date, no responses have been received. As planning proceeds, the RCD will continue to consult with interested Tribal representatives regarding the Project and incorporate their concerns into project planning and mitigation as warranted.

Impact CUL-1

The potential for vegetation treatment activities, such as manual and mechanical treatments that cause ground disturbance, to cause adverse effects to historical resources (those resources evaluated as eligible for listing in the CRHR), was examined in the PEIR and found to be less than significant. According to the NWIC records search and surveys conducted for the Project, no elements of the historic era-built environment were previously identified within the Project area. As discussed above, logging equipment, including a barn and dwelling, was identified within the Project area that appears to be historic-period—although substantially altered. However, any impact to potential historical resources, including, but not limited to, structures, buildings, or foundations, would be avoided, per SPR CUL-7, due to the lack of any proposed demolition or material alteration of a structure or building or overall setting. This potential impact is within the scope of the PEIR, because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. As described above, archaeological and historical resource record searches have been conducted per SPR CUL-1. SPR CUL-7 requires the avoidance of known built historical resources and the avoidance of built-environment structures that have not yet been evaluated for historical significance, and SPR CUL-8 requires worker training regarding protection of historical resources.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. 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 CUL-2

Vegetation treatment activities would include mechanical treatments that use heavy equipment that could result in ground disturbance as vegetation is removed, which may result in adverse impacts to unknown historical resources (archaeological sites) or unique archaeological resources if present within a treatment area. According to the NWIC records search, no previously recorded resources are located within the Project area. Consequently, no impact to these resources is expected to occur from the program actions. However, subsurface components of these sites may exist within the areas of

proposed activity. The potential for these treatment activities to result in disturbance to, damage to, or destruction of archaeological resources was examined in the PEIR and found to be significant but would be less than significant for the proposed project with implementation of SPRs and mitigation. This impact is within the scope of the PEIR, because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-1 through CUL-5 and CUL-8. As described above, methods consistent with SPR-1 through SPR-4 have been implemented for the purposes of this PSA. Further, SPR CUL-8 shall be implemented, which requires worker training regarding the protection of sensitive archaeological, historical, and Tribal cultural resources. MM CUL-2 would also apply to this treatment to protect any inadvertent discoveries of archaeological resources.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. 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 CUL-3

As previously summarized, Native American contacts identified by the NAHC were sent an invitation to consult via certified mail on October 16, 2023, consistent with the requirements of SPR CUL-2. No responses have been received to date. The potential for treatment activities to cause a substantial adverse change in the significance of a Tribal cultural resource was examined in the PEIR. Proposed treatment activities include manual and mechanical treatment activities that may require ground disturbance, as well as the use of herbicides, which may adversely affect ethnobotanicals or material culture that may have Tribal importance. The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a Tribal cultural resource during vegetation treatment was examined in the PEIR and found to be less than significant with the implementation of SPR CUL-6. As planning proceeds, additional information provided by tribes during the consultation process may identify the potential for a substantial adverse change to a Tribal cultural resource to result from Project-related actions, and measures to protect the resource shall be formulated consistent with SPR CUL-6, which, upon implementation, would avoid any substantial adverse change to any Tribal cultural resource. The potential for adverse effects on Tribal cultural resources during implementation of the proposed project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are CUL-1 through CUL-6 and CUL-8. SPRs CUL-1 through CUL-4 have been conducted during preparation of this PSA. SPR CUL-5 and CUL-6 require consulting with the geographically affiliated tribes to avoid and protect any resources identified; and SPR CUL-8 requires worker training regarding the protection of sensitive archaeological, historical, and Tribal cultural resources.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the potential for tribal cultural resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. 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 CUL-4

Vegetation treatment activities would include treatments using heavy equipment; these treatments may use masticators, bulldozers, and/or chippers, which could uncover human remains if present in a treatment area. The potential for treatment activities to uncover human remains was examined in the PEIR and found to be less than significant. The NWIC records search did not identify any previously recorded burials or sites that have the potential to contain human remains. This impact is within the scope of the PEIR, because the intensity of ground disturbance under the proposed project is consistent with what was analyzed in the PEIR. Additionally, consistent with the PEIR, the proposed project would comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 in the event of a discovery.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the potential for discovery of human remains present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal to human remains is also the same, as described above. 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 Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed project 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 treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.5.1, “Environmental Setting” and 3.5.2, “Regulatory Setting” in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a changed circumstance to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing environmental and regulatory conditions pertinent to archaeological, built historical resources, or Tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable

landscape would not give rise to any new or more severe significant impacts. Therefore, no new impact related to archaeological, historical, or Tribal cultural resources would occur.

4.5 Biological Resources

Table 5. Consistency of Project-Related Biological Resources Impacts with Scope of CalVTP PEIR.

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	AD-2, AD-3, AD-5, AQ-3, AQ-4, BIO-1, BIO-2, BIO-3, BIO-5, BIO-6, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-2	BIO-1a BIO-1b BIO-3a BIO-4	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-2, pp 3.6-138–3.6-184	Yes	AD-2, AD-3, AD-5, AQ-3, AQ-4, BIO-1, BIO-2, BIO-3, BIO-5, BIO-9, BIO-10, BIO-11, BIO-12, GEO-1, HAZ-5, HAZ-6, HYD-1, HYD-2, HYD-3, HYD-4, HYD-5	BIO-2a BIO-2b BIO-2e BIO-2g BIO-3a BIO-4 BIO-5	SU: Western bumble bee and Crotch's bumble bee LTSM for all other species	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	AD-2, AD-3, AD-5, BIO-1, BIO-2, BIO-3, BIO-5, BIO-6, BIO-9, HYD-4, HYD-5	BIO-3a	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	AD-2, AD-3, AD-5, BIO-9, HAZ-5, HAZ-6, HYD-1, HYD-2, HYD-3, HYD-4, HYD-5	BIO-4	LTSM	No	Yes
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	AD-2, AD-3, AD-5, BIO-1, BIO-2, BIO-3, BIO-5, BIO-10, BIO-11, HYD-1, HYD-4, HYD-5	BIO-5	LTSM	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is this Impact Within the Scope of the PEIR?**
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	AD-2, AD-3, AD-5, BIO-1, BIO-2, BIO-3, BIO-5, BIO-12	--	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD-3	--	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	--	--	--	--	--

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.5.1 Discussion

Impact BIO-1: *Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications (LTSM)*

Following a desktop review, field reconnaissance survey, and focused botanical surveys, it was determined that 12 plant species had moderate to high potential to occur on the project site. Potential impacts and approach to mitigating impacts for these 12 species are discussed further in this section.

The Project proposes manual and mechanical vegetation removal, prescribed burning, pile burning, prescribed herbivory, and targeted herbicide application. These treatment activities have potential to result in direct or indirect adverse effects to special-status plant species. The potential for these treatment activities to result in impacts to special-status plant species was examined in the PEIR and was found to be less than significant with mitigation (pp. 3.6-131–3.6-138). The project site contains known

occurrences of sensitive plant species as well as potentially suitable habitat for some sensitive plant species.

Mechanical treatment and herbicide application have potential to impact special-status species directly or indirectly if not strategically applied; however, strategic removal of understory vegetation and invasive species would promote the regeneration of native species that support a healthier residual forest. The Project is designed to reduce the risk of catastrophic stand-replace wildfires, which would threaten known sensitive plant populations.

The potential for Project-related adverse effects to special-status plant species is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of disturbance resulting from implementing treatment activities are consistent with those analyzed in the PEIR (pp. 3.6-131–3.6-138). Impacts to special-status plants would be reduced to less than significant with the following SPRs and MMs. In addition to the CalVTP PEIR SPRs and MMs, additional Project-specific measures are described below each applicable measure.

SPR AD-2 Delineate Protected Resources for Avoidance

SPR AD-3 Consistency with Local Plans, Policies, and Ordinances

SPR AD-5 Maintain Site Cleanliness

SPR AQ-3 Create Burn Plan

- Fire ignition (nor use of associated accelerants) would not occur within 50 feet of listed plants.

SPR AQ-4 Minimize Dust

SPR BIO-1: Review and Survey Project-Specific Biological Resources and Determine whether avoidance is possible.

SPR BIO-2: Require Biological Resource Training for Workers

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats and Map Locations

- If any rare plant populations are found, location, quantity and description would be reported to the CNDDB. Any in-field methods of identification that will require handling would follow proper permitting and protocols.

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub

> It should be noted that scrub and chaparral are transitional habitat types and over time, canopy in these areas grows taller and denser, and larger tree species such as oak and madrone are naturally recruited and become increasingly dominant. Without any intervention, over a long period of time, chaparral and scrub communities will naturally be converted to woodland and forested habitat.

SPR BIO-6: Prevent Spread of Plant Pathogens

SPR BIO-7: Survey for Special-Status Plants

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife

- Treatment of invasive plants and noxious weeds would follow the guidelines provided by Cal-IPC and other current scientifically based methods.
- To prevent the spread of invasive plants, crews shall ensure equipment is cleaned of all soil, mud, and debris before departing the site. Whenever possible, crews and equipment shall remain on paved, rocked, and well-traveled trails and shall avoid cross-country travel. Mud, soil, and organic debris must be removed from equipment, treads, and boots before moving between work sites, with removed soil being left at its original location. Brushing and blowing, followed by water or sanitizing solution if necessary is an acceptable method of removal. If water is used, crews shall ensure that no erosion occurs, and no waterways are contaminated.

SPR GEO-1: Suspend Disturbance during Heavy Precipitation

SPR GEO-3: Stabilize Disturbed Soil Areas

SPR GEO-4: Erosion Monitoring

SPR GEO-5: Drain Stormwater via Water Breaks

SPR GEO-7: Minimize Erosion

- Heavy equipment would remain on stable operating surfaces to prevent erosion. Heavy equipment would remain on stable soil and use extension arms to treat slopes 50% or less.

SPR HAZ-5: Spill Prevention and Response Plan

- Herbicide application would not occur within protective buffers for special-status plants to prevent drift and non-target application.

SPR HAZ-6: Comply with Herbicide Application Regulations

SPR HYD-2: Avoid Construction of New Roads

Even with implementation of the above SPRs, impacts could be potentially significant per the CalVTP PEIR. Following implementation of MMs BIO-1a and BIO-1b, special-status plants identified during protocol-level surveys would be given a no-disturbance buffer of 50 feet within which vegetation treatment activities would not occur unless a qualified biologist determines that the species would benefit from treatment in the occupied habitat area. For FESA- or CESA-listed plant species, the determination that treatment would benefit the species would be made in consultation with CDFW and/or USFWS. Additionally, all state and federally protected wetlands would be avoided (MM BIO-4) by a standard buffer of 50 feet and will be adjusted if slopes or other conditions warrant an increased buffer. Mitigation of the 13 plant species with moderate to high potential to occur is considered based on persistence of detection throughout their lifecycles. MMs BIO-1a and BIO-1b would be required when the following conditions are met:

- where sensitive species are known to occur
- when treatments cannot be completed in the dormant season, or the species are persistent year-round due to its lifecycle (woody or non-dormant)
- when treatments would be implemented during the growing period of sensitive annual and geophyte species
- where protocol-level surveys are required (per SPR BIO-7) and special-status plants are identified during these surveys

MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA

MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA

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

MM BIO-4: Avoid State and Federally Protected Wetlands

Impacts to Annual Forbs

Annual forbs are plant species exhibiting seasonal vegetative growth and flowering, followed by a dormant period where the vegetation dries after seeding, and new individuals are expected to grow subsequent years in the same general vicinity. One special-status annual forb has been identified as having potential to occur within the Project vicinity:

- Toren's grimmia
- Woodland woollythreads
- Congested-headed hayfield tarplant
- Choris' popcornflower

Focused botanical surveys have been performed in 2023 during the appropriate blooming period for each of these species (MM BIO-1a and MM BIO-1b). To avoid impacts on herbaceous annual forb species, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative growth period until after the species has set seed. No project-related ground disturbance will occur generally within a 50-foot buffer of these identified locations. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or botanist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants. If pre-treatment surveys are conducted outside of the bloom period, and species within the same genus of each of these species are observed, these individuals would be treated as potentially special-status species and would be offered the same protective buffer for avoidance.

Impacts to Perennial Forbs

Perennial forbs are plant species exhibit seasonal vegetative growth and flowering, followed by a dormant period where the vegetation dries and the plant is difficult to locate, but the plant is expected to be persistent underground during dormancy and to grow subsequent years in the same location. Special-status perennial forbs with potential to occur in the Project vicinity include:

- San Mateo woolly sunflower
- Dudley's lousewort
- White-flowered rein orchid
- Focused botanical surveys have been performed in 2023 during the appropriate blooming period for each of these species (MM BIO-1a and MM BIO-1b). To avoid impacts on special-status herbaceous perennial forb species, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative grown period until after the species has set seed. Special-status plants identified during protocol-level surveys would be given a no-disturbance buffer of 50 feet within which vegetation treatment activities would not occur unless a qualified biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or botanist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants. If pre-treatment surveys are conducted outside of the bloom period, and species within the same genus of each of these species are observed, these individuals would be treated as potentially special-status species and would be offered the same protective buffer for avoidance.

Impacts to Woody Shrubs, Trees, Vines, and Mosses

Woody plant species exhibit seasonal vegetative growth and flowering, which may or may not include a period of dormancy, and the plant is expected to be persistent above ground and detectable year-round. Special-status woody plants with potential to occur in the Project vicinity include:

- Anderson's manzanita
- Kings Mountain manzanita
- Western leatherwood
- Arcuate bush mallow
- Minute pocket moss

Focused botanical surveys have been performed in 2023 during the appropriate blooming period for each of these species (MM BIO-1a and MM BIO-1b). To avoid impacts on persistent above-ground perennial species, a no-disturbance buffer of 50 feet within which vegetation treatment activities would

not occur unless a qualified biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or botanist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants. The qualified RPF, biologist, or biological technician would have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. If pre-treatment surveys are conducted outside of the bloom period, and species within the same genus of each of these species are observed, these individuals would be treated as potentially special-status species and would be offered the same protective buffer for avoidance.

Impacts to Sensitive Natural Communities

Focused botanical surveys have been performed in 2023 during the appropriate blooming period for each of these species (MM BIO-1a and MM BIO-1b). Thirteen (13) sensitive natural communities were identified within the project site, designated as vulnerable in the State of California by CDFW. CWHR's Coastal Oak Woodland type includes associations from both VegCAMP's *Quercus agrifolia* and *Umbellularia californica* primary lifeform categories. All the sensitive habitat types were ranked by CDFW as G3, "vulnerable – at moderate risk of extinction", G4, "apparently secure", or G5 "Secure", and S3, "vulnerable within the State of California", S4, "apparently secure", or S5, "Secure".

Prior to commencement of treatment activities, the limits of these habitats within the Project footprint would be recorded using a GPS and flagged. Treatments within S3 habitat would follow the guidelines described in MM BIO-3a including the creation of shaded fuel breaks removing no more than 20% of a stand where feasible; utilizing prescribed burning in fire dependent communities where feasible; and timing prescribed herbivory to avoid damage on non-target vegetation.

With implementation of all SPRs and MMs listed above, including survey protocols and preoperational meetings, impacts to special-status plant species would be reduced to less than significant.

***Impact BIO-2**: Substantially Affect Special-Status Animal Species Either Directly or Through Habitat Modifications (LTSM)*

Following a desktop review and a field reconnaissance survey, 15 special-status species were identified to have moderate to high potential to occur on the project site. Measures to reduce or neutralize Project-related impacts are considered in this section and are described for individual species or grouped species within similar ecological niches.

Manual and mechanical vegetation removal, broadcast and pile burning, targeted herbicide application, and prescribed herbivory have the potential to result in direct or indirect adverse effects to all special-status wildlife species or associated habitat. Project objectives are to prevent or slow the spread of non-wind driven wildfire between urban areas and wildlands (WUI) and/or provide staging areas for fire suppression efforts during an active wildfire (fuel break), which could reduce the impact of fire suppression activities and high-severity fire on the landscape.

The potential for Project-related adverse effects to special-status wildlife species is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of disturbance resulting from implementing treatment activities are consistent with those analyzed in the PEIR (pp. 3.6-131–3.6-138). Impacts to special-status wildlife would be reduced to less than significant with the following SPRs and MMs. In addition to the CalVTP PEIR SPRs and MMs, additional Project-specific measures are described below each applicable measure.

SPR AD-2: Delineate Protected Resources for Avoidance

SPR AD-3: Consistency with Local Plans, Policies, and Ordinances

SPR AD-5: Maintain Site Cleanliness

SPR AQ-3: Create Burn Plan

SPR AQ-4: Minimize Dust

SPR BIO-1: Review and Survey Project-Specific Biological Resources and Determine Whether Avoidance is Possible

SPR BIO-2: Require Biological Resource Training for Workers

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats and Map Locations

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub.

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife.

SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites.

SPR BIO-11: Install Wildlife-Friendly Fencing during Prescribed Herbivory.

SPR BIO-12: Protect Common Nesting Birds, Including Raptors through the use of avoidance buffers, treatment modification, or treatment delay. Monitor Active Raptor Nest During Treatment and Retain Raptor Nest Trees.

SPR GEO-1: Suspend Disturbance during Heavy Precipitation

SPR HAZ-5: Spill Prevention and Response Plan

SPR HAZ-6: Comply with Herbicide Application Regulations

SPR HYD-1: Comply with Water Quality Regulations

SPR HYD-2: Avoid Construction of New Roads

SPR HYD-3: Water Quality Protections for Prescribed Herbivory

SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides

Even with implementation of the above SPRs, impacts could be potentially significant per the CalVTP PEIR. Following implementation of additional MMs BIO-2a, BIO-2b, BIO-2e, BIO-2g, BIO-4, and BIO-5 special-status wildlife with moderate to high potential to occur would be addressed as described below.

MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species

MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species

MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants – Monarch Butterfly

MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees

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

MM BIO-4: Avoid State and Federally Protected Wetlands

MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Site

Impacts to Western Bumble Bee and Crotch's Bumble Bee

Direct and indirect impacts could occur to western bumble bee and Crotch's bumble bee from offroad travel, prescribed burning, herbicide use, and removal of flowering plants. The Project proposes operating heavy equipment from a stable operating surface using extension arms. Throughout the known distribution of special-status bumble bees, primary threats to survival include habitat loss or modification due to development, agriculture, high-intensity fire, fire suppression, and herbicide use (Xerces Society et al. 2018). Because little is known about the life history and behaviors of western bumble bee, and there is no established methodology for detecting overwintering or nesting colonies, they can be difficult to detect and therefore to completely avoid during treatment activities. If colonies were destroyed, it is possible that populations of these species would be reduced below self-sustaining levels, and treatment activities could substantially reduce the number or restrict the range of species.

The Project is designed to avoid riparian habitat and type-conversion of chaparral or coastal sage scrub (SPR BIO-5), and no new roads will be created (SPR HYD-2). Pre-treatment surveys would combine a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify burrows and suitable habitat within the project site. CDFW (2023) issued "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" which offers a survey methodology for western bumble bee among others. In lieu of or in addition to surveys, the Project proponent may choose to assume presence and rely on habitat as an indicator of presence. Crew members and contractors would be trained to identify and avoid these burrows if encountered (SPR BIO-2), and a biologist would be available as needed to provide guidance when crews are working within suitable western bumble bee and Crotch's bumble bee habitat. If identified, these burrows would be protected with an avoidance buffer (SPR AD-2). The project has been designed to protect non-target vegetation and special-status species from herbicides

(SPR HYD-5). A Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of Project implementation, and the Project proponent would comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants.

Although Mitigation Measures BIO-2a, BIO-2g, and BIO-4 would reduce impacts on foraging special-status bumble bees and their floral resources, substantial adverse effects could still occur to special-status bumble bee species during nesting and overwintering, because vegetation treatment activities could kill individuals or crush or disturb overwintering or nesting colonies. If western bumble bee or Crotch's bumble bee, nursery sites, or populations of flowering nectar plants are observed during focused surveys (following CDFW, 2023), or the species is assumed to be present in lieu of conducting surveys, the project proponent would avoid or minimize adverse effects on the species by implementing the following:

- Crew members and contractors would be trained to identify and avoid burrows if encountered (SPR BIO-2), and a biologist would be available as needed to provide guidance when crews are working within suitable western bumble bee habitat. If identified, burrows would be protected with an avoidance buffer (SPR AD-2).
- Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season.
- Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area.
- Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area).
- If any of the candidate bumble bee species are detected during surveys, the biologist would notify CDFW as further coordination may be required to avoid or mitigate certain impacts. As very little is known about nesting or overwintering sites of the candidate species, if nest or overwintering sites are discovered or can be documented, contact (preferably within three days) CDFW (wildlifemgt@wildlife.ca.gov), USFWS (for *B. franklini*, *B. occidentalis*, and/or *B. suckleyi*), as well as regional CDFW staff (R3timber@wildlife.ca.gov) in which the sighting occurred to contribute to the knowledge pool for bumble bee habitat and behavior.
- If CESA-protected bumble bees are observed, Project proponents may consult with CDFW to obtain an Incidental Take Permit (ITP) if take of CESA-protected bumble bees may occur during Project activities.

Additionally, herbicide use restrictions have been incorporated into the project design, such as: following manufacturer's directions, applying pesticide as directly and locally as possible to target species, and applying in a way that reduces spray drift. Within suitable bumble bee habitat, additional precautions will be taken to utilize the least the least toxic option for bumble bees, to follow guidance for reducing bee poisoning, and using the lowest effective application rate for the target species based on bee precaution pesticide rating (e.g., UC IPM) or more updated scientifically-based rating. When feasible, herbicide application within suitable habitat will occur during inactive bumble bee periods (e.g., overwintering; at dusk or night).

Project objectives are to prevent or slow the spread of non-wind driven wildfire between urban areas and wildlands (WUI) and/or provide staging areas for fire suppression efforts during an active wildfire (fuel break), which could reduce the impact of fire suppression activities and high-severity fire on the landscape. The Project treatment could potentially be beneficial to western bumble bee and Crotch's bumble bee by reducing high-intensity wildfire and improving habitat for bumble bee; however, in the process of achieving this objective, there are potentially significant direct impacts to western bumble bee or Crotch's bumble bee. The CalVTP PEIR acknowledges the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts; it concludes that impacts to western bumble bee and Crotch's bumble bee are potentially significant and unavoidable. Correspondingly the proposed project impacts are consistent with those described in the CalVTP PEIR, and the proposed treatment activities may result in impacts to western bumble bee or Crotch's bumble bee that are potentially significant and unavoidable while achieving a beneficial objective.

Impacts to Monarch Butterfly

Direct and indirect impacts could occur to monarch butterfly through removal of flowering plants providing nectar, removal of native milkweed stands for larval development, removal of overwintering habitat, and collisions with project vehicles.

The Project is designed to avoid riparian habitat and type-conversion of chaparral and coastal sage scrub (SPR BIO-5), and no new roads would be created (SPR HYD-2). Treatment activities would be suspended during heavy precipitation until soils are no longer saturated (SPR GEO-1), and this would reduce the potential for Project activities to disturb nectaring and larval host plants. Pre-treatment surveys would be combined with a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify native milkweed plants, nectar plants, and all life stages of monarch butterfly within the project site. Crew members and contractors would be trained to identify and avoid milkweed and monarch butterfly if encountered (SPR BIO-2) and a biologist would be available to provide guidance as needed. If identified, milkweed and monarch larvae/pupae would be protected with an appropriate avoidance buffer (SPR AD-2). The project has been designed to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). A Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of project implementation, and the project proponent would comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants.

Even following the above SPRs, project impacts could still be considered potentially significant. Therefore, the implementation of MM BIO-2a, BIO-2e, and BIO-3a would be implemented including targeting removal of non-native vegetation, protecting occupied native milkweed and occupied overwintering habitat, and restricting prescribed burning activities within occupied habitat to the season when monarch butterfly is inactive to avoid direct impacts to individuals and their nectar plants. If monarch butterfly is observed during larval development stage or overwintering period (conducted pursuant to SPR BIO-10), or the species is assumed to be present in lieu of conducting surveys, the project proponent would avoid or minimize adverse effects on the species by avoiding treatment activities during blooming periods for monarch butterfly host plants and nectar plants.

If avoiding larval stage is deemed infeasible for project implementation, monarch butterfly caterpillars and host plants that are detected during focused surveys would be avoided. The project proponent would require flagging areas for avoidance in which no treatment activities would occur, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species or impacts to the population. Per MM BIO-2b: "A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species." Habitat function for this species would be maintained by the Project because treatment activities would protect native milkweed and overwintering habitat, and restrict prescribed burning activities to the season when monarch butterfly is inactive to avoid direct impacts to individuals and their nectar plants. Additionally, the Project proposes to remove invasive species through various treatments, the results of which may improve habitat quality for monarch butterfly. The Project proponent and qualified biologist or registered professional forester will consult with CDFW and/or USFWS to determine that if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to monarch butterfly or habitat function. With these additional focused MMs, impacts to monarch butterfly would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Central California Coast DPS Steelhead

Indirect impacts to Central California Coast DPS steelhead would include habitat degradation and destruction through the removal of habitat, sedimentation from project-related biomass deposition or erosion. To avoid project impacts, mechanical treatments would identify and avoid state or federally jurisdictional waters and riparian habitat by a minimum of 50 feet (SPR HYD-4) and comply with water quality regulations (SPR HYD-1). Prescribed herbivory will follow water quality protections outlined in SPR HYD-3. Treatment activities would be suspended during heavy precipitation until soils are no longer saturated (SPR GEO-1), and this would reduce the potential for project activities to cause runoff into aquatic

features. Crew members and contractors would be trained to identify and avoid aquatic habitat while traveling between sites (SPR BIO-2) and a biologist would be available to provide guidance as needed.

The project has been designed to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). A Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of project implementation, and the project proponent would comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide within 50 feet of aquatic habitat. Cut vegetation and chips would not be placed below the Ordinary High-Water Mark of aquatic features, within wetlands, or within riparian areas.

As the Project is designed to avoid waters, and following the SPRs outlined above, the treatment activities are not expected to impact waters or Central California Coast DPS Steelhead. Per MM BIO-2b: "A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species." Habitat function for this species would be maintained by the Project because treatment activities avoid waters and riparian habitat by a minimum of 50 feet, comply with water quality regulations, avoid working during heavy rain conditions, apply a spill prevention and response plan, restrict herbicide use, and place vegetation debris outside of the Ordinary High-Water Mark. Pursuant to MM BIO-2a, and because this species is listed under ESA, the San Mateo Resource Conservation District will consult with USFWS and CDFW about its determination that mortality, injury, or disturbance would not occur and that habitat function for the species would be maintained with these additional MMs, impacts to CCC steelhead would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Aquatic Amphibians and Reptiles: California Red-Legged Frog, Foothill Yellow-Legged Frog, Santa Cruz Black Salamander, California Giant Salamander, California Newt, San Francisco Garter Snake, and Western Pond Turtle

Manual and mechanical methods of vegetation removal could impact upland habitat preferred for egg-laying or overwintering, and vehicles or livestock used for prescribed herbivory could trample burrowing amphibians and reptiles or western pond turtle eggs. Herbicide use could impact water quality and suitable breeding habitat for special-status amphibians and aquatic reptiles.

The Project is designed to avoid riparian habitat, watercourse and lake protection zones (SPR HYD-4), type-conversion chaparral and coastal sage scrub (SPR BIO-5), and creation of new roads (SPR HYD-2). The Project is designed to use wildlife-safe fencing whenever installed for prescribed herbivory (BIO-11), The project has been designed to apply herbicides in a manner which protects non-target vegetation and special-status species (SPR HYD-5). Per SPR GEO-1, the Project would suspend treatment activities during heavy precipitation until soils are no longer saturated, reduce the potential for project activities

to disturb ground-supporting burrows or nests occupied by aquatic and semi-aquatic amphibians and reptiles, and reduce the potential for impacts to this species. Pre-treatment surveys would be combined with a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify individuals of all life stages, nests, and aestivation sites within the project site. Crew members and contractors would be trained to identify and avoid nests, aestivation and breeding habitat, and individuals of all life stages, if encountered, (SPR BIO-2) and a biologist would be available to provide guidance as needed. If habitat or individuals are encountered, they would be protected with an avoidance buffer (SPR AD-2). To protect both aquatic and upland habitat, a Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of Project implementation. The Project proponent would comply with water quality regulations (SPR HYD-1), would adhere to water quality protection measures when conducting prescribed herbivory (SPR HYD-3), herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants, and would reduce the potential for impacts to aquatic and upland habitat occupied by this species.

Even following the above SPRs, project impacts could still be considered potentially significant. Therefore, the implementation of MM BIO-2a, BIO-2b, BIO-3a (overwintering upland habitat), and BIO-4 would be implemented. These measures include avoiding suitable habitat such as riparian, wetland, and aquatic habitat with a minimum 50-foot buffer; providing a qualified biologist during treatment activities to provide avoidance advice during an encounter; and avoiding vegetation treatment within occupied habitat or conducting vegetation treatment outside the sensitive period in these species' life cycle. This would be accomplished by identifying and flagging all aquatic habitat during pre-treatment focused surveys. MM BIO-2b requires flagging areas for avoidance and establishing no work-buffers. MM BIO-2b also states: "A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury, or disturbance to special-status species." If these species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition. Manual removal of these species is not anticipated during work but permitted biologists with applicable CDFW SCP and/or USFWS 10(a)(1)(A) permits would be on call during work activities to consult with the on-site biologist, as necessary.

Pre-treatment focused surveys: During the dispersal season, typically October 15 through April 15 (or beginning after the first rainfall of the year), or 24 hours following a rain event of 0.25 inch, pre-treatment visual surveys would occur within 300 feet of Class II streams, and would be performed by a qualified RPF, biologist, or biological monitor prior to implementation of any treatment activities (i.e., mechanical, manual, and herbicide) within breeding, upland, or dispersal habitat as determined by a qualified RPF or biologist.

- California Red-Legged Frog: A qualified biologist will conduct protocol-level surveys for California red-legged frog pursuant to the Revised Guidance on Site Assessments and Field Surveys for the

California Red-Legged Frog (USFWS 2005) within habitat potentially suitable for the species, or presence of the species will be assumed and MM BIO-2a will be implemented.

- Foothill Yellow-Legged Frog: A qualified biologist will conduct visual encounter survey and habitat assessment surveys for Foothill yellow-legged frog pursuant to the Considerations for Conserving the Foothill Yellow-Legged Frog (CDFW 2018) within habitat potentially suitable for the species, or presence of the species will be assumed and MM BIO-2a will be implemented.
- Western Pond Turtle, Santa Cruz Black Salamander, California Giant Salamander, California Newt, and San Francisco Garter Snake: A qualified biologist will conduct focused visual encounter surveys for the western pond turtle, Santa Cruz black salamander, California giant salamander, California newt and San Francisco garter snake. Visual encounter surveys for potentially suitable burrows for nesting and overwintering (as appropriate) will be conducted within habitat areas suitable for these species prior to treatment activities within approximately 1,500 feet of aquatic habitat (i.e., streams, ponds). If upland habitat with suitable burrows/nest sites for any of these species is detected, the RPF or qualified biologist will inspect the burrow to determine whether it is occupied (e.g., using a burrow scope).

If any special-status amphibian or aquatic reptile species are detected or assumed present, MM BIO-2a will be implemented which includes creating a no-work buffer and maintaining habitat function. If special-status amphibians or aquatic reptiles are detected during surveys, the project proponent would require flagging areas for avoidance in which no treatment activities would occur. If any enters the project site during treatment activities, all work would stop within a no-disturbance buffer of 100 feet around the individual unless the qualified RPF, biologist, or qualified designee determines that a different sized buffer is appropriate to avoid disturbance, injury, or mortality. Treatment activities would cease within the buffer until the animal leaves on its own, and the occurrence would be reported to the qualified RPF or biologist and USFWS or CDFW. Additionally, specific habitat features (i.e., log, tree, debris pile) preferred by the species would be evaluated by a qualified RPF, biologist, or qualified designee for habitat retention.

Within suitable breeding and dispersal habitat for special-status amphibian and aquatic reptiles, the following measures would apply to project activities:

- If herbicide applications are anticipated, applications will be made during the dry season (i.e., applied May 1 – October 31) and only when the ground on-site is dry and no rain is forecast within 72 hours, to avoid runoff events into downstream waters.
- If operators need to move or treat large woody debris greater than 12 inches in diameter, that piece of woody debris would be evaluated for the presence of California red-legged frog or other special-status species by a qualified biologist, a qualified RPF, a qualified RPF-supervised designee, or a contractor who has been through the environmental awareness training.
- All contractors, their employees, and agency personnel involved in the implementation of the Project would check for the presence of dispersing amphibians and reptiles or other sensitive

wildlife under or next to stationary vehicles prior to operating their vehicles. If a special-status reptile or amphibian is found, the qualified RPF, biologist, or qualified designee would determine necessary next steps to avoid impact.

- If pile burning is implemented, piles would be placed away from mammal burrows, rock outcrops, or scrub habitat that could serve as refugia for Santa Cruz black salamander, California giant salamander, foothill yellow-legged frog, California newt, western pond turtle, or California red-legged frog. Burn piles would not be placed on mammal burrows which occur in oak woodland, grassland, or savannah within suitable upland, breeding, core, dispersal, or foraging habitat for listed species. Burn piles would be burned gradually and lit from one end (the uphill side on slopes) to allow animals that may be using the pile for refuge to escape. When feasible, and if piles are too close to create safe burning conditions, a single pile would be ignited. "Feeder" piles in the vicinity of the burning pile would then be carried to the burning pile and burned in the same location as the initial burn pile. When feasible, this strategy would minimize risk to wildlife using piles for refuge.
- Whenever feasible in forested environments adjacent to scrublands or in oak woodland or forest or grasslands (for California newt, California giant salamander, Santa Cruz black salamander, western pond turtle, and California red-legged frog), understory vegetation would be removed first, followed by trees, to facilitate visibility of sensitive reptiles and amphibians by a qualified RPF or biologist.

With these additional MMs, impacts to special-status amphibians and reptiles would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Long-Eared Owl

Direct impacts to long-eared owl could occur if nests or nest trees are removed. Indirect impacts include disturbance of active nests within a zone of influence of project activities, depending on the equipment to be used, anticipated amount of time for construction at a given location, sensitivity to disturbance of any nesting birds present, and other factors. Limbing-up of nest trees or trees adjacent to nest trees could disturb nesting activity. Removal of vegetative cover could indirectly impact long-eared owl by reducing cover for prey species and potentially reducing prey abundance.

The Project proposes to retain trees greater than 16 inches DBH unless they pose a fire hazard as determined by a qualified RPF. The Project is designed to avoid effects of type conversion/maintain habitat function for coastal sage scrub (SPR BIO-5), prevent the spread of invasive plants, noxious weeds, and invasive wildlife (SPR BIO-9), and to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). Pre-treatment surveys would be combined with a focused nesting survey during nesting season (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify former and active long-eared owl nests within the project site and a standard 300 foot buffer (PG&E 2015). Crew members and contractors would be trained to identify and avoid raptor nests if encountered (SPR BIO-2) and a biologist would be available to provide guidance as needed. If identified, nests would be protected with

an appropriate avoidance buffer (SPR AD-2) based on species, topography, and other factors. A Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of project implementation, and the project proponent would comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants. SPR GEO-1 would suspend treatment activities during heavy precipitation until soils are no longer saturated, would reduce the potential for project activities to disturb ground-supporting burrows for prey species such as rabbits and small mammals, and would reduce the potential for indirect impacts to this species. During prescribed herbivory activities, a wildlife-friendly fencing would be installed to prevent electrocution, as applicable (SPR BIO-11).

Even following the above SPRs, project impacts could still be considered potentially significant. Therefore, MMs BIO-2b, BIO-3a, and BIO-4 would be implemented, including avoidance of protected aquatic features, targeting removal of non-native vegetation, strategic native vegetation removal to retain habitat function and prevent type conversion, avoid loss of sensitive natural communities and oak woodlands, and restricting treatment activities to non-nesting season as possible avoid impacts to nest success and prey base. If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of 300 feet (PG&E 2015) where no treatment activities would occur until the chicks have fledged, or the nest is otherwise no longer active, as determined by a qualified RPF, biologist, or qualified designee.

MM BIO-2b requires flagging areas for avoidance and establishing no work-buffers. MM BIO-2b states: “A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury, or disturbance to special-status species.” Nest monitoring will occur through non-invasive techniques such as looking for signs of activity such as fresh whitewash or cough pellets under the nest, behavioral cues such as adult activity around the nest at dusk or dawn, and searching for branching or fledged owlets within nest tree and vicinity. If long-eared owl is detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition. With these additional focused MMs, impacts to long-eared owl would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Marbled Murrelet

Marbled murrelets are vulnerable to loss and modification of nesting habitat due to commercial timber harvests, human-induced fires, land conversions, and natural causes such as wildfires and windstorms. Frequent harvest of old growth and mature forests also perpetuates the loss and fragmentation of remaining habitat and prevents regrowth of suitable breeding habitat for marbled murrelets. Direct project impacts to marbled murrelet includes removal of nest trees within the forested portions of the project site. Indirect impacts to marbled murrelet include loss of habitat and nest disturbance through loud project noise.

Prescribed herbivory would not result in adverse effects on nesting marbled murrelets because it would not occur in habitat suitable for marbled murrelet nesting, and because this activity would not use loud equipment or tools or introduce visual stimuli close enough to a marbled murrelet nest to result in disturbance of the nest. The disturbance of nests and the disruption of feeding due to prescribed burning, mechanical treatments, or noise-generating manual treatments (e.g., chainsaws) may result in the loss of eggs and chicks. Treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chainsaws) could result in disturbance of nesting marbled murrelets, if these activities occur near a nesting tree, or disruption of feeding flights to and from the nest during the sensitive nesting season (March 24 to September 15) (Mack et al. 2003). If it is not feasible to conduct treatment activities outside of the season of sensitivity, a qualified RPF, biologist, or a qualified designee would assess habitat within the project site for suitable nesting trees pursuant to SPR BIO-10 following Mack et al. 2003 and in coordination with CDFW and the USFWS. If suitable nesting trees are located within the project site, then surveys for marbled murrelets would be conducted as following Mack et al. 2003, or occupancy would be assumed.

The Project proposes to retain trees greater than 16 inches DBH unless they pose a fire hazard as determined by a qualified RPF. Treatment activities are not likely to result in the removal of marbled murrelet nesting habitat or direct removal of active nests because marbled murrelets nest on platforms in large diameter trees (i.e., greater than 30 inches DBH) (USFS 1995). The Project is designed to avoid effects of type conversion/maintain habitat function for coastal sage scrub (SPR BIO-5), prevent the spread of invasive plants, noxious weeds, and invasive wildlife (SPR BIO-9), and to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). Pre-treatment surveys would be combined with a focused nesting survey during nesting season (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify former and active marbled murrelet nests within the project site.

Even following the above SPRs, project impacts could still be considered potentially significant. In accordance with MM BIO-2A, mortality, injury, and disturbance will be avoided and habitat function maintained through the adoption of the applicable recommended minimization and avoidance measures outlined in the Avoidance Measure Recommendations for Marbled Murrelets in the Santa Cruz Mountains Following the CZU Lightning Complex. Ongoing MAMU monitoring efforts in Sam McDonald Park include inland forest audio-visual (AV) surveys, radar surveys, and audio recording units (ARUs).

Per the recommendations following discussions with CDFW, USFWS, and the California Department of Parks and Recreation the following recommendations will be adhered to:

1. Operational Window: High decibel work in proximity or within areas identified as murrelet habitat, occupied or important habitat areas in the Santa Cruz Mountains may begin on August 5th and continue to March 24th, except for the following conditions:
    a. At sites that are known as prime unburned (pre-CZU Fire) habitat for marbled murrelets, such as areas within Sam McDonald Park, where the project proponent will avoid

working until September 1st, unless new AV or ARU data suggests different dates when murrelets nest in these areas.

b. High decibel work may occur year around in areas of the CZU Fire that burned at moderate-high and high severities (https://sig-gis.com/czu-lightning-complex-map/) within the CZU Fire where murrelet habitat was significantly compromised or destroyed.

2. Working Hours: The project proponent will not work during the dawn and dusk period in areas identified as murrelet habitat, occupied or important areas that experienced low or moderate burn severity. Work from 1.5 hours after sunrise to 1 hour before sunset between March 24th – August 5th, or March 24th – September 1st in marbled murrelet important areas within Sam McDonald Park.
3. Noise Restrictions: Noise restrictions should be in place that address any chronic noise production or new noise that is 30-35 dB above background. These noises should be carefully evaluated and minimized to the extent possible.
    a. Habitat Buffer: Sound analysis work and data indicates that in areas of low to moderate fire severity, where areas identified as murrelet habitat, occupied or important habitat areas in the Santa Cruz Mountains still exists, buffers can be reduced to 330 feet to allow larger handwork crews and mastication equipment to conduct forest restoration and resiliency treatments greater than normal routine maintenance actions and park use, from March 24th – September 1st within marbled murrelet important areas in Sam McDonald Park.
4. Strategic Planning: The project proponent will time forestry work to occur as far from murrelet habitat in the July timeframe and work towards murrelet habitat.
5. Continued monitoring: AV and ARU monitoring should continue in areas where these recommendations are being followed to monitor changes in murrelet behavior supporting adaptive management strategies as needed to protect the species.
6. Corvid Predation: Within the project areas and throughout the property measures will be taken to avoid attracting predators of murrelets as result of project activities. Ravens, crows, and jays, which have large home ranges, are known predators of marbled murrelet eggs and nestlings (Marzluff and Neatherlin 2006). CDFW recommends that all garbage and food scraps be packed out and disposed of in animal-proof containers. All efforts should be made to keep project areas devoid of any material which could potentially attract known murrelet predators.

The potential for treatment activities including maintenance treatments to result in adverse effects on MAMU was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6 pages 138 to 184). MAMU is within the scope of the PEIR because effects to MAMU were covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Furthermore, habitat function for MAMU would be maintained because treatment activities and maintenance treatments would not target potential marbled murrelet nesting habitat.

Impacts to Nesting Birds Protected by the Migratory Bird Treaty Act.

Nesting birds are protected under the Migratory Bird Treaty Act (MBTA) (16 USC §§ 703–711), as administered by the USFWS. Under this act, it is unlawful to kill, injure, or harass birds or their eggs, or directly or indirectly cause the failure of an active nest through actions that result in birds abandoning their nests. Birds protected by the MBTA can have the potential to nest in all work areas and could be impacted by Project implementation if work is to occur within the typical nesting bird season (February 1 to August 31). Initial and maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the nesting bird season. These activities could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli (e.g., heavy equipment, chain saws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. Direct impacts to nesting birds could occur by crushing or destroying nests, force-fledging nestlings before completion of nestling period. Indirect impacts to nesting birds could occur by drawing attention to visual predators through the removal of vegetative cover around a nest which had hidden nests from predators and provided ample cover for parents to sneak on and off active nests, removal of food base (seeds, insects, fruit, rodents, etc.). Indirect impacts could also include loss of habitat for nesting and resources for foraging.

The Project is designed to avoid riparian habitat and type-conversion of chaparral and coastal sage scrub (SPR BIO-5), and no new roads will be created (SPR HYD-2). Pre-treatment surveys would be combined with a focused nesting survey during nesting season (SPR BIO-10) within the project site and at minimum 50-foot buffer.

Adverse effects on nesting birds can be avoided by performing treatment activities between September 1 and January 31, outside of the nesting bird season (February 1 to August 31). A qualified RPF, biologist, or qualified designee with familiarity and knowledge of the identification, life history, and ecological requirements of avian species covered under the MBTA would conduct pre-activity nesting bird surveys prior to work in priority work areas. Nesting bird surveys will occur no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey areas will be determined by the qualified RPF, biologist, or qualified designee depending on the project site, type of activity proposed, and suitable habitat for nesting birds. Surveys will be conducted during periods of high bird activity (i.e., 1-3 hours after sunrise and 1-3 hours before sunset) or as long as conditions remain suitable based on determinations by a qualified RPF or biologist. If the qualified RPF, biologist, or qualified designee determines that visibility is significantly obstructed due to on-site conditions (e.g., access issues, rain, fog, smoke, or sound disturbance [including high wind]), surveys will be deferred until conditions are suitable for nest detection. Should the biologist encounter an active nest of a migratory bird species (e.g., eggs, nestlings, parental attendance, etc.), the biologist will establish a species-appropriate avoidance buffer (SPR AD-2) until the nest is completely fledged or inactive. Crew members and contractors would be trained to identify and avoid raptor nests (SPR BIO-12) and if a nest is encountered, a biologist would be available to provide guidance as needed. Within

the nest buffer, the Project proponent would avoid disturbance to the nest by deferring treatment activity within the buffer until the nests are no longer active as determined by a qualified biologist, or to modify treatment activities to avoid disturbance to the nests under the advisory of a qualified RPF or biologist. If no active bird nests are observed during focused nesting bird surveys, then no additional mitigation would be required.

Spill Prevention and Response Plan (SPR HAZ-5) will be developed as part of Project implementation, and the Project proponent will comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants. SPR GEO-1 would suspend treatment activities during heavy precipitation until soils are no longer saturated, would reduce the potential for Project activities to disturb ground nesting birds and burrows for prey species such as insects and small mammals. During prescribed herbivory activities, a wildlife-friendly fencing will be installed that will allow perching by avian species and prevent electrocution (SPR BIO-11).

Even following the above SPRs, Project impacts could still be considered potentially significant. Therefore, the implementation of MM BIO-2a, BIO-2b, BIO-3a, and BIO-4 would be implemented including avoidance of protected aquatic features, targeting removal of non-native vegetation, strategic native vegetation removal to retain habitat function and prevent type conversion, and restricting treatment activities to non-nesting season as possible avoid impacts to nest success and prey base. MM BIO-2b states: “A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury, or disturbance to special-status species.” With these additional focused MMs, impacts to nesting birds would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Mountain Lion

It is unlikely that implementation of initial and maintenance vegetation treatments would result in adverse effects on mountain lions. However, there is a possibility that a mountain lion could use rocky areas or areas with thick vegetation in the treatment areas for denning. If a mountain lion den is present within the treatment areas, mountain lions and cubs could be disturbed by the presence of equipment and personnel and could be inadvertently injured or killed by heavy machinery, personnel, and work vehicles. Other indirect impacts to mountain lion include removal of thickets and areas with downed woody debris suitable for denning activity, an increase in prey availability through reduction of cover for prey, a reduction in prey availability through removal of habitat, or disruption of behavior patterns from increased human activity in the area.

To reduce potential impacts on mountain lion, the project has been designed to avoid effects of type conversion/maintain habitat function for coastal sage scrub (SPR BIO-5), develop a spill prevention and response plan (SPR HAZ-5), comply with herbicide application regulations (SPR HAZ-6), and protect non-

target vegetation and special-status species from herbicides (SPR HYD-5). SPR BIO-2 would require biological resources training for workers and would instruct workers to stop work and allow wildlife, including mountain lion, to leave the area unharmed. If fencing is used during this project, fencing will be wildlife friendly (SPR BIO-11). Because mountain lions use den habitat year-round, may have cubs year-round, and could be present within treatment areas year-round, there is no reliable season during which impacts on this species could be avoided. Focused, noninvasive surveys would be combined with pre-treatment surveys (SPR BIO-10) for mountain lion dens. Surveys would be conducted within habitat suitable for denning prior to implementation of mechanical and manual treatments to determine whether occupied mountain lion dens are present within treatment areas. If no occupied dens or signs of occupied dens are observed during focused surveys, then no additional mitigation would be required.

If occupied mountain lion dens or rendezvous areas are identified or assumed present during surveys or treatment activities, Project impacts could still be considered potentially significant. Under MM BIO-2a, SMRCD would be required to avoid the occupied area by a distance of at least 2,000 feet, following the most current and commonly accepted science (Wilmers et al. 2013), and consult with CDFW to identify other measures and appropriate buffer size to avoid disturbance to, injury to, or mortality of mountain lions. With the additional focused MM, impacts to mountain lion would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to Townsend's Big-Eared Bat

Depending on the roost location and orientation, the size of the roost, the type of roost (e.g., maternity, day, night, hibernation), and the season when vegetation removal would occur, Project activity could impact Townsend's big-eared bats. Loud mechanical equipment, mechanized hand-tools, and smoke from prescribed burning could disturb this species daily sleep pattern, breeding success, or hibernation period. Townsend's big-eared bat is also vulnerable to white-nose syndrome and loss, modification, and disturbance of roosting and foraging habitat. They are extremely sensitive to disturbance at their roosting sites and have suffered severe population declines throughout much of their range (Bat Conservation International 2023).

Crew members and contractors would be trained to identify and avoid bat roosts if encountered (SPR BIO-2) and a biologist will be available to provide guidance as needed. If identified, active maternity or night roosts would be protected with an avoidance buffer (SPR AD-2). The Project is designed to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). A Spill Prevention and Response Plan (SPR HAZ-5) will be developed as part of Project implementation, and the Project proponent will comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants which could impact insects which are bat prey base. If fencing is used during this project, fencing will be wildlife friendly (SPR BIO-11).

Pre-treatment surveys would be combined with a preliminary bat roost assessment (SPR BIO-10) working in potentially suitable habitat for special-status species, which includes roosting bats and during maternity roosting season (April to August 31). Due to the difficulty of detecting bats during typically

daytime pre-treatment surveys, diurnal bat surveys will focus on identifying potential bat habitat and roosting structures. If any suitable roosting structures occur in project site, a qualified bat biologist may conduct a Level 1 survey any time of the year (HT Harvey 2021) for evidence of bat occupation (past or current), specifically looking for signs of day-roosting bats, fecal matter, staining, and carcasses. Based on the results of Level 1 surveys, the more focused Level 2 surveys for day and night emergence from active roosts (HT Harvey 2021) may be performed (April 1 to September 15).

Even following the above SPRs, project impacts to bats could still be considered potentially significant. Therefore, the implementation of MM BIO-2b, BIO-3a, and BIO-4 would be implemented including avoidance of protected aquatic features, targeting removal of non-native vegetation, strategic native vegetation removal to retain habitat function and prevent type conversion, and restricting treatment activities to non-breeding season as possible avoid impacts bats and their insect prey base. If active roosts for special-status bat are identified during either Level 1 or Level 2 focused surveys, a no-disturbance buffer of approximately 250 feet would be flagged around the active roosts. This buffer may be modified based on the site topography, roost orientation, or other factors as determined by a qualified RPF, biologist, or qualified designee. Mechanical treatments, manual treatments, and broadcast and pile burning would not occur within this buffer. Additionally, MM BIO-2b states: “A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury, or disturbance to special-status species.” If these species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition.

As appropriate, bat exclusion from roosting structures would be implemented. Bat exclusion would be performed by a qualified RPF, biologist, or qualified designee. Exclusion would only occur during the periods from mid-February until mid-April, and from late August until mid-October to avoid hibernation and maternity season. Bat exclusion must include the combination of two actions: 1) careful blockage of all openings that are large enough to allow bats to enter, and 2) installation of one-way valves placed on the actively used openings to allow the bats to fly outside as they normally would but not to re-enter. After 7–10 days, the one-way valves are removed, and the remaining openings are blocked or sealed. Note that bats show a strong propensity to use any available openings to reclaim access to the roost when excluded and blockages must be performed with great thoroughness and attention to detail. Bat exclusions must be overseen by a qualified bat biologist.

With these additional focused MMs, impacts to special-status bats would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

Impacts to San Francisco Dusky-Footed Woodrat

Direct impacts to San Francisco dusky-footed woodrat could result in nest damage during manual or mechanical removal of middens or tree nests. Indirect impacts could include disturbing a woodrat from the safety of its nest, putting it at greater risk of predation and risking reproductive success.

Crews would be trained before the start of work to recognize woodrat nests and follow proper avoidance protocol (SPR BIO-2). If previously unknown nests are uncovered during work, crews would consult a biologist. Biologists would flag woodrat nest avoidance buffers during the pre-activity surveys (SPR AD-2). Pre-treatment surveys would be combined with a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify nest sites within the Project footprint. If a San Francisco dusky-footed woodrat nest is identified during focused surveys, a minimum five-foot no-disturbance buffer would be established around the nest which would be assumed to be occupied. This buffer would include surrounding vegetation, including the vegetative canopy above the nest. The size of the buffer would be determined by the qualified RPF or biologist, and no treatment activities would occur within this buffer. If any individual of this species is detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition.

Even following the above SPRs, Project impacts could still be considered potentially significant. Therefore, MM BIO-2a, BIO-2b, BIO-3a, and BIO-4 would be implemented. MM BIO-2b flagging areas for nest avoidance and establishing no work-buffers. MM BIO-2b also states: “A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment.”

Nests that are deemed hazardous by the Project proponent, such as those creating ladder fuels, may be dismantled under the supervision of a qualified biologist using a phased approach that allows woodrats to safely disperse. The following additional measures would be implemented to when dismantling a woodrat nest:

- Prior to any nest removal, safety measures would be employed to minimize potential human exposure to possible diseases carried by woodrats. Adequate protection, such as protective clothing, equipment and tools, gloves, and appropriate masks, to ensure safety regarding viruses and diseases potentially carried by rodents, is recommended.
- Vegetation immediately surrounding each nest to be removed would be cleared without disturbing the nest, to prevent displaced woodrats from taking cover in dense vegetation within the work area. All vegetation would be hauled off-site immediately. No brush piles or dense understory vegetation that could be used for cover by woodrats would be retained in the nest removal area after the nest is removed.
- Nest removal efforts would not take place during inclement or extreme weather conditions and would take place at dusk or dawn when woodrats are least susceptible to predators. Each nest would be carefully dismantled using hand tools (e.g., a rake and pitchfork).

- If a litter of young is found or suspected, the nest material would be replaced and the nest left alone for 2 to 3 weeks; after this time, the nest would be rechecked to verify that the young are capable of independent survival before proceeding with nest dismantling.

With these additional MMs, impacts to San Francisco dusky-footed woodrat would be reduced to less than significant. This impact is consistent with the CalVTP PEIR.

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)*

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse impacts on sensitive habitats, including designated sensitive natural communities. Direct impacts on sensitive habitats include direct loss or degradation of habitat quantity or quality through vegetation removal. Indirect impacts include inadvertent introduction of invasive plant species or pathogens which would result in a habitat loss and degradation, and disturbance of the ecosystem through loss of species community members (flora or fauna) through repeated presence of human activities.

The potential for adverse effects to riparian or sensitive natural communities is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of disturbance resulting from implementing treatment activities are consistent with those analyzed in the PEIR. Impacts to riparian habitat or other sensitive natural communities would be reduced to less than significant with the following SPRs and MMs:

SPR AD-2: Delineate Protected Resources for Avoidance

SPR AD-3: Consistency with Local Plans, Policies, and Ordinances

SPR AD-5: Maintain Site Cleanliness

SPR BIO-1: Review and Survey Project-Specific Biological Resources and Determine whether avoidance is possible.

SPR BIO-2: Require Biological Resource Training for Workers

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats and map locations

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub

SPR BIO-6: Prevent Spread of Plant Pathogens

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife

SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides

Surveys for sensitive vegetation communities prior to treatment (SPR BIO-1, SPR BIO-3) would be performed to ensure they are identified and that treatment activities avoid communities with a rank of S1 or S2. In accordance with the project description, all riparian areas would be avoided by a standard 50-foot no-work buffer, but size of buffers may be modified based on recommendations of a qualified RPF, biologist, or qualified designee and/or factors such as slope, existing erosion, sensitivity of the vegetative habitat, or presence of sensitive resources. Treatment activities are designed to maintain or enhance habitat function of coastal scrub communities wherever identified (SPR BIO-5). Best management practices would be employed to avoid the spread of plant pathogens (SPR BIO-6) the spread of invasive plants would be prevented (SPR BIO-9).

Even following the above SPRs, project impacts could still be considered potentially significant. Therefore, MM BIO-3a would be implemented. Under MM BIO-3a, the qualified RPF, biologist, or qualified designee would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. 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.

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

The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. Impacts would be less than significant with mitigation, consistent with the CalVTP PEIR.

Impact BIO-4: *Substantially Affect State or Federally Protected Wetlands (LTSM)*

Aquatic resources were identified within the project site as blue-line waters and ponds. Initial vegetation and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Impacts to wetlands would be reduced to less than significant with the following SPRs and MMs:

SPR AD-2: Delineate Protected Resources for Avoidance

SPR AD-3: Consistency with Local Plans, Policies, and Ordinances

SPR AD-5: Maintain Site Cleanliness

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife

SPR HAZ-5: Spill Prevention and Response Plan

SPR HAZ-6: Comply with Herbicide Application Regulations

SPR HYD-1: Comply with Water Quality Regulations

SPR HYD-2: Avoid Construction of New Roads

SPR HYD-3: Water Quality Protections for Prescribed Herbivory

SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides

Aquatic habitat in the vicinity of the project site has been excluded from the treatment area and riparian habitat would be avoided at a standard 50-foot buffer, but size of buffer may be modified based on site topography and other factors according to a qualified RPF or biologist. Implementation of water quality protections (SPR HYD-1), identification of Watercourse and Lake Protection Zones (WLPZs), and establishing no-work buffers (SPR HYD-4, SPR BIO-9), would minimize potential for invasive species spread in protected wetlands and riparian areas.

Even following the above SPRs, project impacts could still be considered potentially significant. Therefore, the implementation of MM BIO-4: Avoid State and Federally Protected Wetlands, which would ensure no impacts to wetlands in the identified features. With implementation of the above listed SPRs and MMs, state and federally protected wetlands would be retained. These measures are within the scope of the PEIR, and treatment activities proposed are consistent with those analyzed in the CalVTP PEIR. No state or federal waters permits are necessary, as the Project proposes complete avoidance of aquatic, wetland, and riparian features.

Impact BIO-5: *Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries (LTSM)*

The treatment areas have potential to provide essential connectivity habitat for wildlife. Habitat within the treatment area may be used for movement (e.g., mule deer migration), seasonal migration (e.g., migratory birds), and protective cover for breeding common wildlife species. Noise during work may impede some movement, but work is generally within proximity to urban landscapes and wildlife inhabiting the area are likely habituated to regular noise disturbance. Tree limb removal, hazardous tree removal, and ground disturbing activities would have the potential to impact nursery sites for native wildlife. Use of noise generating equipment could disturb roosting birds, bats, and other breeding species, impeding use of nursery sites. Manual, mechanical, prescribed burning, and prescribed herbivory treatments could result in some limited direct or indirect adverse effects on wildlife corridors and nurseries. The potential for treatment activities to result in impacts to special wildlife corridors and nurseries was examined in the PEIR and was found to be less than significant with mitigation.

Due to the history of fire suppression and dense understory vegetative growth throughout much of the Project site, it is expected that wildlife corridors and breeding habitat for some species would be improved by the Project's treatment activities. By minimizing the potential for catastrophic wildfire and thereby protecting the forest ecosystem, the wildlife corridors, while slightly degraded in the short term, would be protected from high-intensity wildfire in the future. Implementation of the SPRs and MMs listed below would minimize changes in habitat function within treatment areas that serve as wildlife movement corridors and nurseries.

SPR AD-2: Delineate Protected Resources for Avoidance

SPR AD-3: Consistency with Local Plans, Policies, and Ordinances

SPR AD-5: Maintain Site Cleanliness

SPR BIO-1: Review and Survey Project-Specific Biological Resources and Determine whether avoidance is possible.

SPR BIO-2: Require Biological Resource Training for Workers

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats and map locations

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub

SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites

SPR BIO-11: Install Wildlife-Friendly Fencing during Prescribed Herbivory

SPR HYD-1: Comply with Water Quality Regulations

SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides

Existing habitat types would remain to permit movement of wildlife species. Vegetation management activities would not block or obstruct streams or creeks. Pre-treatment surveys and additional focused surveys (SPR BIO-10) would generally apply to many areas where special-status species could occur. During prescribed herbivory activities, a wildlife-friendly fencing will be installed that will allow safe passage for common wildlife across the landscape, allow perching by birds and small wildlife, and prevent electrocution (SPR BIO-11). With implementation of the above listed SPRs, areas of intact wildlife corridors would be retained.

Even following the above SPRs, wildlife nursery sites could still be significantly impacted if not avoided. Wherever nursery sites (e.g., dens, nests, burrows, etc.) are identified, an appropriate non-disturbance buffer would be established for avoidance during treatment activities around the nursery site if activities are required to occur while the site is active or occupied (MM BIO-5).

Following the above SPRs and MMs, impacts to wildlife corridors and nurseries would be reduced to less than significant with mitigation, and this is consistent with the CalVTP PEIR.

Impact BIO-6: *Substantially Reduce Habitat or Abundance of Common Wildlife (LTSM)*

Initial vegetation treatment activities and treatment maintenance activities 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 the Project footprint. The potential for adverse effects to common wildlife species is within the scope of the activities and impacts

addressed in the PEIR because the treatment activities and intensity of disturbance resulting from implementing treatment activities are consistent with those analyzed in the PEIR. Impacts to common wildlife would be reduced to less than significant with the following SPRs and MMs:

SPR AD-2: Delineate Protected Resources for Avoidance

SPR AD-3: Consistency with Local Plans, Policies, and Ordinances

SPR AD-5: Maintain Site Cleanliness

SPR BIO-1: Review and Survey Project-Specific Biological Resources and Determine whether avoidance is possible.

SPR BIO-2: Require Biological Resource Training for Workers

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats and map locations

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub

SPR BIO-12: Protect Common Nesting Birds, Including Raptors through the use of avoidance buffers, treatment modification, or treatment delay. Monitor Active Raptor Nest During Treatment and Retain Raptor Nest Trees

Pre-treatment surveys to locate common wildlife and associated breeding sites (SPR BIO-1) would determine avoidance strategies to prevent population reduction. Worker environmental awareness training would include identification and avoidance of sensitive biological resources (SPR BIO-2). Sensitive habitats would be located, recorded with a GPS, and avoided (SPR BIO-3) as appropriate. SPR BIO-5 would result in avoidance of type-conversion in scrub habitats. While Project treatment would remove vegetation and alter habitat structure locally, it would not result in permanent habitat degradation or conversion.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments, including maintenance treatments, are consistent with those analyzed in the PEIR. The implementation of SPRs BIO-1, BIO-2, BIO-3, BIO-5, and BIO-12, in addition to measures described for special-status species under Impact BIO-1, BIO-2, BIO-3, and BIO-5, would reduce the risk of this Project, resulting in less than significant adverse effects to habitat and the abundance of common wildlife.

The potential for treatment activities, including treatment maintenance, to result in adverse effects on these resources was examined in the PEIR and was found to be less than significant.

Impact BIO-7: *Conflict with Local Policies or Ordinances Protecting Biological Resources (No Impact)*

Local policies or ordinances would apply to resources that occur within the proposed project site, particularly tree ordinances or noise ordinances. The potential for treatment activities to result in

conflict with local policies or ordinances was examined in the PEIR The potential for the proposed project to conflict with local policies or ordinances is within the scope of the activities and impacts addressed in the PEIR because the treatment projects implemented under the CalVTP are required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources.

In compliance with SPR AD-3 (Consistency with Local Plans, Policies, and Ordinances), the Project has been designed to comply with San Mateo County Regulations for the Preservation, Protection, Removal and Trimming of Heritage Trees on Public and Private Property (Updated 2016). Vegetation treatment for trees will follow these guidelines: for trees taller than 24 feet, prune lower tree limbs up to 15 feet and retain 50 percent of the live crown of the tree; for trees shorter than 24 feet, remove the lower one-third of tree branches less than 3 inches diameter and retain 50 percent of the live crown; and selective removal trees that are 16 inches DBH or less to accomplish the objectives of the fuel break. Non-native trees will be given preference for removal. In compliance with the Heritage Tree ordinance, the Project proponent will avoid removal healthy Santa Cruz cypress, Oregon ash, and Oregon white oaks unless they are qualified as hazardous by a qualified Registered Professional Forester (RPF) or arborist. The Project does not propose planning or building activities, and therefore an "Existing Tree Plan" or arborist's report would not be required under this regulation.

The Project proponent has designed and would implement treatment activities in a manner that is consistent with applicable local plans (e.g., general plans), policies, and ordinances to the extent the Project is subject to them (SPR AD-3). Impact BIO-7 would be less than significant and consistent with the PEIR.

Impact BIO-8: *Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan (No Impact)*

The CalVTP recognized eight (8) HCPs and/or NCCPs in the planning or implementation phase in the Central California Coast Section. The proposed project, including the areas outside the Treatable Landscape, does not fall within the boundaries of any of the eight (8) HCPs/NCCPs. The proposed project does not fall under the jurisdiction of any known HCPs or NCCPs; therefore, this impact does not apply to the treatment areas. As no habitat plans occur in the Project area, no impact to these would occur.

4.6 Geology, Soils, Paleontology, and Mineral Resources

Table 6. Consistency of Project-Related Geology, Soils, Paleontology, and Mineral Resources Impacts with Scope of CalVTP PEIR.

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is this Impact Within the Scope of the PEIR?**
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1 through GEO-8, AQ-3, AQ-4, HYD-3, HYD-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, AQ-3	NA	LTS	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.6.1 Discussion

The Project area is located in San Mateo County, within the Southern Coast Ranges Geomorphic Province, which is characterized by northwest trending mountain ranges and valleys. The Coast Ranges are primarily composed of Jurassic- to Cretaceous-age (about 65-150 million years old) marine sedimentary and volcanic rocks of the Franciscan assemblage. The Franciscan assemblage consists of partially metamorphosed greenstone, basalt, chert, and graywacke that originated as sea floor sediments. The California Department of Conservation Landslide Inventory map was reviewed to identify unstable areas within or in proximity to the treatment areas. No historic or active landslides have been documented within the treatment areas (CDC 2023b), however not all of the treatment areas have been mapped by CDC. The nearest mapped landslide in proximity to the treatment areas was a rockslide that occurred in March 2023 and was located approximately two miles north of the treatment areas. The majority of treatment areas are rated as having very high landslide susceptibility (CDC 2010). Soils within the treatment areas are dominated by Hugo and Josephine loams, very steep (39 percent),

Lobitos loam, moderately steep, eroded (14 percent), and Lobitos loam, steep, eroded (11 percent) (National Resource Conservation Service [NRCS] 2023). The parent material for these soils consists of sandstone and shale. Additionally, these soils are well drained (NRCS 2023). The erosion hazard classifications for the dominant soils range from moderate to very severe (NRCS 2023). The treatment areas classified as severe and very severe will include revegetation and erosion control measures discussed below.

Impact GEO-1

The proposed project would include mechanical treatments, manual treatments, prescribed herbivory, herbicide application, and prescribed burning. These treatment activities would result in vegetation removal and soil disturbance, which has the potential to increase rates of erosion and loss of topsoil. The potential for these treatment activities to result in substantial erosion or loss of topsoil was examined in the PEIR and found to be less than significant. The potential impacts are within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. The implementation of the following SPRs would further minimize the risk of soil disturbance and loss of topsoil associated with treatment activities: SPR GEO-1, which requires the suspension of soil disturbing treatment activities during precipitation; SPR GEO-2, which limits high ground pressure vehicles that could cause soil disturbance or compaction on wet or saturated soils; SPR GEO-3, which requires stabilization of disturbed soil areas during treatment activities; SPR GEO-4, which requires inspection of the treatment area for proper erosion control measures prior to the rainy season and immediately following the first large rainfall event; SPR GEO-5, which requires stormwater to be drained via water breaks to decrease the potential for channelized erosion down linear treatment areas; SPR GEO-6, which minimizes the burn pile size to minimize the spatial extent of soil damage; SPR GEO-7, which minimizes erosion from use of heavy equipment and prescribed herbivory on slopes; SPR GEO-8, which will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils (soil with moderate to high erosion hazard); SPR HYD-3, which requires environmentally sensitive areas to be identified and excluded from prescribed herbivory; SPR HYD-4, which requires establishment of WLPZs to reduce erosion near streams; SPR AQ-3, which requires preparation of a Burn Plan and minimization of soil burn severity to reduce the potential for runoff and soil erosion; and SPR AQ-4, which requires wetting of unpaved dirt roads to control dust.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the slopes and soil characteristics of the Project area are essentially the same within and outside the treatable landscape and SPRs would be implemented as described above. Therefore, the potential impact related to soil erosion is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GEO-2

The proposed project would include treatment activities that would result in the reduction of vegetative cover and affect root structure, decreasing the stability of slopes, which could increase the risk of landslides. The potential for treatment activities to increase the risk of landslides was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR. In addition, the implementation of SPRs, including SPR GEO-1, which requires the suspension of soil disturbing treatment activities during precipitation; SPR GEO-3, which requires the stabilization of disturbed soil during treatment activities; SPR GEO-4, which requires inspections for proper erosion control measures; SPR GEO-7, which minimizes erosion by prohibiting heavy equipment and prescribed herbivory on steep slopes; SPR GEO-8, which will require an RPF or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils; and SPR AQ-3, which minimizes soil burn severity resulting in some vegetation remaining with root structures, would minimize the potential for landslides from treatments.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

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

4.7 Greenhouse Gas Emissions

Table 7. Consistency of Project-Related Greenhouse Gas Emissions Impacts with Scope of CalVTP PEIR.

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	AD-3	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11–3.8-17	Yes	AQ-3	GHG-2	SU	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.7.1 Discussion

Impact GHG-1

Vegetation treatments would involve manual and mechanical vegetation removal, prescribed herbivory, and herbicide application, and biomass disposal would include chipping and pile burning, both of which would generate some greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR and found to be less than significant. The Project would be consistent with the applicable policies, plans, and regulations to reduce GHG emissions as described in California's 2022 Climate Change Scoping Plan (CARB 2022), the California Forest Carbon Plan (Forest Climate Action Team 2018), and the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (CARB 2019). Since the Project is consistent with the latest Climate Change Scoping Plan measures, it is on target to achieve the legislated GHG emission target for 2030 and substantially advance toward the 2050 climate goals. It would also be consistent with the 2022 San Mateo County Community Climate Action Plan (County of San Mateo 2022), which contains GHG reduction strategies and policies and details impacts

of worsening wildfires. Additionally, it would be consistent with the San Mateo County General Plan (County of San Mateo 2013), which contains goals and policies relating to fire protection and wildland fire prevention through the use of controlled burns, fuel removal, and fire breaks. SPRs applicable to this treatment are AD-3. SPR AD-3 requires that the treatment design be consistent with local plans, policies, and ordinances. Impacts related to GHG emissions from these types of treatment activities are within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions are consistent with those analyzed in the PEIR, which were found to be less than significant. SPR GHG-1 is not applicable to the proposed project, as the Project is not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection's AB 1504 Carbon Inventory Process because this Project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. However, within the boundary of the Project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape as well as in areas within the treatable landscape; therefore, the GHG impact is also the same as described above.

Impact GHG-2

The use of vehicles and mechanical equipment, prescribed herbivory, herbicide application, and prescribed burning during initial and maintenance treatments would result in GHG emissions. However, these treatments would have relatively low GHG emissions compared to GHG emissions from catastrophic wildfires. Wildfire hazards, including wildfire intensity and rate of spread could be somewhat reduced through implementation of the Project. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR and found to be potentially significant and unavoidable. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire, are consistent with those analyzed in the PEIR. MM GHG-2 would be implemented and would reduce GHG emissions associated with pile burning by burning when fuels have a higher fuel moisture content, reducing the total area burned by mosaic burning and isolating and leaving large fuels unburned, and by scheduling burns before new fuels appear. Treatment activities would contribute to annual GHG emissions generated under the CalVTP, and this impact would fall within the finding of the PEIR of potentially significant and unavoidable. Methods for reducing GHG emissions from burns would be integrated into SPR AQ-3 (Burn Plan) as described in MM GHG-2.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, GHG emissions and associated climate change impacts are global in nature and are not contained within the boundary of

the treatable areas. Therefore, the GHG impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts Related to GHG Emissions

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (Section 3.8.1, Regulatory Setting, and Section 3.8.2, "Environmental Setting" in Volume II of the Final PEIR).

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

4.8 Energy Resources

Table 8. Consistency of Project-Related Energy Resources Impacts with Scope of CalVTP PEIR.

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

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.8.1 Discussion

Impact ENG-1

The use of vehicles and mechanical equipment during initial treatment and treatment maintenance activities would result in the consumption of energy in the form of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR and found to be less than significant. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. Diesel and petroleum-based fuels, such as gasoline, would be consumed from the use of heavy-duty equipment and trucks, mechanical equipment, and the transport of personnel and equipment to and from and within the Project site. The Project would support fire prevention and suppression. Wildfire response requires an immediate response from emergency personnel and mobilization of equipment from across the state and even across the nation, which often results in inefficient consumption of energy. Implementation of treatment activities would reduce wildfire risk and the intensity of fire responses.

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

landscape, and the types of treatment activities and associated use of energy are of the same scale and scope as analyzed in the PEIR; therefore, the energy impact is also the same. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Energy Resource Impacts

The project proponent has considered the site-specific characteristics of the proposed treatment project both inside and outside the treatable landscape and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (Sections 3.9.1, “Regulatory Setting” and 3.9.2, “Environmental Setting” in Volume II of the Final PEIR) since the added acreage would not expand the total annual acreage proposed for treatment under the PEIR of 250,000 acres per year. Therefore, the impacts of the proposed project are consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to energy resources would occur.

4.9 Hazardous Materials, Public Health, and Safety

Table 9. Consistency of Project-Related Hazardous Materials, Public Health, and Safety Impacts with Scope of CalVTP PEIR.

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. 3.10-13–3.10-14	Yes	HAZ-1, HYD-4	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-14–3.10-17	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	PS	Impact HAZ-3, pp. 3.10-17–3.10-18	Yes	NA	HAZ-3	LTS	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.9.1 Discussion

Impact HAZ-1

The Project would involve mechanical treatments, manual treatments, prescribed herbivory, herbicide application, and prescribed burning. These activities would require the use of various types of equipment and vehicles, which require the use of fuels, oils, and lubricants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was analyzed in the PEIR and the impacts were found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. All equipment associated with the proposed project would comply with SPR HAZ-1, which ensures that

equipment is properly maintained to minimize leaks. Herbicide application impacts are discussed under Impact HAZ-2, below.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, regulatory conditions and the use of hazardous materials are essentially the same within and outside the treatable landscape. Therefore, the impact related to the use of hazardous materials is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-2

The Project would include herbicide application to control species that increase wildfire hazards. Herbicide application would involve transportation, use, storage, and disposal of herbicides, which could result in risks related to human exposure when applied in areas in close proximity to the public. However, only ground-level application would occur; no aerial spraying of herbicides would occur. The potential for treatment activities to create a significant health hazard from the use of herbicides was analyzed in the PEIR and the impacts were found to be less than significant. The potential impacts related to the use of herbicides during treatment activities are within the scope of the activities and impacts discussed within the PEIR because the types of herbicides and application methods that would be used, which are limited to ground-based applications, are consistent with those analyzed in the PEIR. Herbicides may be applied directly (by hand or backpack sprayer) to invasive plants and noxious weeds to minimize the spread and eliminate re-sprouting of invasive species to reduce wildfire risk within the treatment areas. Under the CalVTP, herbicide treatments would be limited to ground-level application and must comply with all EPA label directions as well as be applied by licensed applicators in compliance with all laws and regulations. The Project would comply with SPR HAZ-5 through HAZ-9, which requires preparation of a Spill Prevention and Response Plan prior to any herbicide treatment activities to provide protection to workers, the public, and the environment from accidental spills or leaks of herbicides; compliance with herbicide application regulations to protect worker and public safety; triple rinsing herbicide containers and disposal of rinsed materials at an approved site and disposal of all herbicides following label requirements and waste disposal regulations; minimization of herbicide drift into public areas through application parameters such as limitations for nozzle pressure and nozzle distance from vegetation; and notification of herbicide application within 500 feet of public areas by posting signs at herbicide treatment areas.

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

Impact HAZ-3

The Project would include mechanical treatments that could result in ground disturbance, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the Project area. Additionally, prescribed burning activities could lead to unexpected ignitions should ignitable hazardous waste be present, which could expose workers to risks associated with unexpected fire or explosions. The potential for the treatment activities to encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR, and was identified as potentially significant. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards. In evaluating the potential for effects related to the proposed project, database searches for hazardous materials sites within the Project area were conducted as directed by MM HAZ-3 (Department of Toxic Substances Control [DTSC] 2023, State Water Resources Control Board [SWRCB] 2023a). Two hazardous materials sites were identified within 0.25 mile of the treatment project area, listed below.

- La Honda Corporation Yard (T10000009501) was identified on Entrada Road within approximately 0.16 mile of the Project area. A leaking underground storage tank (LUST) was identified on-site, potentially contaminating soil and a drinking water supply aquifer with benzene, methyl tert-butyl ether (MTBE) / tert-butyl alcohol (TBA) / other fuel oxygenates, gasoline, toluene, xylene, ethylbenzene, total petroleum hydrocarbons (TPH), and naphthalene; however, the site was cleaned up and the case was closed in 2017 (SWRCB 2023b).
- San Mateo County Department of Public Works II (T0608100190) was identified on Entrada Road within approximately 0.17 mile of the Project area. A LUST was identified on-site, potentially contaminating soil with gasoline; however, the site was cleaned up and the case was closed in 1992 (SWRCB 2023c).

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

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

New Hazardous Materials, Public Health, and Safety Impacts

The Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed project and determined that they are in compliance with the applicable environmental and regulatory setting conditions presented in the CalVTP PEIR (Volume II, 3.10.1 and 3.10.2). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts are the same and the impacts of the proposed project are also consistent with those covered in the PEIR. No changed circumstances would create new significant impacts not addressed in the PEIR and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 Hydrology and Water Quality

Table 10. Consistency of Project-Related Hydrology and Water Quality Impacts with Scope of CalVTP PEIR.

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. 3.11-23–3.11-25	Yes	AQ-3, HYD-1, HYD-4, BIO-5, GEO-4, GEO-6,	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. 3.11-25–3.11-26	Yes	BIO-1, GEO-1 though GEO-5, GEO-7, GEO-8, HYD-1, HYD-4, HYD-5, 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. 3.11-26–3.11-27	Yes	HYD-3, GEO-3	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. 3.11-27–3.11-28	Yes	HYD-5, BIO-4, HAZ-5, HAZ-7	NA	LTS	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-28	Yes	GEO-5, HYD-4, HYD-6	NA	LTS	No	Yes

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

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

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:								
				Potentially Significant	Less Than Significant with Mitigation Incorporated			Less than Significant
				☐	☐			☐

4.10.1 Discussion

Impact HYD-1

The Project's initial and maintenance treatments would include prescribed burning and pile burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the use of pile burning and low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-3, HYD-1, HYD-4, BIO-4, GEO-4, GEO-6. SPR AQ-3 requires a Burn Plan using the CAL FIRE burn plan template for all prescribed burns. SPR HYD-1 requires that the treatments comply with the water quality regulations. SPR HYD-4 establishes watercourse and Lake Protection Zones (WLPZ) ranging from 50 to 150 feet be implemented for watercourses that are within treatment areas, and burn piles are located outside of WLPZs. SPR BIO-5 will ensure that the design of the treatment activities will be timed to mimic the natural fire return interval and avoid type conversion where native coastal sage scrub and chaparral is present. SPR GEO-4 requires erosion monitoring after the first large storm or rainfall event and SPR GEO-6 limits burn pile length, width, or diameter to not exceed 20 feet. These SPRs would avoid and minimize the risk of substantial water quality degradation by implementation of prescribed burning and pile burning, making the impact less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. A portion of the proposed treatment area also includes a portion of La Honda Creek which is outside the CalVTP treatable landscape (California Board of Forestry and Fire Protection 2023). Other portions of La Honda Creek both upstream and downstream from this location are included in the CalVTP treatable landscape. The surface water conditions in the proposed treatment area are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-2

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

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

Impact HYD-3

Project treatments would include prescribed herbivory to reduce fuel loads and may be used for treatment maintenance or as a pre-treatment before implementation of other methods. The prescribed herbivory livestock used as part of the proposed project would involve use of cattle, goats, sheep, or horses and would require the installation of temporary fencing where natural barriers are not present. The use of temporary water facilities for the livestock and guard animals and/or shepherd, as well as other temporary infrastructure (e.g., tanks, corrals, fences), would be required with the use of prescribed herbivory as a treatment method. The potential for prescribed herbivory treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR and was found to be less than significant. SPRs applicable to this treatment are HYD-3 and GEO-3. SPR HYD-3 includes best practices to avoid impacts to water quality caused by grazing animals, including providing water outside

of environmentally sensitive areas and herding grazing animals out of an area if accelerated soil erosion is observed. SPR GEO-3 requires stabilization of soil disturbed during prescribed herbivory treatments. These SPRs avoid and minimize the risk of substantial water quality degradation by implementation of prescribed herbivory treatment, making the impact less than significant.

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

Impact HYD-4

Project treatments could include targeted herbicide application to kill, or prevent regrowth of, invasive plants, target species, and noxious weeds. No aerial spraying of herbicides would occur. Herbicides would be applied in adherence with all US EPA, California Environmental Protection Agency (CalEPA), and California Department of Pesticide Regulation regulations. Additionally, no herbicides would be used within 50 feet of aquatic habitat. The use of herbicides has the potential to violate water quality standard regulations or degrade water quality, which was examined in the PEIR, and was found to be less than significant. SPRs applicable to this treatment are HYD-5, BIO-4, HAZ-5, and HAZ-7. All applicable SPRs listed, except SPR HAZ-7, are described in Impacts HYD-1 through Impact HYD-3. SPR HAZ-7 ensures that herbicide containers are triple rinsed. Any used containers will be rendered unusable by puncturing the top and the bottom, unless the containers are a part of a manufacturers recycling program. Containers will be disposed of at legal dumpsites and disposal of all herbicide will follow label requirements and waste disposal regulations. These SPRs avoid and minimize the risk of substantial water quality degradation by implementation of herbicide treatment, thereby making the impacts less than significant.

The inclusion of land in the Project that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. As described in Impact HYD-1, a small portion of the proposed treatment area located in La Honda Creek is outside the CalVTP treatable landscape. However, within the boundary of the Proposed treatment area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they have similar environmental conditions and the same regulatory setting. Potential impacts outside the treatable area are within the scope of the activities and impacts addressed in the PEIR because the methods of herbicide application, transportation, storage, and disposal are consistent with those analyzed in the PEIR with implementation of the same SPRs. This determination is consistent with the PEIR

and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-5

Some of the Project treatments could cause ground disturbance and minor erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatments to violate water quality standard regulations or degrade water quality was examined in the PEIR, and the impacts were found to be less than significant. As described in the PEIR, these activities would have minor impacts to on-site drainage with implementation of SPRs. The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment and treatment activities are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are GEO-5, HYD-4, and HYD-6. All applicable SPRs listed are described in Impacts HYD-1 through HYD4, except HYD-6. SPR HYD-6 provides protection for existing drainage systems during ground disturbing activities to maintain pre-project drainage conditions. If any drainage or filtration system is inadvertently disturbed or modified, the project proponent will meet with the owner of the system to repair any damage. These SPRs would avoid and minimize the risk of substantial altering of the existing drainage pattern, thereby making the impacts less than significant.

The inclusion of land that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed treatment area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, and existing drainage patterns pass through both areas. Therefore, the impact related to alteration of site drainage patterns is also the same. The potential for those treatments to substantially alter the existing drainage patterns of a Project site was evaluated in the PEIR and was found to be less than significant with implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Hydrology and Water Quality Impacts

The proposed treatments are consistent with the treatment types and activities addressed in the PEIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (Sections 3.11.1, “Regulatory Setting” and 3.11.2, “Environmental Setting” in Volume II of the Final PEIR). The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, hydrology, water quality, and treatment methods are consistent with those analyzed in the PEIR; thus, they are also within the scope of the PEIR. Additionally, the existing environmental and regulatory conditions pertinent to hydrology and water quality are also consistent within, as well as outside, of the treatable landscape included in this Project area. No changed circumstances would create new significant impacts not addressed in the PEIR and the inclusion of areas outside of the CalVTP

treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

4.11 Land Use and Planning, Population, and Housing

Table 11. Consistency of Project-Related Land Use and Planning, Population, and Housing Impacts with Scope of CalVTP PEIR.

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	N/A	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14–3.12-15	Yes	N/A	N/A	LTS	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.11.1 Discussion

Impact LU-1

Initial treatment and treatment maintenance activities would take place on public and private lands surrounding the community of La Honda in unincorporated San Mateo County. SPR AD-3 (Consistency with Local Plans, Policies, and Ordinances) requires that the Project proponent design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans), policies, and ordinances to the extent the Project is subject to them. As described in Section 4.4, "Biological Resources," the Project would be consistent with local policies protecting biological resources. As described in Section 4.12, "Noise", treatment activities would occur consistent with the local ordinances of San Mateo County. The Project would also comply with the zoning requirements within the treatment areas. The potential for treatment activities to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the PEIR and was found to be less than significant. The potential for vegetation treatment activities to cause a significant environmental

impact is within the scope of the PEIR because the treatment types and activities are consistent with those evaluated in the PEIR. SPR AD-3 is applicable to the proposed project, and it requires proposed project treatments to be consistent with local plans, policies, and ordinances.

The inclusion of land in the proposed treatment areas that are outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, because the land uses in the Project area are generally the same within and outside the treatable landscape, the land use impact is also the same. No conflict would occur because the project proponent would adhere to SPR AD-3. This determination is consistent with the PEIR and would not constitute a more severe impact than that which is described in the PEIR.

Impact LU-2

The PEIR evaluated the potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees, which was found to be less than significant. Impacts associated with a short-term increase in the demand for workers during construction of the treatment project are within the scope of the PEIR because the number of workers required for the proposed project is consistent with the crew size analyzed in the PEIR for the types of treatments proposed.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape is considered a change to the geographic extent presented in the PEIR. However, because the population and housing characteristics of the Project area are basically the same within and outside the treatable landscape, the population and housing impact is also the same, as described above. There are no SPRs applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than that which was evaluated in the PEIR.

New Land Use and Planning, Population, and Housing Impacts

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

4.12 Noise

Table 12. Consistency of Project-Related Noise Impacts with Scope of CalVTP PEIR.

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	AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, NOI-6	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**
	☐	☐	☐

4.12.1 Discussion

Impact NOI-1

The Project treatment activities that have the potential for short-term increase in ambient noise level include manual treatments and ground-based mechanical treatments. Prescribed herbivory would potentially occur 24 hours a day, but as noted in the PEIR, prescribed herbivory would not require the use of heavy off-road equipment; noise generated by this treatment type would be negligible and it is not discussed further. The manual treatments for this Project include hand-operated power tools, and the mechanical treatments including, handsaws, pole saws, McLeods, Pulaskis, weed pullers, brush cutters, and loppers. All treatments except herbivory would occur primarily on weekdays between 7:00 am and 6:00 pm, and during daylight hours only. If implementation of non-herbivory treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. During prescribed burning, crews would need to conduct some maintenance burning on weekends to manage overall

smoke impacts. Noise-generating treatments would comply with the local noise regulations. The Project will comply with San Mateo County Noise Ordinance, Ordinance No. 4.88.360 e.

Work would be conducted over several months each year. Multiple teams of crews may be working at the same time and using mechanical and manual methods that may generate varying noise levels, temporarily increasing ambient noise in the vicinity. Due to the nature of the proposed project, private residences and other noise-sensitive land uses are adjacent to the Project area and would temporarily be exposed to noise. The proposed project would be implemented on lands surrounding the community of La Honda within unincorporated San Mateo County. The potential for treatment activities to cause substantial short-term increases in exterior ambient noise level was addressed in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment, and thus the noise generated, are consistent with those analyzed in the PEIR. SPRs applicable to the proposed project include AD-3, which requires the treatments to be consistent with local plans, policies, and ordinances. Manual and mechanical treatments would be within the San Mateo County construction noise requirements, which state that construction activities should occur during normal work hours and non-noise-sensitive times of day. Additionally, the San Mateo County noise ordinance provides an exemption for any noise sources associated with demolition, construction, repair, remodeling, or grading of any real property provided said activities do not take place between the hours of 6:00 P.M. and 7:00 A.M. weekdays, 5:00 P.M. and 9:00 A.M. on Saturdays or at any time on Sundays, Thanksgiving and Christmas (San Mateo County noise ordinance, No. 4.88.360). This demonstrates that all work would be within the allowable limits, per SPR AD-3. Additional SPRs applicable to the proposed project include NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6. SPRs NOI-1 through NOI-6 would require that heavy equipment be used only during daytime hours, all equipment be properly maintained, engine shrouds be closed during mechanical equipment operation and idle time be restricted to 5 minutes, all staging areas be placed away from noise sensitive land types, and any noise sensitive receptors be notified ahead of work to ensure impacts to ambient noise levels would be less than significant.

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

Impact NOI-2

Project treatment activities would require large trucks to haul equipment and crews to the Project site. While trucks would pass residential sensitive receptors, it is not anticipated that Project traffic would

result in a substantial increase in truck-generated noise along local roads. These large trucks have the potential for a substantial short-term increase in single event noise levels (SENL), but trucks would only be in use during work hours from 7:00 a.m. to 6:00 p.m., Monday through Friday, or if outside those hours, in compliance with local noise ordinances (see Impact NOI-1). The SENL describes a receiver's cumulative noise exposure from a single impulsive noise event (e.g., an automobile passing by or an aircraft flying overhead), which is defined as an acoustical event of short duration and involves a change in sound pressure above some reference value. The impacts are within the scope of the PEIR because the treatment activities and methods are the same as those analyzed in the PEIR. Vegetation treatment activities under the CalVTP would be required to adhere to SPR NOI-1, which limits vegetation treatment to daytime hours and would not generate SENLs associated with vehicle trips that would result in sleep disturbance. SPRs applicable to this treatment are AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6, described under Impact NOI-1. The potential for a substantial short-term increase in SENL during the Project treatments was evaluated in the PEIR and was found to be less than significant with the implementation of these SPRs.

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

New Noise Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (Sections 3.13.1, "Environmental Setting" and 3.13.2, "Regulatory Setting" in Volume II of the Final PEIR).

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

4.13 Recreation

Table 13. Consistency of Project-Related Recreation Impacts with Scope of CalVTP PEIR.

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	REC-1	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**
	☐	☐	☐

4.13.1 Discussion

Impact REC-1

Initial treatment and treatment maintenance activities would take place on land owned and/or managed by private landowners, the CLHG, Peninsula Open Space Trust, and San Mateo County. Portions of the Project area are within Sam McDonald County Park, Alpine Ranch, Pescadero Creek County Park, and YMCA Camp Jones Gulch. The Project is also in the vicinity of La Honda Creek Open Space Preserve. Some portions of the Project area have land use designations of open space. Access to some treatment areas would rely on trails, which are used recreationally. The potential for treatment activities to directly or indirectly disrupt recreational activities within designated recreation areas was evaluated in the PEIR and was found to be less than significant. The potential for vegetation treatment and maintenance activities to cause a significant environmental impact is within the scope of the PEIR because the treatment types and activities are consistent with those evaluated in the PEIR. SPR AD-3 is applicable to the proposed project, and it requires proposed project treatments to be consistent with local plans, policies, and ordinances relevant to recreation, which include general plans, zoning ordinances, and adopted policies to avoid conflicts with recreational uses. SPR REC-1 is applicable to the proposed project, and it requires the project proponent to coordinate with the owner/manager of any recreation area or facility that would be temporarily closed during treatment activity, including posting notifications at least 2 weeks prior to the commencement of the treatment activities. The potential for the proposed

treatment project to impact recreation is within the scope of the PEIR and would be less than significant because the treatment activities and intensity are consistent with those analyzed in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the availability of recreational resources within the Project area is essentially the same as outside the treatable landscape because the areas are near to each other, and the recreational users would be the same. Impacts to recreation would be the same as previously described and would be less than significant. Implementation of SPRs AD-3 and REC-1 would minimize disruption to recreational activities within the Project area. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Recreation Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.14.1, “Environmental Setting” and 3.14.2, “Regulatory Setting” in Volume II of the Final PEIR).

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

4.14 Transportation

Table 14. Consistency of Project-Related Transportation Impacts with Scope of CalVTP PEIR.

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	Yes	AD-3, TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN- 2, pp. 3.15-10–3.15-11	Yes	AD-3, TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN- 3, pp. 3.15-11–3.15-13	Yes	NA	AQ-1	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 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**
	☐	☐	☐

4.14.1 Discussion

Impact TRAN-1

The Project would require the use of public roadways to access existing fire roads and trails leading to the specific treatment areas. Project-related traffic would include heavy-vehicle trips to haul equipment and materials and worker commute trips to and from the treatment areas. Crew sizes may vary but there would not be more than 45 workers. The number of truck trips and worker vehicle trips to and from the Project area would vary based on the size of the area being treated, the type of treatment being implemented, and the duration of the vegetation treatments. No road closures would be necessary for the implementation of this Project. The potential for a temporary increase in vehicle traffic associated with the proposed project work to conflict with a program, plan, ordinance, or policy

addressing roadway facilities, or for prolonged road closures, was examined in the PEIR and found to be less than significant. The proposed temporary increases in traffic related to the Project is within the scope of the PEIR because the treatment duration and limited number of vehicles (e.g., fire engine, water tender, masticator transport, crew vehicles for team members) associated with the proposed treatments are consistent with those analyzed in the PEIR. The proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed on multiple roads, including local roads. SPRs applicable to this treatment are AD-3 and TRAN-1. Implementing SPR AD-3 requires the treatments to be consistent with local plans, policies, and ordinances, and SPR TRAN-1 would require that the project proponent implement a traffic management plan (TMP) and that traffic control measures be placed on affected roadways during Project treatment activities.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing transportation conditions (e.g., roadways, road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they continue beyond the treatable landscape and are under the same jurisdictions and would be subject to the same programs, plans, ordinances, or policies regarding roadway facilities and closures. Therefore, the transportation impact is also the same and would be less than significant with the implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact TRAN-2

The Project treatment activity that would have the potential to increase transportation hazards during proposed treatment and maintenance activities would be the use of prescribed and pile burning, due to the smoke produced, which could temporarily affect visibility on nearby roadways. The potential for smoke to affect visibility along roadways during implementation of prescribed and pile burning was examined in the PEIR and was found to be less than significant. Vegetation piles for burning would not exceed 20 feet in height or in diameter. Pile burning would be conducted in compliance with the local authority having jurisdiction or with the Fuel Reduction Burn Permit or LE-5 issued by the local CAL FIRE Battalion Chief. It would also be coordinated with resource agencies such as the BAAQMD. The RCD would report site conditions and request approval to burn through PFIRS, which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California. SPRs applicable to this treatment are AD-3 and TRAN-1, described under Impact TRAN-1. The project proponent would prepare and implement a TMP to avoid and minimize temporary transportation impacts under this SPR. Therefore, the Project treatment activities would not substantially increase hazards due to a design feature or incompatible uses, and impacts would be less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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

Impact TRAN-3

The Project treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the Project access locations are in semi-remote locations along fire roads and other small, local roadways, and thus vehicle trips would be required to access the treatment areas. Project-related traffic would include heavy-vehicle trips to haul equipment and materials as well as worker commute trips to and from the treatment areas. The number of truck trips and worker vehicle trips to and from the Project area would vary based on the size of the area being treated, the type of treatment being implemented, and the duration of the vegetation treatments. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as stated in Impact TRAN-3 of the PEIR, individual projects under the CalVTP are likely to generate fewer than 110 trips per day, which is expected to cause a less-than-significant transportation impact for specific later activities, as described in the *Technical Advisory on Evaluating Transportation Impacts* published by the Governor's Office of Planning and Research (Governor's Office of Planning and Research 2018). According to the analysis methodologies presented in the PEIR, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. As presented in the PEIR, this amount would allow for up to 50 vehicles bringing crews and equipment to and from the Project site and hauling materials away in a single day. Because of the small sizes of the crew teams needed for the proposed project (not more than 45 workers), the limited equipment needed, and the limited materials to be hauled in any one day, the total VMT would not exceed 110 trips per day. Initial treatment would likely involve more vehicle trips than subsequent maintenance. Additionally, all vehicle trips would be dispersed across multiple roadways and would likely only utilize particular roadways a few times and for short durations. As a result, impacts related to a potential increase in VMT would be less than significant. Hiring local contractors would be encouraged where feasible to reduce the amount of VMT.

Although the PEIR determined that individual vegetation treatments would likely be less than significant, the overall impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT attributable to the program as a whole. Because the project would generate VMT during implementation, it would contribute to the

environmental significance conclusion in the PEIR; therefore, this impact is considered significant and unavoidable. No SPRs apply to this impact. As discussed for Impact AQ-1 in Section 4.3, "Air Quality," the RCD would implement MM AQ-1 to the extent feasible. MM AQ-1 would reduce the impact by encouraging workers to carpool and/or use public transportation. However, due to the required equipment and number of employees (i.e., the primary trip-generators associated with vegetation treatments) associated with the project, it would not be feasible to reduce VMT substantially. Therefore, the impact would remain significant and unavoidable.

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

New Impacts on Transportation

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Sections 3.15.1, "Environmental Setting" and 3.15.2, "Regulatory Setting" in Volume II of the Final PEIR).

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

4.15 Public Services, Utilities, and Service Systems

Table 15. Consistency of Project-Related Public Services, Utilities, and Service Systems Impacts with Scope of CalVTP PEIR.

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	PSU	Impact UTIL-2, pp. 3.16-10–3.16-12	Yes	AD-3, UTIL-1	NA	LTS	No	Yes
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	Yes	AD-3, UTIL-1	NA	LTS	No	Yes

[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**
	☐	☐	☐

4.15.1 Discussion

Impact UTIL-1

The Project would involve manual treatment; mechanical treatment (including mastication, mowing, chipping, and broadcasting), prescribed herbivory, prescribed (broadcast) burning, targeted herbicide use; and biomass disposal (including chipping and broadcasting, lopping and scattering, hauling off-site, and pile burning). A minimal amount of water would be required for fire suppression during prescribed and pile burning activities and for dust control during mechanical treatments. Depending on the location of the prescribed burning, pile burning, or mechanical treatments, water would be sourced from surface or groundwater supplies via local suppliers. The potential increased demand for water associated with

proposed treatments was examined in the PEIR and was found to be a less than significant impact. This impact is within the scope of the activities and impacts addressed in the PEIR because the amount of water needed for prescribed burning, pile burning, and dust control would be consistent with the PEIR, and the water source type would be consistent with the PEIR. Due to the size of the treatment area, and the minimal amount of water required for treatment activities, there would be a minimal demand on local water providers. Implementation of the Project treatments would not result in a physical impact associated with provision of sufficient water supplies, including related infrastructure needs, and this impact would be less than significant. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The proposed project includes land in the proposed treatment area that is outside the CalVTP treatable landscape, which constitutes a change to the geographic extent presented in the PEIR. Within the boundary of the Project area, the existing conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because the water service providers would be the same. This impact would also be less than significant and within the scope of the PEIR because the water uses and the water providers are essentially the same within and outside the treatable landscape. The treatment activities and intensity of the treatments would be consistent with those analyzed in the PEIR. Therefore, the impact onto water providers is also the same and would be less than significant, as previously described. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact UTIL-2

Manual and mechanical treatments would generate biomass as a result of vegetation removal within the Project treatment areas. Methods for managing biomass include natural decomposition (e.g., chip and broadcast, lop and scatter), hauling off-site, and pile burning. Whenever feasible, natural decomposition of biomass would be the preferred method. The remaining biomass that could not be broadcast on-site would be hauled off-site and disposed at a facility, pile burned, or donated to local agricultural producers for use as compost or other agricultural uses. The potential to generate solid waste in excess of state standards was examined in the PEIR and was found to be a less-than-significant impact. SPRs AD-3 and UTIL-1 would apply to this potential impact. SPR AD-3 requires the project proponent to design and implement the Project consistent with local plans and ordinances, and SPR UTIL-1 requires the project proponent to prepare a Solid Organic Waste Disposition Plan to guide biomass disposal. The potential biomass impact is within the scope of the activities and impacts identified in the PEIR as the conditions for removing biomass are consistent with the analysis in the PEIR.

The PEIR found that while some localities within the state may currently have the requisite infrastructure to process woody biomass or may develop this capacity in the near future, it cannot be guaranteed that all localities across the state would develop the capacities to process excess solid organic waste produced

from treatment activities within the timeframes of the proposed activities. Therefore, because feasible mitigation is not available, and to not risk understating potential future impacts in light of uncertainties about market response, the PEIR classified this impact as potentially significant and unavoidable, notwithstanding the possibility that capacity could increase with the scale of treatments such that it would not be exceeded for most or all individual treatments. Therefore, the impact on solid waste disposal is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included has essentially the same environmental conditions as those assessed within the treatable landscape, and so would result in a similar amount of biomass material for disposal and would use the same local facilities for disposal. Project treatments would primarily involve on-site biomass disposal. Vegetation moved offsite would be hauled to the nearest appropriate facility, or donated to local agricultural producers for use as compost or other agricultural uses. In compliance with SPR UTIL-1, a Solid Organic Waste Disposition Plan will be prepared and will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. The Project would be implemented to ensure consistency with local plans and ordinances and ensure implementation of a Solid Organic Waste Disposition Plan. Therefore, the impact generated from solid waste in excess of state standards outside the treatable landscapes is less than significant. This proposed project reflects a lesser impact than the statewide program, and the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-3

Project treatments as a result of vegetation removal within the Project site would generate biomass, which would be disposed of by natural decomposition (e.g., chip and broadcast, lop and scatter), hauling off-site, and pile burning. The potential to conflict with federal, state, and local waste management requirements was examined in the PEIR and was found to be a less-than-significant impact. Project treatments would primarily involve on-site biomass disposal. Vegetation moved offsite would be hauled to the nearest appropriate facility, or donated to local agricultural producers for use as compost or other agricultural uses. In compliance with SPR UTIL-1, a Solid Organic Waste Disposition Plan will be prepared and will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. The Project would be in compliance with federal, state, and local goals related to solid waste, as required by SPR AD-3. The Project is within the scope of activities and impacts identified in the PEIR.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape because they are near or adjacent to the treatable landscape, would generate a similar amount of solid waste, and would use the same waste disposal

facilities. Therefore, the impact related to compliance with federal, state, and local goals and regulations regarding solid waste is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts on Public Services, Utilities, and Service Systems

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

4.16 Wildfire

Table 16. Consistency of Project-Related Wildfire Impacts with Scope of CalVTP PEIR.

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is this Impact Within the Scope of the PEIR?**
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14–3.17-15	Yes	HAZ-2, 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	Section 3.17.1; 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. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

4.16.1 Discussion

Impact WIL-1

The primary goal of the proposed project is to create and maintain a strategic fuel break surrounding the community of La Honda, to support fire prevention and suppression. In the event of a wildfire, the implemented Project would provide safe access for fire engines and firefighting personnel, support the creation of fire lines, and potentially slow the spread and lower fire intensity.

Initial and maintenance treatments would include pile burning, prescribed (broadcast) burning, and mechanical treatments, which could result in temporary risks associated with uncontrolled wildfire, accidental wildfire ignition, or risk of a prescribed fire escaping its control lines. The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR and found to be less than significant. Increased wildfire risk associated with prescribed pile burning, prescribed burning, and use of heavy equipment in vegetated areas is within the scope of the PEIR. SPRs HAZ-2, HAZ-3, and

HAZ-4 would be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors on mechanical hand tools, requiring each team of crews to carry one fire extinguisher per chainsaw, and prohibiting smoking in vegetated areas. Based on the implementation of the SPRs, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the wildfire risk of the Project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact WIL-2

Initial and maintenance treatments would include prescribed pile burning, mechanical treatment using heavy equipment, and prescribed herbivory. The potential for post-fire flooding and erosion, including landslides, was examined in the PEIR and found to be less than significant. Mechanical treatment activities would occur predominantly on slopes below 40 percent grade and along ridges, and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or another stable operating surface. Mechanical treatments would not be applied on slopes above 50 percent grade unless the above conditions are met.

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

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project area, the post-fire landslide risk of the Project area is essentially the same within and outside the treatable landscape due to similar slopes, soils, hydrological and geological conditions. Therefore, the wildfire impact outside the treatable landscape is also the same and less than significant, as

described above, with implementation of the same SPRs. The impact outside the treatable landscapes would be consistent with the lands analyzed in the PEIR.

New Impacts to Wildfire

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

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Bumble Bee (*Bombus suckleyi*), and Western Bumble Bee (*Bombus occidentalis occidentalis*) as Endangered under the California Endangered Species Act.

Attachment A

Mitigation and Monitoring Reporting Program

A.1 La Honda Fuel Break Project: Mitigation Monitoring and Reporting Program

Standard Project Requirements

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources on-site; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the Burn Plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior-during	RCD	RCD
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	RCD	RCD
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during treatment	RCD	RCD
SPR AD-4 Public Notifications for Prescribed Burning: At least 7 days (to be determined by the Project Owner) prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity,	Initial Treatment: Y Treatment Maintenance: Y	Prior At least 7 days prior to prescribed burn	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
timing, and contact information; and 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.		treatment activities		
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the Project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During Prior to, during, and following treatment	RCD	RCD
SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Initial Treatment: Y Treatment Maintenance: Y	Prior 1–3 days prior to treatment activities	RCD	RCD
SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): • GIS data that include project location (as a point); • Project size (typically acres); • Treatment types and activities; and • Contact information for a representative of the project proponent.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during, post	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): • A completed PSA Environmental Checklist; • A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); • GIS data that include a polygon(s) of the Project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: • GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) • A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes: o Size of treated area (typically acres); o Treatment types and activities; o Dates of work; o A list of the SPRs and MMs that were implemented; and o Any explanations regarding implementation if required by SPRs and MMs (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in MMs BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to	Initial Treatment: Y	Annually	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the Project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit [CDP] is required). If a CDP is required, the treatment project will be designed to meet the following conditions: i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
SPR AES-2 Avoid Staging within Viewsheds: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD
Air Quality Standard Project Requirements				
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD
SPR AQ-3 Create Burn Plan: The project proponent will create a Burn Plan using the CAL FIRE Burn Plan template for all prescribed burns. The Burn Plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The Burn Plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: • Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. • If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. • Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. • Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD/Contractor	RCD
SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP), which will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting on-site briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During prescribed burn treatment activities	RCD	RCD
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior	RCD	RCD
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest NAHC-provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: • A written description of the treatment location and boundaries. • Brief narrative of the treatment objectives. • A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. • A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. • A request for information regarding potential impacts to cultural resources from the proposed treatment. • A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior	RCD	RCD
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior	RCD	RCD
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a Tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important Tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or Tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during treatment	RCD	RCD
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment and treatment maintenance Initial data review and reconnaissance -level survey have been conducted; see	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
for biological resources to help determine the environmental setting of a Project site. The qualified surveyor will identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:		Attachment B for results.		
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. By physically avoiding the suitable habitat, or b. By conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. **2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.** Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, National Oceanic and Atmospheric Administration (NOAA) Fisheries, CDFW, CNPS, or local resource agencies as	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during Prior to treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and MMs and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by CESA or ESA is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment and treatment maintenance	RCD	RCD
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: • Require a qualified RPF or biologist to perform a protocol-level survey following the most current CDFW protocols (2023a) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data; CNPS 2023), or referring to	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
relevant reports (e.g., reports found on the VegCAMP website). • Map and digitally record, using a Global Positioning System unit, the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance. *Project-Specific Measures: If any rare plant populations are found, location, quantity, and description would be reported to the CNDDB. Any in-field methods of identification that would require handling would follow proper permitting and protocols.*				
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: • Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. • Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. • Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat,	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. • Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat [e.g., see National Marine Fisheries Service et al. 2018]). • Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. • Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. • Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. • The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. • In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version; CAL FIRE 2019), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan				

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot, Wilson, and Boumans 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: • Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment and treatment maintenance	RCD	RCD

• The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: • For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. • Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. • A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. • If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance.				

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): • Clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; • Include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; • Minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; • Minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; • Clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and • Follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (UC Cooperative Extension et al. 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Project-Specific Measures *Phytophthora ramorum is a harmful fungal pathogen that can cause mortality in several oak tree species and causes twig and foliar diseases in numerous native shrub and tree species. P. ramorum has devastated oak stands throughout open spaces in Contra Costa and Alameda Counties, and minimizing its spread is a priority during Project activities. The pathogen is spread through the broadcasting of infected material and by wetted soil clinging to boots and equipment. To contain the spread of P. ramorum, crews will minimize the movement of soil and leaf litter under and around infected trees. Boots, treads, and equipment such as saws, shovels, hoes, and other tools will be scrubbed free of soil and debris that come from infected sites. All reasonable methods to sanitize shoes and equipment will be used in areas with susceptible species both before and after work in those areas. These methods will include disinfecting material with 10% bleach, Lysol, or 70% isopropyl alcohol after the surface has been scrubbed free of debris with bristle brushes.* *Any material suspected of being infected must stay in the area, as close to the origin point as possible. Generally, removal of P. ramorum-infected or killed oak trees is only necessary if the tree is considered hazardous in a park setting. When infected oaks are cut down and left on-site, the branches will be chipped and cut and split, if possible, to reduce fire hazard and facilitate decomposition. If chipping is not possible, material will be lopped and scattered downslope and away from host species to reduce fire hazard and further spread. When debris may not be left, infested material will be disposed of at an approved and permitted dump facility.*				
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the surveying and evaluation methods for special-status plants and sensitive natural communities (CDFW 2018). Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: • If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. • If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Environmentally Sensitive Habitat Areas				
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified LCP (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts: • The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. • Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA. • A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. • Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): • Clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; • For all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; • Inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; • Stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area;	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
• Identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; • Treat invasive plant biomass on-site to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on-site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and • Implement Fire and Fuel Management BMPs outlined in Cal-IPC (2012 or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Project Specific Measures *If it is determined that special-status species surveys will be performed, based on habitat suitability and other factors, certain species will follow specific protocols as listed below. Otherwise, surveys would be performed within suitable habitat with a focused pedestrian visual encounter survey searching for species-specific evidence indicating presence.* *Rare plants and sensitive habitat: CDFW 2013* *Special-status bumble bee: CDFW 2023* *California red-legged frog: USFWS 2005* *Foothill yellow-legged frog: CDFW 2018* *Marbled murrelet: Mack et al. 2003* *Townsend's big-eared bat: H.T. Harvey 2021*				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: • Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. • Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. • Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. • Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.				
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include but is not limited to one or more of the following: • **Establish Buffer**. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer, the location of which will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include presence of natural buffers provided by vegetation or topography, nest height above ground,	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment and treatment maintenance	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. • **Modify Treatment**. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. • **Defer Treatment**. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: • **Monitor Active Raptor Nest During Treatment**. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance,				

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
one of the other avoidance strategies (establish buffer, modify treatment, or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. • **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the Project area treatment activities and all treatment types, including treatment maintenance.				
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During, after	RCD	RCD
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (CAL FIRE 2019). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse, Hubbert, and Moghaddas 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical,	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.				
SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Greenhouse Gas Emissions Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during, after	RCD	RCD
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor will prepare a Spill Prevention and Response Plan prior to beginning any herbicide treatment activities to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
herbicides, adjuvants, or other potential contaminants. The Spill Prevention and Response Plan will include (but not be limited to): • A map that delineates staging areas, and storage, loading, and mixing areas for herbicides; • A list of items required in an on-site spill kit to be maintained throughout the life of the activity; • Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: • Be implemented consistent with recommendations prepared annually by a licensed Pest Control Advisor. • Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. • Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. • Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD
SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: • Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); • Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; • Low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and • Spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during	RCD	RCD
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation, and land	Initial Treatment: Y	Prior and during	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
disturbance-related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general WDRs and WDR waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDRs and Waivers of WDRs for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: • Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. • Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. • Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

<table>
<tr><th>STANDARD PROJECT REQUIREMENTS</th><th>APPLICABLE? (Y/N)</th><th>TIMING</th><th>IMPLEMENTING ENTITY</th><th>VERIFYING/ MONITORING ENTITY</th></tr>
<tr><td>This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish WLPZs on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (CAL FIRE 2019). WLPZ’s are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.

Procedures for Determining WLPZ Widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on-site and/or within 100 feet downstream of the operations area and/or

2) Fish always or seasonally present on-site, includes habitat to sustain fish migration and spawning.</td><td>1) Fish always or seasonally present offsite within 1,000 feet downstream and/or

2) Aquatic habitat for non-fish aquatic species.

3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td><td>Man-made watercourses, usu downstream, established dome agricultural, hydroelectric sup or other beneficia use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</td></tr>
<tr><td>< 30 % Slope</td><td>75</td><td>50</td><td colspan="2" rowspan="3">Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.</td></tr>
<tr><td>30-50 % Slope</td><td>100</td><td>75</td></tr>
<tr><td>> 50 % Slope</td><td>150</td><td>100</td></tr>
</table>
Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)

The following WLPZ protections will be applied for all treatments:

• Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-</td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Prior and during</td><td>RCD</td><td>RCD</td></tr>
</table>

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). • Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. • Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. • WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. • Burn piles will be located outside of WLPZs. • No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs. • Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, riprap, grass seeding, or chemical soil stabilizers. • Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. • Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of				

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. • Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: • Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. • Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. • No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including but not limited to protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. • No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. • For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
• Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); • No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HYD-6 Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD
SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses: The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD
SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	RCD	RCD
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Recreation Standard Project Requirements				
SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	RCD	RCD
Transportation Standard Project Requirements				
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include but are not limited to construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations	Initial Treatment: Y Treatment Maintenance: Y	Prior, during	RCD	RCD

STANDARD PROJECT REQUIREMENTS	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
will be identified and addressed within the TMP, which will include measures to monitor smoke dispersion onto public roadways, and traffic control operations that will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.				
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed on-site (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior	RCD	RCD

Mitigation Measures

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Aesthetics and Visual Resources				
MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A
Air Quality				
MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques. Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible.	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Techniques for reducing emissions may include but are not limited to the following: • Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. • Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: o Meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; o Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; o Contain no fatty acids or functionalized fatty acid esters; and o Have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. • Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. • Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. • Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM. *Project-Specific Measures* *RCD will document the extent that it and/or its contractors are able to implement MM AQ-1 by documenting each unit's certified engine tier specification and applicable CARB fleet regulation compliance certificates prior to mobilization. This information will be compiled in an annual monitoring compliance*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
report for the Project. Renewable diesel will be used by the agency and/or its contractors to the extent required by state regulations.				
Archaeological, Historical, and Tribal Cultural Resources				
MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or Tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Initial Treatment: Y Treatment Maintenance: Y	During and after	RCD	RCD
Biological Resources				
MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative,	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement MM BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required. *Project-Specific Measures* *To avoid impacts on listed herbaceous annual forb species within suitable habitat, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative growth period in occupied habitat until after the species has set seed. Manual treatments may occur with an avoidance buffer under the advisory of a qualified RPF or biologist. No Project-related ground disturbance would occur generally within a 50-foot buffer of these identified locations. The size and shape of the generally 50-foot buffer may*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants. *To avoid impacts on listed herbaceous perennial forb species within suitable habitat, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative growth period in occupied habitat until after the species has set seed. Manual treatments may occur with an avoidance buffer. A no-disturbance buffer of at least 50 feet would be established, within which vegetation treatment activities would not occur unless a qualified RPF or biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts.* *To avoid impacts on persistent above-ground listed perennial species within suitable habitat, a no-disturbance buffer of at least 50 feet would be established, within which vegetation treatment activities would not occur unless a qualified RPF or biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants.* *If pre-treatment surveys are conducted outside of the bloom period for these species, and individuals within the same genus of special-status plants are identified, these individuals would be treated as potentially special-status species and would be offered the same protective buffer for avoidance.*				
MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: • Physically avoid the area occupied by the special-status plants by establishing a no disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. • Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. • Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished, and the treatment would need to be modified or precluded from implementation. • No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then MM BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required. *Project-Specific Measures* *To avoid impacts on special-status herbaceous annual forb species within suitable habitat, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative growth period in occupied habitat until after the species has set seed. Manual treatments may occur with an avoidance buffer under the advisory of a qualified RPF or biologist. No Project-related ground disturbance would occur generally within a 50-foot buffer of these identified locations. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants.* *To avoid impacts on special-status herbaceous perennial forb species within suitable habitat, prescribed herbivory, prescribed burning, and mowing would be restricted to outside the vegetative growth period in occupied habitat until after the species has set seed. Manual treatments may occur with an avoidance buffer. A no-disturbance buffer of at least 50 feet would be established, within which vegetation treatment activities would not occur unless a qualified RPF or biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts.* *To avoid impacts on persistent above-ground special-status perennial species within suitable habitat, a no-disturbance buffer of at least 50 feet would be established, within which vegetation treatment activities would not occur unless a qualified RPF or biologist determines that the species would benefit from treatment in the occupied habitat area. The size and shape of the generally 50-foot buffer may be adjusted if a qualified RPF or biologist determines that a smaller or larger buffer would be sufficient to avoid impacts on listed plants.*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
If pre-treatment surveys are conducted outside of the bloom period for these species, and individuals within the same genus of special-status plants are identified, these individuals would be treated as potentially special-status species and would be offered the same protective buffer for avoidance.				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under MMs BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: • Creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); • Purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and • If the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: • The extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when:	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
○ Habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ○ Reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other off-site conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long-term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result, treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following: <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following two measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. • For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury, or disturbance by implementing one of the two options listed above, the project proponent will implement MM BIO-2c. • Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> The project proponent will design treatment activities to maintain the habitat function, by implementing the following: • While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding,	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. • If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. • A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement MM BIO-2c. *Project-Specific Measures* *If listed species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition. Manual removal of these species is not anticipated during work but permitted biologists with applicable CDFW SCP and/or USFWS 10(a)(1)(A) permits would be on call during work activities to consult with the on-site biologist, as necessary. If California Fully Protected Species or species listed under ESA or CESA are observed during focused or protocol-level surveys (conducted pursuant to SPR BIO-10) or assumed present, the project proponent would avoid adverse effects to the species by implementing the following:* *<u>California Red-Legged Frog:</u> A qualified biologist will conduct protocol-level surveys for California red-legged frog pursuant to the Revised Guidance on Site Assessments and Field Surveys for the California Red-*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Legged Frog (USFWS 2005) within habitat potentially suitable for the species, or presence of the species will be assumed and MM BIO-2a will be implemented. *<u>Foothill Yellow-Legged Frog:</u> A qualified biologist will conduct a visual encounter survey and habitat assessment surveys for foothill yellow-legged frog pursuant to the Considerations for Conserving the Foothill Yellow-Legged Frog (CDFW 2018) within habitat potentially suitable for the species, or presence of the species will be assumed and MM BIO-2a will be implemented.* *<u>California Red-Legged Frog and Foothill Yellow-Legged Frog:</u>* *If special-status listed amphibians are detected during surveys, the project proponent would require flagging areas for avoidance in which no treatment activities would occur. If any individual enters the Project site during treatment activities, all work would stop within a no-disturbance buffer of 100 feet around the individual unless the qualified RPF, biologist, or qualified designee determines that a different sized buffer is appropriate to avoid disturbance, injury, or mortality. Treatment activities would cease within the buffer until the animal leaves on its own volition, and the occurrence would be reported to the qualified RPF or biologist and USFWS or CDFW. Additionally, specific habitat features (i.e., log, tree, debris pile) preferred by the species would be evaluated by a qualified RPF, biologist, or qualified designee for habitat retention.* *Within suitable breeding and dispersal habitat for special-status amphibians, the following measures would apply to Project activities:* • *If herbicide applications are anticipated, applications will be made during the dry season (i.e., applied May 1 – October 31) and only when the ground on-site is dry and no rain is forecast within 72 hours, to avoid runoff events into downstream waters.* • *If operators need to move or treat large woody debris greater than 12 inches in diameter, that piece of woody debris would be evaluated for the presence of California red-legged frog or other special-status species by a qualified biologist, a qualified RPF, a qualified RPF-supervised designee, or a contractor who has been through the environmental awareness training.* • *All contractors, their employees, and agency personnel involved in the implementation of the Project would check for the presence of dispersing amphibians and reptiles or other sensitive wildlife under or next to stationary vehicles prior to operating their vehicles. If a special-status*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
reptile or amphibian is found, the qualified RPF, biologist, or qualified designee would determine necessary next steps to avoid impact. • *If pile burning is implemented, piles would be placed away from mammal burrows, rock outcrops, or scrub habitat that could serve as refugia for foothill yellow-legged frog or California red-legged frog. Burn piles would not be placed on mammal burrows which occur in oak woodland, grassland, or savannah within suitable upland, breeding, core, dispersal, or foraging habitat for listed species. Burn piles would be burned gradually and lit from one end (the uphill side on slopes) to allow animals that may be using the pile for refuge to escape. When feasible, a single pile would be ignited, and all other piles in the vicinity of the burning pile would be carried to the burning pile and burned in the same location as the initial burn pile. When feasible, this strategy would minimize risk to wildlife using piles for refuge.* • *Whenever feasible in forested environments adjacent to scrublands or in oak woodland or forest or grasslands, understory vegetation would be removed first, followed by trees, to facilitate visibility of sensitive reptiles and amphibians by a qualified RPF or biologist.* <u>*Marbled Murrelet*</u> *Operational Window: High decibel work in proximity or within areas identified as murrelet habitat, occupied or important habitat areas in the Santa Cruz Mountains may begin on August 5th and continue to March 24th, except for the following conditions:* *-At sites that are known as prime unburned (pre-CZU Fire) habitat for marbled murrelets, such as areas within Sam McDonald Park, where the project proponent will avoid working until September 1st, unless new AV or ARU data suggests different dates when murrelets nest in these areas.* *-High decibel work may occur year around in areas of the CZU Fire that burned at moderate-high and high severities (https://sig-gis.com/czu-lightning-complex-map/) within the CZU Fire where murrelet habitat was significantly compromised or destroyed.* *Working Hours: The project proponent will not work during the dawn and dusk period in areas identified as murrelet habitat, occupied or important areas that experienced low or moderate burn severity. Work from 1.5 hours after sunrise to 1 hour before sunset between March 24th – August 5th , or March 24th – September 1st in marbled murrelet important areas within Sam McDonald Park.*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Noise Restrictions: Noise restrictions should be in place that address any chronic noise production or new noise that is 30-35 dB above background. These noises should be carefully evaluated and minimized to the extent possible. *Habitat Buffer: Sound analysis work and data indicates that in areas of low to moderate fire severity, where areas identified as murrelet habitat, occupied or important habitat areas in the Santa Cruz Mountains still exists, buffers can be reduced to 330 feet to allow larger handwork crews and mastication equipment to conduct forest restoration and resiliency treatments greater than normal routine maintenance actions and park use, from March 24th – September 1st within marbled murrelet important areas in Sam McDonald Park.* *Strategic Planning: The project proponent will time forestry work to occur as far from murrelet habitat in the July timeframe and work towards murrelet habitat.* *Continued monitoring: AV and ARU monitoring should continue in areas where these recommendations are being followed to monitor changes in murrelet behavior supporting adaptive management strategies as needed to protect the species.* *Corvid Predation: Within the project areas and throughout the property measures will be taken to avoid attracting predators of murrelets as result of project activities. Ravens, crows, and jays, which have large home ranges, are known predators of marbled murrelet eggs and nestlings (Marzluff and Neatherlin 2006). CDFW recommends that all garbage and food scraps be packed out and disposed of in animal-proof containers. All efforts should be made to keep project areas devoid of any material which could potentially attract known murrelet predators.*				
MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following: <u>Avoid Mortality, Injury, or Disturbance of Individuals</u>	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: • For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include but not be limited to the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). • No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury, or disturbance to special-status species. • For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: • While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. • If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. • A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. • A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then MM BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. *Project-Specific Measures* *If other (i.e., non-listed) special-status wildlife species are observed during focused or protocol-level surveys (conducted pursuant to SPR BIO-10), or the species is assumed to be present in lieu of conducting surveys, the project proponent would avoid or minimize adverse effects on the species by implementing the following:* *Santa Cruz Black Salamander, California Giant Salamander, California Newt, San Francisco Garter Snake, and Western Pond Turtle* *If these species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition. Manual removal of these species is not anticipated during work but permitted biologists with applicable CDFW SCP and/or USFWS 10(a)(1)(A) permits would be on call during work activities to consult with the on-site biologist, as necessary.*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Pre-treatment focused surveys: During the dispersal season from October 15 (or after the first rainfall of the year) through April 15, within 300 feet of Class II streams or 24 hours following a rain event greater than one quarter inch, pre-treatment visual surveys would be performed by a qualified RPF, biologist, or biological monitor prior to implementation of any treatment activities (i.e., mechanical, manual, and herbicide) within breeding, upland, or dispersal habitat as determined by a qualified biologist. A qualified biologist will conduct focused visual encounter surveys for the western pond turtle, Santa Cruz black salamander, California giant salamander, California newt, and San Francisco garter snake. Visual encounter surveys for potentially suitable burrows for nesting and overwintering (as appropriate) will be conducted within habitat areas suitable for these species prior to treatment activities within approximately 1,500 feet of aquatic habitat (i.e., streams, ponds). If upland habitat with suitable burrows/nest sites for any of these species is detected, the RPF or qualified biologist will inspect the burrow to determine whether it is occupied (e.g., using a burrow scope). *If special-status amphibians or aquatic reptiles are detected during surveys, the project proponent would require flagging areas for avoidance in which no treatment activities would occur. If any individual enters the Project site during treatment activities, all work would stop within a no-disturbance buffer of 100 feet around the individual unless the qualified RPF, biologist, or qualified designee determines that a different sized buffer is appropriate to avoid disturbance, injury, or mortality. Treatment activities would cease within the buffer until the animal leaves on its own, and the occurrence would be reported to the qualified RPF or biologist and USFWS or CDFW. Additionally, specific habitat features (i.e., log, tree, debris pile) preferred by the species would be evaluated by a qualified RPF, biologist, or qualified designee for habitat retention.* *Within suitable breeding and dispersal habitat for special-status amphibian and aquatic reptiles, the following measures would apply to Project activities:* • *If herbicide applications are anticipated, applications will be made during the dry season (i.e., applied May 1 – October 31) and only when the ground on-site is dry and no rain is forecast within 72 hours, to avoid runoff events into downstream waters.* • *If operators need to move or treat large woody debris greater than 12 inches in diameter, that piece of woody debris would be evaluated for the presence of special-status species by a qualified biologist, a qualified RPF, a qualified RPF-supervised designee, or a contractor who has been through the environmental awareness training.*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
• *All contractors, their employees, and agency personnel involved in the implementation of the Project would check for the presence of dispersing amphibians and reptiles or other sensitive wildlife under or next to stationary vehicles prior to operating their vehicles. If a special-status reptile or amphibian is found, the qualified RPF, biologist, or qualified designee would determine necessary next steps to avoid impact.* • *If pile burning is implemented, piles would be placed away from mammal burrows, rock outcrops, or scrub habitat that could serve as refugia. Burn piles would not be placed on mammal burrows which occur in oak woodland, grassland, or savannah within suitable upland, breeding, core, dispersal, or foraging habitat for listed species. Burn piles would be burned gradually and lit from one end (the uphill side on slopes) to allow animals that may be using the pile for refuge to escape. When feasible, a single pile would be ignited, and all other piles in the vicinity of the burning pile would be carried to the burning pile and burned in the same location as the initial burn pile. When feasible, this strategy would minimize risk to wildlife using piles for refuge.* • *Whenever feasible in forested environments adjacent to scrublands or in oak woodland or forest or grasslands, understory vegetation would be removed first, followed by trees, to facilitate visibility of sensitive reptiles and amphibians by a qualified RPF or biologist.* <u>*Long-Eared Owl*</u> *Pre-treatment surveys would be combined with a focused nesting survey during nesting season (February 15 – July 31) to identify former and active long-eared owl nests within the Project site and a 0.5-mile buffer. If active nests are detected during focused surveys, a no-disturbance buffer will be established with a radius of at least 0.25 mile where no treatment activities would occur until the chicks have fledged, or the nest is otherwise no longer active, as determined by a qualified RPF, biologist, or qualified designee. If these species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition.* <u>*Mountain Lion*</u> *If occupied mountain lion dens are identified or assumed present during focused surveys, the project proponent would be required to either avoid the occupied area by a distance of at least 2,000 feet, following the most current and commonly accepted science (Wilmers et al. 2013), or consult with CDFW to identify other measures to avoid disturbance to, injury to, or mortality of mountain lions.*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Townsend's Big-Eared Bat *Pre-treatment surveys would be combined with a preliminary bat roost assessment working in potentially suitable habitat for special-status species, which includes roosting bats and during maternity roosting season (April to August 31). Due to the difficulty of detecting bats during typically daytime pre-treatment surveys, diurnal bat surveys will focus on identifying potential bat habitat and roosting structures. If any suitable roosting structures occur in the Project site, a qualified bat biologist may conduct a Level 1 survey (HT Harvey 2021) for evidence of bat occupation, specifically looking for signs of day-roosting bats, fecal matter, staining, and carcasses. Level 1 surveys can be performed year-round. Based on the results of Level 1 surveys, Level 2 surveys for day and night emergence (HT Harvey 2021) may be performed (April 1 to September 15).* *If special-status bat roosts are identified during focused surveys, a no-disturbance buffer of approximately 250 feet would be flagged around active bat roosts. This buffer may be modified based on the site topography, roost orientation, or other factors as determined by a qualified RPF, biologist, or qualified designee. Mechanical treatments, manual treatments, and broadcast and pile burning would not occur within this buffer. If these species are detected during pre-activity surveys or work, the animal would be allowed to leave the area of its own volition.* *As appropriate, bat exclusion from roosting structures would be implemented. Bat exclusion would be performed by a qualified RPF, biologist, or qualified designee. Exclusion would only occur during the periods from mid-February until mid-April, and from late August until mid-October to avoid hibernation and maternity season. Bat exclusion must include the combination of two actions: 1) careful blockage of all openings that are large enough to allow bats to enter, and 2) installation of one-way valves placed on the actively used openings to allow the bats to fly outside as they normally would but not to re-enter. After 7–10 days, the one-way valves are removed, and the remaining openings are blocked or sealed. Note that bats show a strong propensity to use any available openings to reclaim access to the roost when excluded and blockages must be performed with great thoroughness and attention to detail. Bat exclusions must be overseen by a qualified bat biologist.*				
MM BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of MMs BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows:				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
• The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. • For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. • For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities) If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS 2017 per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle: • If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required. • If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented: o A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g., damage to root system) that could damage or kill the plant, with the exception of the following activities: ▪ Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle. ▪ Manual or mechanical vegetation treatment within the drip line of any elderberry shrub will be limited to the season when adults are not active (August–February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry. o A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of valley elderberry longhorn beetle or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement MM BIO-2c.				
MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: • Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). • Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. • Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. • Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. • Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement MM BIO-2c. **CESA and ESA Listed Species.** A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the	Initial Treatment: Y Treatment Maintenance: Y	Before and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY

qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement MM BIO-2c.

Other Special-Status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then MM BIO-2c will be implemented.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.

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

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*)
Behren's silverspot butterfly	blue violet (*Viola adunca*)
callippe silverspot butterfly	California golden violet (*Viola pedunculata*)

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY

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

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
Project-Specific Measures *Monarch Butterfly* *Project treatment activities would target removal of non-native vegetation, protecting native milkweed and overwintering habitat, and restricting when possible prescribed burning activities to the season when monarch butterfly is inactive to avoid direct impacts to individuals and their nectar plants. If monarch butterfly, monarch larval host plants (region-specific native milkweeds:* Asclepias californica, A. fascicularis, *or* A. speciosa*), flowering nectar plants (e.g.,* Achillea millefolium, Agastache urticifolia, Arctostaphylos *spp*., Baccharis pilularis, B. salicifolia, Ceanothus *spp*., Grindelia *spp*., Helianthus *spp*., Heteromeles arbutifolia, Monardella *spp*., Salix *spp*., Salvia *spp*., Solidago *spp*., Verbena lasiostachys*, etc.), or overwintering roost trees are observed during focused surveys, or the species is assumed to be present in lieu of conducting surveys, the project proponent would avoid or minimize adverse effects on the species by avoiding treatment activities in during blooming periods for monarch butterfly host plants and nectar plants. If avoiding larval stage is deemed infeasible for Project implementation, monarch butterfly caterpillars and host plants that are detected during focused surveys would be avoided.*				
MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: • To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. • To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail (*Helminthoglypta walkeriana*), Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle snail (*Monadenia setosa*), treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species.	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement MM BIO-2c.				
MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: • Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. • Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. • Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). • Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March–September). **CESA and ESA Listed Species.** A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be	Initial Treatment: Y Treatment Maintenance: Y	Before and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
occupied) habitat such that its function would not be maintained would occur, the project proponent will implement MM BIO-2c. **Other Special-Status Species.** A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after applying feasible treatment design alternatives and impact minimization measures, then MM BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required. *Project-Specific Measures* *Western Bumble Bee* *Pre-treatment surveys would combine a focused survey to identify burrows and suitable habitat within the Project site following CDFW (2023) "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species," which offers a survey methodology for western bumble bee, among others. In lieu of or in addition to surveys, the project proponent may choose to assume presence and rely on habitat as an indicator of presence. The project proponent would avoid or minimize*				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
adverse effects on the species by implementing the following: avoiding impactful treatment activities in suitable habitat during sensitive periods (see CDFW 2023 for sensitive periods), protecting potential nests/burrows for bumble bees with a no work buffer, and avoiding or minimizing impacts to their foraging habitat. Additionally, herbicide use restrictions have been incorporated into the project design, such as: following manufacturer's directions, applying pesticide as directly and locally as possible to target species, and applying in a way that reduces spray drift. Within suitable bumble bee habitat, additional precautions will be taken to utilize the least the least toxic option for bumble bees, to follow guidance for reducing bee poisoning, and using the lowest effective application rate for the target species based on bee precaution pesticide rating (e.g., UC IPM) or more updated scientifically-based rating. When feasible, herbicide application within suitable habitat will occur during inactive bumble bee periods (e.g., overwintering; at dusk or night).				
MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory) The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: • Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the bighorn sheep recovery plan (USFWS 2007). • Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).	Initial Treatment: N Treatment Maintenance: N	N/A	N/A	N/A
MM BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: • Reference Appendix 2, Table A2 of California vegetation (Sawyer, Keeler-Wolf, and Evens 2009 or current version, including updated natural communities data online) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined.	Initial Treatment: Y Treatment Maintenance: Y	Before and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
• Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type (as described in Van Wagtendonk et al. 2018 and Sawyer, Keeler-Wolf, and Evens 2009 or current version, including updated natural communities data online). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. • To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). • To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). • Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes (as described in Van Wagtendonk et al. 2018 and Sawyer, Keeler-Wolf, and Evens 2009 or current version, including updated natural communities data online). • Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g., non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this MM will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including but not limited to protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then MM BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.				
MM BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands	Initial Treatment: N	N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY

If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under MM BIO-3a, the project proponent will implement the following actions:
• Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by:
  ○ Restoring sensitive natural community or oak woodland functions and acreage within the treatment area;
  ○ Restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or
  ○ Preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function.
• The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:
  1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.
  2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.
	Treatment Maintenance: N			

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				

MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 	
If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following:
 	
• Compensate for unavoidable losses of riparian habitat acreage and function by:
  ○ Restoring riparian habitat functions and acreage within the treatment area;
  ○ Restoring degraded riparian habitat outside of the treatment area;
  ○ Purchasing riparian habitat credits at a CDFW-approved mitigation bank; or
  ○ Preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value.
 	
• The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:
  1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.
  2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and
	Initial Treatment: N
	
	Treatment Maintenance: N
		N/A	N/A	N/A

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
MM BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: • The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. • The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). • A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. • A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. • Within this buffer, herbicide application is prohibited.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY

• Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging.
• Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that:
  ○ No special-status species are present in the wetland habitat.
  ○ The wetland habitat function would be maintained.
  ○ The prescribed burn is within the normal fire return interval for the wetland vegetation types present.
  ○ Fire containment lines and pile burning are prohibited within the buffer.
• No fire ignition (nor use of associated accelerants) will occur within the wetland buffer.				

MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: • **Retain Known Nursery Sites**. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. • **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
to stop any treatment activities that could result in potential adverse effects to special-status species. *Project Specific Measures* *<u>Nesting Birds Protected by the Migratory Bird Treaty Act</u>* *Pre-treatment surveys would be combined with a focused nesting survey during nesting season for nests within the Project site and at minimum 50-foot buffer. Adverse effects on nesting birds can be avoided by performing treatment activities between September 1 and January 31, outside of the nesting bird season (February 1 to August 31). A qualified RPF, biologist, or qualified designee with familiarity and knowledge of the identification, life history, and ecological requirements of avian species covered under the MBTA would conduct pre-activity surveys prior to work in priority work areas. Nesting bird surveys will occur no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey areas will be determined by the qualified RPF, biologist, or qualified designee depending on the Project site, type of activity proposed, and suitable habitat for nesting birds. Surveys will be conducted during periods of high bird activity (i.e., 1-3 hours after sunrise and 1-3 hours before sunset). If the qualified RPF, biologist, or qualified designee determines that visibility is significantly obstructed due to on-site conditions (e.g., access issues, rain, fog, smoke, or sound disturbance [including high wind]), surveys will be deferred until conditions are suitable for nest detection. Should the biologist encounter an active nest of a migratory bird species (e.g., eggs, nestlings, parental attendance, etc.), the biologist will establish a species-appropriate avoidance buffer (SPR AD-2) until the nest is completely fledged or inactive. Crew members and contractors would be trained to identify and avoid raptor nests, and if encountered, a biological monitor will be present on-site to provide guidance as needed. Within the nest buffer, the project proponent would avoid disturbance to the nest by deferring treatment activity within the buffer until the nests are no longer active as determined by a qualified biologist, or by modifying treatment activities to avoid disturbance to the nests under the advisory of a qualified RPF or biologist. If no active bird nests are observed during focused nesting bird surveys, then no additional mitigation would be required.*				
Greenhouse Gas Emissions				

MITIGATION MEASURES	APPLICABLE? (Y/N)	TIMING	IMPLEMENTING ENTITY	VERIFYING/ MONITORING ENTITY
MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in NWCG (2020): • Reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; • Reduce the total area burned through mosaic burning; • Burn when fuels have a higher fuel moisture content; • Reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and • Schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity.The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during	RCD	RCD
Hazardous Materials, Public Health, and Safety				

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

Attachment B

Biological Resources Report

Held on file at San Mateo Resource Conservation District

Attachment C

Cultural Resources Report (Confidential)

Held on file at San Mateo Resource Conservation District

Attachment D

Statement of Overriding Considerations

INTRODUCTION

The **San Mateo Resource Conservation District**, referred to herein as "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the **La Honda Fuel Break Project**, referred to herein as "vegetation treatment project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Section 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Section 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

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

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

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

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

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

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

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

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

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

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

BACKGROUND AND PROJECT DESCRIPTION

1.0 INTRODUCTION

1.1 Overview of the Proposed Project

The San Mateo Resource Conservation District (RCD) is proposing the La Honda Fuel Break Project (Project) in the south coast region of San Mateo County (Figures 1 and 2). The local Community Wildfire Protection Plan (CWPP) has identified the Project as a high priority for fire prevention work. This strategic fuel break surrounding the La Honda community was designed in collaboration with San Mateo-Santa Cruz California Department of Forestry and Fire Protection (CAL FIRE) and the San Mateo RCD to support fire prevention and suppression. Treatment would occur on up to approximately 661 acres throughout the duration of Project implementation; however, roughly 250 acres are prioritized for treatment during the first 3 years. In the event of a wildfire, the implemented Project would provide safe access for fire engines and firefighting personnel, support the creation of fire lines, and potentially slow the spread of fire and lower its intensity.

Recent fires, including the CZU Lightning Complex, have demonstrated that fuel breaks can be critical in providing access for firefighters into less developed areas without roads, and have been vital in creating fire lines for low-intensity fires to help stop wildfire spread. Project implementation would not stop fire spreading during periods of strong, warm, downslope winds with low relative humidity (i.e., Foehn winds) when pieces of burning material can be blown across fuel breaks. However, the Project would provide points from which firefighting resources can “anchor” to conduct suppression activities, and it would increase the construction rate of fire lines while simultaneously reducing the amount of air-delivered fire retardant required to coat vegetation effectively. Slowing the spread of wildfire would provide additional time for an effective community evacuation.

Uncontrolled wildfire is associated with environmental degradation impacts such as increased greenhouse gas (GHG) emissions and habitat loss. This Project would reduce dangerous wildfire fuels in a deliberate manner designed to minimize environmental impacts. Strategic fuel removal would focus on areas of high fuel concentrations and would disrupt the horizontal and vertical continuity of fuel beds. Fuel treatments would aim to mimic conditions that existed prior to colonization, where fires would have occurred more frequently. Biological diversity in the area would be maintained by promoting conditions that favor native plant and animal species. Forest health would be improved through enhancing native, fire-resilient plant communities, primarily through ladder fuel and weed removal, opening space for native plants to return. Healthy mature trees and scrub dominating the canopy would be thinned out and retained, reducing new brush and understory growth while preserving the carbon sequestration function. Biomass would be strategically diminished in open grassy areas.

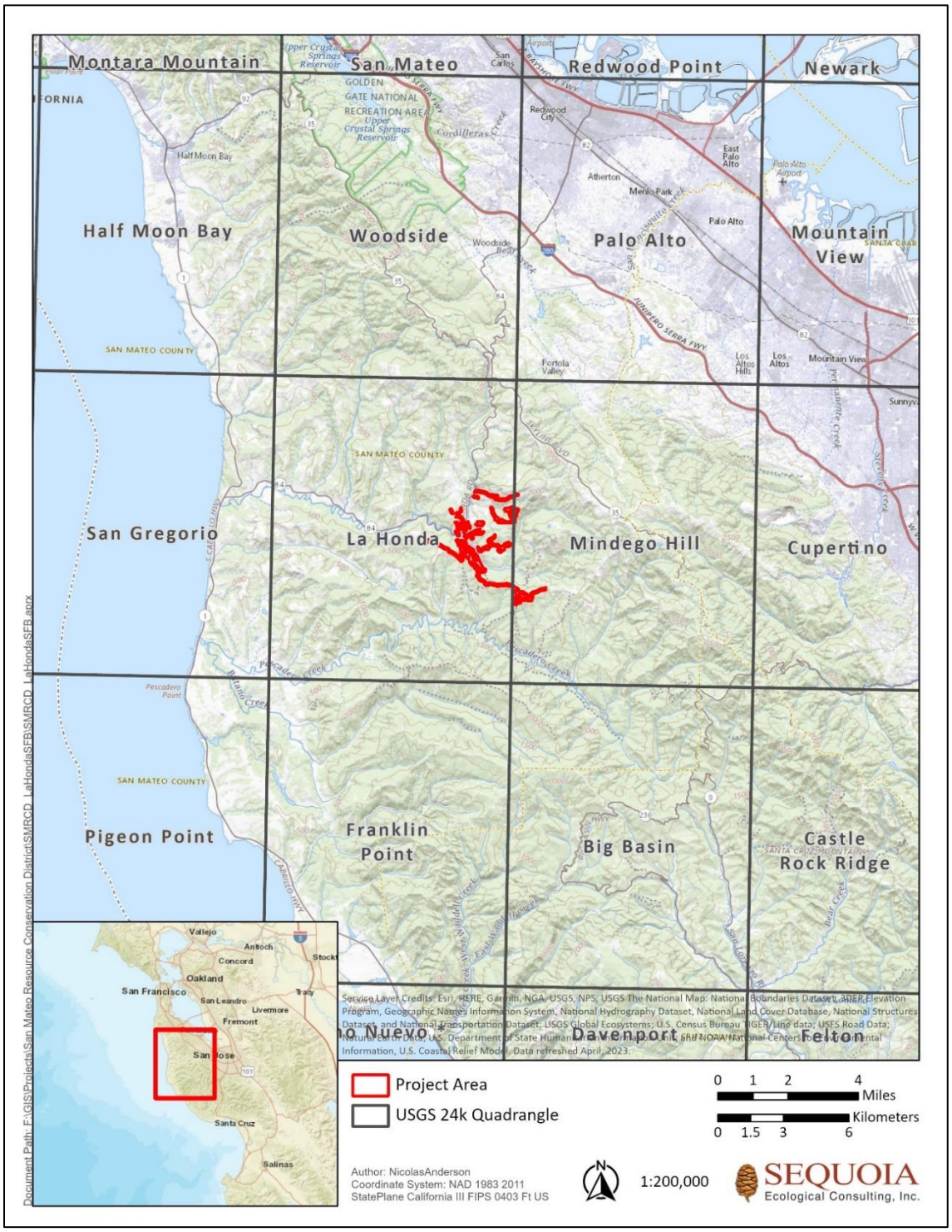

Figure 1. Regional Setting of La Honda Fuel Break Project Site.

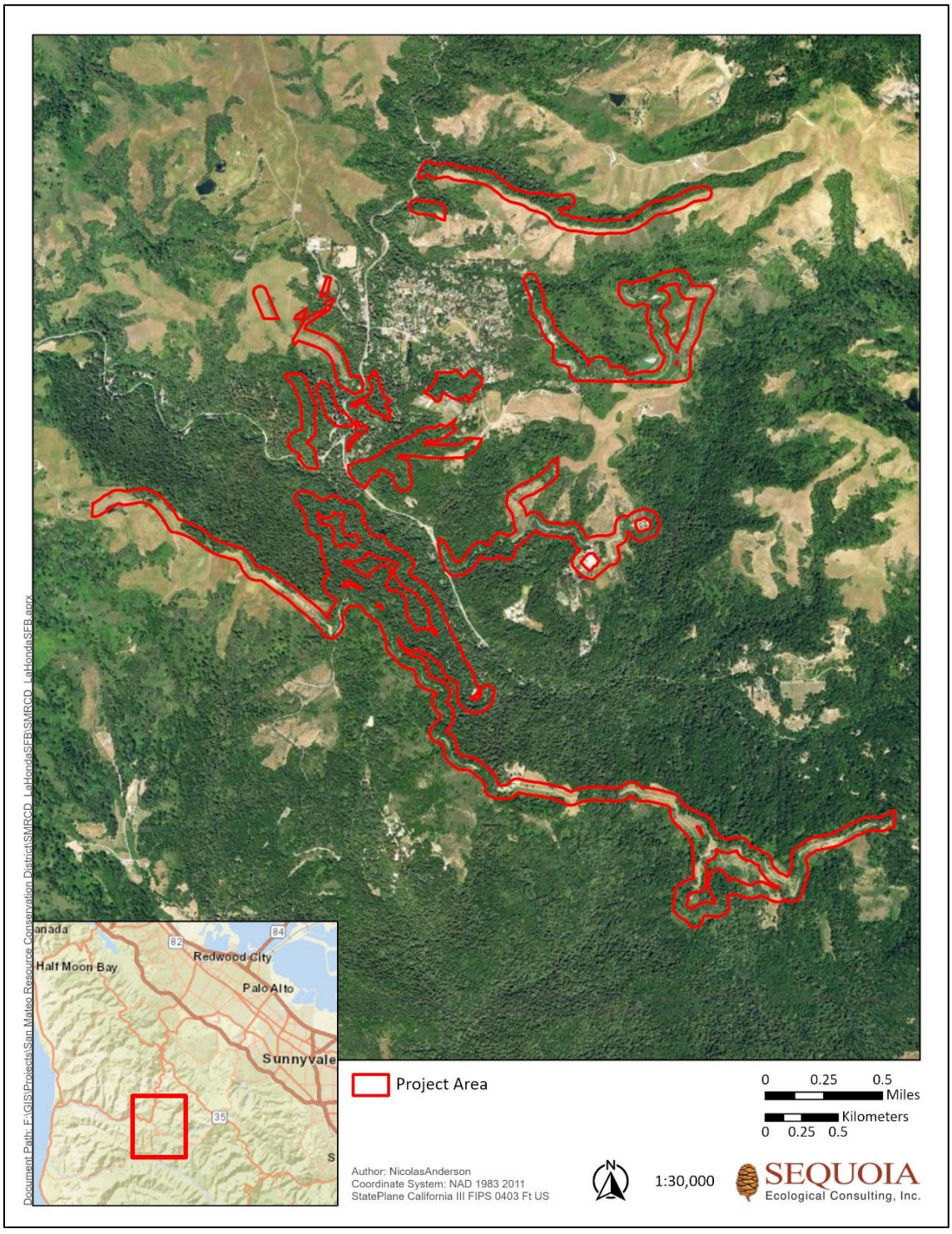

Figure 2. Project Location of La Honda Fuel Break Project Site.

The Project would be implemented on public and private lands surrounding the community of La Honda. La Honda is an underserved community of approximately 979 residents located in the high fire risk south coast region of San Mateo County. There are approximately 600 homes and structures within the community and surrounding areas, including 250 homes in the largest residential community in the area, known as the Cuesta La Honda Guild (CLHG).

The outlying area comprises recreational lands, community services, and other rural community assets, ranches, and businesses. To the east, CLHG manages 450 acres of open space, which includes multiple water system assets with an emergency tank system, a critical asset for CLHG and adjacent communities. Log Cabin Ranch (a juvenile detention facility owned by the City and County of San Francisco), Peninsula Humane Society facilities, and YMCA Camp Jones Gulch are located along the perimeter of the residential community. North and south of the residential area, there are two large wineries. To the west is the La Honda Open Space Preserve (LHOSP), which is part of the Midpeninsula Regional Open Space District (MROSD). LHOSP is a 6,142-acre property of historical value with more than 10,000 visitors per year. Through the Wildland Fire Resiliency Program Environmental Impact Report (EIR), MROSD has permitted 60,000 acres of fire fuels treatments adjacent to the proposed Project. To the south, San Mateo County Parks owns and manages Sam MacDonald Park. The park is 850 acres and averages 66,500 visitors per year. Adjacent to Sam McDonald Park, Alpine Ranch is owned and managed by the Peninsula Open Space Trust. The Project footprint also intersects with both California Department of Transportation and San Mateo County rights-of-way.

The Project treatments proposed in the Project-Specific Analysis (PSA) would reduce dangerous wildfire fuels in a deliberate manner designed to minimize environmental impacts to wildlife and protected plants consistent with the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR; Ascent Environmental 2019). For the entire state, the CalVTP PEIR identified 20.3 million acres within the 31-million-acre State Responsibility Area (SRA) that may be appropriate for vegetation treatments as part of the CalVTP. The PEIR calls this the “treatable landscape” or “treatable areas.” CalVTP recognizes that the treatable landscape represents areas suitable for CalVTP vegetation treatments, but projects will not necessarily occur in every location within the treatable landscape. The location and geographic extent of projects will be determined based on several factors, including environmental constraints and treatment objectives, which are analyzed for the proposed project within the PSA. Of the approximate 660-acre Project footprint, approximately 96 percent is located within the CalVTP treatable landscape (Figure 3). Approximately 4 percent of the Project footprint occurs outside of the treatable landscape, and a PSA and an Addendum to the CalVTP PEIR were prepared to provide CEQA compliance for the proposed vegetation treatments within and outside of the treatable landscape.

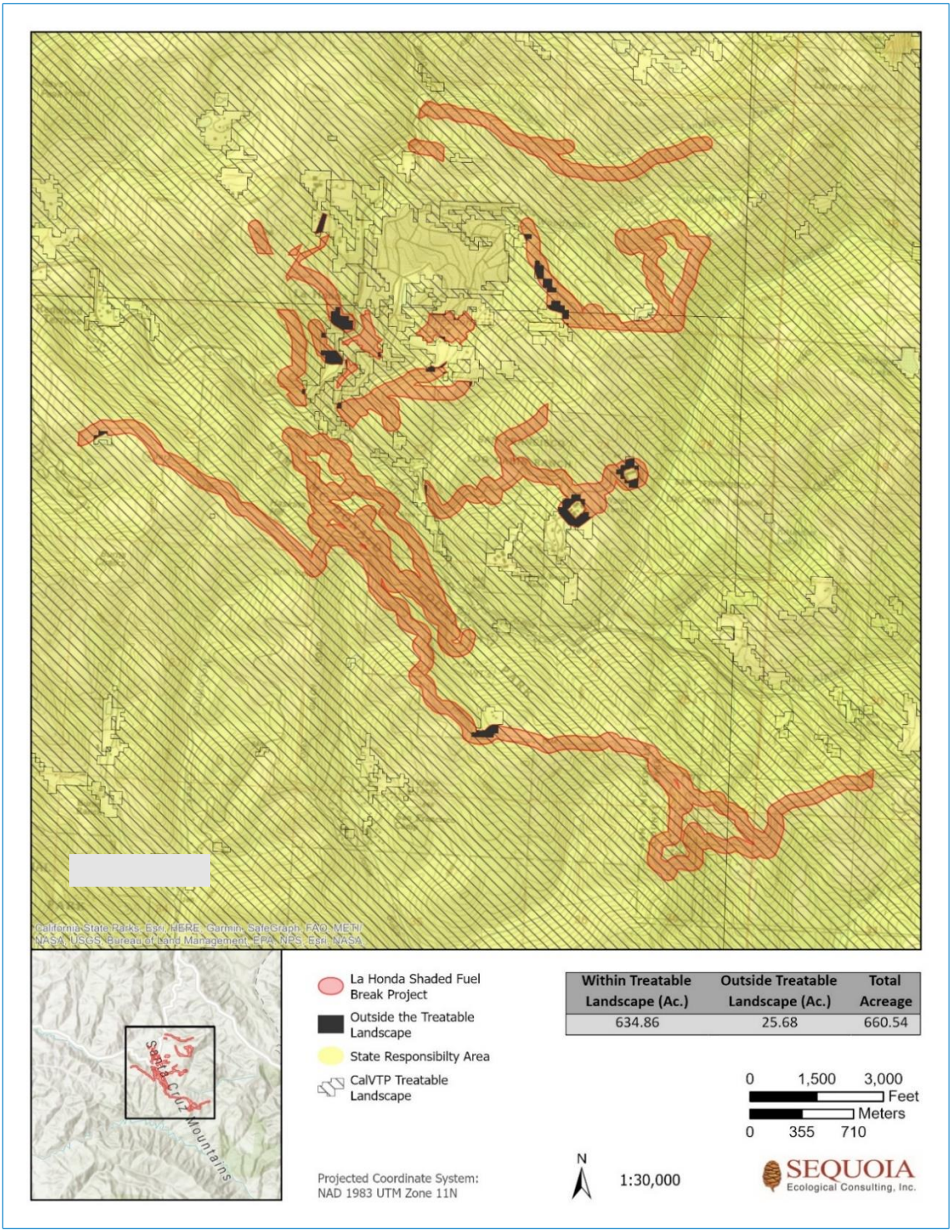

Figure 3. Acreage Inside and Outside of CalVTP's Defined Treatable Landscape

1.2 California Environmental Quality Act

The CalVTP PEIR evaluated the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire within the CAL FIRE's SRA. Serving as the lead agency under CEQA, the RCD is proposing vegetation treatments across 661 acres of land within San Mateo County. The proposed treatment types include fuel breaks and fuel reduction at the wildland-urban interface (WUI). The treatment activities and methods include manual vegetation management, mechanical treatment, prescribed herbivory treatment, herbicide application, and prescribed burning.

The RCD has evaluated the proposed treatments for CEQA compliance as later activities covered by the CalVTP PEIR using the PSA checklist herein. These treatment types and treatment activities are consistent with those covered in the CalVTP PEIR. Ongoing maintenance of the proposed vegetation treatments would involve the same activities as the original treatments (i.e., manual, mechanical, prescribed herbivory, herbicide, and prescribed burning treatments).

1.3 Purpose of the Project-Specific Analysis and Addendum

A PSA was used to evaluate whether the proposed project is within the scope of the CalVTP PEIR. As described above, the treatment types and treatment activities are consistent with the CalVTP, which identifies the portion of the SRA that may be appropriate for vegetation treatments as "the treatable landscape." One criterion for determining whether a 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). Within the Project area, approximately 636 acres are within the treatable landscape and 25 acres are outside of the treatable landscape (Figure 3).

The PSA checklist (see Section 4 of the PSA) includes the criteria to support an addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment Project, including the "changed condition" of additional geographic area, would result in significant impacts that would be more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR. The Project-specific mitigation monitoring and reporting program (MMRP), which includes the CalVTP standard project requirements (SPRs) and mitigation measures (MMs) applicable to the proposed project, is presented in Attachment A. The SPRs and MMs have been tailored to the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In all cases, the additional Project-specific implementation instructions and clarifying edits to MMs maintain the SPRs and MMs as equivalent or more effective than those presented in the PEIR. Where applicable, the SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation of the proposed project.

The PSA also serves as an addendum to the CalVTP PEIR for the inclusion of the additional 25 acres outside of the treatable landscape. An addendum to an EIR is appropriate when a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts. In this case, there are no changed circumstances.

2.0 PROJECT DESCRIPTION

The San Mateo RCD has proposed this Project to create and maintain up to 661-acres of reduced hazardous fuel zone. The Project footprint and surrounding area have a wildfire hazard risk which is considered "high" to "very high" (CAL FIRE 2007). Multiple factors contribute to wildfire hazard risk, including widespread invasive, noxious, fire-hazardous vegetation; decades of accumulation of dead vegetation; over a century of fire suppression; and the increased risk of anthropogenic ignition associated with dense urban development (CAL FIRE 2022). The proposed project would reduce and maintain reduced fuel loads to more natural levels. The Project would reduce excess and ladder fuels within the fuel break. The Project follows a route throughout the landscape that supports a strategic approach to wildfires specific to the local topography and fuel load (Figure 2). The Project footprint is mostly characterized by valleys and a few ridges, and is characterized by annual grasslands, coastal oak woodland, coastal scrub, montane hardwood-conifer, chamise-redshank chaparral, urban, lacustrine, and redwood forest. Slopes range between 5 and 100 percent grade, often with an exposed lithic layer within grasslands and a deep layer of leaf duff under the canopy.

Treatment types and activities will be contingent upon existing site conditions, accessibility, and fuels management needs to achieve the fuel break. This Project proposes two treatment types consistent with the CalVTP: fuel breaks and WUI fuel reduction. The Project's proposed activities would be consistent with CalVTP-described treatment activities: manual treatment, mechanical treatment, prescribed burning (broadcast and pile), prescribed herbivory, and herbicide (spot treatment). While 96 percent of the Project footprint includes land mapped as treatable landscape by the CalVTP, 4 percent is not considered to be within treatable landscape. Treatment types and treatment activities explained in this Project Description would be consistent throughout the Project footprint regardless of whether it has been mapped as treatable landscape.

2.1 Treatment Types

The proposed project would use two treatment types in combination to create a linear break for firefighting resources to contain or stop a fire: WUI fuel reduction and fuel break. Strategic placement of the WUI fuel break would be based upon the prevailing vegetation types, topographic characteristics, environmental considerations, and surrounding land uses. Work would be completed with minimal

disturbance to the ground and remaining vegetation. Treatment activities by fuel type are described in more detail in Section 2.3.

2.1.1 Wildland-Urban Interface Fuel Reduction

WUI fuel reduction involves strategic removal of vegetation to prevent or slow the spread of non-wind-driven wildfire between structures and wildlands. In areas where wildland and manufactured structures overlap, higher intensity fuel reduction typical of defensible space would occur within 100 to 150 feet of manufactured structures, as determined by fire professionals, and based on site conditions. Beyond 100 to 150 feet from manufactured structures, vegetation treatments would be implemented with lower intensity. Fuel reduction would focus primarily on the removal of invasive plants, noxious weeds, fire hazardous vegetation, and dead and dying vegetation, as well as limbing up of trees.

2.1.2 Fuel Breaks

Fuel breaks give firefighters access to control wildfires and are useful in slowing fires before they grow beyond initial attack capabilities. Fuel breaks permit responders to reach the leading edges of a fire and to protect isolated communities, and they can stop or reduce the lateral spread of fires. In heavily wooded areas, a shaded fuel break would be implemented; the retained canopy shade would slow future growth of many grass and brush species and assist in future maintenance efforts. Development and maintenance of a fuel reduction zone within a 100-foot-wide fuel break would extend around community structures located adjacent to undeveloped open spaces. Portions of the fuel break would extend up to a width of 300 feet based on topography, site conditions, and land management constraints.

2.2 Treatment Activities

Treatment activities to achieve Project objectives would be applied singularly or in combination, depending on site conditions and site-specific goals of each treatment type. The Project's proposed treatment activities are consistent with CalVTP PEIR (Ascent Environmental 2019) and will include the following:

- **Prescribed Burning**: Includes broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire adapted plant communities conducted under specific conditions related to fuels, weather, and other variables) and pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment).
- **Mechanical Treatment:** Use of motorized equipment on stable operating surfaces to cut, uproot, crush/compact, or chop existing vegetation.
- **Manual Treatment**: Use of hand tools and hand operated power tools to cut, clear, or prune herbaceous or woody species.

- **Prescribed Herbivory**: Use of domestic livestock to reduce a target plant population, thereby reducing fire fuels or competition of desired plant species.
- **Herbicides**: Chemical application designed to inhibit growth of target plant species.

2.2.1 Prescribed Burning (Broadcast)

Prescribed understory fires would mimic periodic low intensity wildfires historically prevalent in the region and would create similar structural and habitat conditions that benefit many plant and wildlife species. Gradual reintroduction of fire presents an opportunity to improve forest health, reduce critical fuel loading, improve emergency access, and regenerate a healthy ecosystem. Prescribed low intensity surface fires (broadcast burning) would be used to control vegetation and manage fuel loads. Prescribed burning would reduce the volume of grass and thatch while removing encroaching brush and trees that are overtaking the grassland. Burning would be timed to control invasive non-native grasses where present. Prescribed burning would remain within a predetermined area and would occur only with specific fuels and in safe weather conditions. Perimeter fire lines would include existing roads and natural features where possible to maintain aesthetic values. Prescribed burns would be used for maintenance of treatments, and they would occur every five (5) years, or as appropriate.

Active burns would follow environmental safety guidelines, including burning only under consideration of specific weather conditions (e.g., appropriate humidity, wind direction, etc.) and coordinating with resource agencies such as the California Air Resources Board (CARB) and the Bay Area Air Quality Management District (BAAQMD). Specifically, active burns would include the preparation and implementation of a burn plan and a smoke management plan (SMP). The RCD would report site conditions and request approval to burn through the Prescribed Fire Information Reporting System (PFIRS), which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California. A prescribed burn SMP must be submitted to BAAQMD at least 30 days prior to burning. Additionally, the SMP must be approved by the air district prior to burning.

Prescribed burns would typically be ignited using various ignition devices, including, but not limited to, drip torches, fuzees, helitorches, and vary pistols. Prescribed burns are typically completed in a single day, but under certain circumstances they could be maintained for up to 1 week. On average, up to 45 workers are present on-site for a prescribed burn. Heavy equipment would be operated from an existing road or stable operating surfaces with less than 50 percent slope.

2.2.2 Mechanical Treatment

Mechanical treatments would include mowing, chipping and broadcasting target vegetation above ground surface, with particular care to minimize ground disturbance. A variety of equipment including but not limited to mowers, masticators, and track chippers, would be used as appropriate. Broadcast

burning would use bulldozers to install control lines pre-emptively and in case of an emergency. Mechanical treatment activities would occur on slopes below 40 percent grade, along ridges, and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or other stable operating surfaces. No mechanical treatment would occur on slopes above 50 percent grade unless the above conditions are met.

Mechanical treatments would be limited to cutting or chopping above-ground vegetation with the intent of keeping masticating heads out of duff layers and minimizing direct disturbance to subsurface soil layers, allowing intact root systems to resprout. Mechanical activities would cut, crush/compact, or chop standing and downed vegetation using masticators and other methods. Small-diameter trees (6 inches or less diameter at breast height [DBH]), downed woody debris, and woody shrubs would be strategically masticated to increase tree spacing and reduce fire fuel loads. Native understory vegetation, brush, and shrubs under the drip lines of trees would be cut and masticated leaving root systems intact for resprouting. Mechanical treatments would avoid state or federally jurisdictional waters and riparian habitat by a minimum of 50 feet.

During typical mechanical treatments, work would require 1 crew with up to 20 workers and equipment such as bucket trucks, skid steers, tow chippers, track chippers, and masticators with swing arm attachments. Typical mechanical treatments would require several days to several months to complete, depending on the size of the treatment area, steepness of terrain, and type and density of vegetation.

2.2.3 Manual Treatment

Ground crews would use hand tools and hand-operated power tools, including but not limited to chainsaws, hand saws, pole saws, McLeods, Pulaskis, weed pullers, brush cutters, and loppers. Manual treatments would cut, clear, and/or prune trees, herbaceous vegetation, and woody shrubs to increase space between trees. Manual treatments would be used to treat dead, dying, and diseased trees. Manual treatments may occur on slopes greater than 40 percent grade or where mechanical treatments are infeasible. Herbicides may be used in conjunction with manual treatments to prevent the spread and resprouting of invasive plant species within the treatment areas, along roads and other high-traffic areas. Manual treatment activities would avoid riparian habitat with a minimum of 50 feet and state or federally jurisdictional waters by a minimum of 50 feet from the ordinary high water mark.

Manual treatments within the Project area would require several days to several months to complete, depending on the size of the treatment area, steepness of terrain, and type and density of vegetation. Manual treatment typically clears 0.3 acre or more per day per crew. Manual treatments typically require one or two hand teams with approximately 20 to 40 crew members to be present on-site.

2.2.4 Prescribed Herbivory

Prescribed herbivory involves transporting, releasing, herding, and moving grazing animals such as cattle, sheep, goats, or horses to designated sites. Herds would be installed strategically within areas

with wildlife-safe fencing and with a professional shepherd who would coordinate animal movements to prevent excessive grazing and ground disturbance. Herds would be moved as often as every 1 to 3 days as appropriate, and one to two crews would be required on average to implement this treatment activity. Moving livestock from one grazing ground to another would occur at a frequency based on numerous site-specific factors, including slope, density and type of vegetation, stocking rate, type of livestock, and precipitation/moisture content of vegetation. Stocking rate would vary based on species of grazer (e.g., a herd of cattle would require a larger acreage than a herd of goats of the same size). Site conditions (e.g., relative density or quantity of the vegetation to be treated, etc.) would determine herd size and the grazing time to complete the job.

Prescribed herbivory would require temporary wildlife-safe fencing where natural barriers are not present, temporary water facilities and other infrastructure (e.g., corrals, fences), and would require guard animals and/or a shepherd to be present on-site. Any identified sensitive areas would be clearly marked on Project maps, and protection measures would be communicated to the herder and project manager, including a pre-vegetation removal field visit, as appropriate.

To prevent the undesirable introduction of invasive or noxious plant species to the site, consideration would be given to where animals come from and whether viable seeds of undesirable species are present. As necessary, the herd would be fed a weed-free diet for 3 days prior to being introduced to the grazing site. Any supplemental feed brought on-site would be free of noxious weeds.

2.2.5 Herbicide Application

Herbicides would be used strategically to supplement other treatment methods to prevent the spread and resprouting of invasive species within the treatment areas and along roads. Effective herbicides identified by the California Invasive Plant Council (Cal-IPC) and U.S. Department of Agriculture that are consistent with those described in CalVTP PEIR would be applied. On-the-ground application methods would include painting cut stems or stumps and using backpack sprayers or hand applicators to target specific invasive plants; no aerial spraying, broadcast spraying, or spraying from trucks would occur. No herbicide treatment would occur within 50 feet of aquatic habitat.

Herbicide application would comply with the U.S. Environmental Protection Agency (EPA) label directions and both California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation label standards. All herbicide application would be performed or supervised by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations. Herbicide application would not take place within 24 hours of a rain event.

2.2.6 Biomass Disposal

The goal of biomass disposal is to reduce ignitable material and associated air quality impacts from wildfire, reduce brood material for harmful insects and disease, and enhance aesthetics. By reducing the

available fuel in the fuel break, the fuel continuity is disrupted which slows down the spread of wildfires and decreases potential fire intensity.

Methods for managing biomass include natural decomposition (e.g., chip and broadcast, lop and scatter), hauling off-site, and pile burning. Downed woody debris may be masticated where it creates a fire hazard. Whenever feasible, natural decomposition of biomass would be preferred because: (1) forestry mulch aids in mitigating erosion and excessive soil disturbance; (2) keeping material on-site prevents the spread of disease and pathogens to other sites, with sudden oak death (SOD; *Phytophthora ramorum*) being of particular concern in our region; and (3) greenhouse gas emissions are reduced by avoiding the transportation of material off-site. For all these reasons, the most climate-friendly option is to leave woody biomass on-site to decompose naturally. To mitigate brood stratum opportunities for beetles, downed pine logs will be mitigated in accordance with California Forest Practice Rules (CAL FIRE 2023) and best management practices.

Natural Decomposition

Cut vegetation may be retained on-site to decompose naturally via "chipping and broadcasting" and "lopping and scattering" across the landscape. Residual matter would be spread uniformly and would not exceed a depth of approximately 6 inches, with an average of approximately 3 inches.

Slash (i.e., fine and coarse woody debris) from cut trees or pre-existing would be chipped and broadcast across the landscape. Off-road trails may be mulched if compatible with landowner's objectives. Slash too large for the chipper (e.g., greater than 4 inches diameter) would be removed from the fuel break whenever possible and disposed of off-site or pile burned. Where log removal is not possible, and equipment can access slopes less than 40 percent grade, masticators and/or chippers would be utilized to mulch target vegetation.

Lopping and scattering biomass would be used in areas where slopes exceed 50 percent grade and where mastication and pile burning would not be feasible. Any slash material from cut trees or pre-existing debris would be lopped to an appropriate length based on best management practices and distributed uniformly. Poison oak would be lopped and left in place; poison oak would not be pile-burned or mulched.

Cut vegetation and chips would not be placed below the Ordinary High-Water Mark of aquatic features, within wetlands, or within riparian areas. Slash treatment should adhere to the standards of the California Forest Practice Rules for the Southern Subdistrict of the Coast District 14 CCR 917.4 (California Board of Forestry and Fire Protection N.D.):

> (a) To provide more efficient firebreaks the areas within fifty (50) feet of the edge of all Public Roads shall be kept free of Slash. Slash between fifty (50) feet and one hundred (100) feet of the edge of said roads and Slash between one hundred to two hundred (100-200) feet of all Approved and Legally Permitted Habitable Structures shall be treated by piling and burning,

chipping, removal, or lopping to within twelve (12) inches above the ground not later than April 1 of the year following its creation.

(b) All Slash and Woody Debris greater than one (1) inch but less than eight (8) inches in Diameter within one hundred (100) feet of Approved and Legally Permitted Habitable Structures shall be removed or piled and burned.

Hauling Off-Site

Biomass too large for the chipper (e.g., greater than 4 inches diameter) would be removed from the fuel break whenever feasible and disposed at a facility, pile burned, or donated to local agricultural producers for use as compost or other agricultural uses. Transported invasive plant materials would be stored in a sealed container to prevent spreading during transport.

Pile Burning

Where materials cannot be chipped and scattered, hand-cut material between 1 inch and 10 inches in diameter would be piled as "feeder piles," with the cut stems facing in one direction in a manner to minimize any overstory scorch when the piles are restacked and burned. Most of the piles would be built in open areas. Suitable areas for pile burning are open areas away from tree canopies and power lines. Sites suitable for pile burning would depend on location of sensitive species habitat and safety guidelines (e.g., humidity, wind direction, etc.). General operations for pile burning will follow these guidelines:

- Multiple piles would be burned on a single day.
- Pile size would not exceed 20 feet in diameter by 20 feet high.
- Piles would not be placed atop roads, trails, logs, stumps, or watercourses.
- Piles would be kept sufficiently dry to allow for ignition when surrounding fuels are saturated when fire danger is low.

Pile burning would be conducted in compliance with the local authority having jurisdiction or a Fuel Reduction Burn Permit or LE-5 issued by the local CAL FIRE Battalion Chief. Burns would be coordinated with appropriate resource agencies (e.g., CARB) and would follow a burn plan that includes a smoke management plan. The RCD would report site conditions and request approval to burn through PFIRS, which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California.

2.3 Treatment Prescriptions by Fuel Type

Traditional fuel reduction methods adopt treatment activities that are typically determined by fuel type and will be categorized as tree, shrub, and grass fuel types. Vegetation types within the Project footprint have been classified by California Wildlife Habitat Relationship System (CDFW 2021) as a mosaic of

conifer, hardwood, shrub, and herbaceous vegetation and includes developed areas and open water (Mayer and Laudenslayer, eds. 1988). Treatment strategies combine multiple treatment activities within each fuel type. All treatment activities would be employed within each fuel type to achieve and maintain the fuel break.

The overarching treatment approach will follow these basic guidelines:

- Class I and II watercourses would be protected by a 50-foot mechanical treatment exclusion zone year-round.
- Biomass disposal methods would avoid watercourses, including cut and chipped vegetation and pile burning.
- Prioritize removal of invasive plants and dead woody material while before removing live native vegetation.
- Hazardous trees (e.g., dead or dying trees) identified by a qualified professional would be removed.
- Equipment used for mechanical treatment would avoid operating on slopes greater than 50 percent grade.
- No cleared timber or other forest products would be removed for commercial purposes.
- All treatment activities and biomass distribution would avoid riparian habitat by a standard minimum buffer of 50 feet. Buffer size would increase if qualified biologist or registered professional forester recommends this based on factors such as slope, existing erosion, sensitivity of the vegetative habitat, or presence of sensitive resources.

2.3.1 Grassland Fuel Type Prescription

Grass fuel type would include habitat classified by as annual grassland by the California Wildlife Habitat Relationship (CWHR). Within grassland fuel type, treatment activities would cut grasses and herbaceous plants to a height of approximately 6 inches, achieve horizontal spacing, and reduce overall fuel loading.

Dead, dying branches would be selectively pruned from native shrubs interspersed within grassland. Small, isolated trees (6 inches or smaller DBH) growing in the grassland would be cut flat to 6 inches maximum and piled for burning. Larger trees encroaching on or distributed sparsely throughout grasslands would be limbed up to reduce vertical fuel continuity or cut flat to 6 inches maximum and piled for burning. Trees, as identified by a qualified professional, would be strategically removed to maintain canopy cover and avoid habitat conversion. Cut vegetation would be left to naturally decompose, pile burned, or hauled off-site.

2.3.2 Shrub Fuel Type Prescription

Shrub fuel type would include habitat classified by CWHR as chamise-redshank chaparral and coastal scrub. Treatment activities would reduce the amount and continuity of vegetation and achieve horizontal spacing. The general approach to shrub fuel type retains shrub habitat through selective removal of invasive species and dead, woody vegetation and limbs, and removal of entire shrubs as identified as a qualified professional. Shrubs will be selectively removed or thinned until spacing between individual shrubs or shrub islands is more than double the height of the canopy (e.g., a 12-foot gap between shrubs would be created to maintain a canopy 6 feet high). Shrub removal and thinning would be accomplished primarily with manual treatments and mechanical treatments. Where cutting and masticating vegetation in shrub-dominated areas, root systems for desired plants would be left intact to permit resprouting. Shrub islands would be retained in a natural mosaic ideally at 50 percent but at a minimum of 35 percent. The results of shrub vegetation treatment would not convert the existing habitat type to a different habitat type.

2.3.3 Tree Fuel Type Prescription

Tree fuel types would include habitat classified by CWHR as redwood, montane-hardwood conifer, and coastal oak woodland. The general approach to tree fuel types would be designed to prevent fire from approaching or departing the fuel break, prevent fire from laddering into the tree canopy, and would promote the establishment of native trees. Selective thinning would result in a shaded fuel break that retains the tree canopy. This would be achieved through the removal of select trees, branches, shrubs, and both living and dead vegetation that could facilitate the upward spread of fire from surface fuels to the forest canopy. The shade of the retained canopy would reduce the potential for rapid re-growth of understory, and the selectively treated areas would provide firefighters an opportunity to access lower intensity ground fires should they occur.

The prescription within tree fuel-dominated areas would follow these guidelines.

- Retain healthy hardwoods and conifers greater than 16 inches DBH with appropriate canopy spacing.
- Strategically retain native trees, shrubs, herbaceous plants, grasses, and downed woody debris on the forest floor while reducing fuel connectivity.
- Retain small stands of untreated oak trees with a cluster diameter of approximately 50 feet, and approximately 75 to 100 feet apart depending on site conditions and fire risk.
- Strategically remove and thin understory trees, dead and dying trees to achieve separation between the ground and the tree canopy.
- Dead, dying, and diseased trees would be prioritized for removal over those with potential to contribute to the natural forest process would be retained.

- Healthy trees less than 16 inches DBH would be removed to achieve spacing 10 to 20 feet apart, as feasible, prioritizing those that do not contribute to canopy development.
- Remaining stumps would be cut flat or parallel to the ground with a smooth appearance and no frayed material visible
- For all trees, lower tree limbs would be pruned up to 15 feet, retaining 50 percent of the live crown of the tree; for trees less than 24 feet in height, the lower one-third of tree branches less than 3 inches diameter would be removed, retaining 50 percent of the live crown.

Within redwood habitat, the general approach would thin understory small trees less than 8 inches DBH and to remove sprouts with less than 20 percent live crown, snags, and accumulated debris (e.g., fallen breathe inches). The remaining redwood trees would be limbed up to fifteen feet, retaining 50 percent of the canopy. Within coastal oak woodland and montane hardwood-conifer, the general approach would remove snags, thin brush species away from tree crowns retaining approximately 10 percent, and thin out small trees less than 8 inches DBH to a maximum of one stem per 20 feet.

Most ground vegetation would be removed to break up the horizontal and vertical continuity of flammable vegetation. Shrubs in the understory would be selectively removed or pruned to remove all branches (living or dead) less than 3 inches in diameter and less than 8 feet from the ground or three times the height of any understory shrub, whichever is greater. Understory vegetation outside of the dripline of retained trees will be cut, retaining intact root systems for resprouting. Where feasible, non-native understory vegetation would be removed by manual or mechanical methods and treated with herbicides as appropriate. The understory would be cut to achieve horizontal crown separation 50 to 100 feet between stands or individual plants, with approximately 10 percent retention per acre, for aesthetic and wildlife value.

2.3.4 Timing of Initial Treatment and Duration

Project implementation of initial treatments is expected to start in spring 2024 and to be completed by the end of 2025, which accommodates potential extended seasonal delays or unexpected disruptions. Seasonal delays could include an extended or extreme fire season, requiring redirection of resources to other projects, or an extended winter with wet soil conditions that temporarily halt large equipment use. Manual treatment activities would be permitted during saturated soil conditions.

2.3.5 Workers

The RCD, CAL FIRE crews, and/or subcontractors, and private landowners would conduct all treatment activities. Crew sizes would vary and would typically be fewer than 25 workers per site, per day. Multiple crews would work at the same time.

2.3.6 Site Access and Conditions

Treatment areas would be accessed via existing fire roads and trails. No new roads would be created. Private properties would be used as access points contingent on the landowner's consent. Vehicles and equipment would be staged at the contractor's yard daily or on-site with landowner consent. Throughout the course of project implementation, the RCD would maintain road integrity, including maintaining drainage features. Garbage and construction debris would be regularly removed from the work site.

2.3.7 Daily Treatment Schedule and Noise

All treatments except herbivory would occur primarily on weekdays between 7:00 am and 6:00 pm, and during daylight hours only. If implementation of non-herbivory treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. During prescribed burning, crews would need to conduct some maintenance burning on weekends to manage overall smoke impacts. Noise-generating treatments would comply with the local noise regulations. The Project will comply with San Mateo County Noise Ordinance, Ordinance No. 4.88.360 e).

2.4 Pests, Diseases, and Invasive Species

Without proper prevention, Project treatments have the potential to spread pathogens, diseases, pests, or invasive species. Invasive plants can be spread when crews and equipment travel between sites, transporting soil and mud contaminated with seeds. The goal of reducing invasive plant species within the Project area is in conformity with the overall Project goals of fuels reduction and wildfire prevention. Regularly updated, scientifically-established guidance for invasive plant control and treatments is located on the California Invasive Plant Council (Cal-IPC) website, (Cal-IPC 2020). Within the Project area, eight (8) invasive plant species and two (2) diseases were identified as occurring or having high potential to occur in the region and have potential to spread in the Project area from one work area to another, or from the Project area to off-site areas. If any additional pests, diseases, or invasive species are identified throughout the course of the Project, they will be treated according to the Cal-IPC or other scientifically available guidance. These species include:

- black acacia (*Acacia melanoxylon*)
- poison-hemlock (*Conium maculatum*)
- jubatagrass (*Cortaderia jubata*)
- Cape-ivy (*Delairea odorata* (=*Senecio mikaniodes*))
- panic veldtgrass (*Ehrharta erecta*)
- pitch canker (*Fusarium circunatum*)

- French broom (*Genista monspessulana*)
- English ivy (*Hedera helix*)
- English holly (*Ilex aquifolium*)
- Sudden oak death (*Phytophthora ramorum*; SOD)

2.4.1 Black Acacia

Black acacia is a coastal tree that favors disturbed areas, especially near buildings and agricultural sites. It can develop root suckers which can spread into large clonal populations.

2.4.2 Poison-Hemlock

Poison-hemlock is a biennial forb that has spread throughout California in elevations below 5,000 feet. It prefers disturbed areas and is commonly found along roadsides, fields, meadows, pastures, riparian forests, and floodplains. It spreads readily in areas that have been cleared or disturbed. Once established, it outcompetes most species and prevents native plants from establishing by providing an over-shaded environment.

2.4.3 Jubatagrass

Jubatagrass was introduced as an ornamental plant and for erosion control, and it quickly colonizes bare ground. Each seed-filled plume produces up to 100,000 seeds that are widely wind-dispersed. It establishes on bare ground, but typically does not colonize where other grasses and sedges dominate. Chemical and non-chemical control methods can be useful in removing jubatagrass (DiTomaso et al. 2013).

2.4.4 Cape-Ivy

Cape-ivy is a perennial vine that is problematic primarily in coastal riparian areas, though it may be found inland in riparian, moist forests, and oak woodlands. Vines form dense mats that kills plants growing underneath. It spreads primarily through stems, rhizomes, and stolons, and these will resprout if not completely removed.

2.4.5 Panic Veldtgrass

Panic veldtgrass prefers disturbed areas within riparian, scrub, grassland, urban areas, and turf. It spreads rapidly and outcompetes native grasses and herbaceous plants. Chemical and non-chemical control methods can be useful in removing panic veldtgrass (DiTomaso et al. 2013).

2.4.6 Pitch Canker

The fungal disease commonly referred to as pitch canker affects many pine species and can infect Monterey pine (*Pinus radiata*). Most California native pines are susceptible to pitch canker, but Monterey pine is the most widely affected host.

2.4.7 French Broom

French broom is a particularly ignitable invasive shrub known for its ability to shade out seedlings, replace native plant species, and carry fire into tree canopies. This species creates a large seed bank and readily resprouts from the root after cutting, freezing, or fire (Cal-IPC 2020).

2.4.8 English Ivy

English ivy is a perennial evergreen woody vine that grows vigorously in forests and outcompetes understory plants and can impact the health of native trees. Underground parts create runners which facilitates spreading.

2.4.9 English Holly

English holly is an evergreen shrub or small tree which has escaped and invaded moist forested areas throughout the west coast. It is slow-growing and may be controlled by removing plants before they start producing seed, between 5 and 12 years after germination.

2.4.10 Sudden Oak Death

Sudden oak death infects coastal forests throughout California and Oregon and kills susceptible species including valley oak (*Quercus lobata*), coast live oak (*Q. agrifolia*), California black oak (*Q. kelloggii*), canyon live oak (*Q. chrysolepis*), and madrone (*Arbutus menziesii*) saplings. Host species that are in the treatment area include California bay laurel (*Umbellularia californica*) and coast redwood (*Sequoia sempervirens*). To avoid the spread of this pathogen, all hand equipment and boots worn by treatment crews would be sanitized and heavy equipment hosed off prior to operations in areas where the spread of SOD is possible. The California Oak Mortality Task Force offers additional information regarding treatment and disposal measures for plants infected with SOD, which would be monitored for changes in SOD treatment recommendations (California Oak Mortality Task Force 2023).

2.5 Treatment Maintenance

Maintenance after the project will be managed by each individual landowner, with technical support and oversight from the RCD. The larger landowners (San Mateo County Parks, Midpeninsula Regional Open Space District, Peninsula Open Space Trust, and Cuesta La Honda Guild Homeowners' Association)

collectively cover about half of the Project footprint. Each will maintain the fuel break through their regular vegetation management plans. The RCD will collaborate with the smaller landowners to develop fuel break maintenance routines that align with the treatment activities of the Project. Because vegetation communities are dynamic, treatment activities would be modified to reflect changes. Maintenance treatments are anticipated to follow the same methods as initial treatments but are subject to change depending on-site response to initial treatment. At locations where intensive vegetation removal (e.g., prescribed burning) occurred, treatment maintenance may use more low intensity manual treatment activities in subsequent years.

The RCD would monitor the treated areas to maintain treatment of desired vegetation conditions. The RCD would work with the Santa Cruz CAL FIRE Unit, Cuesta La Honda Guild, and other landowners to identify areas for priority in treatment maintenance to ensure that the defensible space is maintained for maximum benefit. In tree habitat type, treatment maintenance may occur every 3 to 5 years. In shrub habitat type, treatment maintenance such as herbivory may occur every 1 to 5 years. In grass habitat types and areas where initial treatments were primarily manual, treatment maintenance may occur annually.

Throughout the treatment maintenance period, the RCD would consider the continued relevance of the PSA. Where the RCD determines that the PSA is no longer sufficiently relevant, the RCD would determine whether a new PSA or other environmental analysis is warranted. If more than 10 years pass since approval of the latest PSA update, the RCD would update the PSA. For example, the RCD would conduct a reconnaissance survey to verify that conditions are comparable to those anticipated in the PSA. Any updates would be documented.

ENVIRONMENTAL REVIEW PROCESS

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

On **January 2, 2024,** Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

- GIS data that included project location (as a point);
- Project size;
- Planned treatment types and activities; and
- Contact information for a representative of the Project Proponent.

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

- The completed PSA Environmental Checklist;
- The completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); and
- GIS data that includes a polygon(s) of the Project area, showing the extent of each treatment type included in the Project (ecological restoration, fuel break, WUI fuel reduction).

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

- GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction); and
- A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes:
  - Size of treated area (typically acres);
  - Treatment types and activities;
  - Dates of work;
  - A list of the SPRs and mitigation measures that were implemented; and
  - Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b).

RECORD OF PROCEEDINGS

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

- The certified Final PEIR for the CalVTP, including the Draft PEIR, responses to comments on the Draft PEIR, and appendices;
- All recommendations and findings adopted by the Board in connection with the CalVTP and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the Project Proponent, consultants to the Project Proponent, or responsible or trustee agencies with respect to the Project Proponent's compliance with the requirements of CEQA and with respect to the Project Proponent's action on the CalVTP;

- Matters of common knowledge to the Project Proponent, including, but not limited to, federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6, subdivision (e).

Pursuant to CEQA Guidelines Section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at **San Mateo Resource Conservation District, 80 Stone Pine Road, Suite 100, Half Moon Bay, California 94019**. The custodian of these documents is **Eddie Sanchez, Project Manager**.

MITIGATION MONITORING AND REPORTING PROGRAM

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

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the Final PEIR and the treatment project PSA, which were presented to the Board of Directors for San Mateo Resource Conservation District and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment project.

The Project Proponent concurs with the conclusions in the Final PEIR and treatment project PSA that all of the following impacts will be less than significant. Resource topics for which there are no anticipated or considered impacts are not described below.

AESTHETICS AND VISUAL RESOURCES

- Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities

- Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types

AGRICULTURAL AND FORESTRY RESOURCES

- Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use

AIR QUALITY

- Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

BIOLOGICAL RESOURCES

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

GEOLOGY, SOILS, AND MINERAL RESOURCES

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

GREENHOUSE GAS EMISSIONS

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

ENERGY RESOURCES

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

HAZARDOUS MATERIALS, PUBLIC HEALTH, AND SAFETY

- Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials
- Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides
- Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites

HYDROLOGY AND WATER QUALITY

- Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning
- Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities
- Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory
- Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides
- Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

LAND USE AND PLANNING, POPULATION, AND HOUSING

- Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation
- Impact LU-2: Induce Substantial Unplanned Population Growth

NOISE

- Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation
- Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated Single Event [Impulsive] Noise Level (SENLs) During Treatment Activities

RECREATION

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

TRANSPORTATION

- Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures
- Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses

PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

- Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs
- Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity
- Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

WILDFIRE

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

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

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

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

measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

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

FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

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

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

BIOLOGICAL RESOURCES

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

☒ Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA

☒ Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA

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

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

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

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

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

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

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

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

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

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

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

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

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

☒ Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP PEIR determined that some impacts of the program would be significant and unavoidable, even after implementation of all feasible mitigation. The Project Proponent finds that the treatment project would contribute to or cause the following significant and unavoidable impacts as indicated. Incorporating and implementing the following mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted. The Project Proponent

therefore finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR and PSA.

The Project Proponent finds that fully mitigating these impacts are not feasible; there are no feasible mitigation measures beyond the mitigation measures indicated below to reduce these impacts. These impacts will remain significant and unavoidable. The Project Proponent concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant unavoidable impacts of the Program and treatment project, as set forth in the Board's Statement of Overriding Considerations.

AIR QUALITY

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

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

Implementation of Mitigation Measure AQ-1 was required or incorporated into the CalVTP by the Board of Forestry to reduce the severity of this impact, but it was not feasible to attain a less-than-significant level. The Project Proponent would implement the emission reduction techniques included in Mitigation Measure AQ-1 to the extent feasible. However, because the treatments would be implemented by a public agency with limited funding, procuring or paying additional amounts for contractors that use equipment meeting the latest efficiency standards, including meeting the EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology may be cost prohibitive. Carpooling would be encouraged by the Project Proponent, but because crews may not all be employed with the same company, carpooling may not be feasible to implement for most of the workers. The Project Proponent will document the extent the agency and/or its contractors are able to implement Mitigation Measure AQ-1. Renewable diesel will be used by the Project Proponent and/or its contractors to the extent required by state regulations. The Project Proponent incorporated all feasible and applicable measures to prevent and minimize this potential impact, pursuant to SPRs AD-1, AD-4, AQ-1 through AQ-4, and AQ-6. The RCD finds that mitigating this impact below a level of significance is not feasible. The Project Proponent concludes, however, that the benefits of the CalVTP and proposed project outweigh the significant unavoidable impacts of the Program and proposed vegetation treatment project, as set forth in the Statement of Overriding Considerations, below. The Project Proponent therefore finds that changes or alterations

have been required in, or incorporated into, the proposed project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR.

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

☒ No feasible mitigation is available.

All feasible precautions and notifications have been incorporated into the CalVTP to reduce the severity of this impact, but not to a less-than-significant level. No additional feasible measures are available for the Project Proponent to implement and, for the same reasons explained in the PEIR, this impact would remain potentially significant and unavoidable. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs, however, this impact would remain significant and unavoidable, as explained in the PEIR. The Project Proponent concludes, however, that the benefits of the CalVTP outweigh the significant unavoidable impacts of the Program, as set forth in the Statement of Overriding Considerations, below. The Project Proponent therefore finds that changes or alterations have been required in, or incorporated into, the proposed project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR.

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

☒ No feasible mitigation is available.

All feasible precautions and notifications have been incorporated into the CalVTP to reduce the severity of this impact, but not to a less-than-significant level. No additional feasible measures are available for the Project Proponent to implement and, for the same reasons explained in the PEIR, this impact would remain potentially significant and unavoidable. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs, however, this impact would remain significant and unavoidable, as explained in the PEIR. The Project Proponent concludes, however, that the benefits of the CalVTP outweigh the significant unavoidable impacts of the Program, as set forth in the Statement of Overriding Considerations, below. The Project Proponent therefore finds that changes or alterations have been required in, or incorporated into, the proposed project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR.

BIOLOGICAL RESOURCES

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

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

Direct and indirect impacts could occur to western bumble bees from offroad travel, prescribed burning, herbicide use, and removal of flowering plants. The Project proposes operating heavy equipment from a stable operating surface using extension arms. Throughout the known distribution of special-status bumble bees, primary threats to survival include habitat loss or modification due to development, agriculture, high-intensity fire, fire suppression, and herbicide use (Xerces Society et al. 2018). Because little is known about the life history and behaviors of western bumble bee, and there is no established methodology for detecting overwintering or nesting colonies, they can be difficult to detect and therefore to completely avoid during treatment activities. If colonies were destroyed, it is possible that populations of these species would be reduced below self-sustaining levels, and treatment activities could substantially reduce the number or restrict the range of species.

The Project is designed to avoid riparian habitat and type-conversion of chaparral or coastal sage scrub (SPR BIO-5), and no new roads will be created (SPR HYD-2). Pre-treatment surveys would combine a focused survey (SPR BIO-1, SPR BIO-3, SPR BIO-10) to identify burrows and suitable habitat within the project site. CDFW (2023) issued "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" which offers a survey methodology for western bumble bee among others. In lieu of or in addition to surveys, the Project proponent may choose to assume presence and rely on habitat as an indicator of presence. Crew members and contractors would be trained to identify and avoid these burrows if encountered (SPR BIO-2), and a biologist would be available as needed to provide guidance when crews are working within suitable western bumble bee habitat. If identified, these burrows would be protected with an avoidance buffer (SPR AD-2). The project has been designed to protect non-target vegetation and special-status species from herbicides (SPR HYD-5). A Spill Prevention and Response Plan (SPR HAZ-5) would be developed as part of Project implementation, and the Project proponent would comply with herbicide application regulations (SPR HAZ-6) and restrict use of herbicide to avoid native plants.

Although Mitigation Measures BIO-2a, BIO-2g, and BIO-4 would reduce impacts on foraging special-status bumble bees and their floral resources, substantial adverse effects could still occur to special-status bumble bee species during nesting and overwintering, because vegetation treatment activities could kill individuals or crush or disturb overwintering or nesting colonies. If western bumble bee, nursery sites, or populations of

flowering nectar plants are observed during focused surveys (following CDFW, 2023), or the species is assumed to be present in lieu of conducting surveys, the project proponent would avoid or minimize adverse effects on the species by implementing the following: avoiding impactful treatment activities in suitable habitat during sensitive periods (see CDFW 2023 for sensitive periods), protecting potential nests/burrows for bumble bees with a no work buffer, and avoiding or minimizing impacts to their foraging habitat. Additionally, herbicide use restrictions have been incorporated into the project design, such as: following the manufacturer's directions, applying pesticide as directly and locally as possible to target species, and applying it in a way that reduces spray drift. Within suitable bumble bee habitats, additional precautions will be taken to utilize the least the least toxic option for bumble bees, to follow guidance for reducing bee poisoning, and use the lowest effective application rate for the target species based on bee precaution pesticide rating (e.g., UC IPM) or more updated scientifically based rating. When feasible, herbicide application within a suitable habitat will occur during inactive bumble bee periods (e.g., overwintering; at dusk or night).

Project objectives are to prevent or slow the spread of non-wind driven wildfire between urban areas and wildlands (WUI) and/or provide staging areas for fire suppression efforts during an active wildfire (fuel break), which could reduce the impact of fire suppression activities and high-severity fire on the landscape. The implementation of all treatment activities would reduce understory vegetation which may, in turn, modify preferred habitats for some species; however, it would promote a healthier, native residual forest habitat in addition to Project objectives. The Project treatment could potentially be beneficial to western bumble bee by reducing high-intensity wildfire and improving habitat for bumble bee; however, in the process of achieving this objective, there are potentially significant direct impacts to western bumble bee. The CalVTP PEIR acknowledges the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts; it concludes that impacts to western bumble bee are potentially significant and unavoidable. Correspondingly the proposed project impacts are consistent with those described in the CalVTP PEIR, and the proposed treatment activities may result in impacts to western bumble bee that are potentially significant and unavoidable while achieving a beneficial objective.

GREENHOUSE GAS EMISSIONS

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

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

The Project Proponent finds that the use of vehicles and mechanical equipment, prescribed herbivory, herbicide application, and prescribed burning during initial and maintenance treatments would result in GHG emissions. However, these emissions would be relatively low when compared to GHG produced by catastrophic wildfires. Implementation of mitigation measure GHG-2 would reduce GHG emissions associated with pile burning by burning when fuels have a higher fuel moisture content, reducing the total area burned by mosaic burning and isolating and leaving large fuels unburned, and by scheduling burns before new fuels appear. Treatment activities would contribute to annual GHG emissions generated under the CalVTP. Methods for reducing GHG emissions from burns would be integrated into SPR AQ-3 (Burn Plan) as described in mitigation measure GHG-2. The Project Proponent incorporated all feasible and applicable measures to prevent and minimize this potential impact, pursuant to mitigation measure GHG-2. The Project Proponent finds that mitigating this impact below a level of significance is not feasible. The Project Proponent concludes, however, that the benefits of the CalVTP and the proposed project outweigh the significant unavoidable impacts of the Program and the proposed vegetation treatment project, as set forth in the Statement of Overriding Considerations, below.

TRANSPORTATION

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

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

Although the PEIR determined that individual vegetation treatments would likely be less than significant, the overall impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in vehicle miles traveled (VMT) attributable to the program as a whole. Because the Project would generate VMT during implementation, it would contribute to the environmental significance conclusion in the PEIR; therefore, this impact is considered significant and unavoidable. No SPRs apply to this impact. The Project Proponent would implement Mitigation Measure AQ-1 to the extent feasible. MM AQ-1 would reduce the impact by encouraging workers to carpool and/or use public transportation. However, due to the required equipment and number of employees (i.e., the primary trip-generators associated with vegetation treatments) associated with the project, it would not be feasible to reduce VMT substantially. The Project Proponent incorporated all feasible and applicable measures to prevent and minimize this potential impact. The Project Proponent finds that mitigating this impact below a level of significance is not feasible. The Project Proponent concludes, however, that the benefits of the CalVTP and the proposed project outweigh

the significant unavoidable impacts of the Program and the proposed vegetation treatment project, as set forth in the Statement of Overriding Considerations, below.

STATEMENT OF OVERRIDING CONSIDERATIONS

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

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

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

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

- The CalVTP will reduce dire risks to life, property, and natural resources in California.
- The CalVTP reflects the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- The CalVTP reflects the Board's and CAL FIRE's goals. The CalVTP will help the Board and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- The CalVTP will help implement Executive Orders, including:

  - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state;
  - EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed fire; and
  - EO N-05-19: Governor Newsom's order directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires.

- The Board is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The CalVTP will bring the Board into compliance with these requirements.
- The Board is required by law to comply with SB 632, signed into law by Governor Newsom in October 2019, which requires the Board to certify a Final PEIR, pursuant to CEQA, for the vegetation treatment program filed with the State Clearinghouse under Number 2019012052 in January 2019. The CalVTP will bring the Board into compliance with this requirement.
- The CalVTP will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.
- The CalVTP and the proposed vegetation treatment project reflect San Mateo RCD's goals to reduce wildfire fuels, reduce risks to homes, and increase access for firefighters, through implementing the state's Program.

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