

CALVTP PROJECT-SPECIFIC ANALYSIS FOR THE NORTH OJAI
INCENDIARY FUELS AND EMBER CAST REDUCTION PROJECT,
VENTURA COUNTY, CALIFORNIA

CAL FIRE Project 2022-14

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SECTION 1 Project Overview and Purpose

1.1 Introduction

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

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

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

If a later vegetation treatment project would have impacts that were not covered by the PEIR (and therefore would not qualify for a within the scope finding), then additional documentation may need to

be prepared that accompanies the PEIR to demonstrate the project's CEQA compliance (State CEQA Guidelines Section 15168(c)(1)). If additional documentation is needed, it may be a Negative Declaration, Mitigated Negative Declaration, or an EIR, depending on the environmental impact differences encountered. In this situation, the PSA serves the same function as an initial study to identify which impacts were not covered by (and are therefore not within the scope of) the PEIR and, therefore, must be addressed in a Negative Declaration, Mitigated Negative Declaration, or an EIR, as well as documenting those impacts that are within the scope of the PEIR. This document serves as the PSA for the North Ojai Incendiary Fuels and Ember Cast Reduction Project.

1.2 Project Overview

The North Ojai Incendiary Fuels and Ember Cast Reduction Project (Project) is located entirely on private lands in part within the incorporated area of the City of Ojai, Ventura County, and in part in unincorporated Ventura County. Within the City of Ojai, the Project area includes private parcels within the Wildland Urban Interface (WUI) along the north end of the City of Ojai. The Project also includes private parcels adjacent to the western and eastern boundaries of the City of Ojai within unincorporated Ventura County. The cumulative total acreage of all private land parcels that are proposed for treatment is 1,100 total acres; however, treatment activities would occur on approximately 98 acres of the Project area. The Project proposes to conduct mechanical and manual treatment to incendiary, ember cast producing trees and other fuels (eucalyptus, Italian cypress, fan palm, and nonnative conifers) around private homes within the WUI in and around the City of Ojai.

1.3 CEQA Lead Agency

Fuel Reduction Works has received a CAL FIRE CCI grant to implement the proposed Project. Projects performed under these grants are overseen by CAL FIRE and local fire departments. As a CAL FIRE contract agency with jurisdiction over the Project area, the Ventura County Fire Department is lead agency for this CEQA review.

1.4 Treatable Landscape Consistency

The geographic scope of the analyses included in the CalVTP PEIR consists of approximately 20.3 million acres throughout the state where vegetation conditions are suitable for treatment in the SRA, referred to as the "treatable landscape". The treatable landscape does not include Local Responsibility Areas (LRAs), except for potential isolated ridge fuel break locations that extend into a local jurisdiction.

The 1,110 total acres of the Project area contains 684 acres in the SRA and 426 acres in the LRA, all of which are within ½ mile of the SRA. The entire Project Area is in a Very High Fire Hazard Severity Zone. Of the 98 acres of WUI on which treatment activities would occur, 48 acres are within the SRA and approximately 50 acres are in the LRA and thus, outside the CalVTP treatable landscape evaluated in the PEIR. The environmental conditions of these parcels are essentially the same as those within the treatable landscape. The treatment type and activities are consistent with those analyzed in the PEIR and the proposed Project is within the scope of the CalVTP PEIR.

1.5 Purpose of the Document

Pursuant to Appendix PD-3 of the CalVTP PEIR, Ventura County Fire Department is using this PSA to evaluate the potential environmental impacts of the proposed Project and determine if it qualifies as within the scope of the CalVTP PEIR or requires additional environmental documentation or its own independent environmental review.

Consistent with CEQA Guidelines Sections 15162, 15163, 15164, and 15168, an addendum to an EIR is appropriate when revisions to a previously certified EIR are proposed, but none of the revisions would result in a new significant environmental impact or substantially more severe significant environmental impact. As described above, portions of the Project Area are outside the treatable landscape, thus requiring a revision to the PEIR. The environmental conditions of these areas are the same as those within the treatable landscape and would not result in a new or more severe significant impacts than those identified in the CalVTP PEIR. Therefore, this document serves as both the PSA and the Addendum to the CalVTP PEIR to provide CEQA compliance for the proposed vegetation treatments. A Project-specific Mitigation Monitoring and Reporting Program (MMRP), which identifies the CalVTP SPRs and mitigation measures applicable to the proposed Project, is presented in Appendix A.

SECTION 2 Environmental Checklist

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** North Ojai Incendiary Fuel and Ember Cast Reduction Project
2. **Project Proponent Name and Address:** Ventura County Fire Department, 165 Durley Ave Camarillo, CA 93010
3. **Contact Person Information and Phone Number:** Celine Moomey, (805) 340-6838
4. **Project Location:** The Project is located in Ventura County in the Wildland Urban Interface along the north end of the City of Ojai and unincorporated land west and east of the city. The Project would be conducted on private parcels of land located between S La Luna Ave to the east and Gridley Rd to the west. The Project Area extends to the north along Foothill Road and the southernmost treatment areas are on El Toro Road. A map is included in Figure 1.
5. **Total Area to be Treated (acres):** The total Project area is 1,110 acres; of this area, approximately 98 acres are proposed for treatment.
6. **Description of Project:**

Initial Treatment

The proposed Project would remove incendiary, ember cast producing trees and other fuels around private homes in the Project area, which is located in the Wildland-Urban Interface (described in the PEIR in Section 2.5.1, p. 2-7). The goals of the Project are four-fold:

1. Reduce greenhouse gas (GHG) emissions of future fires by substantially reducing the risk of catastrophic fire via permanent eradication of a considerable portion of presently existing incendiary, ember cast and firebrand producing fuels in and within ½ mile of SRA;
2. Strategically apply resources in a manner that will result in the greatest wildfire hazard, GHG, and life/structure loss reduction possible;
3. Provide hazardous fuel reduction services to every land parcel in the project area that has disabled, elderly, and/or low-income residents that request it; and
4. Work in concert with the Ventura County Fire Protection District Unit Strategic Fire Plan.

The proposed Project would target eucalyptus trees, Italian cypress, fan palms, conifers, and other nonnative trees that may be deemed a fire safety concern. Based on responses from households obtained during area surveys, it is anticipated that four out of five households that need fuel reduction on their property will participate in the proposed Project. The removal of the following vegetation is anticipated:

- >500 eucalypti seedlings up to 6" tall
- 637 juvenile eucalypti ranging from 6' to 35' tall (ladder fuels)
- 343 6" to 12" diameter breast height (DBH) eucalypti (ladder fuels)

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- 186 12” to 30” DBH eucalypti (adult trees)
- 131 Italian cypress > 5” DBH
- 37 fan palms < 40’ tall

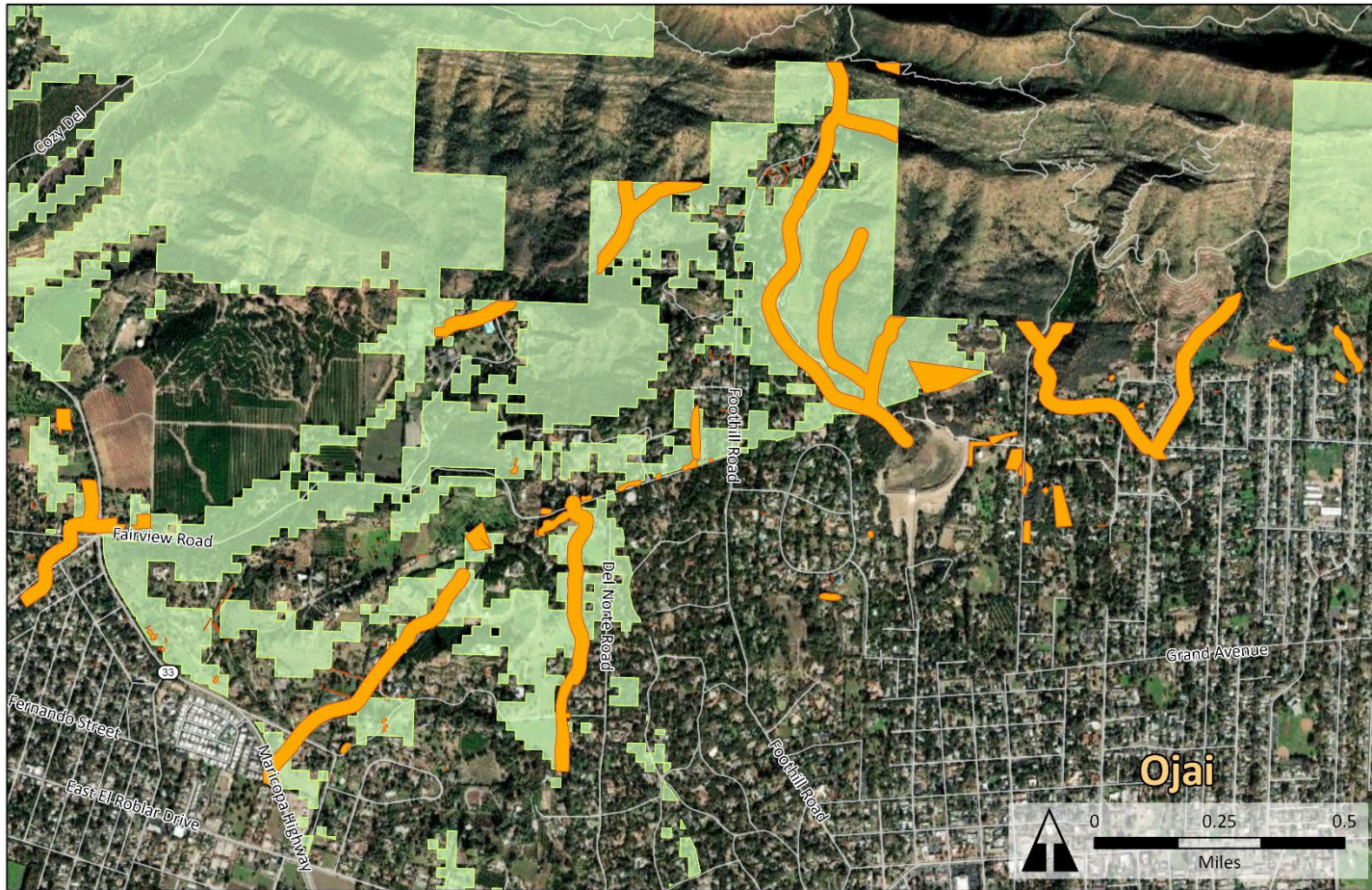
In addition, conifers and other nonnative trees would be removed as needed on the participating parcels to reduce fuel loads and create defensible space around structures.

The Project would include mechanical and manual treatments including tree removal, stump grinding, and chipping, as described in Section 2.5.2 of the CalVTP PEIR (p. 2-22 – 2-25). All chipped material would be spread out onsite approximately 2-3 inches thick for weed control. All chipped material would be placed a minimum of 500 feet from all buildings. In the unlikely event that there is not sufficient space onsite at a particular parcel to spread all of the chipped material, the material may be spread on a neighboring parcel that is also included in the Project area. There would be no trucking of chipped materials off-site. Equipment used for non-native species removal would include a 259 and 299 Caterpillar skid steer, a grapple crane, and a bucket lift, along with woodchippers and stump cutters. Table 1 presents the equipment that would be used to conduct the Project.

Table 1. Project Equipment

Fuel Reduction Activity	Equipment	Horsepower	Number	Duration (days)	Hours/Day Onsite
Mechanical Treatment Tree Fuel Type	Grapple Saw Crane Truck	430	1	15	6
	Chainsaw	10	2	15	4
	Loader	120	1	15	6
	Chipper	180	1	15	6
	Chip/Crew Transport Truck	180	1	5	6
	Chip/Crew Transport Truck	180	1	10	2
	Stump Grinder	120	1	15	8
Manual Treatment Tree Fuel Type	Chainsaw	10	1	105	4
	Chainsaw	5	1	105	7
	Loader	120	1	60	5
	Chipper	120	1	105	4
	Chip/Crew Transport Truck	180	1	25	6
	Chip/Crew Transport Truck	180	1	80	2
	Stump Grinder	120	1	15	7
	Stump Grinder	15	1	105	7
Manual Treatment Shrub Fuel Type	Loader	120	1	15	8
	Chipper	120	1	15	6
Revegetation	Tree/Crew Transport Truck	180	1	50	4
	Water Truck	180	1	120	4

Project-Specific Analysis



Legend	PROJECT TREATMENT AREAS
Project Treatment Areas	Ojai Fuels Project
CalVTP PEIR Treatable Landscape	
Roads	

Fig. 01
April 2022

Figure 1. Project Treatment Areas

Project-Specific Analysis

Treatment Types

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

Treatment Activities

- Prescribed Burning (Broadcast), _____ acres
- Prescribed Burning (Pile Burning)
- Mechanical Treatment, ___1___ acres
- Manual Treatment, __97___ acres
- Prescribed Herbivory, _____ acres
- Herbicide Application, _____ acres

Fuel Type

- Grass Fuel Type
- Shrub Fuel Type
- Tree Fuel Type

Treatment Maintenance

Project personnel would return to removal locations annually for a period of three years to stem target species regrowth from remnants of stumps and/or seed banks.

Treatment Types

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

Treatment Activities

- Prescribed Burning (Broadcast), _____ acres
- Prescribed Burning (Pile Burning)
- Mechanical Treatment, _____ acres
- Manual Treatment, __98___ acres
- Prescribed Herbivory, _____ acres
- Herbicide Application, _____ acres

Fuel Type

- Grass Fuel Type
- Shrub Fuel Type
- Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses:

The Project area is in the WUI along the north end of the City of Ojai. The geographic scope of the proposed Project is 1,110 acres, all of which are in Very High Fire Hazard Severity Zones. There are 684 acres in the SRA and 426 acres in the LRA, all of which are within ½ mile of the SRA. Most of the treatment areas are in inhabited, hilly, often steep terrain. The Project area contains 543 habitable structures. Many target trees are near structures, fences and or non-target protected oaks and/or sycamores.

8. Other Public Agencies Whose Approval is Required:

If a target tree stump that requires removal is within Ojai City limits, and the soil disturbance is within the drip line of an Oak tree or Sycamore tree, an encroachment permit is required by the City in accordance with the Ojai Tree Protection Ordinance. No other public agency approval is required to implement the proposed Project, and no discretionary permits are required.

Coastal Act Compliance

- The proposed project is NOT within the Coastal Zone
- The proposed project is within the Coastal Zone
- A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
- The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

9. Native American Consultation.

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Tribal consultation under Assembly Bill 52 was completed as part of the CalVTP PEIR. However, because the scope of the PEIR does not extend to the Local Responsibility Areas, which are included within the scope of this addendum, the Ventura County Fire Department conducted additional consultation with tribes in the vicinity of the Project area, pursuant to Assembly Bill 52 and in accordance with SPR CUL-2. Letters were mailed to representatives from the following tribes on May 13, 2022:

Barbareno/Ventureno Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Northern Chumash Tribal Council, San Luis Obispo County Chumash Council, Santa Ynez Band of Chumash Indians. The letters described the Project and inquired if they wished to consult on the Project. No tribes requested formal consultation.

DETERMINATION

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

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

Celine Moomey
Signature

06/16/2022
Date

Celine Moomey
Printed Name

Pre Fire Specialist
Title

Ventura County Fire Protection District
Agency

SECTION 3 Evaluation of Environmental Impacts

3.1 Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	SPR AES-1 SPR AES-2 SPR AES-3	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	SPR AES-1 SPR 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 Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	None	None	No	No	Yes

¹NA: 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.

<p>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?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.1.1 Discussion

3.1.1.1 Impact AES-1– Less than Significant

The proposed WUI fuel reduction treatments would occur on privately owned land. The proposed sites are not visible from a state scenic highway but may be visible from the Foothills or Pratt trails (see Figure 4). The implementation of the applicable SPRs, including **SPR AES-1, AES-2, AES-3, and REC-1** would minimize the impacts to visual resources within the treatment areas. **SPR AES-1** requires that the Project proponent thin and feather adjacent vegetation along a clearing to maintain a natural transition appearance. **SPR AES-2** avoids staging of equipment and materials within public viewsheds. **SPR AES-3** requires preservation of sufficient vegetation at the edge of treatment areas to screen views from public view. **SPR REC-1** requires public notification at least two weeks before closing trails or recreational areas. Therefore, the potential for the Project to result in short-term degradation of a scenic vista, visual character, or damage to scenic resources would be less than significant.

The potential for mechanical and manual treatments conducted for WUI fuel reduction to result in short-term degradation of the visual character of an area was analyzed in the PEIR and determined to be less than significant. The potential for the Project to result in a short-term impact to this resource area is within the scope of the PEIR because the treatment types and activities are consistent with those analyzed 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 in the LRA, which are outside the treatable landscape, are essentially the same as those within the treatable landscape. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.1.1.2 Impact AES-2 – Less than Significant

Initial and maintenance treatments would include WUI fuel reduction treatment type. The proposed Project would remove non-native fuel ladder vegetation and retain native trees. The potential long-term degradation of the scenic resources was examined in the PEIR. The implementation of the applicable SPRs, including **SPR AES-1 and AES-3**, would minimize the impacts to visual resources within the treatment areas. Therefore, the Project would not create long-term visual impacts, and results would be less than significant.

The potential for the Project to result in a long-term degradation of scenic resources is within the scope of the PEIR analysis as the scenic resources and the proposed treatment type and activities are consistent with those analyzed 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

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3.1.1.3 Impact AES-3 – No Impact

This impact does not apply to the proposed Project because the Project does not include non-shaded fuel break treatment types. Therefore, no impact would occur.

3.1.1.4 New Aesthetic and Visual Resource Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to aesthetics and visual resources would occur that are not covered in the PEIR.

3.2 Agriculture and Forestry Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	NA	NA	LTS	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.2.1 Discussion

3.2.1.1 Impact AG-1 – Less than Significant

The proposed Project would remove non-native trees (predominantly eucalyptus trees, Italian Cypress, fan palms, conifers, and other nonnative trees that may be deemed a fire safety concern) on private property within the Project Area. It would not remove trees for commercial purposes and would not remove native live trees. Therefore, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest land and any impacts would be less than significant.

The potential for the treatment area to result in loss or conversion of forest lands was examined in the PEIR and determined to be less than significant. There are no applicable SPRs or MMs for this impact. The potential impact for the proposed Project to result in loss or conversion of forest lands is within the scope of the PEIR analysis as the proposed treatment type and activities are consistent with those analyzed 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, and the LRA does not contain any designated forest land or trees for commercial purposes. The proposed Project would be consistent with

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the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.2.1.2 New Agriculture and Forestry Resource Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to aesthetics and visual resources would occur that are not covered in the PEIR.

3.3 Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	SPR AQ-4	MM AQ-1	PSU	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	SPR HAZ-1 SPR NOI-4 SPR NOI-5	MM AQ-1	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	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	No	None	NA	No Impact	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	SPR HAZ-1 SPR NOI-1 SPR NOI-4 SPR NOI-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	No	None	NA	No Impact	No	Yes

¹NA: 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.

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New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.3.1 Discussion

The proposed Project would be located in Ventura County, which is in nonattainment for both federal and state ozone standards as well as state PM₁₀ and federal PM_{2.5}. Air emissions within the Project area are under the jurisdiction of the Ventura County Air Pollution Control District.

3.3.1.1 Impact AQ-1 – Potentially Significant and Unavoidable

As shown in Table 1, the mechanical and manual treatments proposed would require the use of heavy trucks, loaders, chippers, stump grinders, and chainsaws, all of which would emit criteria pollutants. The criteria air pollutant emissions calculated for mechanical and manual treatments in tree and fuel types in the CalVTP PEIR (Table 3.4-6) are shown in Table 2 below.

Table 2. Emissions of Criteria Air Pollutants and Precursors Associated with a Single Treatment Crew During a One-Acre Treatment

	Emissions per Acre Treated (lb/acre) ROG	Emissions per Acre Treated (lb/acre) NO _x	Emissions per Acre Treated (lb/acre) PM ₁₀	Emissions per Acre Treated (lb/acre) PM _{2.5}
Mechanical Treatment				
Tree Fuel Type	3.0	5.3	0.3	0.2
Shrub Fuel Type	0.7	4.1	0.5	0.3
Manual Treatment				
Tree Fuel Type	43.8	4.3	0.8	0.2
Shrub Fuel Type	18.0	2.6	0.6	0.2

The proposed Project has the potential to exceed the Ventura County Air Pollution Control District’s threshold of significance of 5 lb/day for ROG and NO_x. The potential emission of criteria air pollutants from these treatments to exceed the thresholds standards was examined in the PEIR. The Project proponent would apply **SPR AQ-4** to minimize dust during treatment activities. The Project proponent would also implement **MM AQ-1** (emission reduction techniques to reduce exhaust emissions from off-road equipment) as feasible.

The emission of criteria air pollutants from the proposed project are within the scope of the PEIR analysis, as the air quality conditions are the same within and outside the CalVTP treatable landscape, and the treatment activities, including the usages of the equipment, are consistent with the treatment activities 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. Therefore, the impact on air quality from criteria air pollutants is also significant. As described in the PEIR, due to multiple variables quantifying the reduction of emissions, the impact would remain potentially

significant and unavoidable. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.3.1.2 Impact AQ-2 – Less than Significant

The mechanical and manual treatments implemented under the proposed Project would require the use of diesel-powered equipment (see Table 1). The use of diesel-powered equipment at each specific Project site would be temporary (i.e., a couple hours to one-two working days) and would not take place near a single sensitive receptor for an extended period of time. The implementation of **SPR HAZ-1** (maintenance of diesel- and gasoline-powered equipment per manufacturer’s specifications and in compliance with all state and federal emissions requirements), **SPR NOI-4** (locate staging areas away from noise-sensitive land use), and **SPR NOI-5** (limiting idling of motorized equipment to 5 minutes when not in use) would minimize human receptor exposure to diesel particulate matter emissions. Therefore, the impact on air quality from diesel particulate matter (DPM) emissions would be less than significant.

The PEIR evaluated the potential for treatment activities to expose sensitive receptors to substantial short- and long-term DPM emissions in a manner that could increase cancer risk greater than 10 in one million to a Hazard Index of 1.0 or greater and determine that impacts would be less than significant. The emission of DPM emissions from the proposed Project is within the scope of the PEIR analysis, as the proposed treatment activities, including the types and duration of use of the equipment and vehicles, is consistent with the treatment activities 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.3.1.3 Impact AQ-3 – No Impact

There are no mapped occurrences of naturally-occurring asbestos in Ventura County as mapped on the USGS’s “Reported Historic Asbestos Mines, Historic Asbestos Prospects, and other Natural Occurrences of Asbestos in California Map” (USGS 2011), and therefore no occurrences of naturally-occurring asbestos within the proposed treatment areas. Thus, this impact does not apply to this Project and no impact would occur.

3.3.1.4 Impact AQ-4 – No Impact

This impact does not apply to this project because the proposed Project does not include prescribed burning. Therefore, no impact would occur.

3.3.1.5 Impact AQ-5 – Less than Significant

The use of diesel-powered equipment and vehicles during Project implementation could expose people to objectionable odors. Diesel exhaust emissions from the proposed Project would be short term and intermittent, not occurring at one location for more than two days and would dissipate rapidly from the source. Consistent with the PEIR, the Project proponent would implement **SPR HAZ-1**, **SPR NOI-1** (limiting heavy equipment use to daytime hours), **SPR NOI-4**, **SPR NOI-5** to minimize odor from the

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proposed Project. Therefore, the impact on people exposed to objectionable odors from diesel exhaust would be less than significant.

The objectionable odor from diesel exhaust is within the scope of the PEIR analysis because the types of equipment and usage duration are consistent with those 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.3.1.6 Impact AQ-6 – No Impact

This impact does not apply to this project because the proposed Project does not include prescribed burning. Therefore, no impact would occur as a result of the proposed Project.

3.3.1.7 New Air Quality Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to aesthetics and visual resources would occur that are not covered in the PEIR.

3.4 Archaeological, Historical, and Tribal Cultural Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	SPR CUL-1, SPR CUL-7, SPR 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	SPR CUL-1, CUL-2, 3, 4, 5, 8	MM CUL-2	SU	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	SPR CUL-1, CUL-2, 3, 4, 5, 6, 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

¹NA: 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.

<p>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?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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3.4.1 Discussion

Consistent with **SPR CUL-1** an archaeological resources records search was requested at the California Historical Resources Information System, South Central Coast Information Center, California State University Fullerton for the total 1,110-acre Project Area and 0.25-mile buffer around the area. Records search results provided on March 2, 2022, identified six recorded archaeological resources within the Project area and five archaeological resources within 0.25-mile of the Project area. The results also identified no historic resources within the Project area and identified two historic-period structures within a 0.25-mile buffer, both of which are over 0.20-mile away from the Project Area. Thirty

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investigations have been completed within the Project area, and an additional 30 have been completed within 0.25-mile of the Project area. A cultural resources report is attached as Appendix B.

As described in the CalVTP PEIR, CalFIRE has completed consultation requirements pursuant to AB52 for the State Responsibility Areas. This addendum expands the PEIR analysis to the Local Responsibility Areas in the Ventura County. Therefore, a request was submitted to the NAHC to provide contact information for Native American tribal organizations and individuals with traditional lands or cultural places located within the Project area. The NAHC responded on May 5, 2022, with a list of 12 contacts. On May 13, 2022, the Ventura County Fire Department sent letters to each of the tribal representatives provided by the NAHC inquiring if they wished to consult on the proposed Project, if they had any knowledge of cultural resources or values in the area, if they had any concerns with the proposed Project, and asking for a response within 30 days, per PRC Section 21080.3.1(d) requirements. These letters fulfill both AB 52 and SPR CUL-2 requirements. No tribes requested formal consultation.

3.4.1.1 Impact CUL-1 - Less than Significant

The proposed Project would include mechanical and manual treatments on approximately 98 acres or private property throughout the Project Area. These localized treatments would have no adverse effects on historic resources because none occur within the Project area.

The potential for treatment activities to result in disturbance or destruction of built-environmental structures that have not yet been evaluated for historical significance was evaluated in the PEIR and determined to be less than significant. In addition to implementing **SPR CUL-1** (conducting a records search), the Project proponent would implement **SPR CUL-7** (avoidance of built historical resources), and **SPR CUL-8** (cultural resource training for all crew members) to minimize impacts to historic resources. The proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the area outside of the treatable landscape was reviewed in the cultural records search and no historic resources were determined to be present. Therefore, project-specific impacts related to built historical resources would be less than significant. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.4.1.2 Impact CUL-2 – Potentially Significant and Unavoidable

The proposed Project would include mechanical treatment activities that would result in localized ground disturbance (i.e., stump grinding). The potential for treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was evaluated in the PEIR. In addition to **SPR CUL-1 and SPR CUL-2**, the Project proponent would implement SPR CUL-3, 4, 5, and 8. **SPR CUL-3** requires that pre-field research is conducted to ensure proper survey design, and **SPR CUL-4** requires a site survey by a qualified archaeologist. **SPR CUL-5** requires tribal notification if cultural resources are identified within the treatment area and cannot be avoided and subsequent development of protective measures. In addition, PEIR **MM CUL-2** would be implemented to protect inadvertently discovered unique archaeological and/or subsurface historical resources by halting work within 100 feet of the find, evaluating the significance of the find, and developing effective protection strategies in coordination with applicable agencies.

The potential for an inadvertent discovery of unique archaeological resources or subsurface historical resources during implementation of the Project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. The 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. While implementation of the SPRs and MM would minimize the potential for unknown resources to be inadvertently damaged, this impact would remain significant and unavoidable. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.4.1.3 Impact CUL-3 - Less than Significant

The proposed Project would include mechanical treatment activities that would result in localized ground disturbance (i.e., stump grinding). The potential for treatment activities to cause a substantial adverse change in the significance of tribal cultural resources was evaluated in the PEIR. The potential for adverse effects to tribal cultural resources during implementation of the Project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. The Project proponent would implement **SPR CUL-1** through **SPR CUL-6** (development of protection measures for important tribal resources located within treatment areas) and **SPR CUL-8** to ensure that potential impacts to the significance of tribal cultural resources is less than significant.

The potential for the proposed project to cause a substantial adverse change in significant Tribal Cultural Resources is within the scope of the PEIR analysis as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.4.1.4 Impact CUL-4 – Less than Significant

There are no identified burial sites within the Project area. The mechanical treatment activities that would be implemented under the proposed Project may disturb subsurface soils and expose unknown human remains.

The potential for the treatment activities to uncover human remains was examined in the PEIR. The PEIR does not require any SPRs for this impact. However, as identified in the PEIR, the proposed Project would comply with the California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097, which indicate that if human remains are discovered, there shall be no further disturbance or excavation of the site and the human remains shall be left undisturbed. Therefore, the proposed Project would have a less than significant impact on the potential to disturb human remains.

The potential for human remains to be uncovered during the implementation of project treatments is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and

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level of ground disturbance are consistent with those analyzed 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.4.1.5 New Archaeological, Historical, and Tribal Cultural Resource Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to archaeological, historical, and tribal cultural resources would occur that are not covered in the PEIR.

3.5 Biological Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR AQ-4 SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-7 SPR BIO-9 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4	MM BIO-1a MM BIO-1b MM BIO-1c	LTS	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-4 SPR BIO-5 SPR BIO-10 SPR BIO-12 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4	MM BIO-2b MM BIO-2c MM BIO-2g MM BIO-3a MM BIO-3b MM BIO-3c MM BIO-4	LTS	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-9	MM BIO-3a MM BIO-3b MM BIO-3c	LTS	No	Yes

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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:								
				SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4				
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-9 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4	MM BIO-4	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-4 SPR BIO-10 SPR BIO-12 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4	MM BIO-5	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-4 SPR BIO-12	NA	LTS	No	Yes

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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:								
				SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4				
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	SPR AD-3 SPR BIO-1 SPR BIO-3 SPR BIO-7	NA	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	NA	NA	No Impact	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.5.1 Discussion

The PEIR identifies a process for identifying biological resources and avoiding impacts, beginning with a biological survey of all treatment areas. If sensitive resources are present, mitigation measures would be applied to avoid impacts. **SPR BIO-1** requires a qualified Registered Professional Forester (RPF) or biologist 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 the completion of the PSA and implementation of the proposed Project. The Project proponent retained Pax Environmental to conduct a biological review and survey. Prior to performing the field surveys, Pax performed a records search for special-status plant and wildlife species potentially occurring in the Project region. Sources

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utilized during the records search included the California Natural Diversity Database (CNDDDB) (CDFW 2022), the Calflora Observation Hotline (Calflora 2022), and the Jepson Flora Project website (eFlora 2022). The CNDDDB records search was performed for a 10-mile radius around the Project area. The USGS 7.5-minute quadrangles included in the records search for the Project area were *Devil's Heart Peak*, *Lion Canyon*, *Matilija*, *Ojai*, *Old Man Mountain*, *Santa Paula*, *Santa Paula Peak*, *Saticoy*, *Topatopa Mountains*, *Ventura*, *Wheeler Springs*, and *White Ledge Peak*.

A focused plant and animal survey was performed on February 22, 2022 by Pax associate biologist, Deven Kammerichs-Berke, and senior botanist, Scott Tomkinson. The survey consisted of meandering transects in public access areas (primarily around Spelway Dam and Shelf Road) and along public roads in developed areas. The following description of plant communities found within the survey area is compiled in accordance with the Manual of California Vegetation (California Native Plant Society, CNPS 2022a). Scientific and common plant names used in this section and in Appendix A are those used by Calflora (2022) and scientific names reflect the most recently recognized taxonomic treatments published in eFlora (2022). Appendix C (Biological Resources Report) provides a list of plant species documented in the Project area during the February 22, 2022 survey.

Northern portions of the survey area, apart from developed parcels, are dominated by mostly undisturbed chaparral and coastal sage scrub vegetation communities. The most prevalent plant alliances in the undeveloped portions of the survey area include the following:

- *Adenostoma fasciculatum* Shrubland Alliance (Chamise chaparral),
- *Artemisia californica* – *Salvia mellifera* Shrubland Alliance (California sagebrush - black sage scrub),
- *Platanus racemose* – *Quercus agrifolia* Woodland Alliance (California sycamore - coast live oak riparian woodlands),
- *Prunus ilicifolia* – *Heteromeles arbutifolia* – *Ceanothus spinosus* Shrubland Alliance (Holly leaf cherry - toyon - greenbark ceanothus chaparral), and
- *Malacothamnus fasciculatus* – *Malacothamnus* spp. Shrubland Alliance (Bush mallow scrub).

Southward from the undeveloped portions of the survey area has primarily been developed into low-density residential parcels. While ornamental and ruderal vegetation is prevalent throughout many of these parcels, a mostly contiguous coast live oak woodland persists over a majority of the area. The following alliances are found in addition to ornamental vegetation in the southern portion of the survey area:

- *Quercus agrifolia* Forest & Woodland Alliance (Coast live oak woodland and forest)
- *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance (Wild oats and annual brome grasslands)
- *Brassica nigra* – *Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance (Upland mustards or star-thistle fields)
- *Eucalyptus* spp. – *Ailanthus altissima* – *Robinia pseudoacacia* Woodland Semi-Natural Alliance (Eucalyptus - tree of heaven - black locust groves)

Wildlife observed in the Project area during the survey included those common to sagebrush scrub and oak woodland habitats. A full list of wildlife species observed is also included in Appendix C (Biological Resources Report). No special-status species were observed during the survey.

Reptiles observed in the Project area include western fence lizard (*Sceloporus occidentalis*). Mammals detected within the Project area include California ground squirrel (*Otospermophilus beecheyi*) and mule deer (*Odocoileus hemionus*).

Common bird species observed include the following: band-tailed pigeon (*Patagioenas fasciata*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), great egret (*Ardea alba*), turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Dryobates nuttallii*), merlin (*Falcon columbarius*), Cassin's kingbird (*Tyrannus vociferans*), California scrub-jay (*Aphelocoma californica*), common raven (*Corvus corax*), oak titmouse (*Baeolophus inornatus*), wrentit (*Chamaea fasciata*), white-breasted nuthatch (*Sitta carolinensis*), Bewick's wren (*Thryomanes bewickii*), northern mockingbird (*Mimus polyglottos*), cedar waxwing (*Bombycilla cedrorum*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), white-crowned sparrow (*Zonotrichia leucophrys*), California towhee (*Melospiza crissalis*), and yellow-rumped warbler (*Setophaga coronata auduboni*).

3.5.1.1 Special-Status Resources

The following discussion addresses special-status biological resources with the potential to occur in the Project area. These resources include plant and wildlife species and habitats that have been afforded special-status and/or recognition by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and CNPS. Special-status plant species include those that are listed as threatened or endangered by the California or federal Endangered Species Acts, as well as those that are assigned a California Rare Plant Rank (CRPR) by the CNPS. CRPR listing statuses are based on the degree of rarity (Lists 1A through 4) and threat level (0.1, 0.2, and 0.3) as follows (CNPS 2022b):

Rarity Ranks:

- List 1A: presumed extirpated in California, and rare or extinct elsewhere
- List 1B: rare, threatened, or endangered in California and elsewhere
- List 2A: presumed extirpated in California, but more common elsewhere
- List 2B: rare, threatened, or endangered in California, but more common elsewhere
- List 3: review list of plants about which more information is needed
- List 4: watch list of plants with limited distribution

Threat Ranks:

- 0.1: seriously threatened in California (> 80% threatened/high degree and immediacy of threat)

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- 0.2: moderately threatened in California (20-80% threatened/moderate degree and immediacy of threat)
- 0.3: not very threatened in California (< 20% threatened/ low degree and immediacy or no current threats known)

Natural Communities are evaluated using NatureServe’s Heritage Methodology, the same system used to assign global and state rarity ranks for plant and animal species in the CNDDDB. They are assigned an overall rarity score for a single rank of 1 through 5. Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (state) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents.

Wetlands are protected under Section 404 of the Clean Water Act (CWA) and are under the jurisdiction of the United States Army Corps of Engineers (USACE). According to the USACE, areas considered to be a “wetland” (and subject to the regulatory jurisdiction of the USACE) must exhibit hydrology, hydric soils, and hydrophilic vegetation that meet federal criteria, as indicated in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008).

In addition, if drainages meet the criteria established by Section 1600 of the California Fish and Game Code, the CDFW may require a Streambed Alteration Agreement prior to any modification of the bed, bank, or channel of streambeds. The CDFW jurisdiction generally includes the streambed and the canopy of associated riparian vegetation. A search of the National Waters Inventory and national hydrographic database identified three freshwater forest/shrub wetlands, one riverine wetland in the central portion, and one freshwater pond in the Project area (Figure 2).

Table 3, Special-Status Plant Species, and Table 4, Special-Status Wildlife Species, provide a summary of special-status plant and wildlife species known to occur in the Project region including information on the status, potential for occurrence, and definitions for the various status designations. Sources used to determine the conservation status of biological resources are as follows:

- Electronic Inventory of Rare and Endangered Vascular Plants of California CNPS (CNPS 2022b), California Natural Diversity Database (CNDDDB) List of Special Plants (CDFW 2022),
- Wildlife – CNDDDB List of Special Animals (CDFW 2022), and
- Habitats – CNDDDB List of Sensitive Natural Communities (CDFW 2022).

The CNDDDB and CNPS online inventory listed 24 CNPS List 1B, 2B, or 4 plant species occurring in the Project region. Based on the field assessment and the known habitat requirements of the special-status species identified by the records search, ten species were determined to have a low potential for occurrence and four species were determined to have a high potential for occurrence. No federally and/or state-listed threatened or endangered wildlife species were determined to potentially occur exclusively on the Project site. The CNDDDB records search identified California walnut woodland (G2,

S2.1), southern California steelhead stream (GNR, SNR), southern coast live oak riparian forest (G4, S4), and southern sycamore alder riparian woodland (G4, S4).

No state and/or federally-listed threatened and/or endangered plant species are expected to occur in the Project area. Based on the presence of marginally suitable habitat, the Project area was determined to have a low potential for occurrence of the following CNPS List 1B, 2B, or 4 plant species: Abrams' oxytheca (*Acanthoscyphus parishii* var. *abramsii*), Miles' milk-vetch (*Astragalus didymocarpus* var. *milesianus*), late-flowered mariposa-lily (*Calochortus fimbriatus*), umbrella larkspur (*Delphinium umbracolorum*), mesa horkelia (*Horkelia cuneata* var. *puberula*), pale-yellow layia (*Layia heterotricha*), Davidson's bush-mallow (*Malacothamnus davidsonii*), Baja navarretia (*Navarretia peninsularis*), chaparral nolina (*Nolina cismontana*), and Nuttall's scrub oak (*Quercus Dumosa*). The Project area was determined to have a high potential for occurrence of the following CNPS List 1B, 2B, or 4 plant species: Plummer's mariposa-lily (*Calochortus plummerae*), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), and white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*).

No special-status wildlife species were observed during the reconnaissance-level survey. CNDDDB lists 23 special-status wildlife species in the Project region. Of those listed, 13 species were determined to have a low potential, two species were determined to have a moderate potential, and one species was determined to have a high potential to occur in the Project area.

Based on the presence of potentially suitable habitat, the Project area was determined to have a low potential for occurrence of the following Species of Special Concern: coast range newt (*Taricha torosa*), coastal whiptail (*Aspidoscelis tigris steinegeri*), San Bernardino ringneck snake (*Diadophis punctatus modestus*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), Dulzura pocket mouse (*Eumops perotis californicus*), and American badger (*Taxidea taxus*). In addition, the Project area was determined to have a moderate potential for occurrence Crotch's bumble bee (State Endangered; *Bombus crotchii*). Lastly, the Project area was determined to have a high potential for occurrence of coast horned lizard (State Species of Special Concern; *Phrynosoma blainvillii*).

Special-status bird species are not likely to nest in the Project area, but some have a low to moderate potential to forage, including burrowing owl (State Species of Special Concern; *Athene cunicularia*), California condor (Federal Endangered, State Endangered, California Fully Protected; *Gymnogyps californianus*), yellow warbler (State Species of Special Concern; *Setophaga petechia*), and least Bell's vireo (Federal Endangered, State Endangered; *Vireo bellii pusillus*).

Project-Specific Analysis

Table 3. Special-Status Plant Species Occurring in the Project Region

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW	CNPS			
<i>Acanthoscyphus parishii</i> var. <i>abramsii</i>	Abrams' oxytheca			1B.2	Jun-Aug	Dry, rocky mountain soils between 727-8,418 ft elevation.	Low (8)
<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Miles' milk-vetch			1B.2	Apr-Jul	Coastal scrub with clay soils between 160 and 1,265 ft elevation	Low (7)
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Ventura Marsh milk-vetch	FE	SE	1B.1	May-Oct	Marshes, swamps, and coastal scrub or dune between 0-200 ft elevation	Does Not Occur (1, 3, 4)
<i>Calochortus fimbriatus</i>	late-flowered mariposa-lily			1B.3	Jun-Aug	Chaparral, cismontane woodland, and riparian woodland with serpentine soils between 885-5,400 ft elevation	Low (2, 7)
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily			1B.2	Apr-Jul	Meadows and seeps, chaparral, and lower montane coniferous forests between 640-8,300 ft elevation	Does Not Occur (1)
<i>Calochortus plummerae</i>	Plummer's mariposa-lily			4.2	May-Jul	Dry, rocky places on coastal chaparral and inland hills between 0-7,300 ft elevation	High (9)
<i>Caulanthus lemmonii</i>	Lemmon's jewelflower			1B.2	Mar-May	Pinyon and juniper woodland and valley/foothill grasslands between 3,560-9,910 ft elevation	Does Not Occur (3)
<i>Delphinium umbraculorum</i>	umbrella larkspur			1B.3	Apr-Jun	Mesic sites in cismontane woodlands and chaparral between 705-6,810 ft elevation	Unlikely (7)
<i>Fritillaria ojaiensis</i>	Ojai fritillary			1B.2	Apr-Jun	Broadleaf upland forest, chaparral, lower montane coniferous forest, and cismontane woodland between 310-3,740 ft elevation	Does Not Occur (1, 2)
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia			1B.1	Feb-Jul	Sandy or gravelly sites in chaparral, cismontane woodland, and coastal scrub between 50-5,400 ft elevation	Low (2)
<i>Imperata brevifolia</i>	California satintail			2B.1	Mar-May	Mesic sites in coastal scrub, chaparral, riparian scrub, Mojavean desert scrub, and meadows/seeps between 10-4,905 ft elevation	Does Not Occur (1)
<i>Layia heterotricha</i>	pale-yellow layia			1B.1	Mar-Jun	Cismontane woodland, coastal scrub, pinyon and juniper woodland, and valley/foothill grassland between 295-5,905 ft elevation	Low (8)

Project-Specific Analysis

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW	CNPS			
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass			4.3	Jan-July	Dry, disturbed areas such as bottomland, riverbanks, meadows, fields, and pastures, with dry soils, below 2,800 ft elevation.	High (9)
<i>Malacothamnus davidsonii</i>	Davidson's bush-mallow			1B.2	Jun-Jan	Sandy washes in coastal scrub, riparian woodland, chaparral, and cismontane woodland between 490-5,005 ft elevation	Low (8)
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	white-veined monardella			1B.3	Jun-Aug	Chaparral and cismontane woodland on dry slopes between 160-4,200 ft elevation	High (9)
<i>Muhlenbergia utilis</i>	aparejo grass			2B.2	Oct-Mar	Wet sites along streams, ponds between 820-3,280 ft. elevation	Does Not Occur (1)
<i>Navarretia ojaiensis</i>	Ojai navarretia			1B.1	Jan-Apr	Drying alkaline flats in chaparral, cismontane woodland, and coastal scrub between 900-9,202 ft elevation	High (9)
<i>Navarretia peninsularis</i>	Baja navarretia			1B.2	Jun-Aug	Wet areas in lower montane coniferous forest, chaparral, pinyon and juniper woodland and meadows/seeps between 3,770-7,760 ft elevation	Low (1, 3)
<i>Nolina cismontana</i>	chaparral nolina			1B.2	Jun-Aug	Chaparral and coastal scrub primarily in gabbro soils between 460-3,610 ft elevation	Low (8)
<i>Orobancha valida</i> ssp. <i>valida</i>	Rock Creek broomrape			1B.2	May-Sep	Chaparral and pinyon-juniper woodland with serpentine soils between 3,360-6,560 ft elevation	Does Not Occur (3)
<i>Quercus dumosa</i>	Nuttall's scrub oak			1B.2	Feb-Apr	Closed-cone conifer forest, chapparal, and coastal scrub in sandy/clay loam soils between 50-1,310 ft elevation	Low (8)
<i>Sagittaria sanfordii</i>	Sanford's arrowhead			1B.2	May-Jun	Marshes and swamps between 0 and 1,985 ft elevation	Does Not Occur (1)
<i>Sidalcea neomexicana</i>	salt spring checkerbloom			2B.2	Apr-Jun	Alkali springs and marshes in chaparral, coastal scrub, lower montane coniferous forest, and Mojavean Desert scrub between 10-7,810 ft elevation	Does Not Occur (1)
<i>Streptanthus campestris</i>	southern jewelflower			1B.3	May-Jul	Open areas in chaparral or coniferous forest between 3,000-7,500 ft elevation	Does Not Occur (3)
STATUS DEFINITIONS							

Project-Specific Analysis

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW	CNPS			
USFWS					CDFW		
	FE: Species designated as endangered under the federal Endangered Species Act. Endangered = "any species in danger of extinction throughout all or a significant portion of its range."				SE: Endangered = "a species is endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes" and is officially listed as such under the California Endangered Species Act (CESA).		
	FT: Species designated as threatened under the Federal Endangered Species Act = "species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range."				ST: Threatened = "a species that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this Act" (CESA).		
	FPE: Proposed for federal listing as Endangered.				SR: State-listed as Rare = "taxa that are biologically rare, very restricted in distribution, or declining throughout their range but not currently threatened with extirpation" (Special Vascular Plants, Bryophytes, and Lichens List)		
	FPT: Proposed for federal listing as Threatened.						
	C: Candidate for federal listing as Threatened or Endangered.						
CNPS					RATIONALE		
	1A: Plants Presumed Extinct in California				1: Lack of suitable habitat		
	1B: Plants Rare, Threatened, or Endangered in California and Elsewhere				2: Lack of suitable substrate		
	2: Plants Rare, Threatened, or Endangered in California but More Common Elsewhere				3: Beyond known elevation range		
	4: Watch List of Plants with Limited Distribution				4: Beyond known geographic range		
					5: Required soil moisture regime not present		
	2: LIKELIHOOD FOR OCCURRENCE				6: Observable perennial species not observed during survey		
	Not likely: Not likely to occur				7: Marginally suitable habitat present		
	Low: Low potential to occur				8: Suitable habitat present but no known records within one mile		
	Moderate: Moderate potential to occur				9: Suitable habitat present with known records within one mile		
	High: High potential to occur				10: Observed during survey		
	Present: Known to occur						

Project-Specific Analysis

Table 4. Special-Status Wildlife Species Occurring in the Project Region

Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW		
Fishes					
<i>Catostomus santaanae</i>	Santa Ana sucker	FT		Shallow portions of rivers and streams with coarse substrates consisting of gravel, rubble, and boulders with growths of algae; lower and middle Santa Ana River, east, west, and north forks of San Gabriel River, and lower Big Tujunga Creek.	Does Not Occur (1)
<i>Gila orcuttii</i>	Arroyo chub		SSC	Native streams from Malibu Creek to San Luis Rey River. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave, and San Diego River basins.	Does Not Occur (1)
<i>Oncorhynchus mykiss irideus</i>	Southern California steelhead	FE		Coastal streams from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County).	Does Not Occur (1)
Amphibians					
<i>Anaxyrus californicus arroyo toad</i>	arroyo toad	FE	SSC	Semi-arid habitats near washes or intermittent streams with low-flow pools, alluvial benches or upland habitats that include friable soils for burrowing	Does Not Occur (1)
<i>Rana boylei</i>	foothill yellow-legged frog		SE, SSC	Partly shaded, shallow streams and riffles with a rocky substrate	Does Not Occur (1)
<i>Rana draytonii</i>	California red-legged frog	FT	SSC	Lowlands and foothills in or near deep permanent water sources with dense, shrubby, or emergent riparian vegetation	Does Not Occur (1)
<i>Taricha torosa</i>	Coast Range newt		SSC	Drier habitats such as oak woodlands or hilly grasslands. Breeding sites include ponds, reservoirs, and slow-moving streams.	Low (5)
Reptiles					
<i>Actinemys pallida</i>	southwestern pond turtle		SSC	Ponds, marshes, rivers, streams, and irrigation ditches with basking sites and suitable upland habitat for egg-laying	Not likely (5)
<i>Anniella</i> spp.	California legless lizard		SSC	Moist sandy or loose loamy soils under sparse vegetation	Not likely (2, 5)
<i>Aspidoscelis tigris stejnegeri</i>	Coastal whiptail		SSC	Hot and dry chaparral, woodland, and riparian areas with sparse foliage.	Low (5)
<i>Diadophis punctatus modestus</i>	San Bernardino ringneck snake			Prefers moist habitats, including wet meadows, rocky hillsides, gardens, farmland, grassland, chaparral, mixed coniferous forests, woodlands.	Low (6)
<i>Phrynosoma blainvillii</i>	coast horned lizard		SSC	Sandy substrate with scattered low bushes and abundant native ants and other insects	High (9)
<i>Salvadora hexalepis virgulata</i>	coast patch-nosed snake		SSC	Brushy or shrubby vegetation west of the south coast, peninsular and transverse mountain range peaks	Low (6)
<i>Thamnophis hammondi</i>	two-striped gartersnake		SSC	Riparian areas in coastal California from Salinas south to northwest Baja California up to 7,000 ft elevation	Not Likely (1)

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Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW		
Birds					
<i>Athene cunicularia</i>	burrowing owl		SSC	Open, dry annual or perennial grasslands and scrublands with low-growing vegetation	Nesting: Not likely (1) Foraging: Low (5)
<i>Gymnogyps californianus</i>	California condor	FE	SE, FP	Vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude for foraging; and deep canyons with clefts in vertical walls for nesting	Nesting: Not likely (1) Foraging: Moderate (6)
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	FT	SSC	Coastal sage scrub dominated or co-dominated by California sagebrush below 1,700 ft elevation.	Nesting: Does Not Occur (4) Foraging: Does Not Occur (4)
<i>Setophaga petechia</i>	yellow warbler		SSC	Riparian vegetation among cottonwood, sycamore, ash, or alder in close proximity to water or montane scrub of Cascade and Sierra Nevada ranges	Nesting: Not likely (1) Foraging: Low (5)
<i>Vireo bellii pusillus</i>	least Bell's vireo	FE	SE	Riparian areas in vicinity of water or dry river bottoms below 2,000 ft elevation	Nesting: Not likely (1) Foraging: Low (5)
Mammals					
<i>Chaetodipus californicus femoralis</i>	dulzura pocket mouse		SSC	Coastal scrub, chaparral and grasslands, especially at the interface of chaparral and grassland	Low (5)
<i>Eumops perotis californicus</i>	western mastiff bat		SSC	Roosts in cliff face crevices, high buildings, trees and tunnels among open semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral	Low (5)
<i>Taxidea taxus</i>	American badger		SSC	Drier open stages of most shrub, forest, and herbaceous habitats, with friable soils	Low (5)
<i>Bombus crotchii</i>	Crotch's bumble bee		SE	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> ssp., <i>Phacelia</i> ssp., <i>Clarkia</i> ssp., <i>Dendromecon</i> ssp., <i>Eschscholzia</i> ssp., and <i>Eriogonum</i> ssp.	Moderate (6)

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Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/Rationale
		USFWS	CDFW		
Status Definitions					
USFWS		CDFW			
FE: Species designated as Endangered under the Federal Endangered Species Act. Endangered = "any species in danger of extinction throughout all or a significant portion of its range."		ST: Threatened = "a species that, although not presently Threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this Act (California Endangered Species Act)."			
FT: Species designated as Threatened under the Federal Endangered Species Act. Threatened = "species likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range."		SE: Endangered = "a species is endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes."			
FPE: Proposed for federal listing as Endangered. FPT: Proposed for federal listing as Threatened. BCC: Bird of Conservation Concern		SR: Rare = " not presently Threatened with extinction, but in such small numbers throughout its range that it may become Endangered if its present environment worsens." FP: Fully Protected species are protected by special legislation and cannot be taken at any time. SSC: Species of Special Concern. WL: Watch List			
<u>2: LIKELIHOOD FOR OCCURRENCE</u>		<u>RATIONALE</u>			
Not likely: Not likely to occur		1: Lack of suitable habitat			
Low: Low potential to occur		2: Lack of suitable substrate			
Moderate: Moderate potential to occur		3: Beyond known elevation range			
High: High potential to occur		4: Beyond known geographic range			
Present: Known to occur		5: Marginally suitable habitat present			
		6: Suitable habitat present but no known records within one mile (or appropriate distance based on typically-sized territory for the species)			
		7: Suitable habitat present with known records within one mile (or appropriate distance based on typically-sized territory for the species)			
		8: Observed during survey			
		9: Overwintering migrant			

Project-Specific Analysis

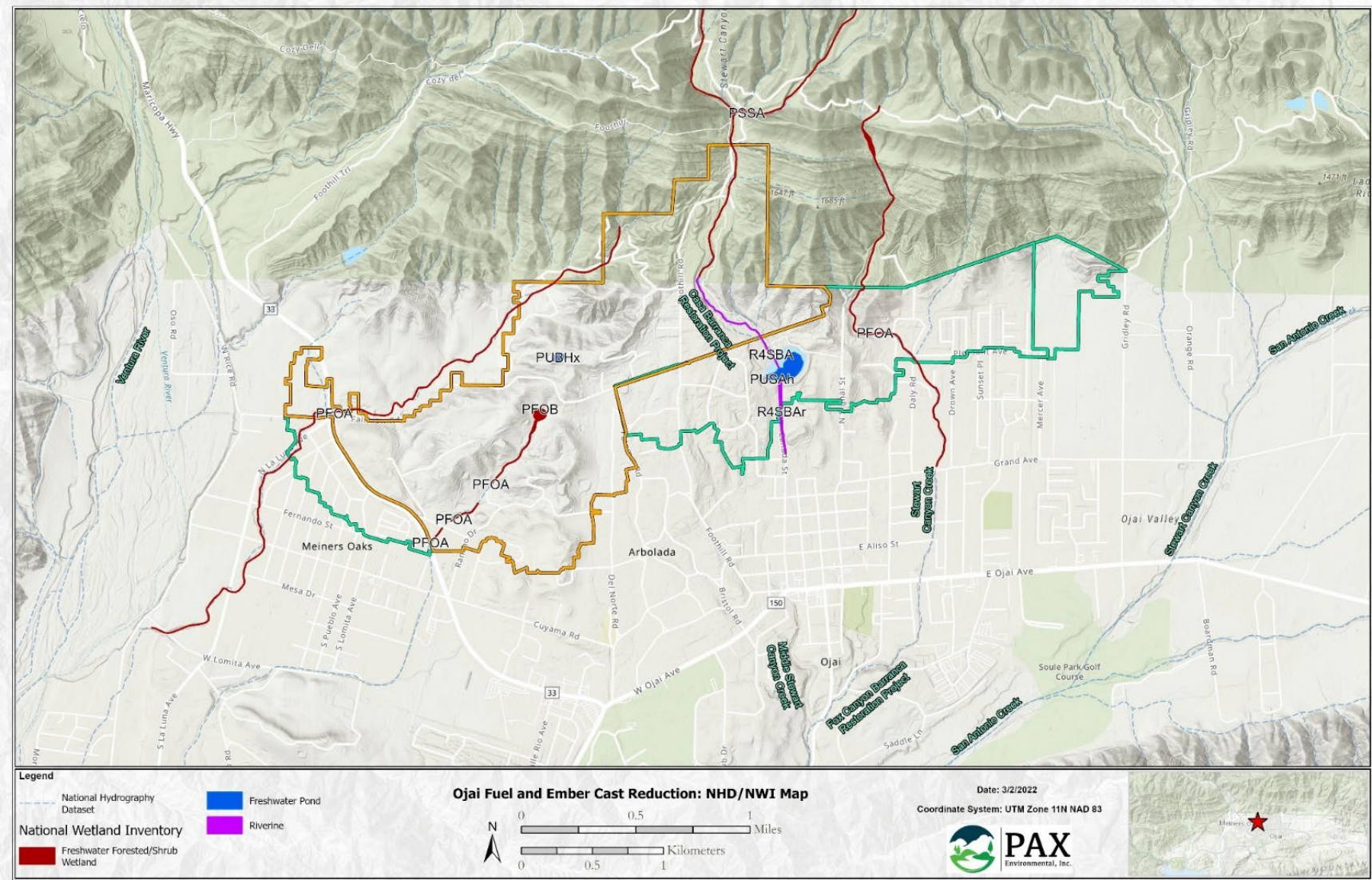


Figure 2. National Hydrographic Data and Wetland Map

3.5.1.2 Impact BIO-1 - Less than Significant

The PEIR states that mechanical treatments have the highest potential to harm special-status plants in comparison to other treatment activities. Masticating, tilling, grubbing, and raking can disturb soil several inches below the surface affecting roots, rhizomes, bulbs and other underground parts of special-status plants, as well as the seedbed, and affecting soil stability. In addition, the removal of vegetation using mechanical treatments is less precise (in comparison to manual treatments); therefore, this treatment activity is used at sites where precision removal is not necessary. Mechanical treatments in areas occupied by special-status plants would likely directly kill or damage these plants. This treatment activity would also have the highest potential to adversely modify habitat in a way that reduces survivorship, growth, and reestablishment of special-status plant populations because of the large-scale vegetation removal and soil disturbance.

Treatment activities could result in direct or indirect adverse effects to the special-status plants described above. **SPR BIO-1** requires that a qualified RPF or biologist 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 the completion of the PSA and implementation of the treatment project. The data review and survey results for the proposed Project are described above. Some special-status species typically associated with wet or riparian habitat have a low likelihood of occurrence in the Project area. The Project proponent would establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the PEIR, based on 14 CCR Section 916.5 of the California Forest Practice Rules. Pursuant to **SPR HYD-4**, WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat (i.e., wetland areas) within the treatment area would be implemented, which would avoid most adverse effects to these species. Prior to implementation of treatments, protocol-level surveys for special-status plants would be conducted (**SPR BIO-7**). If special-status species are identified during surveys, a no-disturbance buffer of appropriate distance by a qualified biologist will be established around the area occupied by the species within which mechanical and manual treatments will not occur.

The Project proponent would implement the following SPRs to minimize impacts under Impact BIO-1:

- SPR BIO-1, which includes the already completed initial data review and reconnaissance-level survey
- SPR BIO-2 requires crew members and contractors receive training from a qualified RPF or biologist prior to beginning treatment.
- SPR BIO-3 is contingent upon the findings of SPR BIO-1 and initiates protocol-level surveys and mapping.
- SPR BIO-4 requires the project proponent consult with a RPF or qualified biologist to design treatments in riparian habitats to retain or improve habitat function.
- SPR BIO-5 requires that chaparral and coastal sage scrub be identified to the alliance level and that treatments be designed to maintain or enhance habitat function of said alliance and avoid environmental effects of type conversion.
- SPR BIO-6 prevents the spread of plant pathogens.
- SPR BIO-7 is contingent upon the findings of SPR BIO-1 and would require a survey for special-status plants.
- SPR BIO-9 prevents the spread of invasive plants, noxious weeds, and invasive wildlife.
- SPR GEO-1 suspends disturbance during heavy precipitation

- SPR GEO-3 limits high ground pressure vehicles
- SPR GEO-4 monitors erosion
- SPR GEO-5 drains stormwater via water breaks
- SPR GEO-7 minimizes erosion
- SPR HYD-4 identifies and protects watercourse and lake protection zones

Pursuant to SPR BIO-7, protocol-level surveys for special-status plants will be conducted prior to implementation of any treatment. If special-status plants are identified during surveys, the following mitigation measures would be applicable to avoid impacts:

- 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-1c - compensate for unavoidable loss of special-status plants

The impacts of the treatment activities on special-status plants were examined in the PEIR and determined to be less than significant. The impact of the proposed Project on special-status plants is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.3 Impact BIO-2 - Less than Significant

Treatment activities could result in direct or indirect impacts to special-status wildlife, which are listed in Table 4. Data review and reconnaissance surveys were conducted in accordance with **SPR BIO-1** (Appendix C - Biological Resources Report). No federally and/or state-listed threatened or endangered wildlife species were determined to potentially occur exclusively on the Project site.

According to the CNDDDB BIOS database, 15 species have potentially suitable habitat in the Project area: 13 species were determined to have a low potential to occur in the to occur in the Project area, one species was determined to have a moderate potential to occur in the Project area (Crotch bumblebee), and one species was determined to have a high potential to occur in the Project area (coast horned lizard). The CalVTP PEIR discusses impacts to special-status wildlife by life history categories and provides applicable SPRs for these groups along with mitigation measures that reduce impacts to less than significant. The 15 potentially present species fall into the following PEIR-designated groups:

- **Tree-Nesting and Cavity-Nesting Wildlife:** No tree-nesting or cavity-nesting species were identified as potentially nesting in the Project area; however, all tree and cavity-nesting avian species would be protected with pre-implementation surveys (see below “Nesting Birds”).
- **Shrub-Nesting Wildlife:** No shrub-nesting species were identified as potentially nesting in the Project area; however, all shrub-nesting avian species would be protected with pre-implementation surveys (see below “Nesting Birds”).

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- **Ground-Nesting Wildlife:** No ground-nesting species were identified as potentially nesting in the Project area; however, all ground-nesting avian species would be protected with pre-implementation surveys (see below “Nesting Birds”).
- **Burrowing or Denning Wildlife:** Dulzura pocket mouse (*Eumops perotis californicus*), and American badger (*Taxidea taxus*)
 - These species have a low probability of occurring in the project area and habitat was determined to be marginal following reconnaissance-level surveys conducted per SPR BIO-1. Based on these findings, no protocol-level surveys or mitigation measures for protection of burrowing or denning wildlife would be required. All workers would receive biological resource training to avoid any previously unidentified burrowing or denning sites, which would be protective of special-status and common burrowing or denning wildlife (**SPR BIO-2**).
- **Insects and Other Terrestrial Invertebrates:** Crotch’s bumble bee (*Bombus crotchii*)
 - Focused surveys as per **SPR BIO-10** would include surveys for bumblebee presence on spring flowers and flying individuals. Implementation of **MM BIO-2g** is designed to avoid loss of Crotch's bumblebee nests. Surveying for Crotch’s bumblebee per **SPR BIO-10** and minimizing impacts to Crotch’s bumblebee per **MM BIO-2g** are described with additional detail in Appendix C (Biological Resources Report).
- **Bats:** There are no special-status bat species in or near the Project area.
- **Ungulates:** There are no special-status ungulate species in or near the Project area.
- **Fish and Aquatic Invertebrates:** There are no special-status fish or aquatic invertebrate species in or near the Project area.
- **Amphibians and Reptiles:** coast range newt (*Taricha torosa*), coastal whiptail (*Aspidoscelis tigris steinegeri*), San Bernardino ringneck snake (*Diadophis punctatus modestus*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), coast horned lizard (*Phrynosoma blainvillii*)
 - Following reconnaissance-level surveys per SPR BIO-1, habitat for special-status reptiles and amphibians was determined to be marginal with the exception of coast horned lizard. A protocol-level survey of potential suitable habitat would be conducted for presence of coast horned lizard per **SPR BIO-10**. If coast horned lizards are present, the occupied portion of the treatment area would be avoided and buffered as per **MM BIO-2b** and compensated for per **MM BIO-2c** as applicable. **MMs BIO-3a, 3b, 3c, and 4** avoid and compensate for loss of sensitive natural communities that could provide habitat for wildlife as described below under Mitigation Measures. Procedures and protocols for surveying (**SPR BIO-10**) for and avoiding (**MM BIO-2b**) special-status herpetofauna (e.g., coast horned lizard), as well as documenting losses to aid in determining when **MM BIO-2c** are described in Appendix C (Biological Resources Report).

Special-Status and Common Nesting Birds, Including Raptors. No special-status bird species are likely to nest in the Project area, but some have a low to moderate potential to forage, as described in the discussion section. Breeding behavior of most species of bird is protected by the Migratory Bird Treaty Act (MBTA) and California FGC 3503. Nesting bird protection measures are included in **SPRs BIO-10** survey for special-status wildlife and nursery sites and **BIO-12** protect common nesting birds, including raptors and ground nesting birds. Protocols

and procedures for fulfilling the preconstruction nesting bird survey requirements of **SPR BIO-10** and **SPR BIO-12** are described in Appendix C (Biological Resources Report).

With implementation of applicable SPRs and MMs, potential impacts of the proposed Project on special-status species would be less than significant. The Project proponent would implement the following SPRs to minimize impacts under Impact BIO-2:

- SPR BIO-1 includes the already completed initial data review and reconnaissance-level survey.
- SPR BIO-2 requires crew members and contractors receive training from a qualified RPF or biologist prior to beginning treatment.
- SPR BIO-4 requires the project proponent consult with a RPF or qualified biologist to design treatments in riparian habitats to retain or improve habitat function.
- SPR BIO-5 requires that chaparral and coastal sage scrub be identified to the alliance level and that treatments be designed to maintain or enhance habitat function of said alliance and avoid environmental effects of type conversion.
- SPR BIO-10 is contingent on the findings of SPR BIO-1 and includes surveying for special-status wildlife and nursery sites.
- SPR BIO-12 protects common nesting birds, including raptors.
- SPR GEO-1 suspends disturbance during heavy precipitation.
- SPR GEO-3 limits high ground pressure vehicles.
- SPR GEO-4 monitors erosion.
- SPR GEO-5 drains stormwater via water breaks.
- SPR GEO-7 minimizes erosion.
- SPR HYD-4 identifies and protects watercourse and lake protection zones.

Pursuant to SPR BIO-10, protocol-level surveys for special-status wildlife would be conducted prior to implementation of any treatment. If special-status wildlife are identified during protocol-level surveys, the following mitigation measures would be applicable to avoid impacts and ensure the Project impacts are less than significant:

- MM BIO-2b - avoid loss of special-status wildlife not listed under ESA or CESA
- MM BIO-2c - compensate for unavoidable loss of special-status wildlife
- MM BIO-2g - design treatment to avoid mortality, injury, or disturbance and maintain habitat function for special-status bumblebees
- MM BIO-3a - design treatments to avoid loss of sensitive natural communities and oak woodlands
- MM BIO-3b - compensate for loss of sensitive natural communities and oak woodlands
- MM BIO-3c - compensate for unavoidable loss of riparian habitat
- MM BIO-4 - avoid state and federally protected wetlands

Project-Specific Analysis

The impacts of the treatment activities on special-status wildlife were examined in the PEIR and determined to be less than significant. The impact on special-status wildlife is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.4 Impact BIO-3 - Less than Significant

Data review and reconnaissance-level surveys of project-specific biological resources were conducted according to **SPR BIO-1**. The CNDDDB records search identified California walnut woodland (G2, S2.1), southern California steelhead stream (GNR, SNR), southern coast live oak riparian forest (G4, S4), and southern sycamore alder riparian woodland (G4, S4). Due to the likely presence of sensitive communities overlapping the project area, **SPR BIO-3** would be implemented and requires site-specific surveys and mapping within sensitive habitat types. **SPR BIO-4** would be implemented so that the treatment would be designed to maintain habitat function and avoid type conversion of riparian habitat. Implementation of **SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, and HYD-4** require that potential sensitive natural communities and other sensitive habitats be identified and protected prior to implementing treatments. With implementation of applicable SPRs and MMs, potential impacts of the proposed Project on sensitive communities would be less than significant.

The Project proponent would implement the following SPRs to minimize impacts under Impact BIO-3:

- SPR BIO-1 requires data review and a reconnaissance-level survey of the proposed treatment site to determine whether there is potential for sensitive natural communities or sensitive habitats to occur or be affected by treatment activities
- SPR BIO-2 requires crew members and contractors to receive training regarding biological resources from a qualified RPF or biologist so crews are aware of potential sensitive natural communities and sensitive habitats in the treatment area and measures to reduce adverse effects
- SPR BIO-3 requires a protocol-level survey for sensitive natural communities and identify them prior to treatment so that appropriate avoidance and minimization measures can be implemented
- SPR BIO-4 requires that treatments in riparian habitat be designed to avoid loss or degradation of riparian habitat function.
- SPR BIO-5 requires that chaparral and coastal sage scrub be identified to the alliance level and that treatments be designed to maintain or enhance habitat function of said alliance and avoid environmental effects of type conversion.
- SPR BIO-6 requires that best management practices be used to avoid spreading plant pathogens, such as *Phytophthora*, that could kill oak trees or other characteristic vegetation that comprises sensitive natural communities and sensitive habitats.
- SPR BIO-9 prevents spread of invasive plants, noxious weeds, and invasive wildlife
- SPR GEO-1 suspends disturbance during heavy precipitation.
- SPR GEO-3 limits high ground pressure vehicles.

- SPR GEO-4 monitors erosion.
- SPR GEO-5 drains stormwater via water breaks.
- SPR GEO-7 minimizes erosion.
- SPR HYD-4 identifies and protects watercourse and lake protection zones.

If sensitive communities are identified during protocol-level surveys (SPR BIO-3), the following mitigation measures would be applicable to avoid impacts and ensure the project impacts are less than significant:

- MM BIO-3a - design treatments to avoid loss of sensitive natural communities and oak woodlands
- MM BIO-3b - compensate for loss of sensitive natural communities and oak woodlands
- MM BIO-3c - compensate for unavoidable loss of riparian habitat

The impacts of the treatment activities on sensitive natural communities, including those mapped in the Project area, were examined in the PEIR and determined to be less than significant. The impact on sensitive natural communities is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.5 Impact BIO-4 - Less than Significant

The proposed Project does not involve work in state-protected or federally-protected wetlands; however, a search of the National Waters Inventory and national hydrographic database identified three freshwater forest/shrub wetlands, one riverine wetland in the central portion of the Project area, and one freshwater pond in the Project area. The treatment area contains portions of riparian streams and seasonal wetland features. Under **SPR HYD-4**, WLPZs ranging from 50 to 150 feet would be established adjacent to all Class I and II streams within the treatment area, and Equipment Limitation Zones (ELZs) of at least 25 feet would be established around all Class III ephemeral streams within the treatment area. Under **MM BIO-4**, a qualified RPF or biologist will delineate the boundaries of the seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance would be prohibited within this buffer.

The Project includes non-native species removal, which would enhance riparian habitats and provide the opportunity for passive habitat restoration. If non-native species removal is conducted in or near wetland features, application of **MM BIO-4** using the following avoidance and minimization measures would avoid or reduce potential impacts:

- *Preconstruction Wetland Area and Riparian Habitat Avoidance and Minimization.* Riparian vegetation will not be removed, no machinery will come within 50 ft of riparian habitat or wetlands without a biological monitor. No fueling of equipment will occur within 100 ft from any wetland or riparian resources. If impacts are expected to riparian habitat or associated wetlands, work will not proceed until consultation with CDFW is conducted and determinations are made.

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With implementation of applicable SPRs and MMs, potential impacts of the proposed Project on wetlands would be less than significant. The project proponent would implement the following SPRs to minimize impacts under Impact BIO-4:

- SPR BIO-1 requires data review and a reconnaissance-level survey of the proposed treatment site to determine whether there is potential for protected wetlands to occur or be affected by treatment activities
- SPR BIO-2 requires crew members and contractors to receive training regarding biological resources from a qualified RPF or biologist so crews are aware of wetlands in the treatment area and measures to reduce adverse effects
- SPR BIO-3 requires a protocol-level survey for sensitive habitats.
- SPR BIO-4 requires that treatments in riparian habitat be designed to avoid loss or degradation of riparian habitat function.
- SPR BIO-5 requires that chaparral and coastal sage scrub be identified to the alliance level and that treatments be designed to maintain or enhance habitat function of said alliance and avoid environmental effects of type conversion.
- SPR BIO-6 requires that best management practices be used to avoid spreading plant pathogens, such as *Phytophthora*, that could kill oak trees or other characteristic vegetation that comprises sensitive natural communities and sensitive habitats.
- SPR BIO-9 prevents spread of invasive plants, noxious weeds, and invasive wildlife
- SPR GEO-1 suspends disturbance during heavy precipitation.
- SPR GEO-3 limits high ground pressure vehicles.
- SPR GEO-4 monitors erosion.
- SPR GEO-5 drains stormwater via water breaks.
- SPR GEO-7 minimizes erosion.
- SPR HYD-4 identifies and protects watercourse and lake protection zones.

The SPRs listed above would substantially reduce potential direct and indirect impacts to wetlands and aquatic habitats; however, some treatment activities could inadvertently destroy or adversely modify protected wetlands resulting in loss of wetland habitat functions and values from ground disturbance or upland vegetation removal that alters hydrology, direct removal of wetland vegetation, or fill of wetlands. If this occurred, it would be a potentially significant impact. The following mitigation measure would be applied to reduce impacts to less than significant:

- MM BIO-4 - perform a wetland delineation and avoid state and federally protected wetlands with no-disturbance buffers clearly marked.

The impacts of the treatment activities on wetlands were examined in the PEIR and determined to be less than significant. The impact on wetlands is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.6 Impact BIO-5 - Less than Significant

Maintaining connectivity between areas of suitable habitat is critical for dispersal, migration, foraging, and genetic health of plant and wildlife species. A functional network of connected habitats is essential to the continued existence of California's diverse species and natural communities in the face of both human land use and climate change. Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. In addition, aquatic connectivity is critical for anadromous fish like salmon that encounter many potential barriers as they return upstream to their places of origin. Projects that introduce substantial barriers to movement of resident or migratory fish or wildlife species, or hinder the normal activities of wildlife, require mitigation to offset Project effects.

The Project area consists of open space and low-density residential development. The proposed Project does not involve the construction of hardscape, fencing, or other obstacles to wildlife movement. Due to the nature of the proposed treatment activities, implementation would not result in a substantial change in the existing conditions that facilitate wildlife movement in the treatment area. The Project would not be expected to affect or impinge local or regional wildlife movement or migration patterns and therefore, impacts would be less than significant.

The Project proponent would implement the following SPRs to minimize impacts under Impact BIO-5:

- SPR BIO-1 requires data review and a reconnaissance-level survey of the proposed treatment site to determine whether there is potential for protected wetlands to occur or be affected by treatment activities
- SPR BIO-2 requires crew members and contractors to receive training regarding biological resources from a qualified RPF or biologist so crews are aware of wetlands in the treatment area and measures to reduce adverse effects
- SPR BIO-4 requires that treatments in riparian habitat be designed to avoid loss or degradation of riparian habitat function.
- SPR BIO-5 requires that chaparral and coastal sage scrub be identified to the alliance level and that treatments be designed to maintain or enhance habitat function of said alliance and avoid environmental effects of type conversion.
- SPR BIO-10 is contingent on the findings of SPR BIO-1 and includes surveying for nursery sites, such as rattlesnake dens or rookeries.
- SPR BIO-12 protects common nesting birds, including raptors.
- SPR GEO-1 suspends disturbance during heavy precipitation.
- SPR GEO-3 limits high ground pressure vehicles.
- SPR GEO-4 monitors erosion.
- SPR GEO-5 drains stormwater via water breaks.
- SPR GEO-7 minimizes erosion.
- SPR HYD-4 identifies and protects watercourse and lake protection zones.

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The SPRs listed above would substantially reduce potential direct and indirect impacts to wildlife movement corridors and nursery sites. Implementation of **MM BIO-5** that identifies and avoids important nursery and denning sites would also reduce impacts to less than significant.

- MM BIO-5 - retain nursery habitat and implement buffers to avoid nursery sites

The impacts of the treatment activities on wildlife corridors and nurseries were examined in the PEIR and determined to be less than significant. The impact on wildlife corridors and nurseries is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.7 Impact BIO-6 - Less than Significant

Manual and mechanical treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds as well as lizard species that lay eggs a few centimeters deep in soil under shrubs, because habitat suitable for these common species is present throughout treatment areas.

Nesting bird protection measures are included in **SPRs BIO-10** survey for special-status wildlife and nursery sites and **SPR BIO-12** protect common nesting birds, including raptors and ground nesting birds. Adverse effects on nesting birds would be avoided using the following protocol that fulfills the requirements of **SPR BIO-10** and **SPR BIO-12**. Protocols and procedures for fulfilling the preconstruction nesting bird survey requirements of **SPR BIO-10** and **SPR BIO-12** are described in Appendix C (Biological Resources Report).

With implementation of applicable SPRs, potential impacts of the proposed Project on wetlands would be less than significant. The project proponent would implement the following SPRs to minimize impacts under Impact BIO-6:

- SPR BIO-2 would include training for workers to recognize active bird nests and to identify lizard nests/eggs under shrubs.
- SPR BIO-4 designs treatment to avoid loss or degradation of riparian habitat function and would protect common wildlife in riparian areas
- SPR BIO-6 prevents the spread of plant pathogens that could reduce habitat quality for commons species.
- SPR BIO-9 prevents the spread of noxious plants and invasive species that could negatively impact common wildlife.
- SPR BIO-12 protects common nesting birds, including raptors, by timing to avoid nesting or implementing buffers
- SPR GEO-1 suspends disturbance during heavy precipitation, which would protect common wildlife from the impacts of erosion.
- SPR GEO-3 limits high ground pressure vehicles, which would protect common wildlife from the impacts of erosion.
- SPR GEO-4 monitors erosion.

- SPR GEO-5 drains stormwater via water breaks.
- SPR GEO-7 minimizes erosion.
- SPR HYD-4 identifies and protects watercourse and lake protection zones, which would protect common wildlife in riparian areas or lake protection zones.

There are no mitigation measures required for Impact BIO-6.

The impacts of the treatment activities on common wildlife species were examined in the PEIR and determined to be less than significant. The impact on common wildlife species is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.8 Impact BIO-7 - No Impact

The Project area includes parcels that are in unincorporated Ventura County, as well as parcels that are in the City of Ojai. Although Ventura County has a tree removal ordinance (Non-Coastal Zoning Ordinance Div. 8, Ch. 1, Sec. 8107-25, 2022 Edition), it does not apply to the removal of nonnative species. In the Ventura County non-coastal zone, protected trees include all oaks and sycamores 9.5 inches in circumference or larger (measured at least 4.5 feet above ground), trees of any species with a historical designation, trees of any species 90 inches in circumference or larger, and most 9.5-inch in circumference or larger native trees that are located in the Scenic Resources Protection Zone.

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR. Vegetation treatment projects implemented under the CalVTP PEIR that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per **SPR AD-3** Consistency with Local Plans, Policies, and Ordinances. SPRs that apply to this impact include:

- SPR AD-3 consistency with local plans, policies, and ordinances
- SPR BIO-1 review and survey project specific biological resources
- SPR BIO-3 survey sensitive habitats
- SPR BIO-7 survey for special-status plants

There are no mitigation measures required for Impact BIO-7.

The potential for project treatment activities to result in conflict with local policies or ordinances is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR, which had a determination of less than significant. 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.5.1.9 Impact BIO-8 - No Impact

The Project area does not fall within an adopted California Natural Community Conservation Plan or Habitat Conservation Plan Area or the planning area for such plans. Therefore, the proposed Project would not conflict with any NCCPs or HCPs, and no impact would occur.

3.5.1.10 New Biological Resources Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to biological resources would occur that are not covered in the PEIR.

3.6 Geology, Soils, Paleontology, and Mineral Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29		SPR AQ-4 SPR GEO-1 SPR GEO-2 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR GEO-8 SPR HYD-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30		SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR GEO-8	NA	LTS	No	Yes

¹NA: 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.

<p>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?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.6.1 Discussion

The Project area consists of developed and undeveloped land in the northeast portion of the City of Ojai and the southern foothills of Los Padres National Forest. Habitat is a mixture of sagebrush scrub chaparral, oak woodland, and ornamental-dominated residential areas with elevations ranging from 750 to 1,450 ft above mean sea level. Soils in the Project area are diverse (USDA 2022, Table 5 and Figure 3). with most of the Project area composed of Lodo rocky loam with 30-50% slopes, Sorrento clay loam with 9-15% slopes, Millerton-Millsholm families with 30-80% slopes, and Ojai series soils with 2-30% slopes. Soils in the Lodo series consist of

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shallow, somewhat excessively drained soils formed in material weathered from hard shale and fine-grained sandstone. Soils in the Sorrento series consists of very deep, well drained soils formed mostly from sedimentary rocks in alluvial fans and stabilized floodplains and have slopes of 0 to 15. Soils in the Ojai series consists of very deep, well drained soils that formed in alluvium derived from material weathering from mostly sandstone or related sedimentary rocks.

Table 5. USDA Soil Types

Soil Type	Series Description	Acreage	Percent of Project
Lodo rocky loam, 30-50% slopes	Shallow, somewhat excessively drained soils that formed in material weathered from hard shale and fine-grained sandstone. Found on uplands with slopes of 5 to 75 percent.	184.98	16.66
Sorrento clay loam, heavy variant, 9-15% slopes	Very deep, well drained soils that formed in alluvium mostly from sedimentary rocks. Sorrento soils are on alluvial fans and stabilized floodplains and have slopes of 0 to 15 percent.	141.65	12.76
Millerton-Millsholm families-Rock outcrop complex, 30-80% slopes	Loamy, mixed, thermic family of Lithic Haploxeralfs. The soils have brown, fine sandy loam, neutral A horizons, and reddish brown, fine sandy loam, neutral Bt horizons overlying hornblende schist bedrock.	131.93	11.88
Ojai stony fine sandy loam, 2-15% slopes, eroded	Very deep, well drained soils that formed in alluvium derived from material weathering from mostly sandstone or related sedimentary rocks. Ojai soils are on alluvial fans and terraces and have slopes of 0 to 30 percent.	126.22	11.37
Ojai stony fine sandy loam, 15-30% slopes, eroded		111.68	10.06
Ojai very fine sandy loam, 2-9% slopes, eroded		107.98	9.73
Sespe clay loam, 15-30% slopes, eroded	Moderately deep, well drained soils that formed in material weathered from reddish sandstone and shale bedrock. Sespe soils are on uplands and have slopes of 15 to 75 percent.	79.82	7.19
Sespe clay loam, 30-50% slopes		73.62	6.63
Sorrento clay loam, heavy variant, 2-9% slopes	Very deep, well drained soils that formed in alluvium mostly from sedimentary rocks. Sorrento soils are on alluvial fans and stabilized floodplains and have slopes of 0 to 15 percent.	65.51	5.90
Cortina stony sandy loam, 2-9% slopes	Very deep, somewhat excessively drained soils on alluvial fans and floodplains formed in gravelly alluvium from mixed rock sources. Slope ranges from 0 to 15 percent.	39.00	3.51
Kimball sandy loam, 2-9% slopes, eroded	Very deep, well drained soils formed in alluvium from mixed sources on low terraces with slopes of 0 to 15 percent	19.38	1.75
Azule gravelly loam, 5-9% slopes, warm	Moderately deep, well drained soils formed in material weathered from consolidated alluvium	10.19	0.92

	and from soft shale and fine-grained sandstone on hills with slopes of 9 to 75 percent.		
Millsholm loam, 15-50% slopes	Shallow, well drained soils formed in material weathered from sandstone, mudstone and shale on hills and mountains with slopes of 5 to 75 percent.	8.55	0.77
Azule loam, 2-9% slopes, eroded	Moderately deep, well drained soils formed in material weathered from consolidated alluvium and from soft shale and fine-grained sandstone on hills with slopes of 9 to 75 percent.	7.17	0.65
Anacapa gravelly sandy loam, 2-9% slopes	Deep, well drained soils formed in alluvium derived from predominantly sedimentary rock sources in flood plains and on alluvial fans with slopes of 0 to 9 percent.	2.11	0.19
Riverwash	Very recent depositions of gravel, sand, and silt alluvium along major streams and tributaries.	0.41	0.04

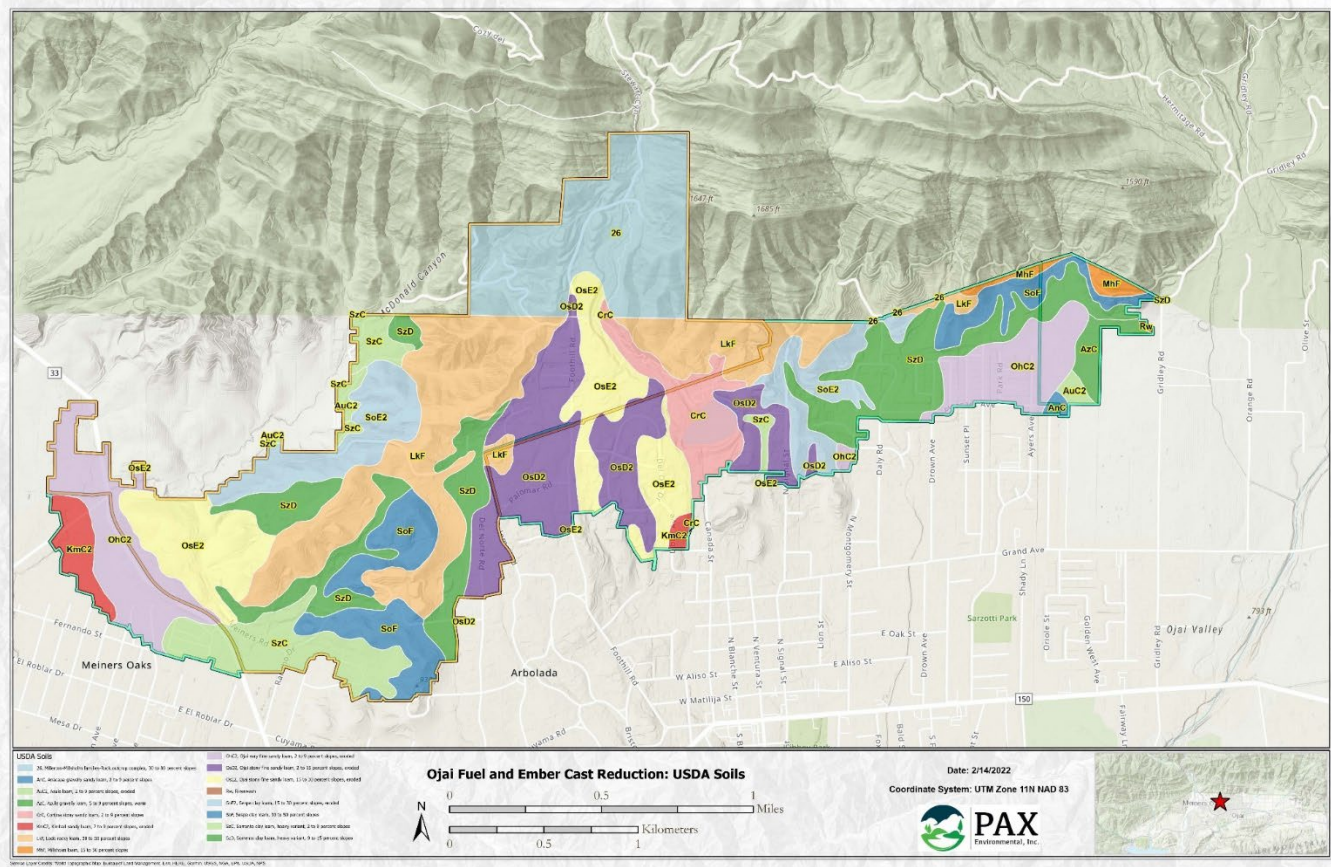


Figure 3. USDA Soils Classification in the Project Area

As described in the Section 3.7.3 of the CalVTP PEIR (p. 3.7-26), treatment activities would not include excavation beyond the top inches of soil during some manual treatments (e.g., mastication). Therefore, there is no potential for treatments to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and the issue was not evaluated further. Similarly, treatment activities would not include

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mineral extraction and would not obstruct access to any mineral resources. Therefore, there is potential for impacts to the availability of mineral resources or on the loss of availability of a known mineral resource or locally important mineral resource recovery site, and the issue was not evaluated further.

3.6.1.1 Impact GEO-1 - Less than Significant

The proposed Project activities include manual and mechanical treatments, which would result in the removal of vegetation and soil disturbance. For manual and mechanical treatments, cut vegetation would be chipped and rebroadcast back over bare soil areas with a depth of three inches or less. Mechanical operations (heavy equipment) would be limited to slopes less than 50%, manual treatment would be limited to slopes less than 65%, and 65% or higher slopes are no work zones. With implementation of applicable SPRs, potential impacts of the proposed Project on erosion and topsoil would be less than significant. The Project proponent would implement the following SPRs to minimize erosion and topsoil loss:

- SPR AQ-4 directs the project to implement dust management measures.
- SPR GEO-1 suspends disturbance during heavy precipitation
- SPR GEO-3 limits high ground pressure vehicles
- SPR GEO-4 monitors erosion
- SPR GEO-5 drains stormwater via water breaks
- SPR GEO-7 minimizes erosion
- SPR GEO-8 require a 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).
- SPR HYD-4 identifies and protects watercourse and lake protection zones

The potential for manual and mechanical treatments to cause substantial erosion or loss of topsoil was examined in the PEIR and determined to be less than significant. The potential for manual and mechanical treatments under the proposed project to cause substantial erosion or loss of topsoil is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.6.1.2 Impact GEO-2 - Less than Significant

The proposed Project activities include manual and mechanical treatments, which would result in the removal of vegetation, impacts to root structure, and soil disturbance on steep slopes. These activities could result in decreasing the stability of slopes, which could increase the risk of landslide. There are no recorded landslides in within the project area; however, three landslides have been recorded along Maricopa Highway in Ojala northwest of the project area and one landslide has been recorded southeast of the project area near Dennison Park (CDOC 2022). The majority of the Project area has slopes of 30-50 percent, with some areas exhibiting slopes of up to 80 percent. Application of the appropriate SPRs would minimize the risk of landslide to less than significant. SPRs that apply to this impact include the following:

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- SPR GEO-1 suspends disturbance during heavy precipitation
- SPR GEO-3 limits high ground pressure vehicles
- SPR GEO-4 monitors erosion
- SPR GEO-5 drains stormwater via water breaks
- SPR GEO-7 minimizes erosion
- SPR GEO-8 require a 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).
- SPR HYD-4 identifies and protects watercourse and lake protection zones

The potential for manual and mechanical treatments to result in increased landslide risk was examined in the PEIR and determined to be less than significant. The potential for manual and mechanical treatments under the proposed Project to result in increased landslide risk is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.6.1.3 New Geology, Soils, Paleontology, and Mineral Resource Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to geology, soils, paleontology, and mineral resources would occur that are not covered in the PEIR.

3.7 Greenhouse Gas Emissions

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	None	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	None	None	PSU	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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3.7.1 Discussion

3.7.1.1 Impact GHG-1 – Less than Significant

The proposed Project would involve the use of gasoline- and diesel-power equipment that would result in greenhouse gas (GHG) emissions. The potential for manual and mechanical treatments to result in a conflict with the applicable plans, policies, and regulations regarding reducing GHG emissions was evaluated in the PEIR and determined to be less than significant. The proposed Project is not subject to Assembly Bill 1504 as a registered carbon offset project, so SPR GHG-1 is not applicable to this Project. The proposed Project is consistent with all applicable plans, policies, and regulations related to the purpose of reducing GHG emissions and treatment activities area consistent with those analyzed in the PEIR and impacts would be less than significant. 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. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.7.1.2 Impact GHG-2 – Potentially Significant and Unavoidable

The proposed Project would involve the use of gasoline- and diesel-power equipment that would result in GHG emissions. No prescribed burning would occur under the proposed Project. The potential for treatment activities

to generate GHG emissions was examined in the PEIR. To meet CEQA's mandate of good faith disclosure and acknowledge potential future impacts in light of uncertainties, the PEIR determined that this GHG impact is potentially significant, recognizing the reliability of estimates for direct GHG emissions and the uncertainty of the intended net carbon benefits of reduced wildfire intensity and increased carbon sequestration in treated areas. There are no SPRs or MMs for this impact. As shown in the CalVTP PEIR Table 3.8-3, for tree fuel types, mechanical and manual treatments would produce 0.92 MTCO₂e/acre and 0.69 MT MTCO₂e/acre, respectively, and for shrub fuel types, mechanical and manual treatments would produce 0.29 MTCO₂e/acre and 0.40 MT MTCO₂e/acre, respectively.

The potential for the proposed Project to result in GHG emissions is within the scope of the PEIR because the proposed treatment activities in terms of GHG emissions from equipment and duration of use are consistent with the associated activities analyzed 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 and the use of GHG emitting equipment would be the same. Therefore, the impact related to GHG emissions is potentially significant and unavoidable. The proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.7.1.3 New GHG Emission Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has evaluated site-specific characteristics to determine that the project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to GHG emissions would occur that are not covered in the PEIR.

3.8 Energy Resources

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

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.8.1 Discussion

3.8.1.1 Impact ENG-1 – Less than Significant

The mechanical and manual treatment activities to be implemented under the proposed Project require the use of heavy equipment, handheld power tools, and vehicles. These use fossil fuels, which results in the consumption of energy resources. The use of equipment and associated energy use would be short-term and less than significant. There are no SPRs or MMs that apply to this impact.

The potential for treatment activities to result in wasteful use of fuels was examined in the PEIR and determined to be less than significant. The potential of the proposed Project to result in wasteful use of fossil fuel from implementing the treatment activities is within the scope of the PEIR analysis, as the use of energy for equipment and duration of use, are consistent with the associated activities analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.8.1.2 New Energy Resources Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the

same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to energy resources would occur that are not covered in the PEIR.

3.9 Hazardous Materials, Public Health and Safety

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	SPR HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	No	None	NA	No Impact	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. 3.10-18 – 3.10-19	Yes	NA	MM HAZ-3	LTS	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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3.9.1 Discussion

3.9.1.1 Impact HAZ-1 - Less than Significant

The proposed Project includes mechanical and manual treatment activities that would require the transportation, use, and storage of petroleum products (fuels, oils, and lubricants). These products are known hazardous materials that can cause significant health hazards. The Project proponent would apply **SPR HAZ-1** to minimize leaks and the risk of resultant contaminants from entering the environment. **SPR HAZ-1** requires maintenance of all diesel-and gasoline-powered equipment to the manufacture’s specification. Therefore, potential impacts of the proposed Project would be less than significant.

The potential for manual and mechanical treatments to create significant health hazard from the use of hazardous materials was examined in the PEIR and determined to be less than significant. The potential for manual and mechanical treatments under the proposed Project to create significant health hazard from the use of hazardous materials is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.9.1.2 Impact HAZ-2 - No Impact

The proposed Project does not include the use of herbicides. Therefore, there would be no impact.

3.9.1.3 Impact HAZ-3 - Less than Significant

The proposed Project includes mechanical and manual treatment activities that would generate soil disturbance, which could expose workers or the environment to hazardous materials. There are no applicable SPRs for this impact. **MM HAZ-3** applies and directs the review of the Hazardous Waste and Substance Site List (Cortese) (www.envirostor.dtsc.ca.gov/public/). Consistent with **MM HAZ-3**, the review of the Cortese List reflects no known hazardous material sites within the Project area and the closest known site is Ready Property, past battery reclamation site and junkyard, located 11.6 miles away in the city of Ventura, California (DTSC 2022). Therefore, the potential for treatment activities to expose workers or the environment to significant hazards from the disturbance of known hazardous materials would be less than significant.

The potential for manual and mechanical treatments to expose the public or environment to significant hazards from disturbance to known hazardous materials sites was examined in the PEIR and determined to be less than significant. The potential for manual and mechanical treatments conducted under the proposed Project to expose the public or environment to significant hazards from disturbance to known hazardous materials sites is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.9.1.4 New Hazardous Materials, Public Health and Safety Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to hazardous materials, public health, and public safety would occur that are not covered in the PEIR.

3.10 Hydrology and Water Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	No	None	None	No Impact	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	SPR BIO-1 SPR GEO-1 SPR GEO-2 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HAZ-1 SPR HYD-1 SPR HYD-2 SPR HYD-4	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	None	None	No Impact	No	Yes

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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-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	None	None	No Impact	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	SPR BIO-4 SPR GEO-1 SPR GEO-2 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR GEO-8 SPR HYD-2 SPR HYD-4 SPR HYD-6	LTS	No	Yes	LTS

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.10.1 Discussion

Southern California has a Mediterranean climate, with warm to hot and dry summers and cool, wet winters. Most rainfall occurs between late October and late April. Thunderstorms at higher elevations can produce flash floods at lower elevations. All of Ventura County is affected by drought: 2022 is the third driest year-to-date for the county over the past 128 years, with precipitation 8.54 inches below normal (NIDIS 2022). In total, 98.75 percent of Ventura County is currently in Category D2 - Severe Drought, which indicates that fire seasons are

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longer and have higher burn intensities, dry fuels, and large fire spatial extent. Trees are stressed and plants increase reproductive mechanisms. Wildlife diseases also increase under drought conditions.

A search of the National Waters Inventory and national hydrographic database identified three freshwater forest/shrub wetlands, one riverine wetland in the central portion, and one freshwater pond in the Project area (Figure 6 of Appendix C - Biological Resources Assessment).

The proposed Project is within the service area of the Los Angeles Regional Water Quality Control Board, the Ventura River Water, and the Casitas Municipal Water District. The State Water Resources Control Board (State Water Board) adopted a statewide water quality order (Vegetation Treatment General Order) on July 6, 2021, for vegetation treatment activities that are within the scope of the CalVTP PEIR. The main goals of the Vegetation Treatment General Order are listed below:

- Maintain and protect water quality from potential waste discharges resulting from vegetation treatment activities.
- Support implementation of vegetation treatment to reduce wildfire risk in California.
- Streamline permitting requirements for certain vegetation treatment activities.

Vegetation treatment activities may result in discharge of waste that could affect the quality of waters of the state and therefore require a permit under California Water Code. The Vegetation Treatment General Order provides a mechanism for vegetation treatment projects that are within the scope of the CalVTP PEIR to comply with California Water Code. If the Project proponent makes a “within the scope” finding, the State Water Board automatically enrolls the project in the Vegetation Treatment General Order using project information provided by the Board of Forestry. The State Water Board informs Project proponents of their permit coverage by sending a Notice of Applicability to the primary contact listed in the PSA. Coverage is anticipated for the proposed Project as discussed below.

3.10.1.1 Impact HYD-1 - No Impact

The proposed Project does not include prescribed burning. No impact would occur.

3.10.1.2 Impact HYD-2 - Less than Significant

The proposed Project includes manual and mechanical treatment, focused on the removal of nonnative species. Cut vegetation would be chipped and dispersed over the Project property grounds for weed control. The project proponent would apply **SPR BIO-1, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-1, HYD-1, and HYD-4**. **SPR BIO-1** requires a qualified RPF or biologist to conduct a data review and a reconnaissance level survey prior to treatment. **SPR GEO-1 through GEO-3** limit ground disturbance and stabilize soils. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** requires that the project proponent drain compacted areas and/or bare linear treatment areas capable of generating storm runoff via water breaks. **SPR GEO-7** minimizes erosion. **SPR HAZ-1** requires maintenance of all diesel-and gasoline-powered equipment to the manufacture’s specification. **SPR HYD-1** requires compliance with water quality regulations (see Discussion above). **SPR HYD-2** prohibits the construction of new roads. **SPR HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. With implementation of the applicable SPRs, the proposed Project would have a less than significant impact on water quality.

The potential for manual and mechanical treatments to result in violations of water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of water quality control plans was examined in the PEIR and determined to be less than significant. The potential for these impacts due to the proposed Project is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.10.1.3 Impact HYD-3 - No Impact

The proposed Project does not include prescribed herbivory. No impact would occur.

3.10.1.4 Impact HYD-4 - No Impact

The proposed Project does not include application of herbicides. No impact would occur.

3.10.1.5 Impact HYD-5 - Less than Significant

Although the proposed Project seeks only to remove nonnative vegetation, treatment activities could alter the existing drainage pattern within the treatment area. Retention of healthy native vegetation, applying chipped material to bare soils, and use of waterbreaks are consistent with the best management practices typically used to minimize alteration of drainage patterns. The Project proponent would implement numerous SPRs to ensure that impacts to drainage are less than significant.

SPR BIO-4 includes designing treatment to avoid loss or degradation of riparian habitat by consulting with a qualified RPF or biologist to retain or improve habitat functions. **SPR GEO-1 through GEO-3** limit ground disturbance and stabilize soils. **SPR GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **SPR GEO-5** requires that the project proponent drain compacted areas and/or bare linear treatment areas capable of generating storm runoff via water breaks. **SPR GEO-7** minimizes erosion. **SPR GEO-8** requires a RPF or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils. **SPR HAZ-1** requires maintenance of all diesel-and gasoline-powered equipment to the manufacture's specification. **SPR HYD-1** requires compliance with water quality regulations (see Discussion above). **SPR HYD-2** prohibits the construction of new roads. **SPR HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. **SPR HYD-6** protects existing drainage infrastructure.

The potential for manual and mechanical treatments to substantially alter drainage patterns in the treatment area was examined in the PEIR and determined to be less than significant. The potential for the proposed Project to substantially alter drainage patterns in the treatment area is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be

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consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.10.1.6 New Hydrology and Water Quality Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to hydrology and water quality would occur that are not covered in the PEIR.

3.11 Land Use and Planning, Population and Housing

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

¹NA: 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.

<p>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?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.11.1 Discussion

The Project area total 1,110 acres, with 684 acres located in the SRA – High Fire Severity Zone, which is within CAL FIRE jurisdiction for wildlands protection. An additional 426 acres of the Project area is located in the LRA – High Fire Severity Zone for Ventura County Fire Department, which also serves the City of Ojai and the eastern Ojai Valley. The Project would primarily occur on privately owned parcels, and treatment activities are proposed on 97.93 acres of the total Project area.

The following plans, policies, and ordinances are relevant to the proposed Project.

- Ventura County General Plan (VCRMA 2022) Hazards and Safety Element:
 - HAZ-1: Fire Prevention Design and Practices. The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.
 - HAZ-2: Controlled Burns and Other Fire Prevention Measures. The County shall continue to recognize the role of fire in local ecosystems by supporting controlled burns and other fire prevention measures
- Ojai Valley Area Plan Wildfire Hazards¹

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- OV-48.2: Fuel Modification Zone Requirement. The County shall require a Fire Protection District approved fuel modification zone (fuel break) of at least 100 linear feet to be provided around all combustible structures located in “high” or “very high” fire hazard areas.
 - OV 49.1: High Fire Hazard Area Requirements. The County shall require discretionary development within high fire hazard areas to be reviewed with attention to the environmental impact of required brush clearance to biological resources, particularly on moderate to steep slopes. The County shall encourage brush clearance that reduces fuel volumes while allowing the selective retention of native shrubs a minimum of 20 feet apart, as permitted by the Ventura County Fire Protection District.
- Ventura County Fire Protection District Unit Strategic Fire Plan 2020 recommendations:
- Continue existing vegetation management efforts and the initiation of new projects as appropriate to reduce risks in the WUI and ember-landing areas within and around the communities at risk.
 - Promote fire-resistant landscaping and construction.
 - Conduct mechanical fuel treatments.
 - Develop and enforce building construction standards and local fire codes.
 - Compose pre-fire safety and escape plans.
 - Continuing development and implementation of focused community meetings, programs, and wildfire safety education efforts directed at structure and property owners in the WUI areas.

3.11.1.1 Impact LU-1- Less than Significant

The treatment activities would include mechanical and manual removal of vegetation. The treatment areas are located on private property. The Project proponent would comply with all local plans, policies, and regulations, per **SPR AD-3**. The Project would be consistent with the requirements of the Ventura County General Plan elements, Ventura County Fire Protection District Unit Strategic Fire Plan 2020 recommendations, and Ojai Valley Area Plan requirements listed above, and impacts would be less than significant.

The potential for manual and mechanical treatments to cause a significant environmental impact due to conflict with a land use plan, policy, or regulation was examined in the PEIR and determined to be less than significant. The potential for the proposed Project to conflict with a land use plan, policy, or regulation is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.11.1.2 Impact LU-2- Less than Significant

The proposed Project area is within the Wildland Urban Interface along the north end of the City of Ojai. Crews would be from the local area and would commute to the Project sites. The proposed Project would not require any staff relocation and would not generate significant population growth. Therefore, impacts would be less than significant.

The potential for the proposed Project to cause substantial population growth and thereby increase the demand for housing was examined in the PEIR and determined to be less than significant. There are no SPRs or MMs for this impact. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the Project does not involve any activities that would result in population growth. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.11.1.3 New Land Use and Planning. Population and Housing Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to land use and planning or population and housing would occur that are not covered in the PEIR.

3.12 Noise

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	SPR AD-3 SPR NOI-1 SPR NOI-2 SPR NOI-3 SPR NOI-4 SPR NOI-5 SPR NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	SPR NOI-1	NA	LTS	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.12.1 Discussion

3.12.1.1 Impact NOI-1- Less than Significant

The treatment activities under the proposed Project include noise-generating heavy equipment, vehicles, handheld power tools, and woodchippers. The treatment areas include residential properties, and many may be near worship facilities, livestock, schools, or other sensitive areas. Consistent with **SPR AD-3** and **SPR NOI-1**, Ventura County’s Noise Ordinance No. 4124 (Ventura County prohibits loud noises during the hours of 9:00 PM and 7:00 AM, at a distance of 50 feet from the property line of the noise source of 50 feet from any such noise source if the noise source is in a public right-of-way.

SPRs that specifically avoid and minimize noise exposure are **SPRs NOI-1, NOI-4, and NOI-6**. **SPR NOI-1** restricts hauling of equipment to daytime hours; and thus, the haul truck passbys associated with treatment activity would not occur during more noise-sensitive evening and nighttime hours. **SPR NOI-4** would require vegetation treatment activities and staging areas be located away from sensitive receptors to the extent feasible to

minimize noise exposure. Additionally, **SPR NOI-6** requires notification be provided to nearby sensitive receptors when heavy equipment would be used for a treatment.

Treatment activities would occur between 7:00 AM and 5:00 PM Monday through Saturday. The amount of time spent at each property would vary by depending on the number of trees and shrubs to be removed and the distance between them. Some properties could require multiple days of work. **SPR NOI-2** specifically addresses that all equipment, vehicles, and power tools, are expected to be used and maintained according to manufacturers' specifications. **SPR NOI-3** requires engine shrouds to be closed during operations. With implementation of the applicable SPRs, the proposed Project would result in a less than significant increases in short-term noise impacts.

The potential for manual and mechanical treatments to cause a substantial short-term increase in exterior ambient noise levels during treatment was examined in the PEIR and determined to be less than significant. The potential for the proposed Project impacts are addressed within the scope of the PEIR analysis because the treatment activities, equipment use, and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the implementation of the SPRs described above in the LRA would ensure that noise impacts in this area is less than significant. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.12.1.2 Impact NOI-2 - Less than Significant

Mechanical treatment activities require large trucks to haul heavy equipment and crews to and from treatment sites. These vehicles may pass through residential areas, increasing the single event noise level (SENL). The SENL describes a receiver's cumulative noise exposure from a single impulsive noise event (e.g., a passing truck, a truck downshifting to engine brake, or an aircraft flying overhead), which is a rating of a discrete noise event that compresses the total sound energy of the event into a 1-second period, measured in decibels.

Travel to and from sites would most likely occur in the early mornings and late afternoons consistent with a typical workday. Heavy equipment would operate throughout the day. **SPR NOI-1** restricts hauling of equipment to daytime hours; and thus, the haul truck passbys associated with treatment activity would not occur during more noise-sensitive evening and nighttime hours. With implementation of **SPR NOI-1**, potential impacts of the proposed Project on truck-generated increases in SENL would be less than significant.

The potential for manual and mechanical treatments to cause a substantial short-term increase in truck-generated SENLs during treatment was examined in the PEIR and determined to be less than significant. The potential for the proposed Project to have this impact is within the scope of the PEIR analysis because the treatment activities, equipment use, and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the treatment activities proposed in the LRA would be the same as those in the SRA and impacts would be the same as described within the treatable area. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.12.1.3 New Noise Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the treatments are

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consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to noise would occur that are not covered in the PEIR.

3.13 Recreation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	SPR AD-3 SPR REC-1	NA	LTS	No	Yes

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

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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3.13.1 Discussion

Recreational trails occur within the Project area (see Figure 4). The 9.6 mile-long Pratt Trail within Los Padres National Forest is entirely within the Project area and closely parallels a project treatment area corridor running north-south just east of Foothill Road, intersecting the treatment area in several places along its length. A separate hiking trail, the Foothill Trail, intersects with the Pratt Trail and overlaps the same treatment corridor at the very northern extent of the Project area. A small section of the local Shelf Road Trail intersects with parcels in the eastern portion of the Project area.

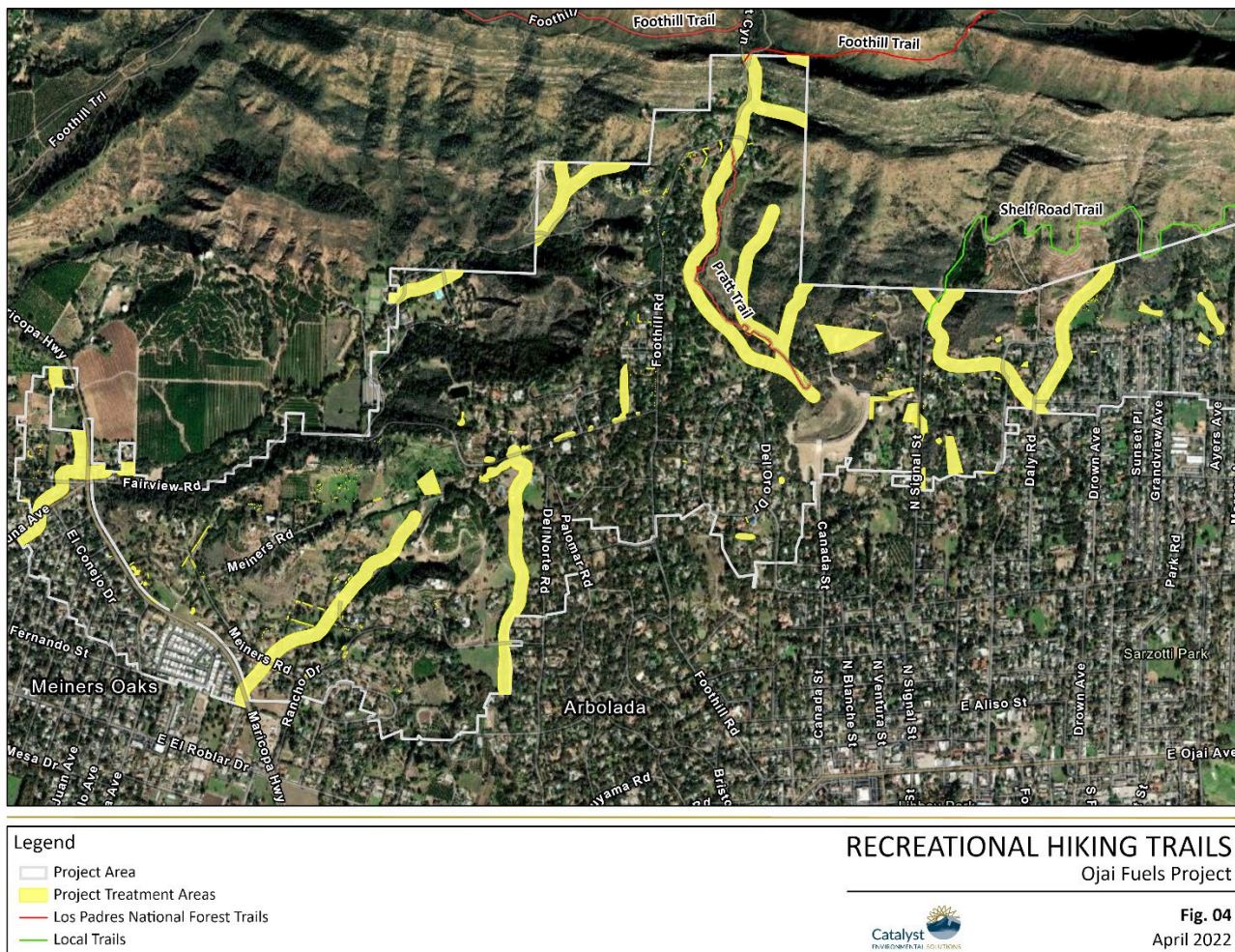


Figure 4. Recreational trails in the Project area

3.13.1.1 Impact REC-1 - Less than Significant

The Project proponent may need to temporarily close trails to access treatment sites and conduct vegetation removal, which could temporarily disrupt access to hiking, biking, or other recreational activity areas. **SPR AD-3** and **SPR REC-1** are applicable to this impact. **SPR AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances **SPR REC-1** requires public notification at least two weeks before closing trails or recreational areas. There are no mitigation measures for Impact REC-1.

The potential for manual and mechanical treatments to directly or indirectly disrupt recreational activities within designated recreation areas was examined in the PEIR and determined to be less than significant. The potential for the proposed Project to disrupt recreation is within the scope of the PEIR analysis because the treatment activities, equipment use, and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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 and SPRs AD-3 and REC-1 would be applied if temporary closure of the Shelf Road Trail (which is outside the treatable landscape) is necessary. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.13.1.2 New Recreation Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to recreation would occur that are not covered in the PEIR.

3.14 Transportation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	SPR AD-3 SPR HYD-2 SPR 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	SPR AD-3 SPR HYD-2 SPR 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	None	LTS	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.14.1 Discussion

3.14.1.1 Impact TRAN-1 - Less than Significant

Accessing the treatment properties would temporarily increase vehicular traffic on public and private roads. Treatment activities would occur on private properties. Vehicles and equipment would be parked at or directly next to the proposed treatment area during workday operations and vehicles may be parked overnight depending on landowner approval and the size of the property/number of removals to be conducted. The proposed Project would not result in the closure of public roads but may reduce road capacity if treatment areas must be accessed from the public roadway. **SPRs AD-3** and **TRAN-1** are applicable to reduce potential traffic impacts. **SPR AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **SPR TRAN-1** guides the project proponent to coordinate with the transportation department to determine whether a Traffic Management Plan is needed.

Temporary traffic impacts from conflicting with a program, plan, ordinance, or policy regarding roadway facilities is within the scope of the PEIR analysis, as the treatment duration and the limited number of vehicles associated with the Project are consistent with the analysis identified in the PEIR, which had a determination of less than significant. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the roads outside of the treatable landscape are adjacent to or continuations of those within the CalVTP treatable landscape (see Figure 1) and therefore environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.14.1.2 Impact TRAN-2- Less than Significant

The Project would not construct new roads or modify existing roads. The Project proponent would implement **SPRs AD-3, HYD-2, and TRAN-1** to minimize hazards and ensure impacts are less than significant. In addition to SPR AD-3 and TRAN-1 described above, **SPR HYD-2** avoids construction or reconstruction of roads.

The potential impact of increased hazards due to design features or incompatible uses is within the scope of the PEIR analysis, as the treatment duration and the limited number of vehicles associated with the Project are consistent with the analysis identified in the PEIR, which had a determination of less than significant. 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.14.1.3 Impact TRAN-3- Less than Significant

The proposed Project would require vehicles and trucks to transport crews and equipment to the treatment areas each day. Mechanical and manual treatment activities would require crew carriers (2-4), pickup trucks (2-4), and various supporting equipment transported on trailers. Vehicles could come from crew members' homes or from a base facility in the vicinity of the treatment area.

Temporary increases in vehicle miles traveled (VMT) based on trips per day above baseline was addressed in the PEIR. The PEIR and the Technical Advisory on Evaluating Transportation Impacts published by the Governor's Office of Planning and Research (OPR 2018) evaluated transportation impacts based on the number of trips per day. Since the CalVTP PEIR covers the statewide program, the net VMT was assumed to be greater than 110 trips per day; and the transportation impact was determined as significant and unavoidable. The proposed Project would occur at a much smaller, local scale and net VMTs would be less than for the statewide program and would never exceed the threshold of 110 trips per day. Therefore, the proposed Project would have a less than significant impact to transportation. No SPRs apply to this impact, and the MM AQ-1 is not necessary for this impact.

The potential for the proposed Project to result in a net increase in VMTs is within the scope of the PEIR analysis because the treatment activities, equipment use, and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR, which had a determination of less than significant. 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.14.1.4 New Transportation Impacts

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to transportation would occur that are not covered in the PEIR.

3.15 Public Services, Utilities and Service Systems

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

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.15.1 Discussion

3.15.1.1 Impact UTIL-1 - Less than Significant

The proposed treatment activities include manual and mechanical treatment that could generate dust and may require on-site water to control fugitive dust. Water would be supplied to the treatment sites as needed via truck for dust suppression and revegetation. There are no SPRs or MMs for this impact. No additional infrastructure needs would be required for water provisioning, and impacts would be less than significant.

The impact is within the scope of the activities and impacts addressed in the PEIR, as the proposed treatments are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a

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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, and no additional infrastructure would be required in these areas to provide water for the Project. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.15.1.2 Impact UTIL-2 - Less than Significant

Manual and mechanical treatments generate biomass. Most of the cut vegetation biomass would be chipped and dispersed over the site. All chipped material would be spread out for weed control with a maximum thickness of three inches. Chipped material will be placed 500 feet from all buildings. Typically, chipped material would be spread onsite at the treatment parcel in the immediate work area, but if space is limited, materials could be taken to a neighbor or adjoining parcel. No chipped material would be hauled offsite for disposal at green waste facilities or landfills. **SPRs AD-3** and **UTIL-1** would be applied. **SPR AD-3** directs the Project proponent to design and implement the Project consistent with local plans and ordinances. **SPR UTIL-1** directs the project proponent to prepare a Solid Organic Waste Disposition Plan to guide biomass disposal.

Green waste processing facilities in Ventura County are located in Oxnard, Simi Valley, Ojai, Fillmore, and Moorpark (Ventura County Public Works 2022). The potential to generate solid waste in excess of state standards was examined in the PEIR. The potential biomass impact is within the scope of activities and impacts identified in the PEIR, as the conditions for removing biomass are consistent with the analysis in the PEIR. Based on the variability of assessing biomass disposal across the state, the determination in the PEIR classified the potential effects; however, as noted above, no excess biomass is expected and therefore would not need to be disposed of at facilities.

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, and work in these areas would not generate biomass that requires disposal at any green waste processing facilities. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.15.1.3 Impact UTIL-3 - Less than Significant

The proposed manual and mechanical treatment activities would generate biomass or solid waste; however, most of the biomass would remain on-site. The Project proponent would implement **SPR AD-3** and **SPR UTIL-1** as described above. The proposed Project would comply with the federal, state, and local goals and regulations related to solid waste, and impacts would be less than significant.

The proposed Project reflects compliance with federal, state, and local solid waste disposal and that the proposed 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 and activities in these areas would be consistent with federal, state, and local goals and regulations related to solid waste. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.15.1.4 New Impacts to Public Services, Utilities and Service Systems

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project Area outside the treatable landscape are essentially the same as those within the treatable landscape, and no extension of existing utilities or services would be required in this area. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed Project, and no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to public services, utilities, and service systems would occur that are not covered in the PEIR.

3.16 Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	SPR HAZ-2 SPR HAZ-3 SPR HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	SPR GEO-1 SPR GEO-2 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-6 SPR GEO-7 SPR GEO-8	NA	LTS	No	Yes

¹NA: 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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3.16.1 Discussion

3.16.1.1 Impact WIL-1 - Less than Significant

The proposed Project intends to reduce wildfire risk by mechanically and manually removing nonnative trees and shrubs that are deemed a fire safety concern from private properties. These activities could pose a fire risk and expose people to the uncontrolled spread of a wildfire through a fire spark ignition from vehicles, heavy equipment, and hand-held power tools. **SPRs HAZ-2, HAZ-3, and HAZ-4** are applicable. **SPR HAZ-2** requires mechanized equipment hand tools to be equipped with federal or state-approved spark arrestors. **SPR HAZ-3** requires a crew using chainsaws to have a fire extinguisher per chainsaw, and each vehicle would be equipped with one long-handled shovel and one axe or pulaski, which is consistent with PRC 4428. **SPR HAZ-4** would restrict smoking to a designated area, a minimum of a 3-foot diameter area, barren and cleared down to mineral soil. Smoking is prohibited in vegetated areas. Implementation of applicable SPRs would ensure that the proposed Project’s impacts on wildfire risk are less than significant.

Increased wildfire risk from the proposed Project is within the scope of the PEIR analysis as the operational components for this project are covered within the analysis of 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.16.1.2 Impact WIL-2 - Less than Significant

The proposed Project could expose people or structures to substantial risks related to post-fire flooding or landslides. Steep slopes are present at the private properties within the treatment area. The removal of vegetation could result in slope instability. The proposed Project would remove only target non-native species and not healthy native vegetation. Stump removal would leave plant root systems intact to retain soil stability. In addition, chipped biomass would be dispersed over the treatment properties, which aids in surface soil stability. The Project proponent would apply **SPRs GEO-1 through GEO-8** to ensure that potential impacts from post-fire flooding or landslides would be less than significant.

SPR GEO-1 directs suspending fuels treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **SPR GEO-2** restricts high-ground pressure vehicles from operating on saturated soil conditions. **SPR GEO-3** instructs for stabilizing disturbed soils by applying mulch over exposed soils. **SPR GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **SPR GEO-5** guides the installation of water breaks according to the waterbreak section in the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, then other erosion control measures would be instated as needed to maintain topsoils. **SPR GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. **SPR GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by a RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided.

Potential exposure of people or structures to substantial risks related to post-fire flooding or landslides from these treatment activities is within the scope of the CalVTP PEIR, as the type of equipment and duration of the treatment activities for the proposed Project are consistent with those analyzed 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. Therefore, the proposed Project would be consistent with the evaluation and determinations included in the PEIR, and no new or more severe impacts would occur.

3.16.1.3 New Impacts to Wildfire

None. The proposed Project is consistent with the treatment types and activities considered in the CalVTP PEIR. The Project proponent has evaluated site-specific characteristics to determine that the Project treatments are consistent with the CalVTP PEIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions in the Project area outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed Project are also consistent with those covered in the PEIR. No new or altered circumstances would result from the proposed project, and

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no new or more severe significant impacts would occur as a result of proposed activities. Therefore, no new impacts related to wildfire risk would occur that are not covered in the PEIR.

SECTION 4 References

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Appendix A – Standard Project Requirements and Mitigation Measures Checklist

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

Applicable (Yes/No). Document whether the SPR or mitigation measure is applicable to the initial treatment and/or treatment maintenance (Yes or No), and whether it is applicable to initial treatment and/or treatment maintenance. The applicability should be substantiated in the Environmental Checklist Discussion.

Timing. This column identifies the time frame in which the SPR or mitigation measure will be implemented (e.g., prior to treatment, during treatment, etc.).

Implementing Entity. The implementing entity is the agency or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.

Verifying/Monitoring Entity. The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

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Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
<p>SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR AD-4 Public Notifications for Prescribed Burning: At least days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3)</p>	<p>Initial Treatment: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: N</p>			
<p>SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism.</p> <p>Information on proposed projects (PSA in progress):</p> <ul style="list-style-type: none"> GIS data that include project location (as a point); project size (typically acres); treatment types and activities; and contact information for a representative of the project proponent. 	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before, During, and After</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent’s own website).</p> <p>Information on approved projects (PSA complete):</p> <ul style="list-style-type: none"> A completed PSA Environmental Checklist; A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). <p>Information on completed projects:</p> <ul style="list-style-type: none"> GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes <ul style="list-style-type: none"> a. Size of treated area (typically acres); b. Treatment types and activities; c. Dates of work; d. A list of the SPRs and mitigation measures that were implemented e. Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>				
<p>SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed</p>	<p>Initial Treatment: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions:</p> <ul style="list-style-type: none"> i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Aesthetic and Visual Resource Standard Project Requirements</p>				
<p>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</p>	<p>Initial Treatment: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Air Quality Standard Project Requirements</p>				
<p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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</p>	<p>Initial Treatment: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	<p>Treatment Maintenance: N</p>			
<p>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.</p>	<p>Initial Treatment: N Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures:</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may “cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property,” per Health and Safety Code Section 41700.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements</p>				
<p>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</p>	<p>Initial Treatment: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. 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:</p> <p>A written description of the treatment location and boundaries.</p> <p>Brief narrative of the treatment objectives.</p> <p>A description of the activities used (e.g., prescribed burning, mastication) and associated acreages.</p> <p>A map of the treatment area at a sufficient scale to indicate the spatial extent of activities.</p> <p>A request for information regarding potential impacts to cultural resources from the proposed treatment.</p> <p>A detailed description of the depth of excavation, if ground disturbance is expected.</p> <p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. 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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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,</p>	<p>Initial Treatment: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. 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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

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Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Biological Resources Standard Project Requirements</p>				
<p>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, CNDDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

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Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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:</p>				
<p>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:</p> <ul style="list-style-type: none"> 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). <p>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.</p> <p>2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence.</p>				

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p>SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Sensitive Natural Communities and Other Sensitive Habitats</p>				
<p>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will:</p> <p>require a qualified RPF or biologist to perform a protocol-level survey following the CDFW “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities” (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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 <i>A Manual of California Vegetation</i> (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).</p> <p>map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p>SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats:</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements.</p> <p>Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service).</p> <p>Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection</p>				

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed).</p> <p>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.</p> <p>For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will:</p> <p>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</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>availability, and edge effects may inform the determination of an appropriate spatial scale.</p> <p>The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion.</p> <p>These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance.</p> <p>Additional measures will be applied to ecological restoration treatment types:</p> <p>For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types.</p> <p>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.</p> <p>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.</p>				

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity.</p> <p>These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance.</p> <p>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.</p>				
<p>SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle):</p> <p>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;</p> <p>include training on <i>Phytophthora</i> diseases and other plant pathogens in the worker awareness training;</p> <p>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;</p> <p>minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination;</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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</p> <p>follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for <i>Phytoptheras</i> in Native Habitats 2016).</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
Special-Status Plants				
<p>SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW’s “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.”</p> <p>Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status.</p> <p>If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS.</p> <p>For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:</p> <p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				

Environmentally Sensitive Habitat Areas

<p>SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts:</p> <p>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.</p> <p>Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.</p> <p>A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs.</p> <p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
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Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
Invasive Plants and Wildlife				
<p>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):</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area;</p> <p>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;</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and</p> <p>implement Fire and Fuel Management BMPs outlined in the “Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers” (Cal-IPC 2012, or current version).</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
Wildlife				
<p>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, 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.</p> <p>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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>No more than 14 days project implementation</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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:</p> <p>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.</p> <p>Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted.</p> <p>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.</p> <p>Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers.</p> <p>This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist.</p> <p>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., CNDDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identify 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</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p> <p>Survey not more than 30 days prior to initiation of construction activities during</p> <p>Nesting Season (February 15 to August 31 private lands and March 14 to August 1 LPNF lands)</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p> <p>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:</p> <p>Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.</p> <p>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.</p> <p>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.</p> <p>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</p>				

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p> <p>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:</p> <p>Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases.</p> <p>Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
Geology, Soils, and Mineral Resource Standard Project Requirements				
<p>SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. 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</p>	Initial Treatment: Y	During	Fuel Reduction Works	Ventura County Fire

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to</p>	<p>Initial Treatment: Y</p>	<p>During and After</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will:</p> <p>(1) Prohibit use of heavy equipment where any of the following conditions are present:</p> <ul style="list-style-type: none"> (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. <p>(2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to:</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>(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.</p>				
<p>SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). 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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Greenhouse Gas Emissions Standard Project Requirements</p>				
<p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Hazardous Material and Public Health and Safety Standard Project Requirements</p>				
<p>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</p>	<p>Initial Treatment: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): a map that delineates staging areas, and storage, loading, and mixing areas for herbicides;</p>	<p>Initial Treatment: Y Treatment Maintenance: Y</p>	<p>Before (prepare plan) and During (implement plan)</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>a list of items required in an onsite spill kit that will be maintained throughout the life of the activity;</p> <p>procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment.</p> <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p>				
<p>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:</p> <p>Be implemented consistent with recommendations prepared annually by a licensed PCA.</p> <p>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.</p> <p>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.</p> <p>Be applied by an applicator appropriately licensed by the State.</p> <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer’s container recycling program, in which case the manufacturer’s instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p>				
<p>SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas:</p> <p>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);</p> <p>spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift;</p> <p>low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and</p> <p>spray nozzles will be kept within 24 inches of vegetation during spraying.</p> <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Hydrology and Water Quality Standard Project Requirements</p>				
<p>SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or</p>	<p>Initial Treatment: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments:</p> <p>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.</p> <p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity										
<p>Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.</p> <p>This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.</p>														
<p>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.</p> <p>Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths</p> <table border="1" data-bbox="153 756 968 1344"> <thead> <tr> <th>Water Class</th> <th>Class I</th> <th>Class II</th> <th>Class III</th> <th>Class IV</th> </tr> </thead> <tbody> <tr> <td>Water Class Characteristics or Key Indicator Beneficial Use</td> <td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.</td> <td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.</td> <td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td> <td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td> </tr> </tbody> </table> <p>WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</p>	Water Class	Class I	Class II	Class III	Class IV	Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before (establish WLPZs during design of treatment projects); During (implement protections during treatment)</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
Water Class	Class I	Class II	Class III	Class IV										
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.										

Project-Specific Analysis

Standard Project Requirements				Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.				
30-50 % Slope	100	75					
>50 % Slope	150	100					
<p>Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)</p> <p>The following WLPZ protections will be applied for all treatments:</p> <p>Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).</p> <p>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.</p> <p>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.</p> <p>WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.</p> <p>Burn piles will be located outside of WLPZs.</p> <p>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.</p>							

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers.</p> <p>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.</p> <p>Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes.</p> <p>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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p>SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides:</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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.</p> <p>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.</p> <p>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);</p> <p>No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities.</p> <p>This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.</p>				
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before (mark prior to ground disturbance) and During (avoid if possible, coordinate repairs as needed)</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Noise Standard Project Requirements</p>				
<p>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</p>	<p>Initial Treatment: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

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Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Treatment Maintenance: Y</p>			
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Recreation Standard Project Requirements</p>				
<p>SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent to will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before, approximately 2 weeks prior to treatment requiring temporary closure of public recreation</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Transportation Standard Project Requirements</p>				
<p>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. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Public Services and Utilities Standard Project Requirements</p>				
<p>SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
<p>Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks</p> <p>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.</p> <p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
Air Quality				
<p>Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques</p> <p>Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible.</p> <p>Techniques for reducing emissions may include, but are not limited to, the following:</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria:</p> <ul style="list-style-type: none"> ○ meet California’s Low Carbon Fuel Standards and be certified by CARB Executive Officer; ○ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ○ contain no fatty acids or functionalized fatty acid esters; and ○ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. <p>Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment.</p> <p>Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.</p> <p>Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_x and PM.</p>				
Archaeological, Historical, and Tribal Cultural Resources				
<p>Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources</p> <p>If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered</p>	Initial Treatment: Y	During	Fuel Reduction Works	Ventura County Fire

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	<p>Treatment Maintenance: Y</p>			
<p>Biological Resources</p>				
<p>Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA</p> <p>If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site-</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c.</p> <p>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.</p>				
<p>Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA</p> <p>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:</p> <p>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</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape.</p> <p>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.</p> <p>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.</p> <p>No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer.</p> <p>A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented.</p>				

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.</p>				
<p>Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants</p> <p>If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment.</p> <p>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:</p> <ul style="list-style-type: none"> 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. 	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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:</p> <p>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:</p> <p>habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and</p> <p>reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region.</p> <p>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.</p> <p>If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations.</p> <p>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.</p> <p>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</p>				

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.</p>				
<p>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)</p> <p>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.</p> <p><u>Avoid Mortality, Injury, or Disturbance of Individuals</u></p> <p>The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals:</p> <ol style="list-style-type: none"> 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. <p>For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire, CDFW, USFWS, NOAA</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p><u>Maintain Habitat Function</u></p> <p>The project proponent will design treatment activities to maintain the habitat function, by implementing the following:</p> <ul style="list-style-type: none"> ○ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ○ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the 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. <p>A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.</p>				
<p>Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)</p>	<p>Initial Treatment: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire, CDFW, USFWS</p>

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p><u>Avoid Mortality, Injury, or Disturbance of Individuals</u></p> <p>The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals:</p> <p>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).</p> <p>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</p>	<p>Treatment Maintenance: Y</p>			

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods.</p> <p><u>Maintain Habitat Function</u></p> <p>For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:</p> <ul style="list-style-type: none"> ○ 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. <p>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</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function.</p> <p>A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.</p> <p>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.</p>				
<p>Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)</p> <p>If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire, CDFW, USFWS</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment.</p> <p>Compensation may include:</p> <ol style="list-style-type: none"> 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). <p>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:</p> <ol style="list-style-type: none"> 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. <p>Review requirements are as follows:</p> <p>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.</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.</p>				
<p>Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)</p> <p>If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle:</p> <p>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.</p> <p>If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented:</p> <ul style="list-style-type: none"> ○ 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: <p>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.</p> <p>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 -</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry.</p> <ul style="list-style-type: none"> ○ 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. <p>If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.</p>				
<p>Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)</p> <p>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:</p> <p>Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status 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.</p>				

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

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

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Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Quino checkerspot butterfly	dwarf plantain, purple owl's clover				
Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)</p> <p>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:</p> <p>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.</p> <p>To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (<i>Rhaphiomidas terminates abdominalis</i>), Delta green ground beetle (<i>Elaphrus viridis</i>), Morro shoulderband snail, Ohlone tiger beetle (<i>Cicindela ohlone</i>), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species.</p> <p>If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.</p>		<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	NA	NA	NA
<p>Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)</p> <p>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:</p> <p>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.</p>		<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	Before and During	Fuel Reduction Works	Ventura County Fire, CDFW

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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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).</p> <p>Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September).</p> <p>CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status 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.</p>				
<p>Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)</p> <p>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:</p> <p>Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007).</p> <p>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).</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands</p> <p>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:</p> <p>Reference the <i>Manual of California Vegetation</i>, Appendix 2, Table A2, <i>Fire Characteristics</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance)</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>present. The condition class and fire return interval departure of the vegetation alliances present will also be determined.</p> <p>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 <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1.</p> <p>To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).</p> <p>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).</p> <p>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 <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/).</p> <p>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</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory.</p> <p>The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).</p> <p>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 Mitigation Measure BIO-3b will be implemented.</p> <p>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.</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands</p> <p>If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions:</p> <p>Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by:</p> <ul style="list-style-type: none"> 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. <p>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:</p> <ol style="list-style-type: none"> 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. 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. 	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>				
<p>Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat</p> <p>If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following:</p> <p>Compensate for unavoidable losses of riparian habitat acreage and function by:</p> <ul style="list-style-type: none"> • 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. <p>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:</p> <ol style="list-style-type: none"> 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 parties responsible for long-term management and monitoring of the restored or enhanced habitat. 	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>				
<p>Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands</p> <p>Impacts to wetlands will be avoided using the following measures:</p> <p>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.</p> <p>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).</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>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.</p> <p>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.</p> <p>Within this buffer, herbicide application is prohibited.</p> <p>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.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that:</p> <ul style="list-style-type: none"> • 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 				
<p>Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites</p> <p>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:</p> <p>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</p> <p>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 to stop any treatment activities that could result in potential adverse effects to special-status species.</p>	<p>Initial Treatment: Y</p> <p>Treatment Maintenance: Y</p>	<p>Before and During</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>
<p>Greenhouse Gas Emissions</p>				

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns</p> <p>When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018):</p> <p>reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned;</p> <p>reduce the total area burned through mosaic burning;</p> <p>burn when fuels have a higher fuel moisture content;</p> <p>reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and</p> <p>schedule burns before new fuels appear.</p> <p>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.</p> <p>The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.</p>	<p>Initial Treatment: N</p> <p>Treatment Maintenance: N</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Hazardous Materials, Public Health and Safety</p>				
<p>Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites</p> <p>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.,</p>	<p>Initial Treatment: Y</p>	<p>Before</p>	<p>Fuel Reduction Works</p>	<p>Ventura County Fire</p>

Project-Specific Analysis

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	<p>Treatment Maintenance: Y</p>			

Appendix B – Cultural Resources Report

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March 24, 2022

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Senior Project Administrator/Deputy Project Manager
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RE: *Archaeological Resources Sensitivity Assessment
Northern Ojai Incendiary Fuel and Ember Cast Reduction Project
Ojai Area, Ventura County, California*

Dear Ms. Piccirillo:

This assessment provides a discussion of archaeological resource sensitivity within the Northern Ojai Incendiary Fuel and Ember Cast Reduction Project (Project), in unincorporated rural areas north of the City of Ojai, California (Figure 1). The assessment incorporates results of an archaeological resources records search completed at the California Historical Resources Information System, South Central Coast Information Center (SCCIC), California State University Fullerton. These results are used to define areas of high, medium, and low sensitivity, or likelihood of encountering archaeological resources within the proposed Project area. Recommendations are presented to avoid and/or reduce the potential Project activities to impact recorded resources, as well as within areas where the potential for their location is likely.

Project Description

The Project actions include grant funded, non-native tree removal on private property to enhance fire protection in the Wildland Urban Interface. Tree removal is dependent on landowner agreements and grant funding; therefore, it is not feasible to remove all trees in the proposed action areas.

State vs. Local Responsibility. The project boundary for the grant includes CalFire's "High Fire Severity Zones" in the State/Local Responsibility areas.

Permitting Process. Any potential project permitting would be processed by the County of Ventura or City of Ojai if removal of "protected" trees (native species) or disturbance of protected trees by encroachment would occur. Pre-clearance biological surveys will ensure that

all protected trees and encroachment disturbance are avoided. Therefore, all potential tree removals will not require a permit.

Tree Removal. Trees will be cut with power tools and "treated" using a stump grinder; no herbicides will be used. Fallen material will most likely be chipped and then hauled off site. Equipment used for tree removal will include a 259 and 299 Caterpillar skid steer, a grapple crane, and a bucket lift, along with wood chippers and stump cutters. Rubber tired equipment will likely be used by the selected contractor.

Archaeological Resource Record Search

Cultural Resources. A records search was requested of SCCIC of the Project site and a 0.25-mile buffer on January 20, 2022. The records search results were provided by SCCIC Assistant Coordinator Isabella Kott on March 2, 2022. Six recorded archaeological resources are within the Project area; five archaeological resources and two historic-period structures are recorded within 0.25-mile of the Project area. Thirty investigations have been completed within the Project area, and an additional 30 have been completed within 0.25-mile of the Project area.

Recorded archaeological resource characteristics in the Project Site and within 0.25-mile are summarized in Table 1. Results indicate that prehistoric era archaeological sites predominate (this may be a factor of investigations occurring outside areas of historic urbanization). Archaeological sites range from smaller, limited activity areas (e.g., vegetable processing sites and stone tool resharpening areas) to large, complex residential camps. The geographic distribution of different types of sites varied over the millenia, as prehistoric populations in the region grew and contracted in response to climactic changes that influenced the availability of animal and floral food resources. As is generally identified in central California, the location of prehistoric archaeological sites within inland, more mountainous areas was substantially influenced by the location of fresh water- either permanent or seasonal drainages, and/or natural springs. Six of the eight recorded prehistoric sites were located within the immediate vicinity of a drainage; these were primarily (five of the six) complex campsites that yielded a greater diversity of artifacts signifying a longer period of seasonal or permanent habitation. The remaining two prehistoric sites (CA- VEN-1517, and -1654) are smaller with less diversity of artifacts, indicating a seasonal and/or special activity use. Located 104 and 608 meters (m) (340 and 2,000 feet [ft], respectively) from fresh water, these subsistence activities appear to not have been dependent on this source.

Historic-period archaeological resources are associated with early 20th century urbanization, particularly in the vicinity of Ojai. Artifact deposits associated with this development are expected with occupation prior to approximately 1930 and the establishment of municipal solid waste collection and refuse.

Table 1. Recorded Cultural Resources Summary

<i>Permanent Trinomial</i>	<i>Cultural Resources</i>	<i>Site Type</i>	<i>Distance to Water</i>
Within the Project Area			
P-56-000137 (CA-VEN-137)	Groundstone artifacts, hammerstones, stone tools, shellfish deposit and projectile point. Associated bedrock milling area and stone tool lithic scatter recorded 50 m (165 ft) downslope.	Large, residential camp and stone tool manufacturing, vegetable processing activity area.	Continuously flowing creek 300 m (985 ft) away, but intermittent drainage may have flowed past western base of site.
P-56-000138 (CA-VEN-138)	Groundstone artifacts, hammerstones, stone tools and projectile point.	Large, residential camp	Adjacent and above "stream terrace."
P-56-000554 (CA-VEN-554)	Single bedrock mortar depression and utilized chert flake	Limited vegetable processing area.	5 m (16 ft) from continuously flowing creek.
P-56-001517 (CA-VEN-1517)	Groundstone artifacts, possibly shell and glass beads (property owner recollection)	Limited vegetable processing area.	104 m (340 ft) from seasonal creek.
P-56-001654 (CA-VEN-1654)	Shellfish fragments, burned bone, ground stone, and stone tool waste flake scatter	Small, temporary camp.	608 m (2,000 ft)
P-56-153054 (CA-VEN-153054)	Charles M. Pratt House	Historic-period (1909) residence	NA
Within 0.25-mile of the Project Area			
P-56-000139 (CA-VEN-139)	Shellfish, groundstone artifacts, hammerstones, stone tools and projectile points, shell beads, burials.	Large, permanent residential camp	Above river.
P-56-000621 (CA-VEN-621)	Groundstone artifacts, hammerstones, stone tools, projectile points, beads.	Large, permanent residential camp	Terrace above river.
P-56-000641 (CA-VEN-641)	Groundstone artifacts, hammerstones, stone tools, stone tool flake.	Temporary or seasonal camp.	Adjacent to creek.
P-56-001151H (CA-VEN-1151H)	Historic-period artifacts (not defined)	Refuse deposit.	NA
P-56-001516 (CA-VEN-1516)	Early 20 th Century (1905-1917) metal artifacts associated with church	Historic-period Church.	NA
P-56-152386 (CA-VEN-152386)	St. Thomas Aquinas Chapel	Rebuilt church adjacent to CA-VEN-1516.	NA
P-56-153100 (CA-VEN-153100)	Ojai Lutheran Church (1968)	Church	NA

Investigations. The previously completed investigations within the Project area have been conducted over the past 45 years. Professional standards for undertaking intensive ground surface surveys to identify the potential presence of archaeological resources has evolved over this time to require a maximum 15 m (50 ft) spacing of “transects” archaeologists use while walking over a project area. Additionally, the reliability of a survey investigation is influenced by the extent of ground surface visibility that allows for adequate inspection of the ground surface. Impervious, developed surfaces and dense vegetation can obscure the ground surface to varying degrees. Those investigation results that do not quantitatively express the percentage of visible ground surfaces may not reflect adequate confidence in the absence of unrecorded archaeological resources within a particular project area. Investigations that are over 10 years old are often regarded as inadequate when current standards are not evidenced.

A review of the 30 previous investigations within the Project area indicates that many investigations fail to characterize the survey transect spacing and/or ground surface visibility. A summary of investigations with survey areas greater than 1 acre in size within the Project area is provided in Table 2.

Table 2. Archaeological Resource Investigations within the Project Area Summary

Investigation No. (Date)	Size (acres)	Survey Transect Spacing	Ground Surface Visibility.
V-274 (1980)	8	None provided.	“Very thick vegetation of steep slopes.”
V-408 (1978)	14	None provided.	Pasture area visibility “good.”
V-749 (1979)	12	None provided. Only 40 percent of area surveyed.	60 percent of area planted in avocados not surveyed. Other areas “unplanted.”
V-840 (1977)	35	None provided.	“Heavily foliated terrain.”
V-888 (1979)	Not Given	None provided.	None provided.
V-892 (1978)	20	None provided.	None provided.
V-970 (1990)	5	None provided.	Avocados orchards.
V-1102 (1992)	Not Given	None provided.	None provided.
V-1181 (1992)	20	5 m (18 ft)	Good, but surface scrapes completed every 10-15 m in areas of dense vegetation.
V-1454 (1996)	7	5 m (18 ft)	“Foot surface scrapes completed 20 m in areas of dense duff.”
V-1628 (1997)	25	None provided.	“Some areas covered with dense vegetation and visibility was poor.”
V-2288 (2005)	16	5 m (18 ft)	“Some areas of ground surface visibility.”
V-2296 (2006)	2	5-10 m (18-36 ft)	“Exposed trails and roads.”
V-3193 (2014)	2	5-10 m (18-36 ft)	“Exposed trails and roads.”

Archaeological Resource Significance

The significance of prehistoric archaeological resources is based on local, state, and federal regulations. State significance criteria is defined by listing on the California Register of Historical Resources (Pub. Res. Code §§5024.1, Title 14 CCR, Section 4852; California Environmental Quality Act Guidelines 15064.5[3]) associated with the following:

- A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- B. Is associated with the lives of persons important in our past;
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- D. Has yielded, or may be likely to yield, information important in history.

Federal criteria for listing a resource on the National Register of Historic Places identified in the National Historic Preservation Act, Section 106 are:

- A. Associated with events that have made a significant contribution to the broad patterns of our history;
- B. Associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

From a scientific perspective, the condition or integrity of a resource is critical to maintaining resource significance. However, from a tribal cultural perspective, contemporary Native Californians consider that all prehistoric resources are significant as they are associated with ancestral cultural heritage. Several archaeological resources within the Project area have been previously disturbed to some degree, and others have not be adequately assessed to determine their integrity or ability to answer questions about prehistory. Regardless, all recorded prehistoric resources within the Project area are considered significant because of their tribal cultural importance.

Historic-period archaeological resources such as trash deposits can have varying significance dependent on their potential association with persons or events important in local, state or national history. Like prehistoric resources, their significance is determined based on the assessment of their historical context, the extent of the deposit, and their condition (integrity). Without this assessment, the significance of all historic-period deposits must be considered potentially significant.

Sensitivity for Encountering Unknown Cultural Resources

The sensitivity or potential for encountering unknown cultural resources within the Project Area is addressed in three levels as explained below.

High. High sensitivity areas are those that have the greatest potential for encountering unknown prehistoric and historic-era resources. Larger, complex campsites signifying a longer period of seasonal or even permanent habitation are within close proximity to permanent water sources. Areas associated with early 20th century (prior to 1930) occupation have the potential to have been used for disposing of trash. Therefore, high sensitivity areas include:

- All recorded archaeological site boundaries.
- All proposed tree removal areas within 100 m (330 feet) of a fresh water source; and
- All proposed tree removal within 50 m (165 feet) of structures pre-dating 1930 are considered "high sensitivity."

Medium. Medium sensitivity areas are those that have had some level of previous archaeological assessment where no cultural resources were identified. As described above, most of the larger previous archaeological surveys dating to before 2000 do not contain sufficient documentation to comply with existing professional practice (i.e., survey intensity and ground surface visibility are not specifically addressed) such that the reliability of no cultural resources being recorded cannot be verified. The fact that these areas have been previously assessed by a professional archaeologist, however, does provide some level of assurance that substantial, complex prehistoric cultural resources do not exist in these areas. Therefore, moderate sensitivity areas include:

- Areas of archaeological surveys completing before 2000, or those that do not contain sufficient documentation to comply with existing professional practice (i.e., survey intensity and ground surface visibility are not specifically addressed); and
- This also includes areas on within slopes of less than 20 percent that have not been surveyed as they have the potential to have supported unknown, smaller prehistoric temporary camps and special activity areas.

Low. These are areas where previous archaeological investigations have been conducted using methods consistent with contemporary professional practices. Also, areas where previous grading has completely excavated top soils (approximately 2 feet) would have removed the A Horizon deposits formed over the past 15,000 years, such that any evidence of prehistoric occupation would have been removed. Therefore, low sensitivity areas include:

- Areas of archaeological surveys exhibiting a transect spacing of 15 m (50 ft) or less, and determination of good ground surface visibility to ensure reliable results; and
- Areas where grading has completely excavated top soils (approximately 2 feet) would have removed the A Horizon deposits formed over the past 15,000 years.

Recommendations

The following recommendations are presented to address the potential for proposed tree removal activities to impact cultural resources including prehistoric and historic-period archaeological resources. Though tree removal would not result in substantial ground disturbance given that trees would be stump-ground rather than the root ball excavated, use of rubber-tired equipment to and from the tree removal location would have the potential to compress and displace any cultural materials on the surface. Illicit collection of surface artifacts could also result.

High Sensitivity Areas

- Vegetation removal using mechanical equipment should be avoided within all recorded archaeological site boundaries. Manual, hand removal techniques should be exclusively used.
- All proposed vegetation removal areas within 100 m (330 feet) of a fresh water source and within 50 m (165 feet) of structures pre-dating 1930 should be subject to an intensive archaeological ground surface survey using no more than 5-meter (15-foot) transect spacing. Since no ground disturbance will occur during vegetation removal, no need for subsurface archaeological excavations are required.

Medium Sensitivity Areas

- All proposed tree removal areas should be subject to an intensive archaeological ground surface survey using no more than 10-meter (33-foot) transect spacing.
- If archaeological sites are identified, tree removal using mechanical equipment should be avoided. Manual, hand removal techniques should be exclusively used.

Low Sensitivity Areas

Tree removal may be allowed with the following:

- In the unlikely event that cultural resources are encountered, tree removal activity should be temporarily discontinued until a qualified archaeologist and local Native American tribal representative are retained to evaluate the significance of the resource and determine appropriate treatment strategies, including possible avoidance. If a discovery consists of possible human remains, the Ventura County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission who will identify the most likely descendant, who will work with the project applicant to determine an acceptable disposition of the remains.

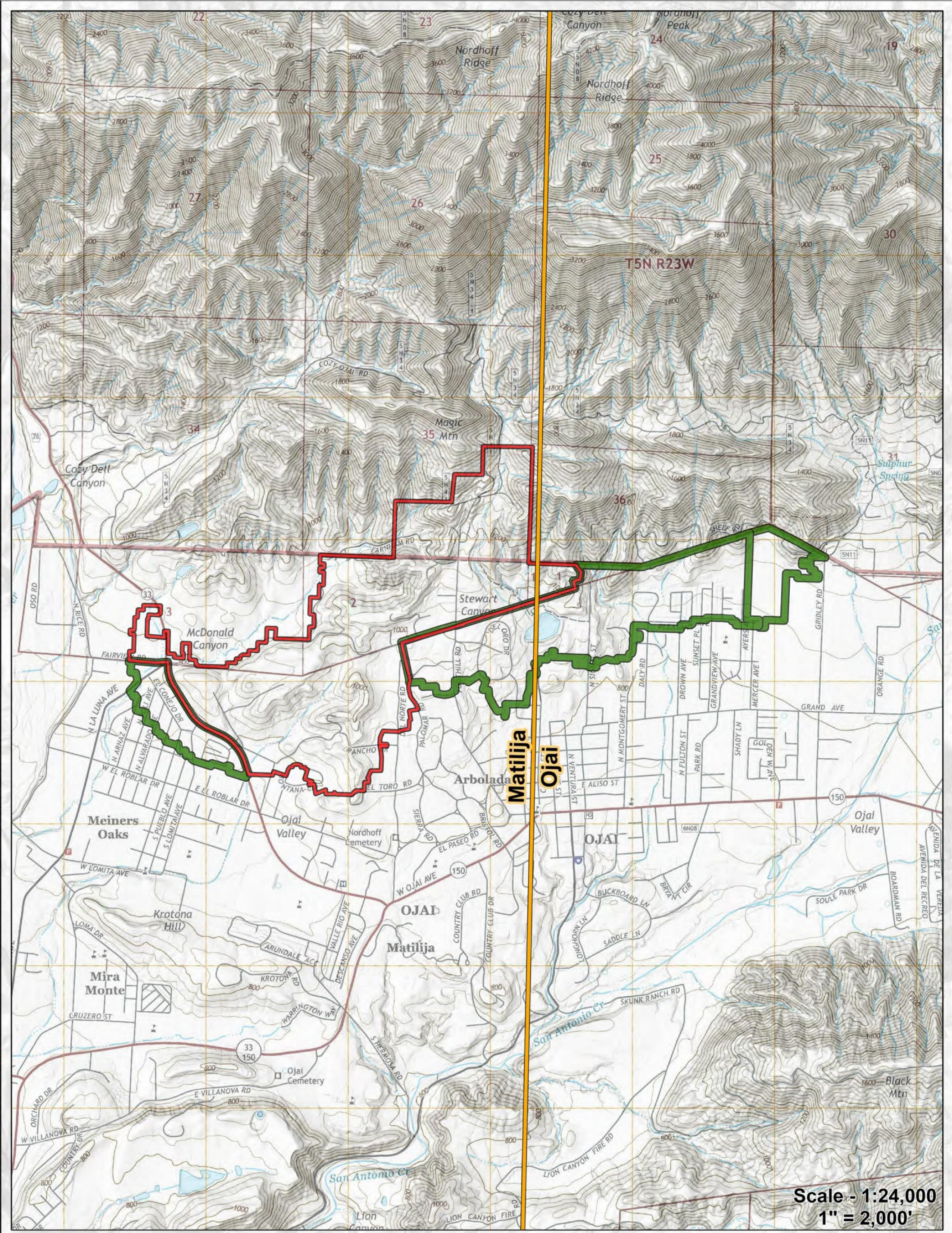
Please call me with any questions.

Sincerely yours,



David Stone, M.A. RPA

Figure 1
Project Area



Scale - 1:24,000
1" = 2,000'

Legend

1 1] Quadrangles - USGS 24k

Project Area SRA and LRA

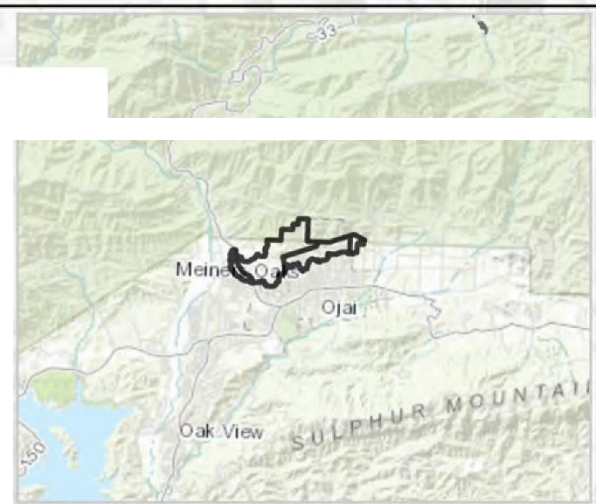
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Matilija & Ojai Quadrangle 2015

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Coordinate System: WGS 1984
UTM Zone 11N
Date: 1/14/2022



Appendix C – Biological Resources Assessment

**BIOLOGICAL RESOURCE ASSESSMENT FOR THE NORTH OJAI
INCENDIARY FUEL AND EMBER CAST REDUCTION PROJECT IN
OJAI, VENTURA COUNTY, CALIFORNIA**

Prepared for:



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Prepared by:



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18 March 2022

EXECUTIVE SUMMARY

This Biological Resources Assessment report was prepared at the request of Fuel Reduction Works, a 501(c)3 non-profit organization, for the *North Ojai Incendiary Fuel and Ember Cast Reduction Project* (Project) awarded by the CAL FIRE Early Action California Climate Investments (CCI) Program - FY 2020-2021 Fire Prevention Grant. The goal of the project is to support private landowners living in Wildland Urban Interface (specifically the High Fire Severity Zones in the State Responsibility Area and Local Responsibility Area) transition to fire-safe landscaping through invasive, non-native plant removal.

Pax Environmental, Inc. (Pax) completed a detailed records search and performed a field survey of public access areas and along public roads of the Project area on February 22, 2022. The survey included a reconnaissance-level botanical and wildlife inventory, identification of vegetation communities, and a habitat assessment focused on the potential for special-status species and sensitive natural communities that have the potential to occur in or near the Project area. The Project area is defined as the High Fire Severity Zones in the State Responsibility Areas and Local Responsibility Areas in Ojai and adjacent communities.

Two sensitive vegetation communities were identified during the survey, Southern Coast Live Oak Riparian Forest and Southern Sycamore Alder Riparian Woodland. No special-status wildlife species were observed during the surveys. Suitable habitat for a total of 14 special-status plant species and 16 special-status wildlife species, as well as migratory nesting birds, were identified within the Project area.

The Project has been designed to avoid impacts to sensitive biological resources. There is potential that Project activities may impact one to several individual plant species that may be present within the Project area. The loss of these individual plant species will not represent an impact large enough to contribute to a trend toward federal listing under the Endangered Species Act or a loss in the viability of the local population. Mitigation measures have been recommended which are expected to avoid or reduce potential impacts to a less than significant level.

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1 INTRODUCTION

Project Location

This report presents the findings of biological surveys conducted on 22 February 2022 within the Wildland Urban Interface along the north end of the City of Ojai, Ventura County, California. The Project area is dominantly unsectioned on the *Matilija* and *Ojai* USGS 7.5-minute topographic quadrangle map with portions in Section 34, 35, and 36 of Township 5 North and Range 23 West, and an elevation range of 750 to 1,450 feet (ft) above mean sea level (asml). The Project area and associated activities (Project) will be discussed in this report to assess any potential impacts to biological resources.

Project Description

The Project area is 1,110 acres, with 684 acres located in the *State Responsibility Area – High Fire Severity Zone* and 426 acres located in the *Local Responsibility Area – High Fire Severity Zone* (Figures 1 and 2). The Project will primarily occur in the proposed action area comprised of 97.93 acres of the total Project area (Figure 3). Project activities include fire-reduction intervention via the selective removal of eucalyptus (*Eucalyptus* spp.), Italian cypress (*Cupressus sempervirens*), palms (*Arecaceae* spp.), and other nonnative species that may be deemed a fire safety concern. Equipment used for non-native species removal will include a 259 and 299 Caterpillar skid steer, a grapple crane, and a bucket lift, along with woodchippers and stump cutters. The goal of the Project is to support private landowners living in the *High Fire Severity Zones* transition to fire-safe landscaping to reduce the likelihood of fire spread by incendiary ember cast in Ojai and surrounding communities.

Methods

Prior to performing the field surveys, Pax performed a records search for special-status plant and wildlife species potentially occurring in the Project region. Sources utilized during the records search included the California Natural Diversity Database (CNDDDB) (CDFW 2022), the Calflora Observation Hotline (Calflora 2022), and the Jepson Flora Project website (eFlora, 2022). The CNDDDB records search was performed for a 10-mile radius around the Project area. The USGS 7.5-minute quadrangles included in the records search for the Project area were *Devil's Heart Peak*, *Lion Canyon*, *Matilija*, *Ojai*, *Old Man Mountain*, *Santa Paula*, *Santa Paula Peak*, *Saticoy*, *Topatopa Mountains*, *Ventura*, *Wheeler Springs*, and *White Ledge Peak*.

A focused plant and animal survey was performed on 22 February 2022 by Pax associate biologist Deven Kammerichs-Berke and senior botanist Scott Tomkinson. The survey consisted of meandering transects in public access areas (primarily around Spelway Dam and Shelf Road) and along public roads in developed areas. Survey times and conditions are presented below in Table 1.

Table 1. Survey Conditions

Date	Start/End Time	Temperature (°Fahrenheit)	Cloud Cover (%)	Wind Speed (miles/hour)	Surveyor
2/22/2022	0800-1130	60-71	0-50	4-10	D. Kammerichs-Berke S. Tomkinson

2 EXISTING CONDITIONS

The Project area consists of developed and undeveloped land in the northeast portion of the City of Ojai and the southern foothills of Los Padres National Forest. Habitat is a mixture of sagebrush scrub chaparral, oak woodland, and ornamental-dominated residential areas with elevations ranging from 750 to 1,450 ft amsl. Soils on the Project area are diverse (USDA 2022, Table 2 and Figure 4). with most of the Project area composed of Lodo rocky loam with 30-50% slopes, Sorrento clay loam with 9-15% slopes, Millerton-Millsholm families with 30-80% slopes, and Ojai series soils with 2-30% slopes. See Table 2 for comprehensive list of soil types within the Project area. Soils in the Lodo series consist of shallow, somewhat excessively drained soils formed in material weathered from hard shale and fine-grained sandstone. Soils in the Sorrento series consists of very deep, well drained soils formed mostly from sedimentary rocks in alluvial fans and stabilized floodplains and have slopes of 0 to 15. Soils in the Ojai series consists of very deep, well drained soils that formed in alluvium derived from material weathering from mostly sandstone or related sedimentary rocks.

Table 2. USDA Soil Types

Soil Type	Series Description	Acreage	Percent of Project
Lodo rocky loam, 30-50% slopes	Shallow, somewhat excessively drained soils that formed in material weathered from hard shale and fine-grained sandstone. Found on uplands with slopes of 5 to 75 percent.	184.98	16.66
Sorrento clay loam, heavy variant, 9-15% slopes	Very deep, well drained soils that formed in alluvium mostly from sedimentary rocks. Sorrento soils are on alluvial fans and stabilized floodplains and have slopes of 0 to 15 percent.	141.65	12.76
Millerton-Millsholm families-Rock outcrop complex, 30-80% slopes	Loamy, mixed, thermic family of Lithic Haploxeralfs. The soils have brown, fine sandy loam, neutral A horizons, and reddish brown, fine sandy loam, neutral Bt horizons overlying hornblende schist bedrock.	131.93	11.88
Ojai stony fine sandy loam, 2-15% slopes, eroded	Very deep, well drained soils that formed in alluvium derived from material weathering from mostly sandstone or related sedimentary rocks. Ojai soils are on alluvial fans and terraces and have slopes of 0 to 30 percent.	126.22	11.37
Ojai stony fine sandy loam, 15-30% slopes, eroded		111.68	10.06
Ojai very fine sandy loam, 2-9% slopes, eroded		107.98	9.73
Sespe clay loam, 15-30% slopes, eroded	Moderately deep, well drained soils that formed in material weathered	79.82	7.19

Sespe clay loam, 30-50% slopes	from reddish sandstone and shale bedrock. Sespe soils are on uplands and have slopes of 15 to 75 percent.	73.62	6.63
Sorrento clay loam, heavy variant, 2-9% slopes	Very deep, well drained soils that formed in alluvium mostly from sedimentary rocks. Sorrento soils are on alluvial fans and stabilized floodplains and have slopes of 0 to 15 percent.	65.51	5.90
Cortina stony sandy loam, 2-9% slopes	Very deep, somewhat excessively drained soils on alluvial fans and floodplains formed in gravelly alluvium from mixed rock sources. Slope ranges from 0 to 15 percent.	39.00	3.51
Kimball sandy loam, 2-9% slopes, eroded	Very deep, well drained soils formed in alluvium from mixed sources on low terraces with slopes of 0 to 15 percent	19.38	1.75
Azule gravelly loam, 5-9% slopes, warm	Moderately deep, well drained soils formed in material weathered from consolidated alluvium and from soft shale and fine-grained sandstone on hills with slopes of 9 to 75 percent.	10.19	0.92
Millsholm loam, 15-50% slopes	Shallow, well drained soils formed in material weathered from sandstone, mudstone and shale on hills and mountains with slopes of 5 to 75 percent.	8.55	0.77
Azule loam, 2-9% slopes, eroded	Moderately deep, well drained soils formed in material weathered from consolidated alluvium and from soft shale and fine-grained sandstone on hills with slopes of 9 to 75 percent.	7.17	0.65
Anacapa gravelly sandy loam, 2-9% slopes	Deep, well drained soils formed in alluvium derived from predominantly sedimentary rock sources in flood plains and on alluvial fans with slopes of 0 to 9 percent.	2.11	0.19
Riverwash	Very recent depositions of gravel, sand, and silt alluvium along major streams and tributaries.	0.41	0.04

3 RESULTS

Plants

The following description of plant communities found within the survey area is compiled in accordance with the Manual of California Vegetation (California Native Plant Society, CNPS 2022a). Scientific and common plant names used in this section and in Appendix A are those used by Calflora (2022) and

scientific names reflect the most recently recognized taxonomic treatments published in eFlora (2022). Appendix A provides a list of plant species documented in the Project area during the 22 February 2022 survey.

Northern portions of the survey area, apart from developed parcels, are dominated by mostly undisturbed chaparral and coastal sage scrub vegetation communities. The most prevalent plant alliances in the undeveloped portions of the survey area include:

- *Adenostoma fasciculatum* Shrubland Alliance (Chamise chaparral),
- *Artemisia californica* – *Salvia mellifera* Shrubland Alliance (California sagebrush - black sage scrub),
- *Platanus racemose* – *Quercus agrifolia* Woodland Alliance (California sycamore - coast live oak riparian woodlands),
- *Prunus ilicifolia* – *Heteromeles arbutifolia* – *Ceanothus spinosus* Shrubland Alliance (Holly leaf cherry - toyon - greenbark ceanothus chaparral)
- *Malacothamnus fasciculatus* – *Malacothamnus* spp. Shrubland Alliance (Bush mallow scrub)

Southward from the undeveloped portions of the survey area has primarily been developed into low-density residential parcels. While ornamental and ruderal vegetation is prevalent throughout many of these parcels, a mostly contiguous coast live oak woodland persists over a majority of the area. The following alliances are found in addition to ornamental vegetation in the southern portion of the survey area:

- *Quercus agrifolia* Forest & Woodland Alliance (Coast live oak woodland and forest)
- *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance (Wild oats and annual brome grasslands)
- *Brassica nigra* – *Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance (Upland mustards or star-thistle fields)
- *Eucalyptus* spp. – *Ailanthus altissima* – *Robinia pseudoacacia* Woodland Semi-Natural Alliance (Eucalyptus - tree of heaven - black locust groves)

Wildlife

Wildlife observed in the Project area during the survey included those common to sagebrush scrub and oak woodland habitats. A full list of wildlife species observed is also included in Table 7. No special-status species were observed during the survey. Reptiles observed in the Project area include western fence lizard (*Sceloporus occidentalis*).

Common bird species observed include band-tailed pigeon (*Patagioenas fasciata*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), great egret (*Ardea alba*), turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Dryobates nuttallii*), merlin (*Falcon columbarius*), Cassin's kingbird (*Tyrannus vociferans*), California scrub-jay (*Aphelocoma californica*), common raven (*Corvus corax*), oak titmouse (*Baeolophus inornatus*), wren

(*Chamaea fasciata*), white-breasted nuthatch (*Sitta carolinensis*), Bewick's wren (*Thryomanes bewickii*), northern mockingbird (*Mimus polyglottos*), cedar waxwing (*Bombycilla cedrorum*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), white-crowned sparrow (*Zonotrichia leucophrys*), California towhee (*Melospiza crissalis*), and yellow-rumped warbler (*Setophaga coronata auduboni*).

Mammals detected within the Project area include California ground squirrel (*Otospermophilus beecheyi*) and mule deer (*Odocoileus hemionus*).

Special-Status Resources

The following discussion addresses special-status biological resources having the potential to occur in the Project area. These resources include plant and wildlife species and habitats that have been afforded special-status and/or recognition by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and CNPS. In general, the principal reason an individual taxon (i.e., species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size, geographic range, and/or distribution resulting in most cases from habitat loss.

Special-status plant species include those that are listed as threatened or endangered by the California or federal Endangered Species Acts, as well as those that are assigned a California Rare Plant Rank (CRPR) by the CNPS. CRPR listing statuses are based on the degree of rarity (Lists 1A through 4) and threat level (0.1, 0.2, and 0.3) as follows (CNPS 2022b):

Rarity Ranks:

- List 1A: presumed extirpated in California, and rare or extinct elsewhere
- List 1B: rare, threatened, or endangered in California and elsewhere
- List 2A: presumed extirpated in California, but more common elsewhere
- List 2B: rare, threatened, or endangered in California, but more common elsewhere
- List 3: review list of plants about which more information is needed
- List 4: watch list of plants with limited distribution

Threat Ranks:

- 0.1: seriously threatened in California (> 80% threatened / high degree and immediacy of threat)
- 0.2: moderately threatened in California (20-80% threatened / moderate degree and immediacy of threat)
- 0.3: not very threatened in California (< 20% threatened / low degree and immediacy or no current threats known)

Natural Communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and state rarity ranks for plant and animal species in the CNDDDB. They are assigned an overall rarity score for a single rank of 1 through 5. Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (state) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents.

Wetlands are protected under Section 404 of the Clean Water Act (CWA) and are under the jurisdiction

of the United States Army Corps of Engineers (USACE). According to the USACE, areas considered to be a “wetland” (and subject to the regulatory jurisdiction of the USACE) must exhibit hydrology, hydric soils, and hydrophilic vegetation that meet federal criteria, as indicated in the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008).

In addition, if drainages meet the criteria established by Section 1600 of the California Fish and Game Code, the CDFW may require a Streambed Alteration Agreement prior to any modification of the bed, bank, or channel of streambeds. The CDFW jurisdiction generally includes the streambed and the canopy of associated riparian vegetation.

Table 3, Special-Status Plant Species, and Table 4, Special-Status Wildlife Species, provide a summary of special-status plant and wildlife species known to occur in the Project region including information on the status, potential for occurrence, and definitions for the various status designations. Figure 5 presents the locations of special-status resources in proximity to the Project area, as determined by records searches. Sources used to determine the conservation status of biological resources are as follows:

- Electronic Inventory of Rare and Endangered Vascular Plants of California CNPS (CNPS 2022b), California Natural Diversity Database (CNDDDB) List of Special Plants (CDFW 2022),
- Wildlife – CNDDDB List of Special Animals (CDFW 2022),
- Habitats – CNDDDB List of Sensitive Natural Communities (CDFW 2022).

Special-Status Plants

The CNDDDB and CNPS online inventory listed 24 CNPS List 1B, 2B, or 4 plant species occurring in the Project region. Based on the field assessment and the known habitat requirements of the special-status species identified by the records search, 10 species were determined to have a low potential for occurrence and 4 species were determined to have a high potential for occurrence.

No state and/or federally-listed threatened and/or endangered plant species are expected to occur in the Project area. Based on the presence of marginally suitable habitat, the Project area was determined to have a low potential for occurrence of Abrams' oxytheca (*Acanthoscyphus parishii* var. *abramsii*), Miles' milk-vetch (*Astragalus didymocarpus* var. *milesianus*), late-flowered mariposa-lily (*Calochortus fimbriatus*), umbrella larkspur (*Delphinium umbraculorum*), mesa horkelia (*Horkelia cuneata* var. *puberula*), pale-yellow layia (*Layia heterotricha*), Davidson's bush-mallow (*Malacothamnus davidsonii*), Baja navarretia (*Navarretia peninsularis*), chaparral nolina (*Nolina cismontana*), and Nuttall's scrub oak (*Quercus Dumosa*). The Project area was determined to have a high potential for occurrence of Plummer's mariposa-lily (*Calochortus plummerae*), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), and white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*).

Special-Status Wildlife

No special-status wildlife species were observed during the reconnaissance-level survey. The CNDDDB online inventory listed 23 special-status wildlife species in the Project region. Of those listed, 13 species were determined to have a low potential, two species were determined to have a moderate potential, and one species was determined to have a high potential to occur in the Project area. No federally and/or state-listed threatened or endangered wildlife species were determined to potentially occur exclusively on the project site.

Based on the presence of potentially suitable habitat, the Project area was determined to have a low potential for occurrence of the following Species of Special Concern: coast range newt (*Taricha torosa*), coastal whiptail (*Aspidoscelis tigris steinegeri*), San Bernardino ringneck snake (*Diadophis punctatus modestus*), coast patch-nosed snake (*Salvadora hexalepis virgultea*), Dulzura pocket mouse (*Eumops perotis californicus*), and American badger (*Taxidea taxus*). In addition, the Project area was determined to have a moderate potential for occurrence Crotch bumble bee (*Bombus crotchii*). Lastly the Project area was determined to have a high potential for occurrence of coast horned lizard (*Phrynosoma blainvillii*).

Special-status bird species are not likely to nest in the Project area, but some have a low to moderate potential to forage, including burrowing owl (*Athene cunicularia*), California condor (*Gymnogyps californianus*), yellow warbler (*Setophaga petechia*), and least Bell's vireo (*Vireo bellii pusillus*).

Sensitive Natural Communities

The CNDDDB records search identified California walnut woodland (G2, S2.1), southern California steelhead stream (GNR, SNR), southern coast live oak riparian forest (G4, S4), and southern sycamore alder riparian woodland (G4, S4). No impacts to sensitive natural communities identified by the CNDDDB records search are anticipated.

A search of the National Waters Inventory and national hydrographic database identified 3 freshwater forest/shrub wetlands, one riverine wetland in the central portion, and one freshwater pond in the Project area (Figure 6).

Table 3. Special-Status Plant Species Occurring in the Project Region

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW	CNPS			
<i>Acanthoscyphus parishii</i> var. <i>abramsii</i>	Abrams' oxytheca			1B.2	Jun-Aug	Dry, rocky mountain soils between 727-8,418 ft elevation.	Low (8)
<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Miles' milk-vetch			1B.2	Apr-Jul	Coastal scrub with clay soils between 160 and 1,265 ft elevation	Low (7)
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Ventura Marsh milk-vetch	FE	SE	1B.1	May-Oct	Marshes, swamps, and coastal scrub or dune between 0-200 ft elevation	Does Not Occur (1, 3, 4)
<i>Calochortus fimbriatus</i>	late-flowered mariposa-lily			1B.3	Jun-Aug	Chaparral, cismontane woodland, and riparian woodland with serpentine soils between 885-5,400 ft elevation	Low (2, 7)
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily			1B.2	Apr-Jul	Meadows and seeps, chaparral, and lower montane coniferous forests between 640-8,300 ft elevation	Does Not Occur (1)
<i>Calochortus plummerae</i>	Plummer's mariposa-lily			4.2	May-Jul	Dry, rocky places on coastal chaparral and inland hills between 0-7,300 ft elevation	High (9)
<i>Caulanthus lemmonii</i>	Lemmon's jewelflower			1B.2	Mar-May	Pinyon and juniper woodland and valley/foothill grasslands between 3,560-9,910 ft elevation	Does Not Occur (3)
<i>Delphinium umbraculorum</i>	umbrella larkspur			1B.3	Apr-Jun	Mesic sites in cismontane woodlands and chaparral between 705-6,810 ft elevation	Unlikely (7)
<i>Fritillaria ojaiensis</i>	Ojai fritillary			1B.2	Apr-Jun	Broadleaf upland forest, chaparral, lower montane coniferous forest, and cismontane woodland between 310-3,740 ft elevation	Does Not Occur (1, 2)
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia			1B.1	Feb-Jul	Sandy or gravelly sites in chaparral, cismontane woodland, and coastal scrub between 50-5,400 ft elevation	Low (2)
<i>Imperata brevifolia</i>	California satintail			2B.1	Mar-May	Mesic sites in coastal scrub, chaparral, riparian scrub, Mojavean desert scrub, and meadows/seeps between 10-4,905 ft elevation	Does Not Occur (1)

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW	CNPS			
<i>Layia heterotricha</i>	pale-yellow layia			1B.1	Mar-Jun	Cismontane woodland, coastal scrub, pinyon and juniper woodland, and valley/foothill grassland between 295-5,905 ft elevation	Low (8)
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass			4.3	Jan-July	Dry, disturbed areas such as bottomland, riverbanks, meadows, fields, and pastures, with dry soils, below 2,800 ft elevation.	High (9)
<i>Malacothamnus davidsonii</i>	Davidson's bush-mallow			1B.2	Jun-Jan	Sandy washes in coastal scrub, riparian woodland, chaparral, and cismontane woodland between 490-5,005 ft elevation	Low (8)
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	white-veined monardella			1B.3	Jun-Aug	Chaparral and cismontane woodland on dry slopes between 160-4,200 ft elevation	High (9)
<i>Muhlenbergia utilis</i>	aparejo grass			2B.2	Oct-Mar	Wet sites along streams, ponds between 820-3,280 ft. elevation	Does Not Occur (1)
<i>Navarretia ojaiensis</i>	Ojai navarretia			1B.1	Jan-Apr	Drying alkaline flats in chaparral, cismontane woodland, and coastal scrub between 900-9,202 ft elevation	High (9)
<i>Navarretia peninsularis</i>	Baja navarretia			1B.2	Jun-Aug	Wet areas in lower montane coniferous forest, chaparral, pinyon and juniper woodland and meadows/seeps between 3,770-7,760 ft elevation	Low (1, 3)
<i>Nolina cismontana</i>	chaparral nolina			1B.2	Jun-Aug	Chaparral and coastal scrub primarily in gabbro soils between 460-3,610 ft elevation	Low (8)
<i>Orobanche valida</i> ssp. <i>valida</i>	Rock Creek broomrape			1B.2	May-Sep	Chaparral and pinyon-juniper woodland with serpentine soils between 3,360-6,560 ft elevation	Does Not Occur (3)
<i>Quercus dumosa</i>	Nuttall's scrub oak			1B.2	Feb-Apr	Closed-cone conifer forest, chaparral, and coastal scrub in sandy/clay loam soils between 50-1,310 ft elevation	Low (8)
<i>Sagittaria sanfordii</i>	Sanford's arrowhead			1B.2	May-Jun	Marshes and swamps between 0 and 1,985 ft elevation	Does Not Occur (1)

Scientific Name	Common Name	Status			Bloom Period	Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW	CNPS			
<i>Sidalcea neomexicana</i>	salt spring checkerbloom			2B.2	Apr-Jun	Alkali springs and marshes in chaparral, coastal scrub, lower montane coniferous forest, and Mojavean Desert scrub between 10-7,810 ft elevation	Does Not Occur (1)
<i>Streptanthus campestris</i>	southern jewelflower			1B.3	May-Jul	Open areas in chaparral or coniferous forest between 3,000-7,500 ft elevation	Does Not Occur (3)
<p>1: STATUS DEFINITIONS</p> <p>USFWS FE: Species designated as endangered under the federal Endangered Species Act. Endangered = "any species in danger of extinction throughout all or a significant portion of its range." FT: Species designated as threatened under the Federal Endangered Species Act = "species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." FPE: Proposed for federal listing as Endangered. FPT: Proposed for federal listing as Threatened. C: Candidate for federal listing as Threatened or Endangered.</p> <p>CNPS 1A: Plants Presumed Extinct in California 2: Plants Rare, Threatened, or Endangered in California but More Common Elsewhere</p> <p>2: LIKELIHOOD FOR OCCURRENCE Not likely: Not likely to occur Low: Low potential to occur Moderate: Moderate potential to occur High: High potential to occur Present: Known to occur</p> <p>CDFW SE: Endangered = "a species is endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes" and is officially listed as such under the California Endangered Species Act (CESA). ST: Threatened = "a species that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this Act" (CESA). SR: State-listed as Rare = "taxa that are biologically rare, very restricted in distribution, or declining throughout their range but not currently threatened with extirpation" (Special Vascular Plants, Bryophytes, and Lichens List)</p> <p>1B: Plants Rare, Threatened, or Endangered in California and Elsewhere 4: Watch List of Plants with Limited Distribution</p> <p>RATIONALE 1: Lack of suitable habitat 2: Lack of suitable substrate 3: Beyond known elevation range 4: Beyond known geographic range 5: Required soil moisture regime not present 6: Observable perennial species not observed during survey 7: Marginally suitable habitat present 8: Suitable habitat present but no known records within one mile 9: Suitable habitat present with known records within one mile 10: Observed during survey</p>							

Table 4. Special-Status Wildlife Species Occurring in the Project Region

Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW		
Fishes					
<i>Catostomus santaanae</i>	Santa Ana sucker	FT		Shallow portions of rivers and streams with coarse substrates consisting of gravel, rubble, and boulders with growths of algae; lower and middle Santa Ana River, east, west, and north forks of San Gabriel River, and lower Big Tujunga Creek.	Does Not Occur (1)
<i>Gila orcuttii</i>	Arroyo chub		SSC	Native streams from Malibu Creek to San Luis Rey River. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave, and San Diego River basins.	Does Not Occur (1)
<i>Oncorhynchus mykiss irideus</i>	Southern California steelhead	FE		Coastal streams from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County).	Does Not Occur (1)
Amphibians					
<i>Anaxyrus californicus arroyo toad</i>	arroyo toad	FE	SSC	Semi-arid habitats near washes or intermittent streams with low-flow pools, alluvial benches or upland habitats that include friable soils for burrowing	Does Not Occur (1)
<i>Rana boylei</i>	foothill yellow-legged frog		SE, SSC	Partly shaded, shallow streams and riffles with a rocky substrate	Does Not Occur (1)
<i>Rana draytonii</i>	California red-legged frog	FT	SSC	Lowlands and foothills in or near deep permanent water sources with dense, shrubby, or emergent riparian vegetation	Does Not Occur (1)
<i>Taricha torosa</i>	Coast Range newt		SSC	Drier habitats such as oak woodlands or hilly grasslands. Breeding sites include ponds, reservoirs, and slow-moving streams.	Low (5)
Reptiles					
<i>Actinemys pallida</i>	southwestern pond turtle		SSC	Ponds, marshes, rivers, streams, and irrigation ditches with basking sites and suitable upland habitat for egg-laying	Not likely (5)
<i>Anniella</i> spp.	California legless lizard		SSC	Moist sandy or loose loamy soils under sparse vegetation	Not likely (2, 5)
<i>Aspidoscelis tigris stejnegeri</i>	Coastal whiptail		SSC	Hot and dry chaparral, woodland, and riparian areas with sparse foliage.	Low (5)

Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW		
<i>Diadophis punctatus modestus</i>	San Bernardino ringneck snake			Prefers moist habitats, including wet meadows, rocky hillsides, gardens, farmland, grassland, chaparral, mixed coniferous forests, woodlands.	Low (6)
<i>Phrynosoma blainvillii</i>	coast horned lizard		SSC	Sandy substrate with scattered low bushes and abundant native ants and other insects	High (9)
<i>Salvadora hexalepis virgulata</i>	coast patch-nosed snake		SSC	Brushy or shrubby vegetation west of the south coast, peninsular and transverse mountain range peaks	Low (6)
<i>Thamnophis hammondi</i>	two-striped gartersnake		SSC	Riparian areas in coastal California from Salinas south to northwest Baja California up to 7,000 ft elevation	Not Likely (1)
Birds					
<i>Athene cunicularia</i>	burrowing owl		SSC	Open, dry annual or perennial grasslands and scrublands with low-growing vegetation	Nesting: Not likely (1) Foraging: Low (5)
<i>Gymnogyps californianus</i>	California condor	FE	SE, FP	Vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude for foraging; and deep canyons with clefts in vertical walls for nesting	Nesting: Not likely (1) Foraging: Moderate (6)
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	FT	SSC	Coastal sage scrub dominated or co-dominated by California sagebrush below 1,700 ft elevation.	Nesting: Does Not Occur (4) Foraging: Does Not Occur (4)
<i>Setophaga petechia</i>	yellow warbler		SSC	Riparian vegetation among cottonwood, sycamore, ash, or alder in close proximity to water or montane scrub of Cascade and Sierra Nevada ranges	Nesting: Not likely (1) Foraging: Low (5)
<i>Vireo bellii pusillus</i>	least Bell's vireo	FE	SE	Riparian areas in vicinity of water or dry river bottoms below 2,000 ft elevation	Nesting: Not likely (1) Foraging: Low (5)
Mammals					
<i>Chaetodipus californicus femoralis</i>	dulzura pocket mouse		SSC	Coastal scrub, chaparral and grasslands, especially at the interface of chaparral and grassland	Low (5)

Scientific Name	Common Name	Status		Habitat Description	Likelihood for Occurrence/ Rationale
		USFWS	CDFW		
<i>Eumops perotis californicus</i>	western mastiff bat		SSC	Roosts in cliff face crevices, high buildings, trees and tunnels among open semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral	Low (5)
<i>Taxidea taxus</i>	American badger		SSC	Drier open stages of most shrub, forest, and herbaceous habitats, with friable soils	Low (5)
<i>Bombus crotchii</i>	Crotch bumble bee		CE	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> ssp., <i>Phacelia</i> ssp., <i>Clarkia</i> ssp., <i>Dendromecon</i> ssp., <i>Eschscholzia</i> ssp., and <i>Eriogonum</i> ssp.	Moderate (6)
<p><u>Status Definitions</u></p> <p><u>USFWS</u> FE: Species designated as Endangered under the Federal Endangered Species Act. Endangered = "any species in danger of extinction throughout all or a significant portion of its range." FT: Species designated as Threatened under the Federal Endangered Species Act. Threatened = "species likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range." FPE: Proposed for federal listing as Endangered. FPT: Proposed for federal listing as Threatened. BCC: Bird of Conservation Concern</p> <p><u>2: LIKELIHOOD FOR OCCURRENCE</u> Not likely: Not likely to occur Low: Low potential to occur Moderate: Moderate potential to occur High: High potential to occur Present: Known to occur</p> <p><u>CDFW</u> ST: Threatened = "a species that, although not presently Threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this Act (California Endangered Species Act)." SE: Endangered = "a species is endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes." SR: Rare = "not presently Threatened with extinction, but in such small numbers throughout its range that it may become Endangered if its present environment worsens." FP: Fully Protected species are protected by special legislation and cannot be taken at any time. SSC: Species of Special Concern. WL: Watch List</p> <p><u>RATIONALE</u> 1: Lack of suitable habitat 2: Lack of suitable substrate 3: Beyond known elevation range 4: Beyond known geographic range 5: Marginally suitable habitat present 6: Suitable habitat present but no known records within one mile (or appropriate distance based on typically-sized territory for the species) 7: Suitable habitat present with known records within one mile (or appropriate distance based on typically-sized territory for the species) 8: Observed during survey 9: Overwintering migrant</p>					

4 IMPACT ASSESSMENT AND MITIGATION

The proposed Project has the potential to directly and/or indirectly impact special-status plant and wildlife species, and migratory nesting birds. Short-term direct impacts to habitat could cause injury or death to wildlife because of Project-related disturbances, such as non-native species removal and associated equipment use. Short-term indirect impacts could result from noise, harassment, dust emissions, or other unanticipated disruption during non-native species removal activities.

Special-Status Plants

The Project area is in developed and undeveloped lands in the northeast portion of the City of Ojai and the southern foothills of Los Padres National Forest. Conditions are considered marginal to highly suitable for the special-status plant species known to occur in the Project region. Ten CNPS List 1B species and one CNPS List 2B species are considered to have a low potential to occur and two CNPS List 1B and 4 species are considered to have a high potential to occur.

Since portions of this Project area are located within undisturbed areas, consideration to preventing the spread of noxious weeds is recommended. Spreading the seed of invasive species from the Project area and into new areas may result in impacts to special-status plant populations and sensitive habitats within the region. Implementation of Mitigation Measure BIO-3 below would be expected to reduce potential impacts to a level considered less than significant.

Special-Status Wildlife

Conditions are considered marginally to highly suitable for several Species of Special Concern, including crotch bumble bee and coast horned lizard. Given the limited extent of the Project disturbance, Project activities are unlikely to impact individuals, if activities do impact one to several individuals the loss of these individuals will not represent an impact large enough to contribute to a trend toward federal listing under the Endangered Species Act or a loss in the viability of the local population. Mitigation Measures BIO-2, BIO-4, and BIO-5 below would avoid or further reduce potential impacts to Species of Special Concern to a level considered less than significant.

No special-status bird species are expected to breed in the Project area; however, several special-status bird species may forage in the Project area. Impacts to a very limited amount of potential foraging habitat would be considered minimal and less than significant. However, it has the potential to introduce micro-trash during trail construction that could be ingested by the federally and state-listed Endangered California condor. Implementation of Mitigation Measure BIO-4 would avoid potential introduction of trash and micro-trash to the Project area during construction.

The Project area has a high potential for nesting common birds. Potential direct or indirect impacts to active nests resulting in nest failure or take would conflict with the Migratory Bird Treaty Act (16 U.S.C. §§ 703–712). The proposed action may impact individuals nesting within the Project area. As a whole, the proposed action will not have a negative effect on populations of migratory bird species. Implementation of Mitigation Measure BIO-5 would avoid or reduce potential impacts nesting birds.

Wildlife Movement

Maintaining connectivity between areas of suitable habitat is critical for dispersal, migration, foraging, and genetic health of plant and wildlife species. A functional network of connected habitats is essential to

the continued existence of California's diverse species and natural communities in the face of both human land use and climate change. Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. In addition, aquatic connectivity is critical for anadromous fish like salmon that encounter many potential barriers as they return upstream to their places of origin. Projects that introduce substantial barriers to movement of resident or migratory fish or wildlife species, or hinder the normal activities of wildlife, require mitigation to offset Project effects.

The Project area consists of open space and low-density residential development. The proposed Project does not involve the construction of hardscape, fencing, or other obstacles to wildlife movement. Therefore, the Project would not be expected to affect or impinge local or regional wildlife movement or migration patterns.

The Project is not anticipated to have any negative impacts on wetlands because non-native species removal would enhance riparian habitats and provide the opportunity for passive habitat restoration. If non-native species removal is conducted in or near any of these features, Implementation of Mitigation Measure BIO-6 would avoid or reduce potential impacts.

5 RECOMMENDATIONS

The following avoidance, minimization, and mitigation measures are recommended to reduce the anticipated impacts to the maximum extent feasible.

BIO-1 Sensitive Plant Species Avoidance and Minimization Measures. Prior to initial ground disturbance and staging activities in areas of suitable habitat for Plummer's mariposa-lily, Robinson's pepper-grass, white-veined monardella, and Ojai naverretia focused surveys shall be completed by a qualified botanist. Survey results will be submitted to the Project and non-native species removal lead if found. If Plummer's mariposa-lily, Robinson's pepper-grass, white-veined monardella, or Ojai naverretia plants are identified on the Project site, they will be avoided to the greatest extent possible. A qualified botanist will flag them for avoidance.

BIO-2 Special-Status Herpetofauna Avoidance and Minimization. A survey for coast horned lizard will be conducted by a qualified biologist using a visual survey methodology. A qualified biologist shall monitor vegetation clearing and ground disturbance to avoid any potential individuals. Any sightings of California Species of Special Concern shall be documented and reported to County and CDFW staff and the CNDDDB. Mortality shall be documented and reported to County and CDFW staff, and specimens donated to the appropriate collection manager of the San Luis Obispo County Museum of Natural History or other appropriate scientific institution.

BIO-3 Crotch's Bumblebee Survey and Minimization Measures. Within 30 days prior to initiation of ground disturbance between March and September, the Project footprint will be surveyed for Crotch's bumble bee using a photograph survey methodology. All insects observed during the survey will be photographed with attention to family Apidae (bees). All bees observed will be photographed to the greatest extent feasible without handling. Photographs should clearly show the entire top side of the abdomen, the side of the thorax/abdomen and the face/head. Several photos should be taken of each specimen to obtain an identification. If a bee is

observed entering a burrow or other cavity, a GPS point should be recorded and attention should be focused on the cavity to determine if multiple individuals may be entering/exiting, indicating the potential presence of a colony. Biologists will submit photos to Bumble Bee Watch (www.bumblebeewatch.org), BeeSpotter (<https://beespotter.org>), or a similar website that employs bumble bee experts to verify the identifications. Qualified scientific experts may also be used to verify photographic records. CDFW will be notified as soon as possible if a *B. crotchii* observation is verified. If a *B. crotchii* colony is detected on the Project site, the colony will be mapped and avoided. No vegetation or soil disturbance will be permitted within a 50-foot radius of the colony. If avoidance is infeasible, CDFW will be consulted regarding potential conservation measures.

BIO-3 Noxious Weed Species. To prevent the potential spread of invasive botanical species identified within the Project site or potentially transported to the Project site from elsewhere, all vehicles and equipment used at the site shall be cleaned of all dirt, mud, and plant debris prior to entering the site after working elsewhere, and/or exiting the site (e.g., driven over rumble strips). This will prevent tracking of potential seed stock onto or off the property.

BIO-4 Worker Environmental Awareness Program (WEAP). Prior to initiation of construction activities on private lands (including staging and mobilization), all personnel associated with Project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special-status resources that may occur in the Project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area, including measures to avoid the spread of weeds and micro-trash in the Project area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the Project. All employees shall sign a form documenting that they have attended the WEAP and understand the information presented to them.

BIO-5 Preconstruction Surveys for Nesting Birds. The applicant shall ensure the following actions are undertaken to avoid and minimize potential impacts to nesting birds: To the extent feasible, tree and vegetation removal within suitable nesting bird habitats will be scheduled to avoid the nesting season and occur between September and January. For activities that cannot avoid the nesting season (February 15 to August 31 private lands, March 14 to August 1 LPNF lands), not more than 30 days prior to initiation of construction activities (e.g. mobilization and staging), a qualified biologist shall conduct preconstruction surveys for nesting raptors and other native nesting birds. The survey for the presence of nesting raptors shall cover all areas within the disturbance footprint plus a 500-foot buffer where access can be secured. If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer ranging from 50 to 300 feet based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest, and 500 feet for nests of fully protected species (such as white-tailed kite) and raptors. All buffers shall be marked using high-visibility flagging, fencing, and/or signage. No construction

activities shall be allowed within the buffers until the young have fledged from the nest or the nest fails, unless approved by the qualified biologist. The qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer. Encroachment into the buffer shall be conducted at the discretion of the qualified biologist.

BIO-6 Preconstruction Wetland Area and Riparian Habitat Avoidance and Minimization. Riparian vegetation will not be removed, no machinery will come within 50 ft of riparian habitat or wetlands without a biological monitor. No fueling of equipment will occur within 100 ft from any wetland or riparian resources. If impacts are expected to riparian habitat or associated wetlands, work will not proceed until consultation with CDFW is conducted and determinations are made.

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APPENDIX A . Plant and Wildlife Species Observed

Table 5. List of Non-Native Plant Species Observed on the Project Area

Scientific Name	Common Name	Family
<i>Acacia dealbata</i>	Silver wattle	Fabaceae
<i>Ailanthus altissima</i>	Tree of heaven	Simaroubaceae
<i>Amaranthus albus</i>	Tumbleweed	Amaranthaceae
<i>Anthriscus caucalis</i>	Bur chevril	Apiaceae
<i>Avena barbata</i>	Slim oat	Poaceae
<i>Avena fatua</i>	Wildoats	Poaceae
<i>Brassica nigra</i>	Black mustard	Brassicaceae
<i>Brassica rapa</i>	Common mustard	Brassicaceae
<i>Bromus diandrus</i>	Ripgut brome	Poaceae
<i>Bromus hordeaceus</i>	Soft chess	Poaceae
<i>Bromus rubens</i>	Red brome	Poaceae
<i>Capsella bursa-pastoris</i>	Shepherd's purse	Brassicaceae
<i>Carduus pycnocephalus</i>	Italian thistle	Asteraceae
<i>Centaurea benedicta</i>	Blessed thistle	Asteraceae
<i>Centaurea melitensis</i>	Tocalote	Asteraceae
<i>Chenopodium album</i>	Lambs quarters	Chenopodiaceae
<i>Convolvulus arvensis</i>	Field bindweed	Convolvulaceae
<i>Cotoneaster pannosus</i>	Woolly cotoneaster	Rosaceae
<i>Cynodon dactylon</i>	Bermuda grass	Poaceae
<i>Cyperus involucratus</i>	Umbrella plant	Cyperaceae
<i>Delairea odorata</i>	Cape ivy	Asteraceae
<i>Digitaria sanguinalis</i>	Crabgrass	Poaceae
<i>Echium candicans</i>	Pride of madeira	Boraginaceae
<i>Erigeron bonariensis</i>	Flax-leaved horseweed	Asteraceae
<i>Erodium botrys</i>	Big heron bill	Geraniaceae
<i>Erodium cicutarium</i>	Coastal heron's bill	Geraniaceae
<i>Eucalyptus camaldulensis</i>	Red gum	Myrtaceae
<i>Eucalyptus globulus</i>	Blue gum	Myrtaceae
<i>Eucalyptus polyanthemos</i>	Silver dollar gum	Myrtaceae
<i>Eucalyptus sideroxylon</i>	Red iron bark	Myrtaceae
<i>Euphorbia lathyris</i>	Gopher plant	Euphorbiaceae
<i>Euphorbia maculata</i>	Spotted spurge	Euphorbiaceae
<i>Euphorbia peplus</i>	Petty spurge	Euphorbiaceae
<i>Festuca perennis</i>	Italian rye grass	Poaceae
<i>Ficus carica</i>	Common fig	Moraceae

Scientific Name	Common Name	Family
<i>Foeniculum vulgare</i>	Fennel	Apiaceae
<i>Geranium dissectum</i>	Wild geranium	Geraniaceae
<i>Hedera helix</i>	English ivy	Araliaceae
<i>Helminthotheca echioides</i>	Bristly ox-tongue	Asteraceae
<i>Hordeum marinum</i>	Seaside barley	Poaceae
<i>Hypochaeris glabra</i>	Smooth cats ear	Asteraceae
<i>Kickxia elatine</i>	Sharp point fluellin	Plantaginaceae
<i>Lactuca serriola</i>	Prickly lettuce	Asteraceae
<i>Lamarckia aurea</i>	Goldentop	Poaceae
<i>Lamium amplexicaule</i>	Henbit	Lamiaceae
<i>Ligustrum japonicum</i>	Japanese privet	Oleaceae
<i>Lobularia maritima</i>	Sweet alyssum	Brassicaceae
<i>Lysimachia arvensis</i>	Scarlet pimpernel	Myrsinaceae
<i>Malva parviflora</i>	Cheeseweed	Malvaceae
<i>Marrubium vulgare</i>	White horehound	Lamiaceae
<i>Medicago lupulina</i>	Black medick	Fabaceae
<i>Medicago polymorpha</i>	California burclover	Fabaceae
<i>Melia azedarach</i>	China berry tree	Meliaceae
<i>Melilotus indicus</i>	Annual yellow sweetclover	Fabaceae
<i>Morus alba</i>	Mulberry	Moraceae
<i>Narcissus tazetta</i>	Cream narcissus	Amaryllidaceae
<i>Nerium oleander</i>	Oleander	Apocynaceae
<i>Nicotiana glauca</i>	Tree tobacco	Solanaceae
<i>Olea europaea</i>	Olive	Oleaceae
<i>Opuntia ficus-indica</i>	Tuna	Cactaceae
<i>Oxalis pes-caprae</i>	Bermuda buttercup	Oxalidaceae
<i>Pennisetum setaceum</i>	Fountaingrass	Poaceae
<i>Phalaris aquatica</i>	Harding grass	Poaceae
<i>Pistacia chinensis</i>	Chinese pistachio	Anacardiaceae
<i>Pittosporum undulatum</i>	Victorian box	Pittosporaceae
<i>Plantago lanceolata</i>	Ribwort	Plantaginaceae
<i>Poa annua</i>	Annual blue grass	Poaceae
<i>Polycarpon tetraphyllum</i>	Four leaved allseed	Caryophyllaceae
<i>Polypogon monspeliensis</i>	Annual beard grass	Poaceae
<i>Pseudognaphalium luteoalbum</i>	Jersey cudweed	Asteraceae
<i>Raphanus sativus</i>	Jointed charlock	Brassicaceae

Scientific Name	Common Name	Family
<i>Ricinus communis</i>	Castor bean	Euphorbiaceae
<i>Rosmarinus officinalis</i>	Rosemary	Lamiaceae
<i>Rumex crispus</i>	Curly dock	Polygonaceae
<i>Salsola tragus</i>	Russian thistle	Chenopodiaceae
<i>Schinus molle</i>	Peruvian pepper tree	Anacardiaceae
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	Anacardiaceae
<i>Senecio vulgaris</i>	Common groundsel	Asteraceae
<i>Silene gallica</i>	Common catchfly	Caryophyllaceae
<i>Silybum marianum</i>	Milk thistle	Asteraceae
<i>Sisymbrium officinale</i>	Hedge mustard	Brassicaceae
<i>Sonchus asper</i>	Spiny sowthistle	Asteraceae
<i>Sonchus oleraceus</i>	Sow thistle	Asteraceae
<i>Spartium junceum</i>	Spanish broom	Fabaceae
<i>Spergula arvensis</i>	Corn spurry	Caryophyllaceae
<i>Stellaria media</i>	Chickweed	Caryophyllaceae
<i>Stipa miliacea</i>	Smilo grass	Poaceae
<i>Torilis arvensis</i>	Field hedge parsley	Apiaceae
<i>Tribulus terrestris</i>	Puncture vine	Zygophyllaceae
<i>Trifolium hirtum</i>	Rose clover	Fabaceae
<i>Ulmus parvifolia</i>	Siberian elm	Ulmaceae
<i>Urtica urens</i>	Annual stinging nettle	Urticaceae
<i>Veronica arvensis</i>	Speedwell	Plantaginaceae
<i>Vicia benghalensis</i>	Purple vetch	Fabaceae
<i>Vicia villosa</i>	Hairy vetch	Fabaceae
<i>Vinca major</i>	Vinca	Apocynaceae
<i>Washingtonia robusta</i>	Mexican fan palm	Arecaceae

Table 6. List of Native Plant Species Observed on the Project Area.

Scientific Name	Common Name	Family
<i>Achillea millefolium</i>	Yarrow	Asteraceae
<i>Acmispon glaber</i>	Deerweed	Fabaceae
<i>Acmispon maritimus</i>	Coastal lotus	Fabaceae
<i>Acmispon strigosus</i>	Strigose lotus	Fabaceae
<i>Acourtia microcephala</i>	Sacapellote	Asteraceae
<i>Adenostoma fasciculatum</i>	Chamise	Rosaceae
<i>Adiantum jordanii</i>	Adiantum	Pteridaceae

Scientific Name	Common Name	Family
<i>Alnus rhombifolia</i>	White alder	Betulaceae
<i>Amaranthus blitoides</i>	Prostrate pigweed	Amaranthaceae
<i>Ambrosia psilostachya</i>	Ragweed	Asteraceae
<i>Amsinckia intermedia</i>	Common fiddleneck	Boraginaceae
<i>Amsinckia menziesii</i>	Fiddleneck	Boraginaceae
<i>Arctostaphylos glauca</i>	Big berry manzanita	Ericaceae
<i>Artemisia californica</i>	Coastal sage brush	Asteraceae
<i>Artemisia douglasiana</i>	California mugwort	Asteraceae
<i>Asclepias fascicularis</i>	narrow leaf milkweed	Apocynaceae
<i>Baccharis pilularis</i>	Coyote brush	Asteraceae
<i>Baccharis salicifolia</i>	Mule fat	Asteraceae
<i>Bloomeria crocea</i>	Golden stars	Themidaceae
<i>Brickellia californica</i>	California brickellia	Asteraceae
<i>Calandrinia breweri</i>	Brewer's calandrinia	Montiaceae
<i>Calandrinia menziesii</i>	Calandrinia	Montiaceae
<i>Calystegia macrostegia</i> ssp. <i>cyclostegia</i>	Coast morning glory	Convolvulaceae
<i>Cardamine oligosperma</i>	Idaho bittercress	Brassicaceae
<i>Ceanothus cuneatus</i>	Buck brush	Rhamnaceae
<i>Ceanothus megacarpus</i>	Big pod ceanothus	Rhamnaceae
<i>Ceanothus spinosus</i>	Greenbark ceanothus	Rhamnaceae
<i>Cercocarpus betuloides</i>	Birch leaf mountain mahogany	Rosaceae
<i>Chenopodium berlandieri</i>	Pit seed goosefoot	Chenopodiaceae
<i>Chenopodium californicum</i>	California goosefoot	Chenopodiaceae
<i>Chlorogalum angustifolium</i>	Narrow leaved soaproot	Agavaceae
<i>Chlorogalum pomeridianum</i> var. <i>pomeridianum</i>	Common soaproot	Agavaceae
<i>Cirsium occidentale</i> var. <i>californicum</i>	California thistle	Asteraceae
<i>Clarkia unguiculata</i>	Woodland clarkia	Onagraceae
<i>Claytonia perfoliata</i>	Miner's lettuce	Montiaceae
<i>Clematis lasiantha</i>	Pipestem	Ranunculaceae
<i>Clematis ligusticifolia</i>	Creek clematis	Ranunculaceae
<i>Collinsia heterophylla</i> var. <i>heterophylla</i>	Purple chinese houses	Plantaginaceae
<i>Cordylanthus rigidus</i>	Rigid bird's beak	Orobanchaceae
<i>Crassula connata</i>	Sand pygmy weed	Crassulaceae
<i>Croton setiger</i>	Turkey-mullein	Euphorbiaceae
<i>Cryptantha intermedia</i>	Common cryptanth	Boraginaceae
<i>Cuscuta campestris</i>	Field dodder	Convolvulaceae
<i>Datisca glomerata</i>	Durango root	Datisceae
<i>Datura wrightii</i>	Jimsonweed	Solanaceae
<i>Deinandra fasciculata</i>	Clustered tarweed	Asteraceae
<i>Dendromecon rigida</i>	Bush poppy	Papaveraceae
<i>Diplacus longiflorus</i>	southern bush monkeyflower	Phrymaceae
<i>Dipterostemon capitatus</i>	Blue dicks	Themidaceae

Scientific Name	Common Name	Family
<i>Dryopteris arguta</i>	Wood fern	Dryopteridaceae
<i>Dudleya cymosa</i>	Rock lettuce	Crassulaceae
<i>Dudleya lanceolata</i>	Southern california dudleya	Crassulaceae
<i>Echinodorus berteroi</i>	Burhead	Alismataceae
<i>Elymus condensatus</i>	Giant wild rye	Poaceae
<i>Elymus glaucus</i>	Blue wildrye	Poaceae
<i>Elymus triticoides</i>	Beardless wild rye	Poaceae
<i>Emmenanthe penduliflora</i>	Whispering bells	Boraginaceae
<i>Encelia californica</i>	Bush sunflower	Asteraceae
<i>Epilobium brachycarpum</i>	Willow herb	Onagraceae
<i>Epilobium canum</i>	California fuchsia	Onagraceae
<i>Ericameria nauseosa</i> var. <i>hololeuca</i>	Common rabbitbrush	Asteraceae
<i>Erigeron canadensis</i>	Canada horseweed	Asteraceae
<i>Eriodictyon crassifolium</i>	Thick leaved yerba santa	Boraginaceae
<i>Eriogonum fasciculatum</i>	California buckwheat	Polygonaceae
<i>Eriogonum gracile</i> var. <i>gracile</i>	Slender buckwheat	Polygonaceae
<i>Eriophyllum confertiflorum</i>	Yellow yarrow	Asteraceae
<i>Eucrypta chrysanthemifolia</i> var. <i>chrysanthemifolia</i>	Common eucrypta	Boraginaceae
<i>Eulobus californicus</i>	California primrose	Onagraceae
<i>Festuca microstachys</i>	Small fescue	Poaceae
<i>Fraxinus dipetala</i>	Two petaled ash	Oleaceae
<i>Galium aparine</i>	Cleavers	Rubiaceae
<i>Gnaphalium palustre</i>	Lowland cudweed	Asteraceae
<i>Hazardia squarrosa</i>	Saw toothed goldenbush	Asteraceae
<i>Hesperoyucca whipplei</i>	Chaparral yucca	Agavaceae
<i>Heteromeles arbutifolia</i>	Toyon	Rosaceae
<i>Heterotheca grandiflora</i>	Telegraph weed	Asteraceae
<i>Juglans californica</i>	Southern california black walnut	Juglandaceae
<i>Keckiella cordifolia</i>	Heart leaved keckiella	Plantaginaceae
<i>Laennecia coulteri</i>	Coulter's horseweed	Asteraceae
<i>Lathyrus vestitus</i>	Common pacific pea	Fabaceae
<i>Lepidium nitidum</i>	Shining pepper grass	Brassicaceae
<i>Lepidospartum squamatum</i>	Scalebroom	Asteraceae
<i>Logfia filaginoides</i>	California cottonrose	Asteraceae
<i>Lonicera interrupta</i>	Chaparral honeysuckle	Caprifoliaceae
<i>Lupinus bicolor</i>	Lupine	Fabaceae
<i>Lupinus hirsutissimus</i>	Stinging lupine	Fabaceae
<i>Lupinus succulentus</i>	Arroyo lupine	Fabaceae
<i>Lyonothamnus floribundus</i>	Island ironwood	Rosaceae
<i>Malacothamnus fasciculatus</i> var. <i>nuttallii</i>	Nuttall's bush mallow	Malvaceae
<i>Malacothrix saxatilis</i>	Cliff aster	Asteraceae
<i>Malosma laurina</i>	Laurel sumac	Anacardiaceae

Scientific Name	Common Name	Family
<i>Malvella leprosa</i>	Alkali mallow	Malvaceae
<i>Marah macrocarpa</i>	Chilicothe	Cucurbitaceae
<i>Matricaria discoidea</i>	Pineapple weed	Asteraceae
<i>Melica imperfecta</i>	Coast range melic	Poaceae
<i>Mirabilis laevis</i>	Desert wishbone bush	Nyctaginaceae
<i>Nasturtium officinale</i>	Watercress	Brassicaceae
<i>Oxalis californica</i>	Californica wood sorrel	Oxalidaceae
<i>Paeonia californica</i>	California peony	Paeoniaceae
<i>Parietaria hespera</i> var. <i>californica</i>	California pellitory	Urticaceae
<i>Pellaea andromedifolia</i>	Coffee fern	Pteridaceae
<i>Pentagramma triangularis</i> ssp. <i>triangularis</i>	Gold back fern	Pteridaceae
<i>Persicaria lapathifolia</i>	Common knotweed	Polygonaceae
<i>Phacelia cicutaria</i> var. <i>hispida</i>	Caterpillar phacelia	Boraginaceae
<i>Phacelia viscida</i>	Sticky phacelia	Boraginaceae
<i>Phacelia viscida</i> var. <i>albiflora</i>	Sticky phacelia	Boraginaceae
<i>Pholistoma auritum</i>	Fiesta flower	Boraginaceae
<i>Phoradendron leucarpum</i> ssp. <i>tomentosum</i>	Mistletoe	Viscaceae
<i>Platanus racemosa</i>	California sycamore	Platanaceae
<i>Polypodium californicum</i>	California polypody	Polypodiaceae
<i>Populus trichocarpa</i>	Black cottonwood	Salicaceae
<i>Prunus ilicifolia</i>	Holly leaf cherry	Rosaceae
<i>Pseudognaphalium beneolens</i>	Cudweed	Asteraceae
<i>Pseudognaphalium biolettii</i>	Two-color rabbit-tobacco	Asteraceae
<i>Pseudognaphalium californicum</i>	Ladies' tobacco	Asteraceae
<i>Quercus agrifolia</i>	Coast live oak	Fagaceae
<i>Quercus berberidifolia</i>	Inland scrub oak	Fagaceae
<i>Quercus lobata</i>	Valley oak	Fagaceae
<i>Rafinesquia californica</i>	California chicory	Asteraceae
<i>Ranunculus californicus</i>	Common buttercup	Ranunculaceae
<i>Rhamnus ilicifolia</i>	Evergreen buckthorn	Rhamnaceae
<i>Rhus aromatica</i>	Fragrant sumac	Anacardiaceae
<i>Rhus ovata</i>	Sugar bush	Anacardiaceae
<i>Ribes malvaceum</i>	Chaparral currant	Grossulariaceae
<i>Ribes speciosum</i>	Fuchsia flowered gooseberry	Grossulariaceae
<i>Romneya coulteri</i>	Coulter's matilija poppy	Papaveraceae
<i>Rubus ursinus</i>	California blackberry	Rosaceae
<i>Salix lasiolepis</i>	Arroyo willow	Salicaceae
<i>Salvia apiana</i>	White sage	Lamiaceae
<i>Salvia leucophylla</i>	Purple sage	Lamiaceae
<i>Salvia mellifera</i>	Black sage	Lamiaceae
<i>Salvia spathacea</i>	Hummingbird sage	Lamiaceae
<i>Sambucus nigra</i> ssp. <i>caerulea</i>	Blue elderberry	Adoxaceae
<i>Sanicula crassicaulis</i>	Pacific sanicle	Apiaceae

Scientific Name	Common Name	Family
<i>Sisyrinchium bellum</i>	Blue eyed grass	Iridaceae
<i>Solanum douglasii</i>	Douglas' nightshade	Solanaceae
<i>Solanum umbelliferum</i>	Blue witch	Solanaceae
<i>Solanum xanti</i>	Nightshade	Solanaceae
<i>Stachys bullata</i>	Southern hedge nettle	Lamiaceae
<i>Stipa lepida</i>	Foothill needle grass	Poaceae
<i>Stipa pulchra</i>	Purple needle grass	Poaceae
<i>Symphoricarpos mollis</i>	Snowberry	Caprifoliaceae
<i>Tauschia arguta</i>	Southern tauschia	Apiaceae
<i>Thysanocarpus curvipes</i>	Common fringe pod	Brassicaceae
<i>Toxicodendron diversilobum</i>	Poison oak	Anacardiaceae
<i>Umbellularia californica</i>	California bay	Lauraceae
<i>Venegasia carpesioides</i>	Canyon sunflower	Asteraceae
<i>Verbena lasiostachys</i>	Western vervain	Verbenaceae
<i>Xanthium strumarium</i>	Cocklebur	Asteraceae

Table 7. List of Wildlife Species Observed on the Project Area.

Scientific Name	Common Name	Status
Reptiles		
<i>Sceloporus occidentalis</i>	Western fence lizard	
Birds		
<i>Accipiter cooperii</i>	Cooper's Hawk	MBTA
<i>Adrea alba</i>	Great Egret	MBTA
<i>Aphelocoma californica</i>	California Scrub-Jay	MBTA
<i>Baeolophus inornatus</i>	Oak Titmouse	MBTA
<i>Bombycilla cedrorum</i>	Cedar Waxwing	MBTA
<i>Buteo jamaicensis</i>	Red-tailed Hawk	MBTA
<i>Buteo lineatus</i>	Red-shouldered Hawk	MBTA
<i>Callipepla californica</i>	California Quail	MBTA
<i>Calypte anna</i>	Anna's Hummingbird	MBTA
<i>Cathartes aura</i>	Turkey Vulture	MBTA
<i>Catherpes mexicanus</i>	Canyon Wren	MBTA
<i>Chamaea fasciata</i>	Wrentit	MBTA
<i>Colaptes auratus</i>	Northern Flicker	MBTA
<i>Corthylio calendula</i>	Ruby-crowned Kinglet	MBTA
<i>Corvus brachyrhynchos</i>	American Crow	MBTA
<i>Corvus corax</i>	Common Raven	MBTA

Scientific Name	Common Name	Status
<i>Dryobates nuttallii</i>	Nuttall's Woodpecker	MBTA
<i>Falco columbarius</i>	Merlin	MBTA
<i>Haemorhous mexicanus</i>	House Finch	MBTA
<i>Junco hyemalis</i>	Dark-eyed Junco	MBTA
<i>Melanerpes formicivorus</i>	Acorn Woodpecker	MBTA
<i>Melospiza melodia</i>	Song Sparrow	MBTA
<i>Melospiza crissalis</i>	California Towhee	MBTA
<i>Mimus polyglottos</i>	Northern Mockingbird	MBTA
<i>Patagioenas fasciata</i>	Band-tailed Pigeon	MBTA
<i>Phainopepla nitens</i>	Phainopepla	MBTA
<i>Pipilo maculatus</i>	Spotted Towhee	MBTA
<i>Psaltriparus minimus</i>	Bushtit	MBTA
<i>Sayornis nigricans</i>	Black Phoebe	MBTA
<i>Selasphorus sasin</i>	Allen's Hummingbird	MBTA
<i>Setophaga coronata auduboni</i>	Yellow-rumped Warbler	MBTA
<i>Sialia mexicana</i>	Western Bluebird	MBTA
<i>Sitta carolinensis</i>	White-breasted Nuthatch	MBTA
<i>Spinus psaltria</i>	Lesser Goldfinch	MBTA
<i>Streptopelia decaocto</i>	Eurasian Collared-Dove	Non-native
<i>Thryomanes bewickii</i>	Bewick's Wren	MBTA
<i>Turdus migratorius</i>	American Robin	MBTA
<i>Tyrannus vociferans</i>	Cassin's Kingbird	MBTA
<i>Zenaida macroura</i>	Mourning Dove	MBTA
<i>Zonotrichia atricapilla</i>	Golden-crowned Sparrow	MBTA
<i>Zonotrichia leucophrys</i>	White-crowned Sparrow	MBTA
Mammals		
<i>Odocoileus hemionus</i>	Mule deer	
<i>Otospermophilus beecheyi</i>	California ground squirrel	

APPENDIX B. PROJECT AREA MAPS

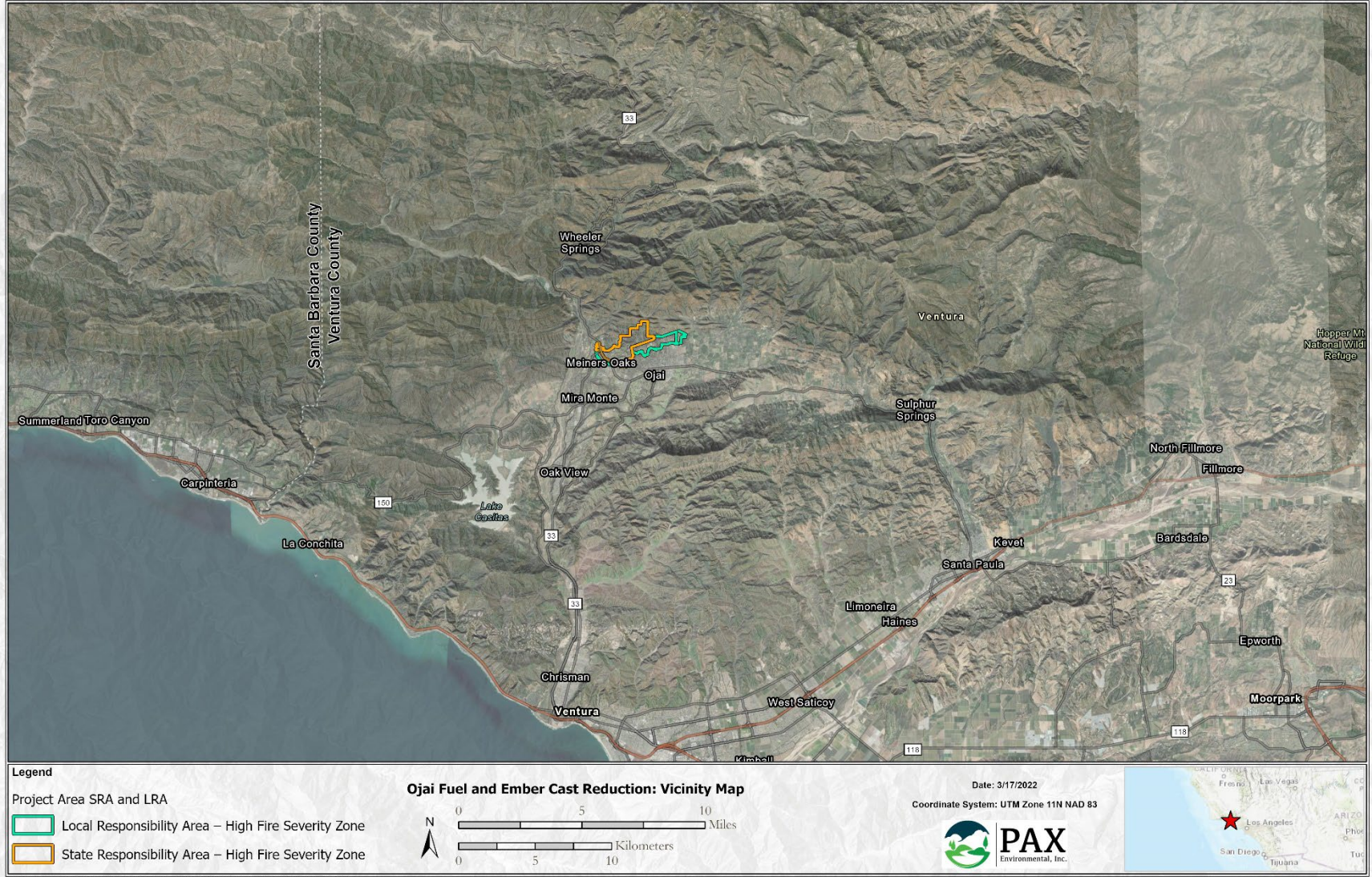


Figure 1. Project Vicinity Map

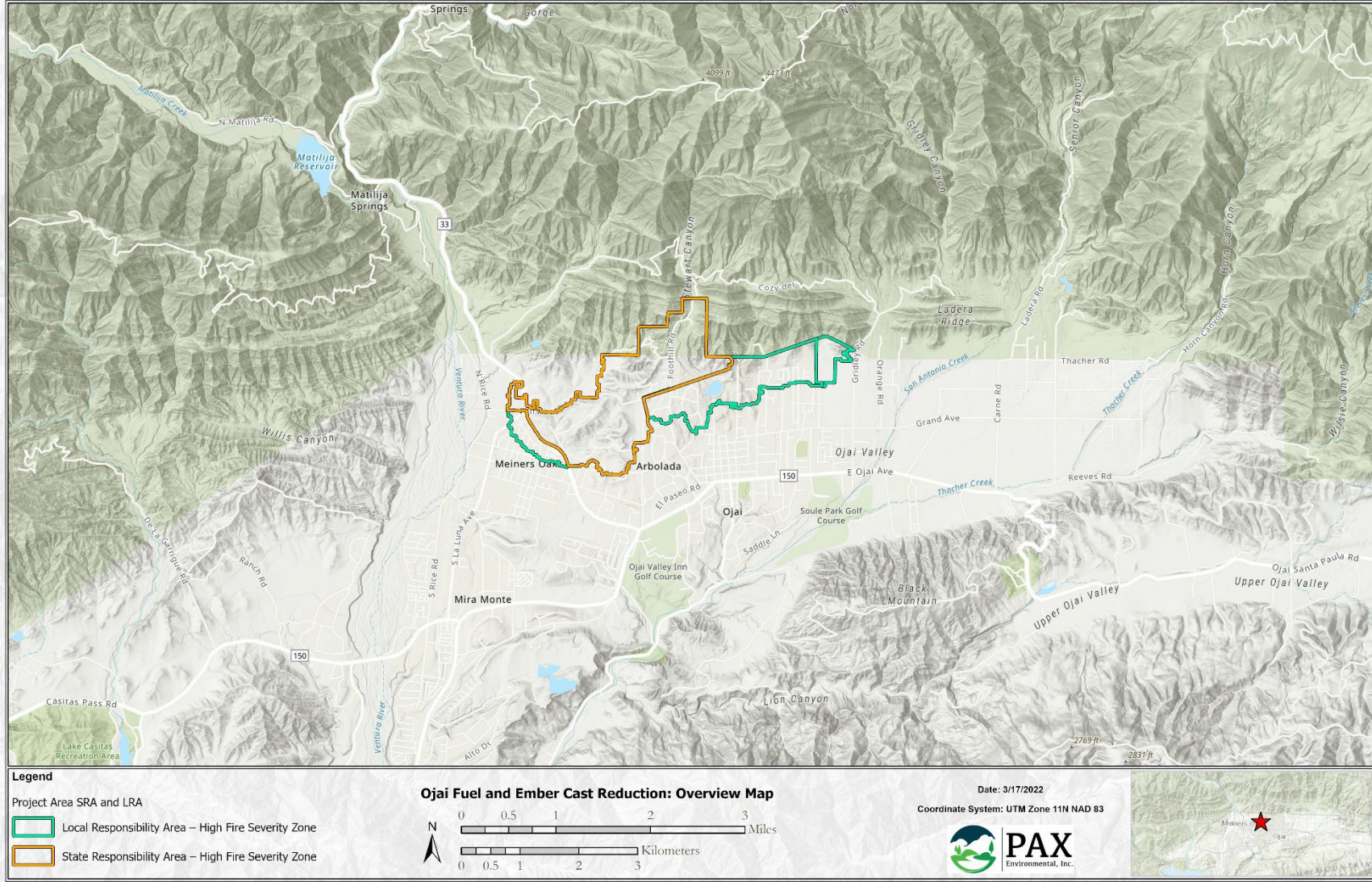


Figure 2. Project Area SRA and LRA Map

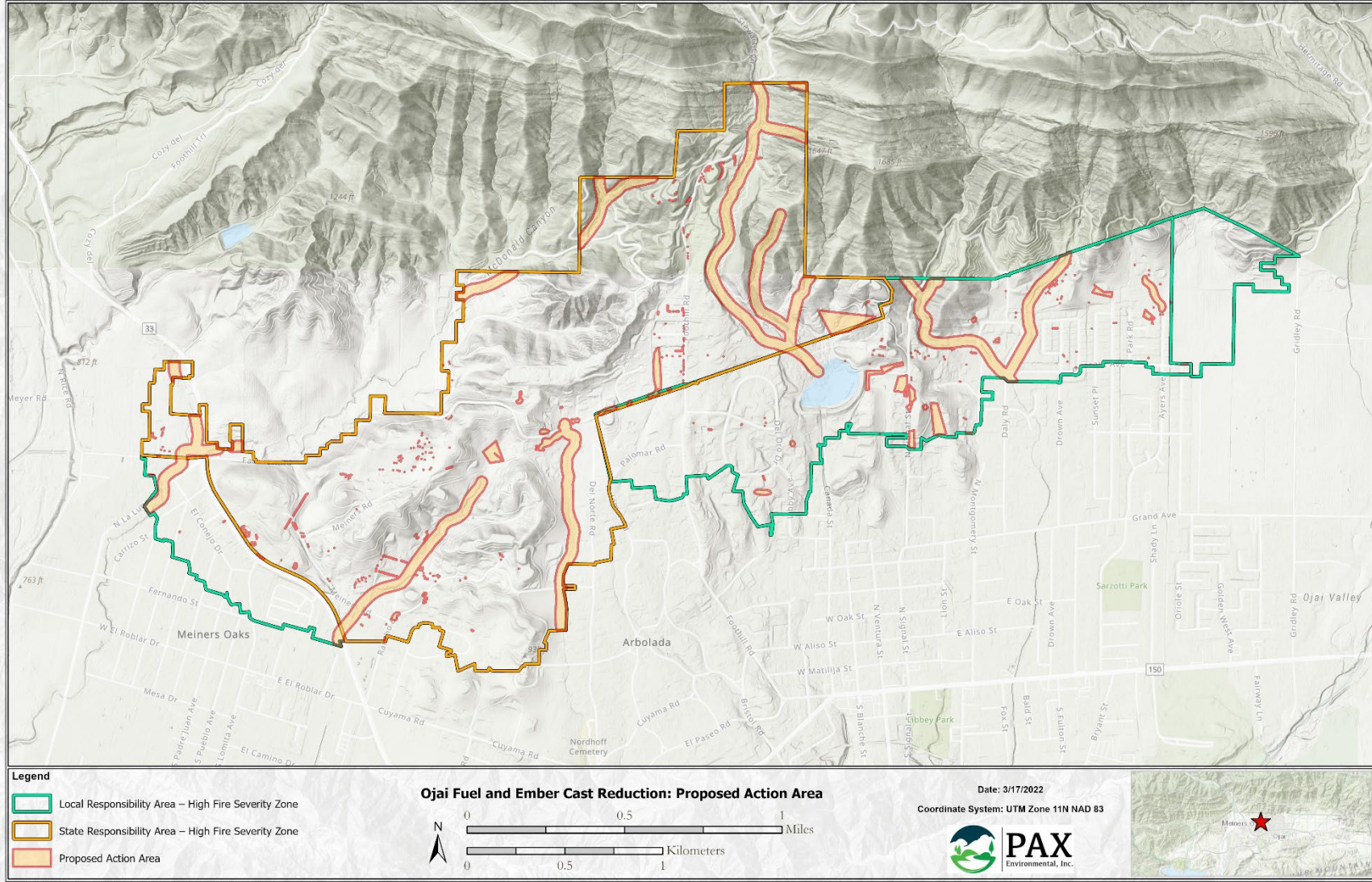


Figure 3. Proposed Action Area within the Project Area

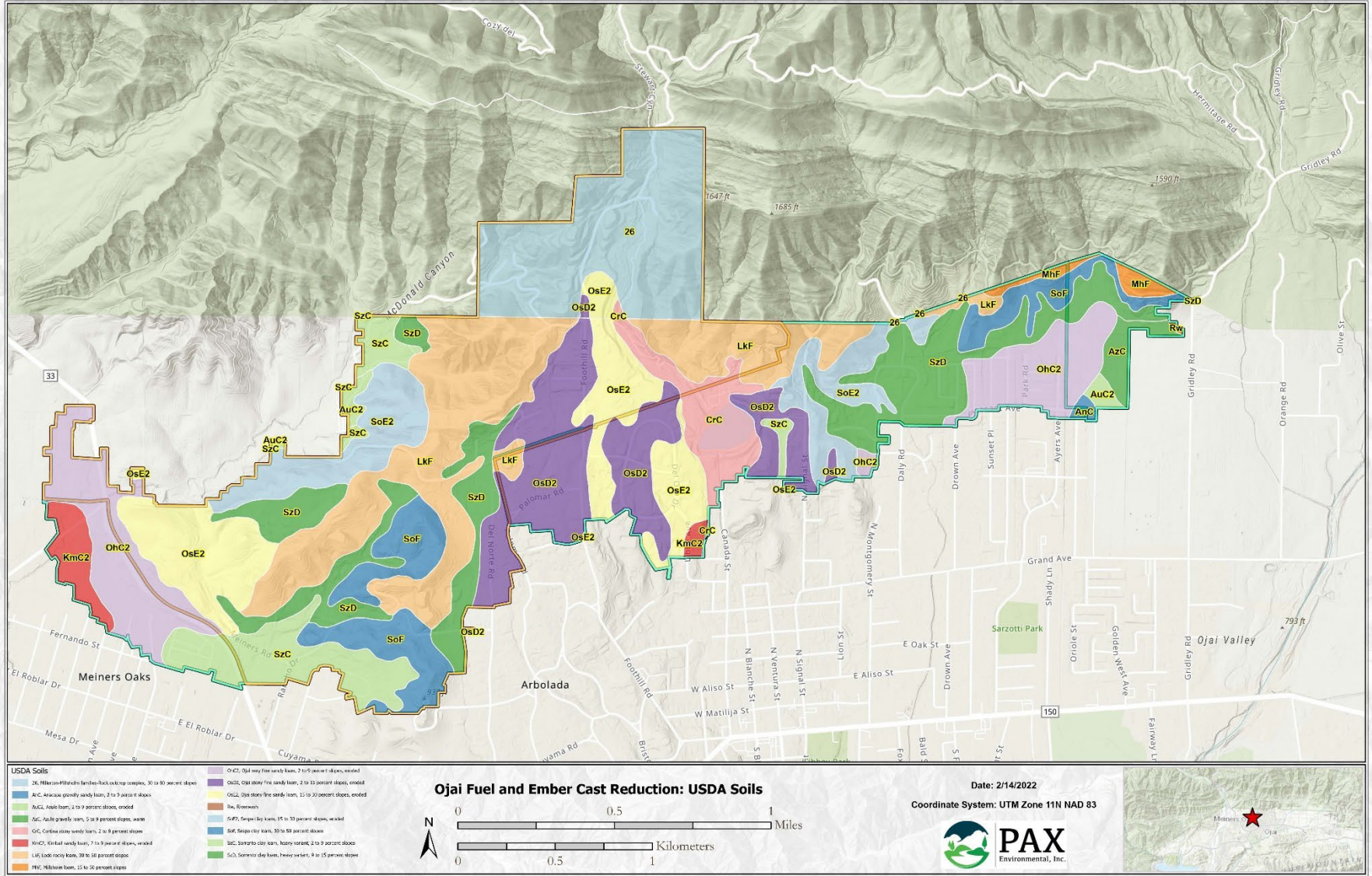


Figure 4. USDA Soils Map

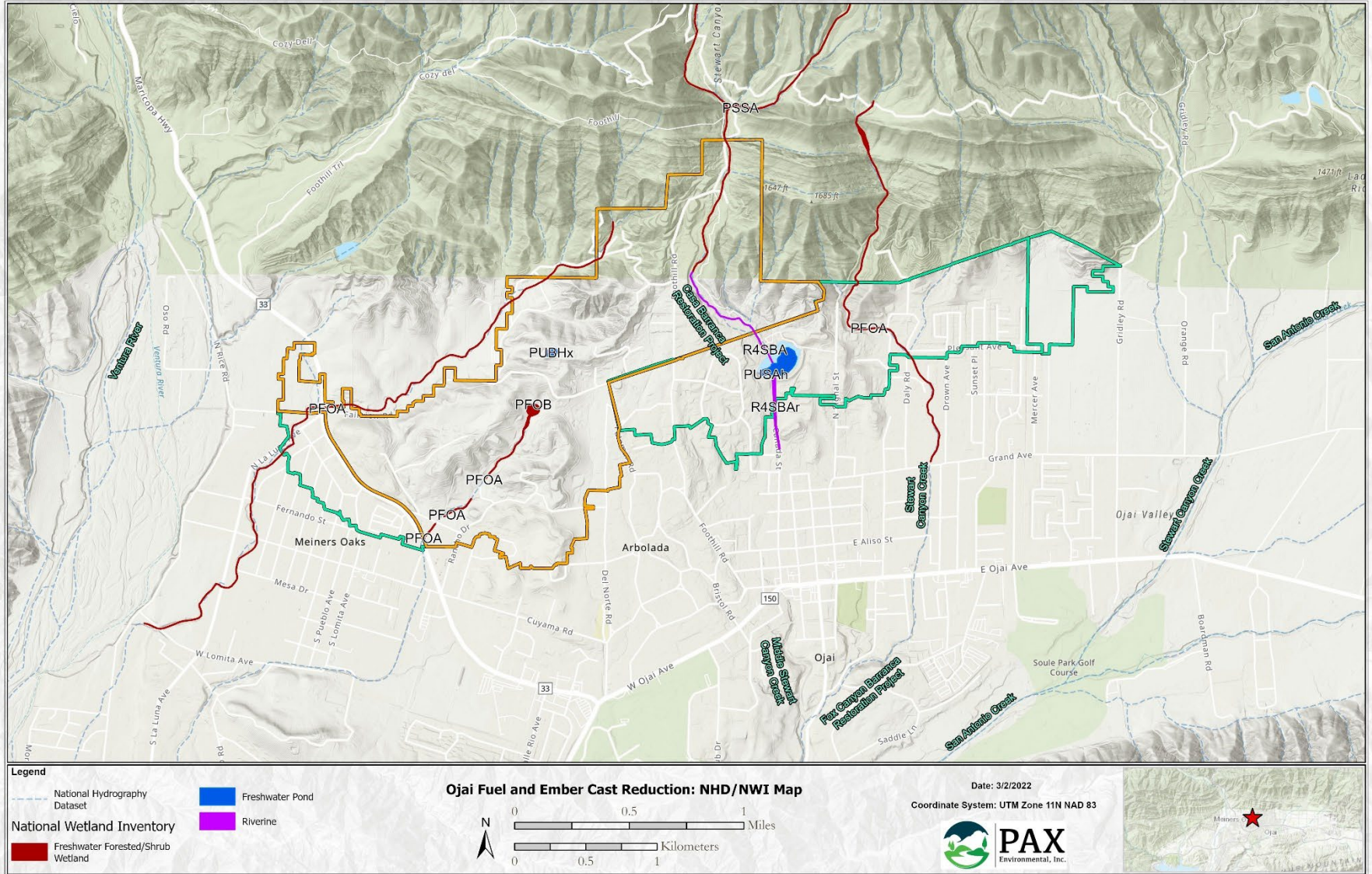


Figure 6. National Hydrographic Data and Wetland Map

Appendix D – Project-Specific CEQA Findings

INTRODUCTION

The Ventura County Fire Department, 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 North Ojai Incendiary Fuel and Ember Cast Reduction Project, referred to herein as "vegetation treatment project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

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

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

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

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

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

Here, as explained in the Board's Findings and the Draft Program Environmental Impact Report (Draft PEIR) and the Final PEIR (collectively, the "PEIR"), the CalVTP would result in significant and unavoidable environmental

effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. For reasons set forth in the Board's Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

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

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

BACKGROUND AND PROJECT DESCRIPTION

The North Ojai Incendiary Fuels and Ember Cast Reduction Project (Project) is located entirely on private lands in part within the incorporated area of the City of Ojai, Ventura County, and in part in unincorporated Ventura County. Within the City of Ojai, the Project area includes private parcels within the Wildland Urban Interface (WUI) along the north end of the City of Ojai. The Project also includes private parcels adjacent to the western and eastern boundaries of the City of Ojai within unincorporated Ventura County. The cumulative total acreage of all private land parcels that are proposed for treatment is 1,100 total acres; however, treatment activities would occur on approximately 98 acres of the Project area. The Project proposes to conduct mechanical and manual treatment to incendiary, ember cast producing trees and other fuels (eucalyptus, Italian cypress, fan palm, and nonnative conifers) around private homes within the WUI in and around the City of Ojai.

ENVIRONMENTAL REVIEW PROCESS

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

On June 3, 2022, Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

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

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

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

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

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

RECORD OF PROCEEDINGS

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

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

Pursuant to CEQA Guidelines section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at Ventura County Fire Department, 165 Durley Ave Camarillo, CA 93010. The custodian of these documents is Celine Moomey, Pre Fire Specialist.

MITIGATION MONITORING AND REPORTING PROGRAM

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

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the Final PEIR and the treatment project PSA, which were presented to the Ventura County Fire Department and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment project.

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

AESTHETICS AND VISUAL RESOURCES

- ▶ Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities
- ▶ Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types

AGRICULTURAL AND FORESTRY RESOURCES

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

AIR QUALITY

- ▶ Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- ▶ Impact AQ-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

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

HYDROLOGY AND WATER QUALITY

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

LAND USE AND PLANNING, POPULATION AND HOUSING

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

NOISE

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

RECREATION

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

TRANSPORTATION

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

PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

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

WILDFIRE

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

CUMULATIVE

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

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

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

The Board adopted the findings required by CEQA for all direct and indirect significant impacts. The findings provided a summary description of each impact, described the applicable mitigation measures identified in the PEIR and adopted by the Board, and stated the Board's findings on the significance of each impact after

imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final PEIR; and the Board incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board ratified, adopted, and incorporated into the findings the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

Not every individual treatment project will have all of the significant environmental impacts that the CalVTP was determined to contribute to or cause. Additionally, some of the environmental impacts predicted by the CalVTP PEIR to be significant and unavoidable or less than significant after mitigation may be determined in a PSA to be less severe for an individual treatment project than determined in the statewide PEIR. The impacts and mitigation measures identified in Sections 8.1 and 8.2 below reflect the conclusions of the PSA by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the Project Proponent's decisionmaker or 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 which avoid or substantially lessen the significant environmental effects indicated below, as identified in the Final PEIR and the PSA. Implementation of the mitigation measures indicated below to be applicable to the treatment project, which have been required or incorporated into the project, will reduce these impacts to a less than significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

BIOLOGICAL RESOURCES

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

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

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

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

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

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

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

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

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

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

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

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- Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
 - Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)
 - Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)
 - Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Bats)**
 - Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ungulates)**
 - Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)

- Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Fish and Aquatic Invertebrates (in wetlands, vernal pools))**
 - Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Amphibians and Reptiles (in wetlands, vernal pools, associated riparian))**
 - Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function**
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- Impact BIO-4: Substantially Affect State or Federally Protected Wetlands**
 - Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries**

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

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

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

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

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

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

AESTHETICS AND VISUAL RESOURCES

- Impact AES-3: Result in long-term substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from the non-shaded fuel break treatment type**

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

AIR QUALITY

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

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

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

- No feasible mitigation is available.

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

- No feasible mitigation is available.

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

BIOLOGICAL RESOURCES

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

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

GREENHOUSE GAS EMISSIONS

Impact GHG-2: Generate GHG Emissions through Treatment Activities

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

TRANSPORTATION

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

No feasible mitigation is available.

PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

No feasible mitigation is available.

CUMULATIVE

Aesthetics

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

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

Air Quality

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

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

Archaeological, Historical, and Tribal Cultural Resources

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

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

Biological Resources

Cumulative Biological Resources Impact related to Bumble Bees

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

Transportation

Cumulative Transportation Impact related to Vehicle Miles Travelled

No feasible mitigation is available.

Public Services, Utilities and Service Systems

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

No feasible mitigation is available.

STATEMENT OF OVERRIDING CONSIDERATIONS¹

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

¹ If the PSA indicates that the project proponent's treatment project will not contribute to or cause any of the significant and unavoidable impacts determined in the PEIR, the proponent need not adopt a statement of overriding considerations.

incorporated by reference into this section, and the documents found in the Record of Proceedings, which are described and defined in Section 5, above.

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