

Attachment A

Standard Project Requirements (SPRs)
& Mitigation Measures (MMs)

AESTHETICS AND VISUAL RESOURCES

SPR AES-1: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.

SPR AES-2: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project area is within the LPDSF, where no public recreation is allowed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR AES-3: 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.

MM AES-3: The project proponent will establish a shaded fuel break along all established roadways within the LPDSF parcel. No non-shaded fuel breaks will be implemented. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

AGRICULTURE AND FOREST RESOURCES

No SPR or MM.

AIR QUALITY

SPR AQ-1: 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.

SPR AQ-2: The project proponent will submit a Smoke Management Plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation, a Smoke Management Plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.

SPR AQ-3: 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 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.

SPR AQ-4: To minimize dust during treatment activities, the project proponent will implement the following measures:

- Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol.
- If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by CARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations.
- Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.
- Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may “cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property,” per Health and Safety Code Section 41700.

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

SPR AQ-5: 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.

SPR AQ-6: Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crews, including the implementation of an approved Incident Action Plan (IAP), which will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting on-site briefings, posting notifications, weather monitoring during burning, and other burn-related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.

MM AQ-1: 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.

Techniques for reducing emissions may include, but are not limited to, the following:

- Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment.
- Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria:
 - Meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer;
 - Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables;
 - Contain no fatty acids or functionalized fatty acid esters; and
 - Have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines.
- Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment.
- Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.
- Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_x and PM.

ARCHEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

SPR CUL-1: For treatments led by CAL FIRE, an archaeological and historical resource record search will be conducted per the "Archaeological Review Procedures for CAL FIRE Projects" (current edition dated 2010). The Archaeological Records Request was completed by Sonoma State University and sent to the Northwest Information Center. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-2: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List, which may be obtained from the CAL FIRE website as appropriate. An information request letter was sent to geographically affiliated tribes and comments will be addressed in the Archaeological Survey Report. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-3: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. Pre-field research included review of a historic plat maps, literature covering indigenous tribes known to occupy the area, and conversations with the current Forest Manager. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-4: The project proponent will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. Sonoma State University

has been contracted to perform the archaeological survey and author the survey report. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-5: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC, and assess whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-6: If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. The archaeological survey will be completed prior to treatment activities. When ground cover is disturbed the potential to discover previously concealed resources exists. Should a prehistoric artifact be discovered, operations will cease within 100 feet of the discovery, appropriate tribal representatives and the CAL FIRE State Archeologist will be notified. Coordinated mitigations will be developed to maintain the integrity of the site. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-7: If the records search identifies built historical resources, as defined in Section 15064.5 of the state CEQA Guidelines, the project proponent will avoid these resources. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR CUL-8: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. The implementation of this SPR will reduce the risk of treatment activities resulting in an impact to sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

MM CUL-2: If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find. Implementation of this Mitigation Measure will minimize the impacts to subsurface resources that may be discovered during operations.

BIOLOGICAL RESOURCES

Biological resource SPRs and MMs require individuals to be qualified in order to implement measures. Qualifications for listed individuals are as follows:

- Qualified Registered Professional Forester (RPF), Biologist, or Botanist: To be qualified as a RPF or biologist, the individual would hold a degree in wildlife, biology, ecology, forestry, or a similar relevant field. The individual would be familiar with the life history and ecology of species known to occur or having potential to occur within the project area. Additionally, the individual would be knowledgeable in required survey protocols as well as state and federal laws applicable to listed species.

SPR BIO-1: The project proponent will require a biologist to conduct a desktop review and reconnaissance-level survey prior to treatment to establish the potential for biologically sensitive resources to occur within the LPDSF parcel. The desktop review shall consist of, but not be limited to, a CNDDDB 3-mile search, CNPS 9-quad search, and USFWS IPaC search. The review will include historic occurrence data, species ranges, required habitat types, and habitat present within the treatment area to determine the possibility of the species occurring during treatment activities. Reconnaissance surveys will be performed to identify and document potentially sensitive resources within the treatment area, including sensitive natural communities and habitat for special-status plants and wildlife.

PROJECT SPECIFIC IMPLEMENTATION - PLANTS

Under SPR BIO-1, the qualified RPF or biologist performed a desktop review to determine the potential for special-status plant species to occur within the project area. Eighteen (18) special-status plants have historically occurred in the vicinity of the project area, and their habitat requirements and potential to occur is discussed below in Table 1. To avoid treatment activity impacts to special-status plants, the qualified RPF or botanist will perform protocol-level surveys as described under SPR BIO-7. Populations of plants listed under the California Endangered Species Act (CESA), Federal Endangered Species Act (ESA), or listed as CNPS Rank 1 or 2 will be mapped and provided with a no-disturbance buffer established with high-visibility flagging tape, fencing, or stakes. 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.

PROJECT SPECIFIC IMPLEMENTATION - WILDLIFE

Under SPR BIO-1, the qualified RPF or biologist performed a desktop review to determine the potential for special-status wildlife species to occur within the project area. Fourteen (14) special-status wildlife species have historically occurred in the vicinity of the project area, and their habitat requirements and potential to occur is discussed below in Table 1.

- To avoid treatment activity impacts to northern spotted owl, protocol-level surveys will be performed within suitable habitat under SPR BIO-10. A total of six (6) visits will be performed with call stations established to determine occupancy during the breeding season. If nesting is observed, a 0.25-mile buffer will be established around the nest location using high-visibility flagging tape, fencing, or stakes. If no northern spotted owl activity is observed during the breeding season, treatment activities may occur within suitable habitat within LPDSF.
- To avoid treatment activity impacts to California giant salamander, foothill yellow-legged frog, or northwestern pond turtle, a no-disturbance buffer of 200 feet will be established around waterways. Project personnel will receive training featuring the identification and life history of these species in order for species to be avoided if encountered within upland refugia.

SPR BIO-2: The project proponent will require all project personnel receive a training from a qualified biologist prior to performing project activities. The training will describe the effective implementation of all biological SPRs and MMs. The training will also feature the identification characteristics, relevant life history, and corresponding avoidance measures for all pertinent special-status species. Additionally, the training will discuss identification and avoidance of sensitive natural communities with potential to occur within the treatment area.

SPR BIO-3: If sensitive natural communities and/or habitat for species-status plants observed in SPR BIO-1 are present and cannot be avoided, the project proponent will require a qualified biologist to perform a protocol-level survey. The survey will be performed in accordance with CDFW "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities" (dated March 20, 2018). Any special-status plants and/or sensitive natural communities will be mapped. If multiple age classes are found within treatment areas, the proposed treatment utilized will promote heterogeneity, resiliency, and health in the residual stand by creating different influences of sunlight through the canopy, promoting a diverse understory. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR BIO-4: The project proponent will ensure that no treatment activities or project-related impacts will be made to potentially jurisdictional waterways. In order to avoid potential impacts, no disturbance will be made to waterways and corresponding riparian habitat. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR BIO-5: The project proponent will identify chaparral and coastal sage scrub vegetation to determine the condition, class, and fire return interval. All treatment types within chaparral and coastal sage scrub will be developed so treatment designs avoid environmental effects resulting in a type conversion of the vegetation alliances. 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.

SPR BIO-6: The project proponent will prevent the spread of plant pathogens whenever working within sensitive natural communities. Measures to ensure that pathogens are not being spread among sensitive natural communities shall consist of:

- Cleaning and sanitizing 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.
- Including training on *Phytophthora* diseases and other plant pathogens in the worker awareness training, required under SPR BIO-2.
- Minimizing 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.
- Minimizing movement of soil and plant material within the site, especially between areas with high and low risk of contamination.
- Cleaning 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.
- Following 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 *Phytopheras* in Native Habitats 2016).

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

SPR BIO-7: If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensitive Natural Communities."

Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status.

If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS.

For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:

If protocol-level surveys, consisting of at least two (2) survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys.

If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment.

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

SPR BIO-8: The project area is located outside the Coastal Zone, therefore no impacts to Coastal Zone ESHAs are expected.

SPR BIO-9: Patches of French broom (*Genista monspessulana*) and yellow-star thistle (*Centaurea solstitialis*) were observed during reconnaissance surveys. The project proponent will utilize the following actions to prevent the further spread of invasive plants, noxious weeds, and invasive wildlife:

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

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

SPR BIO-10: Suitable nesting habitat for northern spotted owl occurs within of the LPDSF. Treatment activities within 0.25 mile of suitable nesting habitat will be adjusted so that operations are outside the breeding season when breeding species could be present and affected by operations. The breeding

period for northern spotted owl is defined as February 1 – July 31. If treatment were to occur within nesting habitat during the breeding period, protocol-level surveys would be performed by a qualified RPF or biologist prior to the implementation of treatment activities. Occupied habitat observed would be provided with a no-disturbance buffer, clearly marked by high-visibility flagging tape, fencing, or stakes. If protocol-level surveys occur and determine special-status species are not present, mechanical treatments may occur during the February 1 – July 31 period. Treatments will not convert habitat to another habitat type nor change its suitability for special-status species.

Suitable roosting habitat occurs within LPDSF for pallid bat and Townsend's big-eared bat. If work is expected to occur within the bat maternity period of April 1 – August 31 (Caltrans 2004), then surveys by a qualified RPF or biologist would be performed prior to manual, mechanical, or prescribed burning treatment activities. A no-disturbance buffer of 250 feet would be provided for any pallid bat or Townsend's big-eared bat roosting site.

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

SPR BIO-11: If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards:

- Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use.
- Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted.
- Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass.
- Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers.

This SPR applies to only to prescribed herbivory.

SPR BIO-12: The project proponent will ensure that treatment activities avoid the migratory bird nesting season, February 1 – September 15. If operations are proposed during the migratory bird nesting season, defined as February 1 to September 15, potential for nesting birds within the project area exists and the following will apply:

- An RPF or representative of the RPF will perform a cursory/visual search of the project area for nesting birds prior to operations.
- If an active nest is identified, the project proponent will establish a species-appropriate buffer around the nest sufficient to ensure that the breeding process would not be disrupted.
- The project proponent will modify the treatment activity within the nesting vicinity to avoid disturbances to the nest. Treatment modifications will be determined by the project proponent in coordination with the RPF.
- The project proponent will defer timing of treatment activities, if necessary, to ensure that treatment would not result in disturbances to the nest.

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

MM BIO-1a: If listed plants are determined to occur through SPR BIO-1 and SPR BIO-7, a no-disturbance buffer around the occupied area will be established using high visibility flagging, fencing, or stakes. The no-disturbance buffer will be a minimum of 50 feet from listed plants, although the size and shape of the buffer may be adjusted under the guidance of a qualified RPF or botanist, depending on the treatment activity. A qualified RPF or botanist will provide the project proponent with appropriately timed rare plant surveys to capture the blooming period. 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."

MM BIO-1b: If non-listed special-status plants are determined to occur through SPR BIO-1 and SPR BIO-7, a no-disturbance buffer around the occupied area will be established using high visibility flagging, fencing, or stakes. The no-disturbance buffer will be a minimum of 50 feet from listed plants, although the size and shape of the buffer may be adjusted under the guidance of a qualified RPF or botanist, depending on the treatment activity. Non-listed special-status plants are defined as species with no state or federal listing status but have a CNPS rare plant ranking 1 and 2. CNPS rank 3 and 4 species will be excluded from review. A qualified RPF or botanist will provide the project proponent with appropriately timed rare plant surveys to capture the blooming period. 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."

MM BIO-1c: The project proponent will propose treatments which will mimic natural disturbance and stimulate the regeneration of oak woodlands and native chaparral communities. The Wildfire-Urban Interface (WUI) Fuel Reduction is intended to promote natural resilience to the ecotones found on-site at the LPDSF. No unavoidable loss is expected, as this treatment will focus on the overall health of each system within the ownership. The Fuel Break treatments are designed to mitigate fire spread through the permeant road network of the property. A systematic reduction of fuel loading will allow fire resources a tactical opportunity to engage a wildfire and maintain adequate ingress and egress.

MM BIO-2a: If California Fully Protected Species or species listed under the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) are observed under SPR BIO-1, the project proponent will avoid adverse effects to the species by implementing the following measures:

- Treatment will not occur within occupied habitat for the listed species. Any treatment activities will occur outside the occupied habitat at a sufficient distance to avoid mortality, injury, or disturbance of the species, as determined by a qualified RPF or biologist.
- Treatment activities will occur outside of sensitive time periods or listed species life history (i.e. nesting or breeding season). If treatment activities are to occur within this sensitive time period, surveys will be conducted to determine the presence or absence of the species.

MM BIO-2b: If 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.

Avoid Mortality, Injury, or Disturbance of Individuals

The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals:

For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or

topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician may will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment if the treatment activity has the potential to result in mortality, injury, or disturbance. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.

For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods.

Maintain Habitat Function

For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:

While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.

If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained.

A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the

treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function.

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

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

Measures outlined in SPR BIO-12 will be implemented to avoid impacts to potential nesting birds within the project area, as required by the Migratory Bird Treaty Act and California Fish and Game Code Section 3500.

MM BIO-2c: If the provisions of Mitigation Measures BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may consist of preserving existing habitat outside of the treatment area or restoring or enhancing existing habitat within the treatment area. No project-related impacts that would cause mortality, injury, or loss of habitat function are expected to occur. Therefore, compensatory mitigation is not expected to apply.

MM BIO-2d: The project proponent anticipates no impacts to valley elderberry longhorn beetle as the species is not known to exist within the project area.

MM BIO-2e: If special-status butterfly species are determined to have potential to occur through SPR BIO-1, then a qualified RPF or biologist under the project proponent would provide surveys for the corresponding larval host plant. No special-status butterflies are expected within the project area.

MM BIO-2f: No special-status beetles, flies, grasshoppers, or snails were determined to have potential to occur through SPR BIO-1. Therefore, this mitigation does not apply.

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

If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble

bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible:

- Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season.
- Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area.
- Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area).
- Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September).

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

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

PROJECT-SPECIFIC IMPLEMENTATION

To avoid impacts on Crotch's bumble bee, the following measures will be implemented:

Herbicides will not be applied to flowering native plants within occupied or suitable habitat during the flight season (March through September), and herbicide application will not target native flowering plants while blooming. Herbicide application will be conducted with ground-level application only (i.e., paint-on stems, backpack hand-applicator, hypo-hatchet tree injection, or hand placement of pellets). No aerial spray of herbicides will occur.

- Prescribed burning and biomass disposal will be designed to avoid overwintering bumble bees and bumble bee floral resources:

- Chips will not be placed on or within 5 feet of habitat that is likely suitable for a bumble bee nest (e.g., existing burrows, cavities).
- Burn piles that remain on site for greater than one year will be surveyed for bumble bee nests prior to burning by a CDFW-reviewed bumble bee biologist, or they will be burned during the season when bumble bees are inactive (October through February).
- Broadcast burning in habitat suitable for sensitive bumble bees will be restricted to the winter season prior to emergence of bumble bee floral resources. Generally, prescribed burning will be limited to October 31 – February 28. If conditions in a given year vary and the timing of floral resource emergence is altered by unusual conditions (e.g., heavy rains, extended cold season), the prescribed burning window may be altered with coordination from a qualified bumble bee biologist. Variation from the October 31 - February 28 broadcast burning window will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).
- 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 scale will be determined by a qualified biologist or RPF. 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.

MM BIO-2h: The project area is outside the habitat range of special-status ungulates. No impact from domestic livestock is expected.

MM BIO-3a: The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified in SPR BIO-3:

- Where oak woodlands exist within the project area, they will be rehabilitated to the extent feasible. In the treatment type specifically designed for the ecological restoration of oak woodlands, emphasis will be on removing encroaching conifer species in this habitat type. The licensed RPF or biologist may design the work so diseased and infested trees will be removed to spare the residual stand of oak woodland from extended inoculation of the forest pathogen.
- WUI Fuel Reduction as well as Fuel Break treatment types will further enhance sensitive natural communities and oak woodlands to the extent feasible. Ecological Restoration treatment is designed to achieve this goal as the primary objective, while providing the range of ecological benefits discussed throughout the project.
- Treatment activities within these habitats will adhere to the relevant restrictions specified in this mitigation measure. These include:
 - Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval, as defined in the California Manual of Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at <http://vegetation.cnps.org/>).
 - Treatments will not remove more than 20 percent of the native vegetation relative cover from a stand of a sensitive natural community.

MM BIO-3b: If significant impacts cannot be avoided to sensitive natural communities or oak woodlands, the project proponent will implement the following actions:

- Compensate for unavoidable losses of sensitive natural communities or oak woodlands at a ratio sufficient to offset the loss of habitat.

- Restore degraded sensitive natural communities or oak woodland at a ratio sufficient to offset the loss of habitat.
- Preserve existing sensitive natural communities or oak woodland at an equal or greater value to the loss of the sensitive natural community or oak woodland through use of a conservation easement.

No significant impacts to sensitive natural communities or oak woodlands through treatment activities are expected.

MM BIO-3c: Under SPR BIO-4, the project proponent will avoid impacts to potentially jurisdictional waterways, including their corresponding riparian areas. Therefore, this mitigation does not apply.

MM BIO-4: Under SPR BIO-4, the project proponent will avoid impacts to potentially jurisdictional waterways, including their corresponding riparian areas. Therefore, this mitigation does not apply.

MM BIO-5: The project proponent will implement the following measures when treatment areas occur within nursery sites, as outlined in SPR BIO-10:

- A qualified RPF or biologist will identify important habitat features for special-status species, including critical habitat for northern spotted owl.
- The project proponent will establish a no-disturbance buffer around nursery sites during the sensitive time periods for the listed species life history. No treatment activity will occur within the no-disturbance buffer unless a qualified RPF or biologist has determined that the nursery site is no longer occupied.

GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

SPR GEO-1: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecasts a “chance” (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.

SPR GEO-2: 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.

SPR GEO-3: 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.

SPR GEO-4: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.

SPR GEO-5: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (CAL FIRE 2019). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface runoff 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.

SPR GEO-6: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse, Hubbert, and Moghaddas 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone (WLPZ) as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.

SPR GEO-7: To minimize erosion, the project proponent will:

- Prohibit use of heavy equipment where any of the following conditions are present:
 - Slopes are steeper than 65 percent
 - Slopes are steeper than 50 percent where the erosion hazard rating is high or extreme
 - Slopes are steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake.
- 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:
 - Existing tractor roads that do not require reconstruction, or
 - New tractor roads flagged by the project proponent prior to treatment activity
- Prescribed herbivory treatments will not be used in areas with over 50 percent slope.

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

SPR GEO-8: The project proponent will require a qualified 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, or other issue related to unstable soils and identify 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.

GREENHOUSE GAS EMISSIONS

SPR GHG-1: 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 Fire and Resource Assessment Program (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.

MM GHG-2: When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing greenhouse gas (GHG) emissions, including the following, which are identified in NWCG (2020):

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

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

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

ENERGY

No SPR or MM.

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

SPR HAZ-1: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR HAZ-2: 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.

SPR HAZ-3: 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.

SPR HAZ-4: 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.

SPR HAZ-5: The project proponent or licensed Pest Control Advisor will prepare a Spill Prevention and Response Plan prior to beginning any herbicide treatment activities to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The Spill Prevention and Response Plan will include (but not be limited to):

- A map that delineates staging areas, and storage, loading, and mixing areas for herbicides
- A list of items required in an on-site spill kit to be maintained throughout the life of the activity
- Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment.

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

SPR HAZ-6: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following:

- Be implemented consistent with recommendations prepared annually by a licensed Pest Control Advisor.
- Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions.
- Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation.
- Be applied by an applicator appropriately licensed by the state.

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

SPR HAZ-7: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site and dispose of rinsate by placing it in the batch tank for application per 3 CCR

Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.

SPR HAZ-8: The project proponent will minimize drift to public areas through correct application techniques practices. These include:

- Avoiding application in excessive winds
- Applying large droplet size
- Maintaining low nozzle pressure
- Application in close proximity to the project site

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

SPR HAZ-9: 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.

MM HAZ-3: The project proponent will identify and avoid known hazardous waste sites. No known hazardous waste sites occur within the project area.

HYDROLOGY AND WATER QUALITY

SPR HYD-1: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation, and land disturbance-related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general WDRs and WDR waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. Initial and maintenance treatments will be implemented in conformance with the WDRs and/or related Waivers from The San Francisco and Central Valley Water Quality Control Boards. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR HYD-2: 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.

SPR HYD-3: The project proponent will include the following water quality protections for all prescribed herbivory treatments:

- Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.
- Water will be provided for grazing animals in the form of an on-site stock pond, or a portable water source located outside of environmentally sensitive areas.
- Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.

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

SPR HYD-4: The project proponent will establish WLPZs on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (CAL FIRE 2019). WLPZs are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes. See below for the specific classifications of established WLPZ buffers as identified in PEIR.

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

The following WLPZ protections will be applied for all treatments:

- Retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced, a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
- Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
- Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.
- WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.
- Burn piles will be located outside of WLPZs.
- No fire ignition (nor use of associated accelerants) will occur within WLPZs; however, low intensity backing fires may be allowed to enter or spread into WLPZs.

The implementation of SPR HYD-1, HYD-2, HYD-4, and HYD-6 would avoid and minimize the risk of substantially altering the existing drainage pattern of the treatment area through compliance to water quality regulations, avoiding construction of new roads, identifying, and protecting the WLPZ, and protecting existing drainage systems. Therefore, any impact would be less than significant. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR HYD-5: The project proponent will implement the following measures when applying herbicides:

- Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.
- Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.
- No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ, provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including but not limited to protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA.
- No herbicides will be applied within a 50-foot buffer of ESA- or CESA-listed plant species or within 50 feet of dry vernal pools.
- For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray.
- Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative).
- No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities.

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

SPR HYD-6: 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.

LAND USE AND PLANNING, POPULATION AND HOUSING

No SPR or MM.

NOISE

SPR NOI-1: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinances, 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.

SPR NOI-2: 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.

SPR NOI-3: 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.

SPR NOI-4: 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.

SPR NOI-5: 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.

SPR NOI-6: 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.

RECREATION

SPR REC-1: If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. The Forest Manager will consider posting additional notifications as unauthorized recreators have been found trespassing on LPDSF lands. Additional notifications will be left to the discretion of the Forest Manager and the associated active treatment activity. Public recreation is not permitted throughout LPDSF as stipulated by the deed gifted to CAL FIRE. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

TRANSPORTATION

SPR TRAN-1: 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. Traffic will not be increased beyond what is normal for the local area. Project-related vehicles will be entering and exiting the project area from Las Posadas Road. The Forest Manager will determine if traffic control is needed at any location. During prescribed burning, operations signs will be placed along the roadway to advise of smoke conditions as appropriate. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

SPR UTIL-1: For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed on-site (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported off-site for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste off-site, 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.

WILDFIRE

No SPR or MM.

ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

SPR AD-1: The project proponent and Lead Agency for the Las Posadas VTP Project is CAL FIRE. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR AD-2: 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. These protected resources consist of WLPZs, sensitive natural communities, and locations of sensitive biological resources. 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.

SPR AD-3: The project proponent would design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

SPR AD-4: At least three days prior to the commencement of prescribed burning operations, the project proponent would:

- Post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or smoke concerns;
- Publish a public interest notification in a local newspaper or other widely distributed media source describing the activity, timing, and contact information;
- 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.

SPR AD-5: The project proponent does not expect to use trash receptacles on the project site. If trash receptacles will be used, receptacles will be fully covered with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker-generated miscellaneous trash. All temporary non-biodegradable flagging, trash, debris, and barriers will be removed from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

SPR AD-6: One to three days prior to the commencement of a treatment activity, the project proponent would post signs in a conspicuous location near the treatment area describing the activity and timing and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.

SPR AD-7: For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

SPR AD-8: For CAL FIRE projects, during contract development, CAL FIRE would include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

SPR AD-9: When planning a treatment project within the Coastal Zone, the project proponent would contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. The project is not located within the coastal zone. Therefore, this mitigation does not apply.