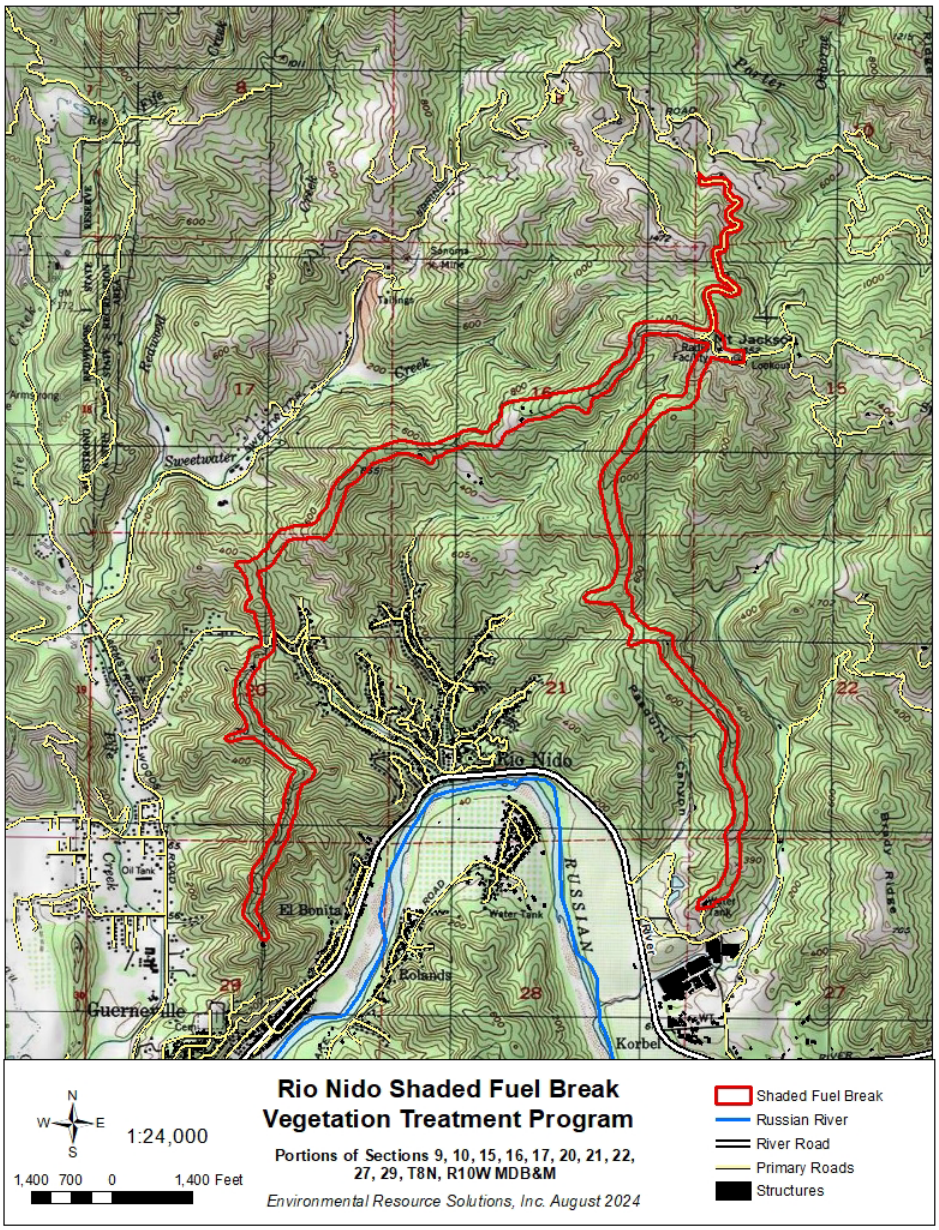
Exhibit A

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

Northside Russian River Shaded Fuel Break VTP Specific Analyses

RIO NIDO PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CalVTP PROGRAM EIR



Prepared for:

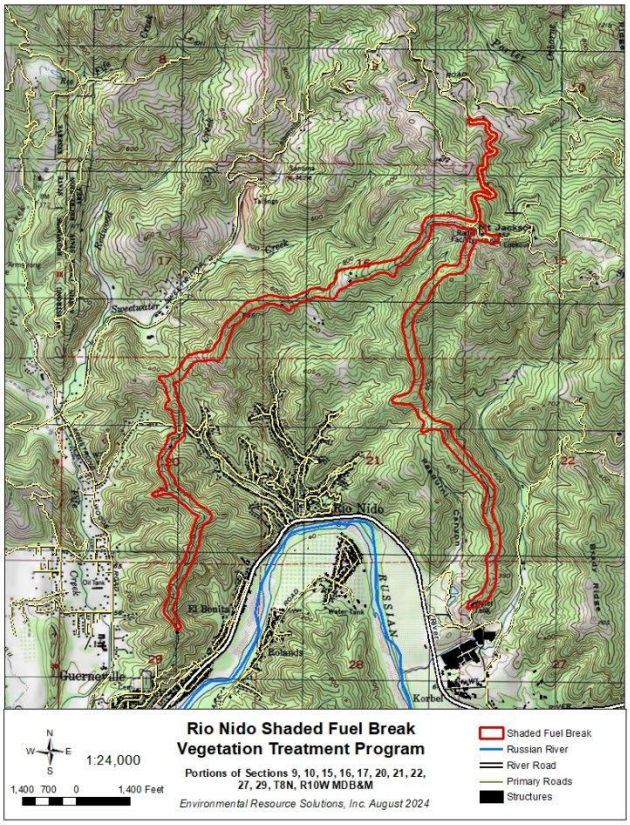
permit SONOMA

County of Sonoma

November 2023

PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CalVTP PROGRAM EIR

Rio Nido Shaded Fuel Break
Vegetation Treatment Program



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November 2023

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LIST OF ABBREVIATIONS

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

1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CAL FIRE's) State Responsibility Area (SRA) to serve as one component of the state's range of actions to reduce wildfire risk, reduce fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. The Program Environmental Impact Report (PEIR) for the CalVTP evaluates the potential environmental impacts of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area (SRA) in California. The CalVTP is described in Chapter 2, "Program Description" of the PEIR. The PEIR has been prepared under the direction of CEQA lead agency, California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The document functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities consistent with the CalVTP. It was designed for use by many state, special district, regional, and local agencies to accelerate the approval of vegetation treatment projects found to be within the scope of the PEIR. If needed for CEQA compliance, the PEIR can be supplemented with minor technical information about a proposed project in the form of an addendum.

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

For the purposes of the CalVTP PEIR and this PSA, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. This document is being prepared for the County of Sonoma to comply with CEQA for the implementation of vegetation treatments that require discretionary action by a state or local agency. The CEQA lead agency is CALFIRE and the responsible agency using the CalVTP as a project proponent is the County of Sonoma. In this PSA, the project parcel owners and their project partners are referred to as the "implementing entity" reflecting their role as the lead implementer of treatments.

1.1.1 CEQA Responsible Agency and Proposed Project

County of Sonoma is the project proponent and CEQA responsible agency, and the project parcel owners and their project partners are the implementing entity for vegetation treatments on up to 180 acres of land (proposed project) on a ridgetop surrounding the community of Rio Nido on the north side of the Russian River in western Sonoma County (Figure 1-1). The proposed treatment type is shaded fuel break and the treatment activities (i.e., mechanical and manual treatments, prescribed herbivory, prescribed burning (pile and broadcast), and herbicide application) are consistent with those evaluated in the CalVTP PEIR. Ongoing maintenance of initial treatments (referred to as "retreatment/treatment maintenance" or "maintenance" in this PSA/Addendum) would involve the same vegetation treatment types and activities used in the original treatment.

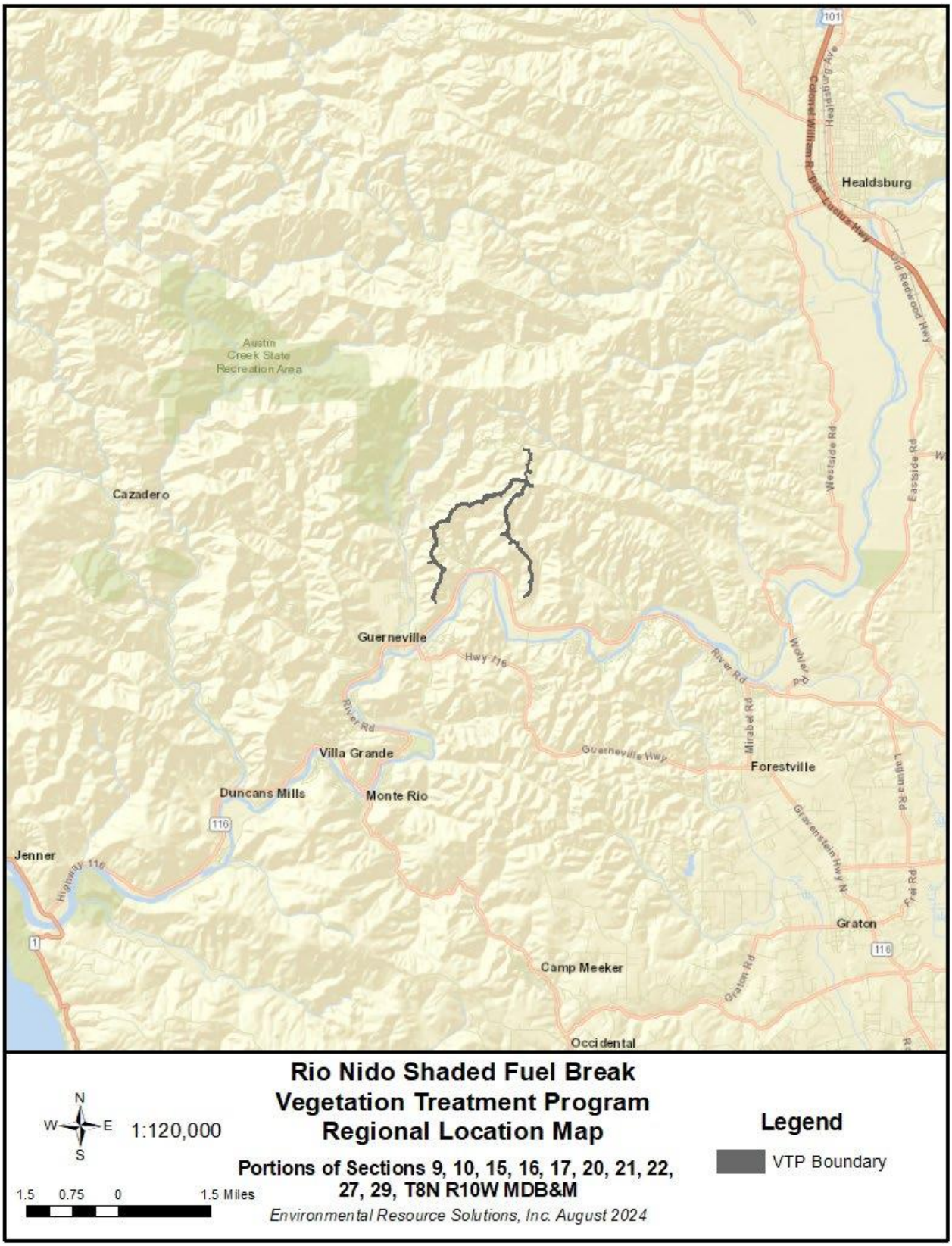
The County proposes to fund the initial proposed treatments through the award of a grant from the Sonoma County Vegetation Management Grant Program. Additional grant funding from the County or other entities could be used to fund subsequent treatments or maintenance treatments. The actual treatment work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

1.1.2 Purpose of This Document

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

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

Figure 1-1 Regional Location



2 TREATMENT DESCRIPTION

The proposed treatment type is shaded fuel break. Proposed treatment activities include mechanical and manual treatments, prescribed herbivory, prescribed burning (piles and broadcast), and herbicide application. The individual units are shown in Figures 2.1-1, 2.1-2, and 2.1-3. Proposed vegetation treatments would occur within three distinct management units and are referred to as "management units" in this PSA/Addendum. Tables 2-1 and 2-2 provide summaries of treatments.

2.1 MANAGEMENT UNIT DESCRIPTIONS

2.1.1 WEST RIDGE UNIT

The West Ridge unit is a 59-acre forested unit that follows the ridge above Armstrong Woods Road to the west and Rio Nido subdivision to the east. The western slope drains toward the confluence of Fife Creek and Sweetwater Creek. It begins at the east edge of the town of Guerneville and extends up the ridge at a width of 200 feet. The unit includes elevations from approximately 400 feet up to 840 feet above mean sea level. This unit has multiple landowners, cooperating to achieve fuel reduction goals.

This management unit is primarily forested and includes a mix of conifers and hardwoods, including redwood, Douglas-fir, true oak, tanoak, bay, big-leaf maple and madrone. Past forestry practices, lack of management, and fire suppression have resulted in forest stands that are overstocked with small diameter trees and that contain excess fuel related to tanoak mortality caused by the Sudden Oak Death pathogen (*Phytophthora ramorum*), and understory species such as tanoak, California bay, madrone, Coast live oak, Oregon white oak, California hazelnut, California coffeeberry, poison oak, coyote brush, toyon, common manzanita, evergreen huckleberry, and French broom that are contributing to ladder fuel.

2.1.2 NORTH RIDGE UNIT

The North Ridge management unit begins approximately one mile north of the town of Rio Nido and follows the top of the ridge to the northeast for approximately .7 miles where it reaches the top of Mt. Jackson. The unit then follows Mt. Jackson Road downhill to the north for approximately one mile where it connects to Sweetwater Springs Road. The ridgetop portion of this 34-acre management unit is located above Sweetwater Creek to the west and the Rio Nido subdivision to the south. The Mt. Jackson portion of the unit will be treated for fuel reduction for approximately 50 feet on either side of the road rather than the 100 feet of treatment proposed on either side of the ridge for the rest of the project. The road is rocked and gated. It is access for several rural residences and communication towers on the mountain top. The fuel break will pass by the towers on the southwest side. Elevations of the management unit range from 1000 to 1640 feet above mean sea level. A portion of the unit burned in the Walbridge Fire in 2020. The ridge top fire break was reestablished at that time. Dead, unburned fuel remains on the edges of the dozer line. The remainder of the unit area is forested.

2.1.3 EAST RIDGE UNIT

The East Ridge management unit begins approximately 1.5 miles east of Guerneville, near Korbel Winery, and runs north for approximately two miles. The 66-acre management unit is located on a ridgetop above the Rio Nido subdivision and Pasquini Canyon to the west and a canyon behind Korbel Winery to the east. Elevations of the management unit range from 200 to 1520 feet above mean sea level. This management unit is primarily composed of mixed conifer forest and other species similar to the West Ridge Unit. The majority of this unit is owned by Sweetwater Springs Water District and Korbel Winery.

Figure 2.1-1 West Ridge Management Unit

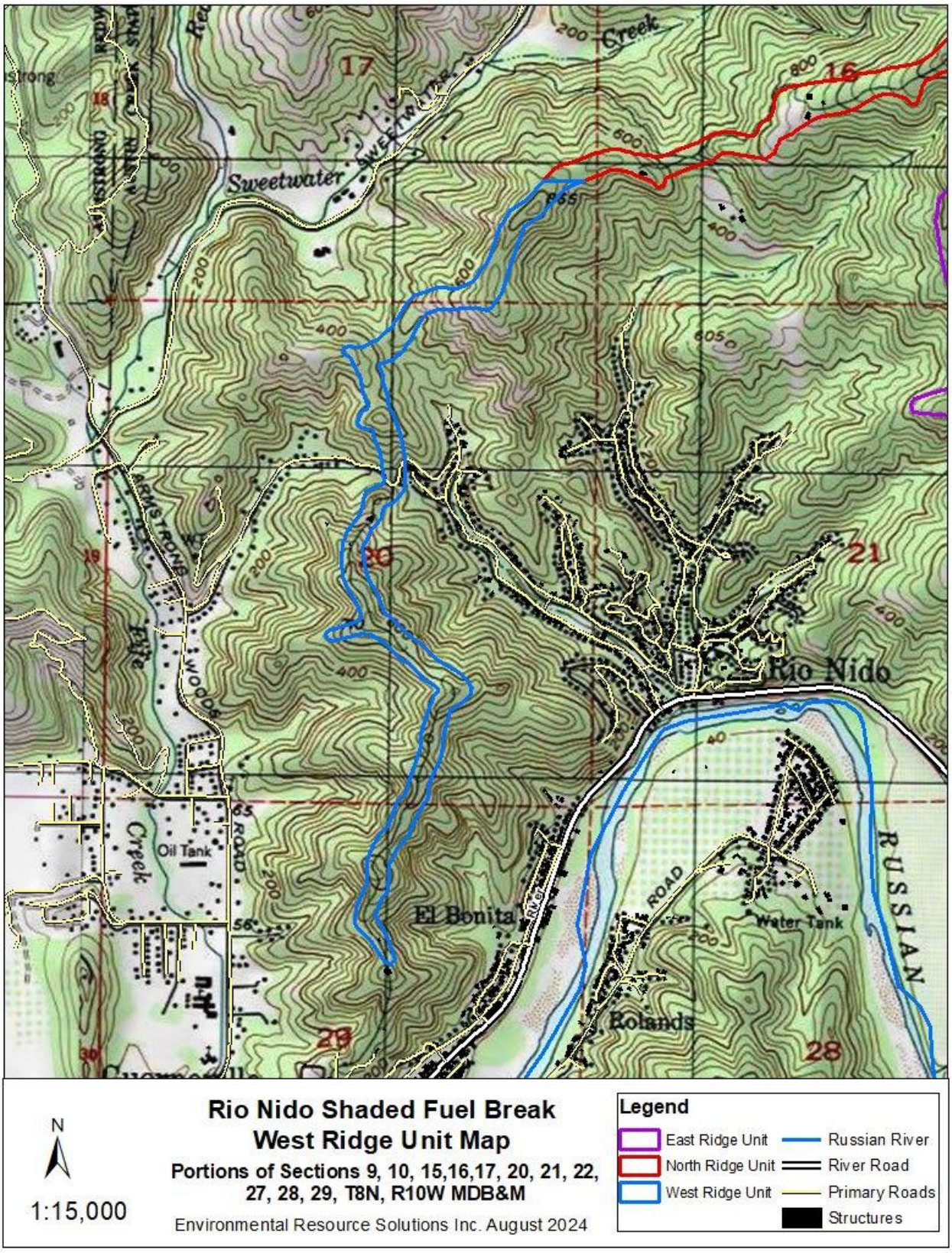


Figure 2.1-2 North Ridge Management Unit

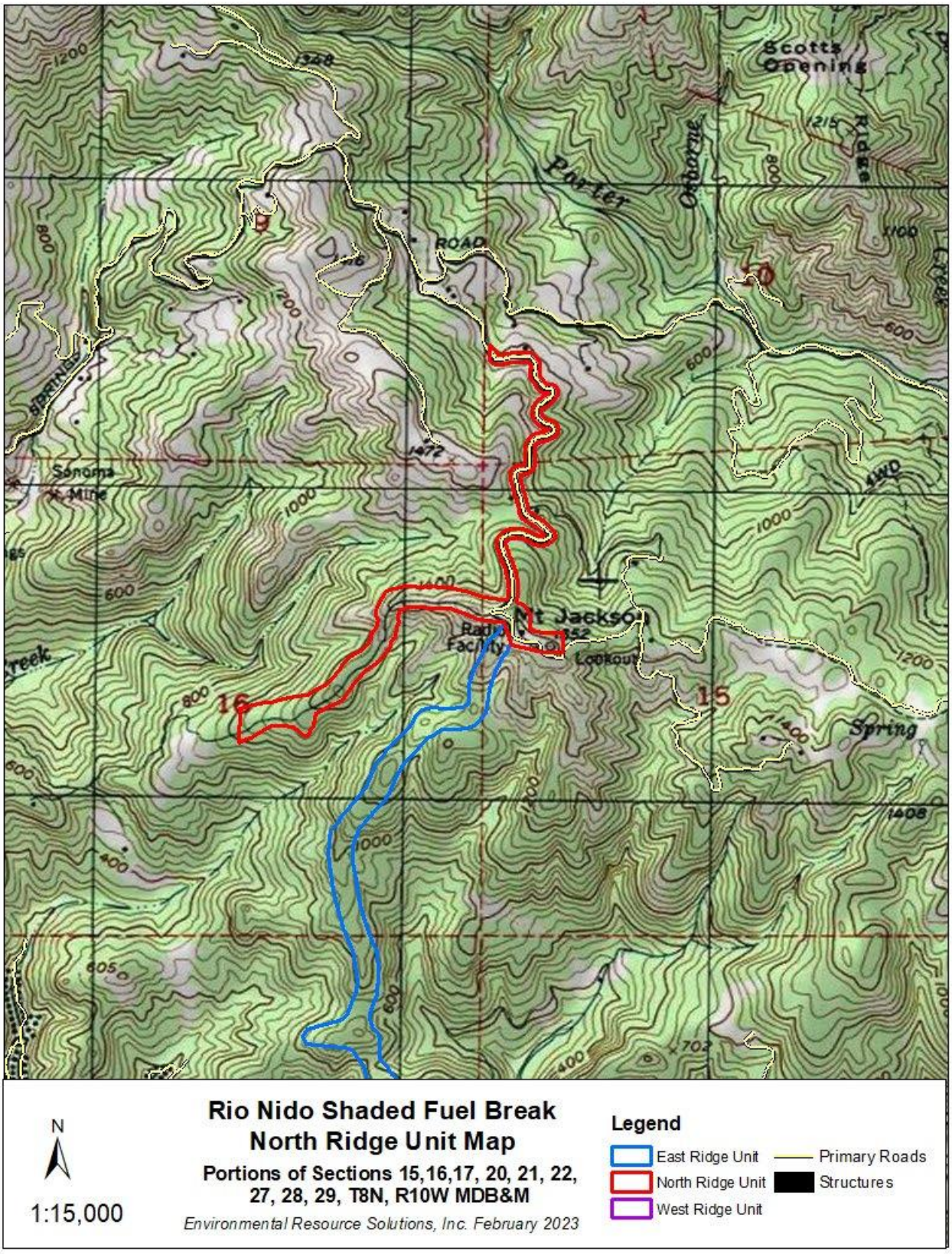
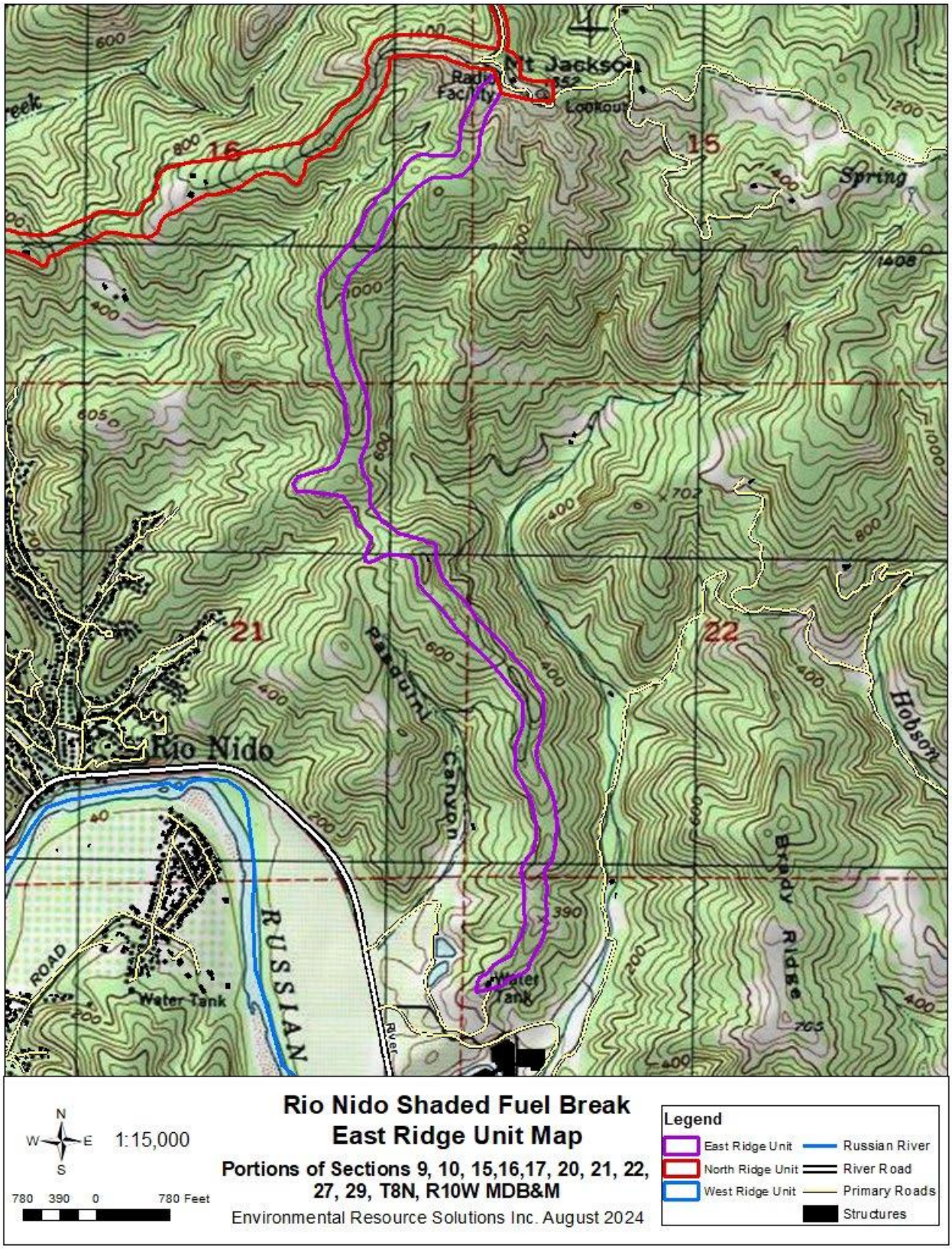


Figure 2.1-3 East Ridge Management Unit



2.2 PROPOSED TREATMENTS

The entire project is shaded fuel break. The vegetation treatment activities proposed to install the shaded fuel break are mechanical treatment, manual treatment, prescribed herbivory, prescribed burning (pile and broadcast), and targeted ground application of herbicides. The treatment types and treatment activities are described below.

2.2.1 Treatment Type

The proposed treatment type is a shaded fuel break. This is described in more detail below and is consistent with the treatment types described in the CalVTP.

FUEL BREAKS

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

Shaded fuel breaks would be established on all three management units along a strategic ridge line, as shown in Figures 2.1-1, 2.1-2, and 2.1-3. Shaded fuel breaks will occur up to 100 feet on each side of existing ridgeline roads and skid trails, or the main ridgeline if the existing road travels off the ridge. To create shaded fuel breaks, equipment or crews will remove excessive small trees and shrubs to reduce woody ladder fuels, remove excessive standing dead wood, masticate, chip or lop woody debris to less than 18” height, prune trees a minimum of 10 feet above ground, control nonnative trees and shrubs (such as English ivy, French broom, and Himalayan blackberry), and retain the largest and best trees to provide shade which helps to reduce vegetation regrowth and overall understory occupancy. Trees observed with wildlife nests will be retained.

2.2.2 Treatment Activities

The proposed vegetation treatment activities are mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides. Each of these treatment activities is described in more detail below and consistent with the treatment activities described in the CalVTP. All treatment activities could occur on all three management units as shown in Figure 2.3-1. Table 2.2-1 provides a summary of treatments.

Treatment activities could occur during any time of year, although the nesting bird season would be avoided when feasible for mechanical and manual treatments, and wet periods will be avoided if applying herbicides. Although there is the potential for prescribed burning to occur during nighttime and weekend hours, all treatment activities using equipment would be limited to daytime hours on Monday through Saturday.

MECHANICAL VEGETATION TREATMENT

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

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

The vegetation treatment specifications are:

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

MANUAL VEGETATION TREATMENT

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

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

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

- Remove ladder fuels in order to prevent the spread of fire from ground to crown;
- Remove SOD infected/dead trees

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

PRESCRIBED BURNING

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

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

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

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

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

PRESCRIBED HERBIVORY

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

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

HERBICIDE APPLICATION

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

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

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

Only ground-level application would occur; no aerial spraying of herbicides would occur. The least impactful method would be used at any given site. Several herbicide application methods are available for use by on-the-ground personnel, including frilling, paint-on stumps, and using backpack hand-applicators. For large treatment areas, herbicide treatments would typically use a one to eight-person crew, a 4x4 pickup truck, a passenger vehicle to transport crew, a utility task vehicle (UTV) with a sprayer/reservoir tank, and backpack sprayers. Treatment would involve removing invasive plant species (e.g., French broom) and noxious weeds through herbicide application. Herbicide application would comply with the U.S. Environmental Protection Agency label directions, as well as California Environmental Protection Agency and California Department of Pesticide Regulation label standards. All herbicide application would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations.

BIOMASS DISPOSAL

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

- masticating (mulching) vegetative debris and placing it on the ground concurrently with vegetation removal (approximately 20 percent of biomass), and the biomass remaining after mastication would be no more than 6 inches deep;
- chipping (approximately 10 percent of biomass); materials up to 50 feet on either side of a road, and chipped biomass would be broadcast spread over treatment areas and would not exceed 6 inches in depth;
- lopping and scattering within the treatment boundaries (approximately 80 percent of biomass) and would be left within 18 inches of the ground to promote decomposition;
- pile burning (approximately 10 percent of biomass), which may be used to dispose of slash, chipped, and masticated materials; or
- broadcast burning (approximately 10 percent of biomass).

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

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

Table 2.2-1 Proposed CalVTP Treatments

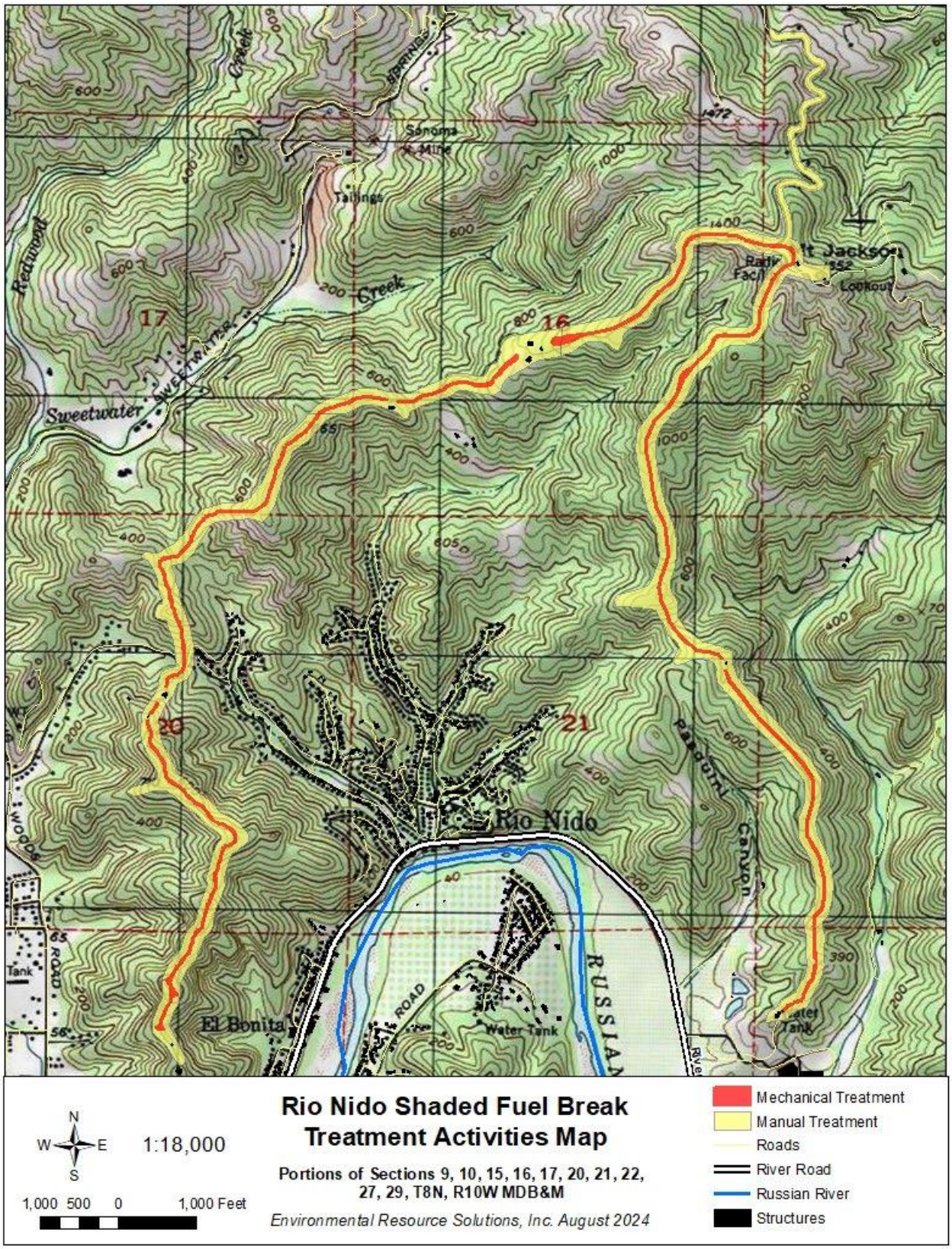
CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Equipment used for Treatments	Typical Duration of Treatments
Shaded Fuel break	200 foot wide corridor (100 feet each side of ridgeline and/or road/skid trails),	Mechanical	Masticators, chippers, tractor, excavator, skidder, dozer,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

2.3 RETREATMENT/TREATMENT MAINTENANCE

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

Retreatment/treatment maintenance would typically be implemented between approximately August and January, outside of the nesting bird season, if feasible. Periodic retreatment/treatment maintenance will occur as needed, determined by qualified staff who would monitor vegetation growth conditions in the management units.

Figure 2.3-1 Rio Nido Shaded Fuel Break Treatment Activities



3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title: Rio Nido Shaded Fuel Break

2. CalVTP I.D. Number: 2023-27

3. Implementing Entity's Name and Address:

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Sacramento, CA 95814
APN: 069-060-012

Liles-Richardson Family Trust
17975 Sweetwater Springs Road
Guerneville, CA 95446
APN: 069-060-042

Kenneth Gorzyca & Lorenz Obwegeser
17909 Sweetwater Springs Road
Guerneville, CA 95446
APN: 069-060-043

4. Contact Person Information and Phone Number: Harlan Tranmer, RPF# 2850
(707) 566-7510
MHaydon@eResourceSolutions.com

5. Project Proponent Name and Address: County of Sonoma
2550 Ventura Ave
Santa Rosa, CA 95403

6. Contact Person Information and Phone Number: Robert Aguero, Senior Environmental Specialist
(707) 565-3718
Robert.Aguero@sonoma-county.org

7. Project Location: Sonoma County, Portions of Sections 15, 16, 17, 20, 21, 22, 27, 28, 29
T8N, R10W, MDB&M
Westerly Coordinant:
38° 31’ 23.194” N, 122° 59’ 26.203” W
Central Coordinate:
38° 31’ 33.493” N, 122° 58’ 38.594” W
Easterly Coordinant:
38° 31’ 24.657” N, 122° 57’ 47.575” W

8. Total Area to Be Treated (acres): Up to 180 acres

9. Description of Project:

a. Initial Treatment

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

The County of Sonoma proposes to fund the initial treatment of up to 180 acres of treatable landscape (ref. PEIR Section 2.4, page 2-4) along 6.5 cumulative length miles of ridgeline that separates the community of Rio Nido from the surrounding drainages including Fife Creek, Sweetwater Creek, and the unnamed drainage behind the Korbel winery. The project includes 180 acres of Shaded Fuel Break (ref PEIR Section 2.5.1, page 2-7) using a combination of mechanical, manual, prescribed fire (both pile burn and broadcast burn), prescribed herbivory, and herbicide use (ref PEIR Section 2.5.2, page 2-18). The VTP project area includes three management units, separated by their respective best access point. The West Ridge Unit is 59 acres, the North Ridge Unit is 55 acres, and the East Ridge Unit is 66 acres. All units contain multiple ownerships.

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

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

The project will occur in two phases. Phase 1 of treatment being installation of the Shaded Fuel Break is being funded by CAL FIRE. This Phase 1 area includes approximately 100 feet on each side of a ridgeline (total of 200-foot wide fuel break zone), along an existing ridgeline fire road. Phase 1 treatments will occur in all three management units. Phase 1 mechanical treatment will occur on up to 34 acres of ground with suitable slopes for mechanical equipment operation. Phase 1 manual treatment will occur on up to 180 acres of ground where mechanical equipment cannot safely operate due to slope or follow-up treatment is necessary.

Phase 2 treatments are landowner dependent based on available funding and other management priorities. Phase 2 treatments may include additional initial treatments or maintenance treatments on Phase 1 areas.

Initial Treatments:

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☐ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), _up to_159_acres

☒ Prescribed Burning (Pile Burning) , _up to_159_acres

☒ Mechanical Treatment, _up to_30_acres

☒ Manual Treatment, _up to_159_acres

☒ Prescribed Herbivory, _up to_159_acres

☒

Herbicide Application, _up to_159_acres

Fuel Type

☐ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Retreatment/Treatment Maintenance

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

Maintenance Treatment:

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☐ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), _up to_159_acres

☒ Prescribed Burning (Pile Burning) , _up to_159_acres

☒ Mechanical Treatment, _up to_30_acres

☒ Manual Treatment, _up to_159_acres

☒ Prescribed Herbivory, _up to_159_acres

☒ Herbicide Application, _up to_159_acres

Fuel Type

☐ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

10. Regional Setting and Surrounding Land Uses:

The project area is located in western Sonoma County, adjacent to the east edge of the town of Guerneville, CA, on the north side of the Russian River, and west side of Korbel Winery. The surrounding land uses are dominated by forested landscapes, vineyards, rural subdivisions, and a few scattered rural residences. The project area surrounds the community of Rio Nido. The project area is mostly unoccupied, however there are several rural residential residences near the project. There are two dwellings in the project area; Michael Gervais TR and Gregory Davis and Caren Catterall.

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

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

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone

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

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

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

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

    Pursuant to CalVTP SPR CUL-2, Native American tribal contacts in Sonoma County were contacted on February 14, 2023 using the updated contact list from July 2022 and included:

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

    Responses were received from:

    - Kashia Band of Pomo Indians of Stewarts Point Rancheria, February 15, 2023. The project area is within aboriginal territory and a site visit was requested.
    - Federated Indians of Graton Rancheria, March 10, 2023. The Tribe has reviewed the location of the project and determined it is not in their area of interest and therefore have no comments on this project, at this time.

The NAHC sacred lands file was received on March 28, 2023. Letters had already been sent to those contacts on February 14, 2023 using the list from a nearby project. The list had not changed. The list of additional Native American contacts suggested by the NAHC sacred lands file response is as follows:

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

No other responses were received as of the date of submittal of this PSA.

Information obtained from Native American tribes will be incorporated into a survey report as required by SPR CUL-4.

DETERMINATION

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

☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.

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

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

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

Robert C Aguero Digitally signed by Robert C Aguero DN: cn=Robert C Aguero, o, ou=Permit Sonoma, email=Robert.Aguero@sonoma-county.org, c=US Date: 2024.10.31 16:10:53 -07'00' 10/31/2024

Signature Date

Robert C Aguero 10/31/2024

Printed Name Title

Permit Sonoma

Agency

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AD-3 AD-4 AES-2 AQ-2 AQ-3	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Wildland Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-2	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Nonshaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	None	None	--	--	--

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

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

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

Discussion

IMPACT AES-1

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

River Road, a County designated scenic road is located approximately 1,000 feet south of the project area in two places, near the town of Guerneville and Korbel Winery. The project is 200 feet wide at each point and extends up the ridge, roughly perpendicular to and away from River Road, from there. Visual impacts would be obscured by distance, intervening topography, and vegetation. Smoke from prescribed burning could be visible from public viewpoints and River Road.

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

IMPACT AES-2

Initial and maintenance treatments would be creation and maintenance of a shaded fuel break. Treatment activities include mechanical treatment, manual treatment, prescribed herbivory, prescribed burning, and targeted ground application of herbicides. The potential for these treatment types and activities to result in long-term degradation of the visual character of an area was examined in the PEIR. Public viewpoints could include public recreation trails, adjacent residences, and County maintained River Road. The project area is visible from River Road but no vegetation will be removed immediately adjacent to the road. There are no public trails in the project area. Project treatments will be planned for aesthetic and visual impacts when located adjacent to existing residences on privately owned land in the project area. The landowners are cooperating to implement this project and understand forest thinning will occur near their residences.

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

IMPACT AES-3

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

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

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

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

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

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

Discussion

IMPACT AG-1

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

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

The project will not impact any farmland.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

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

4.3 AIR QUALITY

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

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

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

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

Discussion

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

IMPACT AQ-1

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

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

IMPACT AQ-2

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

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

IMPACT AQ-3

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

IMPACT AQ-4

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

IMPACT AQ-5

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

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

IMPACT AQ-6

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

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

NEW AIR QUALITY IMPACTS

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

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	CUL-1 CUL-7 CUL-8	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-8	CUL-2	LTSM	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-6 CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

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

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

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

Discussion

Consistent with SPR CUL-1, a records search of the treatment area was performed by the Northwest Information Center (NWIC) on March 27, 2023 (NWIC File No. 22-1266). The records search included the project site and a 0.50-mile buffer beyond the project boundaries. The results of the records search indicate that one cultural resource has been recorded within the VTP boundary. There are 18 formally recorded resources within a 0.5-mile radius beyond the VTP Boundary and four informally documented resources. Four cultural studies are on file with the NWIC for the VTP Boundary and an additional 24 within the 0.5-mile radius. These studies encompassed approximately less than 7 percent of the VTP area, indicating that the majority of the VTP area has not been previously surveyed for cultural resources.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). The NAHC updated list was dated January 1, 2023. On February 14, 2023, letters and emails were mailed to the Sonoma County representatives indicated by NAHC. A response was received on February 15, 2023 from the Kashia Band of Pomo Indians of Stewarts Point indicating that the proposed project is within their aboriginal territory and they requested a site visit. A response was received on March 10, 2023 from The Federated Indians of Graton Rancheria stating that the Tribe has reviewed the location of the project and determined it is not in their area of interest and therefore have no comments on this project, at this time.

On February 15, 2023, a request was sent to NAHC's for a sacred lands file check. A response was received on March 28, 2023, indicating that the sacred lands file search results were negative. The sacred lands file recommended Native American consultation with additional tribes. On February 14, 2023, Native American contact letters were sent preemptively to additional Native American tribes as recommended by the sacred lands file search for a nearby project. The list received on March 28 is the same list. No response was received as of the date of submission of this VTP PSA.

IMPACT CUL-1

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

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

IMPACT CUL-2

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

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

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

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

IMPACT CUL-3

Native American contacts in Sonoma County were contacted on February 14, 2023, and included

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

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

Responses were received from:

- Kashia Band of Pomo Indians of Stewarts Point Rancheria, February 15, 2023, stating that the project area is within aboriginal territory and a site visit was requested.
- Federated Indians of Graton Rancheria, March 10, 2023. The Tribe has reviewed the location of the project and determined it is not in their area of interest and therefore have no comments on this project, at this time.
- As a result of the NAHC sacred lands file request, received on March 28, 2023, the response indicated to contact seven additional Native American contacts that were not included in the NAHC contact list for Sonoma County. Letters had already been sent to those additional contacts on February 14, 2023, using the list from a nearby project. The list had not changed. The list of additional Native American contacts suggested by the NAHC sacred lands file response is as follows:

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

No other responses were received as of the date of submission of this VTP PSA.

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

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

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use skid steers, excavators, dozers, and masticators, which could uncover human remains. The NWIC records search did not reveal any burials or sites containing human remains nor did any tribal representative notify the implementing entity of potential remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. Additionally, consistent with the PEIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery.

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

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. Sonoma County has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, “Environmental Setting,” and Section 3.5.2, “Regulatory Setting,” in Volume II of the Final PEIR). Sonoma County has also determined that the circumstances under which the proposed treatment project would be undertaken are consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to cultural resources would occur that is not covered in the PEIR.

4.5 BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	BIO-1 BIO-2 BIO-6 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-4 HYD-5	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) SU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-9 BIO-10 GEO-1 HYD-4	BIO-2a BIO-2b BIO-2g	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-6 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HAZ-5 HAZ-6 HYD-4 HYD-5	BIO-3a BIO-3b	LTSM	No	Yes

Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 BIO-2 BIO-3 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5	BIO-4	LTSM	No	Yes

Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
				GEO-6 GEO-7 HAZ-5 HAZ-6 HYD-1 HYD-4 HYD-5				
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-2 BIO-3 HYD-4	NA	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	BIO-1 BIO-2 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	--	--	--	--	--

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

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

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

Discussion

Pursuant to SPR BIO-1, A Biological and Special Status Plant and Natural Communities Report was completed by Salix Natural Resource Management Inc. in 2023, a consulting botanist to review project-specific special status plant and natural communities with potential to occur in the treatment areas. A list of special status plants and natural communities with potential to occur in the treatment area was compiled by completing a review of aerial photographs, the California Natural Diversity Database, the California Native Plant Society Electronic Inventory, A Manual of California Vegetation Online, Preliminary Descriptions of the Terrestrial Natural Communities, USFWS Information for Planning and Consultation, Appendix BIO-3 (Table 9a, Table 9b, Table 10a, Table 10b, and Table 19) in the CalVTP PEIR (Volume II) for special status plants and wildlife that could occur in the Northern California Coast and Northern California Coast Ranges ecoregions, and a field visit.

The special status plant scoping list identified 281 sensitive and special status plant species and 24 species were determined to have a high potential to exist within the VTP assessment area. The 24 species with high potential to occur in the project area are identified in Table 4.5-1.

A list of sensitive natural communities with potential to occur within the treatment areas was compiled by completing a CNDDB search of nine USGS quads surrounding the treatment areas and reviewing Table 3.6-16 (pages 3.6-65 – 3.6-66) in the CalVTP PEIR (Volume II) for sensitive natural communities that could occur in the Northern California Coast and Northern California Coast Ranges ecoregions in the vegetation types mapped in the treatment areas. Eighty-five (85) sensitive natural communities were included in the scoping list, 13 were determined to have high potential to exist within the VTP assessment area, and one was present within the project area, Redwood Forest Alliance. This sensitive natural community is described in Table 4.5-2. Four additional non-sensitive communities also occur in the VTP assessment area: Douglas-fir Forest Alliance, Coast Live Oak Forest Alliance, Chamise Shrub Alliance and Brome-Wild Oats Grassland Alliance.

A wildlife assessment was completed by Forest Ecosystem Management in 2023, a consulting wildlife biologist report was prepared to review project-specific special status wildlife with potential to occur in the treatment areas. A list of special status wildlife species with potential to occur in the treatment areas was compiled by completing a review of aerial photographs, the California Natural Diversity Database (CNDDB), the CNDDB Special Animal List, the California Wildlife Habitat Relationships System (WHR), the Sonoma County Vegetation Map, the USFWS List of Federal Endangered and Threatened Species, California Bird Species of Special Concern, Spotted Owl Database, USFWS Information for Planning and Consultation, and National Marine Fisheries Service Essential Fish Habitat Mapper, and a field visit.

Forest Ecosystem Management conducted reconnaissance surveys on May 12 and 13, 2023 to identify land cover types, document existing conditions and determine if suitable habitat exists for any special status wildlife species, determine if special status wildlife species are present, and determine if additional special status wildlife species surveys are required. The biological reconnaissance survey included examining the habitat within each treatment unit and searching for habitat elements associated with specific species (i.e. plant composition, vegetative structure, aquatic or riparian structures, topography and elevation, special features such as rock outcrops, downed logs, etc.), existing disturbance issues (i.e. roads, houses, powerlines), and the potential for nesting and/or roosting structures (i.e snags, cavity trees, mistletoe, stick structures). The biological report identified 18 listed or sensitive wildlife species with the potential to occur within the project area. These species are identified in Table 4.5-1.

Mechanical and manual treatment activities shall occur between September 16th and January 31st if feasible.

If mechanical or manual treatment activities are anticipated to occur between February 1st and September 15th; a nesting bird survey shall occur as required by SPR BIO-10 and SPR BIO-12. A qualified surveyor shall conduct the surveys, which shall determine through field inspection whether occupied nests are present within the treatment area. Surveys shall be conducted for nesting raptors and also nesting song birds (purple martins, Vaux's swifts) and potential maternal bat roost trees. Follow northern spotted-owl survey protocol, to the extent feasible noting variations, in completing a one-year six visits prior to operations As required for safety, the following adjustment may be made: Perform Continuous Walking Surveys: Completed during the day, walk the ridge road playing the electronic caller and pause at prominent points and at regular intervals throughout the area to conduct informal stations that are at least 3 minutes in duration.

The final survey shall be conducted within 14 days prior to beginning operations.

If operations are delayed or there is a break in operations of more than 14 days during the breeding season, then a follow-up nesting bird survey shall be performed to ensure no new nests have been established in the interim.

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

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

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

One (1) Sensitive Natural Community was identified in the treatment areas (See Table 4.5.-2)

Eighteen (18) special status wildlife species were determined to have potential to occur in the treatment areas (see Table 4.5-1).

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

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

Plants

Scientific Name	Common Name	CRPR[2]	CESA[5]	FESA[6]	Blooming Period	Habitat	Elevation Range	Potential Habitat?
Amorpha californica var. napensis	Napa false indigo	1B.2	None	None	Apr-Jul	Broadleafed upland forest, Chaparral, Cismontane woodland	50-2000	High
Calamagrostis bolanderi*	Bolander's reed grass	4.2	None	None	May-Aug	Bogs and fens, Broadleafed upland forest, Closed-cone coniferous forest, Coastal scrub, Marshes and swamps, Meadows and seeps, North Coast coniferous forest	0-455	High
Ceanothus gloriosus var. exaltatus*	glory brush	4.3	None	None	Mar-Jun(Aug)	Chaparral	30-610	High
Erigeron biolettii*	streamside daisy	3	None	None	Jun-Oct	Broadleafed upland forest, Cismontane woodland, North Coast coniferous forest	30-1100	High
Erigeron greenei	Greene's narrow-leaved daisy	1B.2	None	None	May-Sep	Chaparral	80-1005	High
Eryngium jepsonii**	Jepson's coyote-thistle	1B.2	None	None	Apr-Aug	Valley & foothill grassland | Vernal pool	3-305	High
Fritillaria roderickii**	Roderick's fritillary	1B.1	CE	None	Mar-May	Coastal bluff scrub | Coastal prairie | Valley & foothill grassland	20-610	High
Glyceria grandis**	American manna grass	2B.3	None	None	Jun-Aug	Bog & fen | Marsh & swamp | Meadow & seep | Wetland	60-2045	High
Helianthella castanea**	Diablo helianthella	1B.2	None	None	Mar-Jun	Broadleaved upland forest | Chaparral | Cismontane woodland | Coastal scrub | Valley & foothill grassland	45-1070	High
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	1B.2	None	None	Apr-Nov	Valley and foothill grassland	20-560	High
Iris longipetala*	coast iris	4.2	None	None	Mar-May(Jun)	Coastal prairie, Lower montane coniferous forest, Meadows and seeps	0-600	High
Juglans hindsii**	**Northern California black walnut**	**CBR**	**None**	**None**	**Apr-May**			**Present within project area.**

Kopsiopsis hookeri	small groundcone	2B.3	None	None	Apr-Aug	North Coast coniferous forest	90-1435	High
Leptosiphon acicularis*	bristly leptosiphon	4.2	None	None	Apr-Jul	Chaparral, Cismontane woodland, Coastal prairie, Valley and foothill grassland	55-1500	High
Leptosiphon jepsonii	Jepson's leptosiphon	1B.2	None	None	Mar-May	Chaparral, Cismontane woodland, Valley and foothill grassland	55-885	High
Monardella viridis*	green monardella	4.3	None	None	Jun-Sep	Broadleafed upland forest, Chaparral, Cismontane woodland	100-1010	High
Perideridia gairdneri ssp. gairdneri*	Gairdner's yampah	4.2	None	None	Jun-Oct	Broadleafed upland forest, Chaparral, Coastal prairie, Valley and foothill grassland, Vernal pools	0-610	High
Piperia candida	white-flowered rein orchid	1B.2	None	None	(Mar)May-Sep	Broadleafed upland forest, Lower montane coniferous forest, North Coast coniferous forest	30-1615	High
Ramalina thrausta**	angel's hair lichen	2B.1	None	None		North Coast coniferous forest	75-430	High
Tracyina rostrata**	beaked tracyina	1B.2	None	None	May-Jun	Chaparral | Cismontane woodland | Valley & foothill grassland	150-795	High
Trichostema ruygtii**	Napa bluecurls	1B.2	None	None	Jun-Oct	Chaparral | Cismontane woodland | Lower montane coniferous forest | Valley & foothill grassland | Vernal pool | Wetland	30-680	High
Trifolium amoenum	two-fork clover	1B.1	None	FE	Apr-Jun	Coastal bluff scrub, Valley and foothill grassland	5-415	High
Trifolium buckwestiorum	Santa Cruz clover	1B.1	None	None	Apr-Oct	Broadleafed upland forest, Cismontane woodland, Coastal prairie	30-805	High
Usnea longissima	**Methuselah's beard lichen**	**4.2**	**None**	**None**		**Broadleafed upland forest, North Coast coniferous forest**	**45-1465**	**Present within project area.**

WILDLIFE				
Scientific Name (Common Name)	**Status**		**Habitat**	**Potential for Occurrence**
	FEDERAL	**STATE**		
Taxon: Birds				
Accipiter cooperii (Cooper's Hawk)		WL	Dense stands of live oak, riparian deciduous, or other forest habitats near water used most frequently. Seldom found in areas without dense trees stands, or patchy woodland habitat. Nests in trees on a stick platform lined with bark. Usually nests in second-growth conifer stands, or deciduous riparian areas near streams.	May Occur - Habitat is present. Cooper's Hawks often nest on the lower portions of the slopes closer to watercourses, but may be found utilizing the Project Area.
Accipiter straitus (Sharp-Shinned Hawk)		WL	Dense forested stands in close proximity to open areas. Nesting usually in dense, pole and small tree stands of conifers; which are cool, moist, well shaded, and close to water. Eats mostly small birds, usually no larger than jays; but also takes small mammals, insects, reptiles, and amphibians. Will hunt at bird feeders, particularly in the winter.	May Occur - SSHA occurrences are probably more probable during the winter months in Sonoma County. Sharp-shinned hawks often nest on the lower portions of the slopes, closer to watercourses, but might use the ridge top Project Area for foraging. There may not be suitable open areas due to lack of undeveloped meadows and openings.
Ardea alba (Great Egret)		CFS	Groves of trees suitable for nesting and roosting, relatively isolated from human activities, near aquatic foraging areas are required. Great Egrets are colonial nesters, with often many nests in close proximity; therefore, requiring larger trees near feeding grounds. Feeds in shallow water and along shores of estuaries, lakes, ditches, and slow-moving streams and in irrigated cropland and pastures.	May Occur - WHR lists potential to occur. Great Egrets have been observed near the Russian River in the Guerneville Area. Nesting colonies in Sonoma have been located in trees immediately adjacent to the water. The Project Area is located on the ridge top with no year-round water source and is most likely too far from aquatic feeding source (closest site .15 miles from Sweetwater Creek and .4 mile from Russian River); with more suitable habitat closer to the watercourses.
Ardea herodias (Great Blue Heron)		CFS	Perch and roost in secluded tall trees isolated from human activities, near aquatic foraging areas. May also forage in meadows. Colony nester usually near water in large snags or live trees. Tallest trees used near shallow-water feeding areas.	May Occur - Cnddb shows occurrences within the Guerneville Quad & WHR lists potential to occur. Great Blue Herons have been observed along the Russian River. The Project Area is located on the ridge top with no year-round water source and is most likely too far from aquatic feeding source (closest site .15 miles from Sweetwater Creek and .4 mile from Russian River); with more suitable habitat closer to the watercourses.
Chaetura vauxi (Vaux's Swift)		SSC	Forages over most terrains and habitats, often high in the air. Roosts often in flocks. Most Important habitat requirement is appropriate nest-sites in a large, hollow tree. Nests in redwood, Douglas-fir typically built on vertical inner wall of large, hollow tree or snag, especially tall stubs charred by fire.	May Occur - WHR lists potential for occurrences. A few trees were noted within or immediately adjacent to the Project Area that could support nesting Vaux's swifts.
Contopus cooperi (Olive-Sided Flycatcher)	BCC	SSC	Montane conifer forests where tall trees overlook canyons, meadows, lakes or open terrain. High perches. Tall trees for nesting and roosting sites	May Occur - WHR and cnddb lists potential for occurrences. Marginal habitat is present.
Pandion haliaetus (Osprey)		WL	Rivers, lakes, reservoirs, bays, estuaries and surf zones with large trees to nest. Large trees, snags, and dead-topped trees in open forest habitats near fish bearing waters.	May Occur - Cnddb and WHR lists potential for occurrences. Osprey have been observed nesting along the Russian River. Marginal habitat is present although forests may be too thick with more suitable habitat available closer to the river.

Progne subis (Purple Martin)		SSC	Valley foothills and montane hardwood, montane hardwood/conifer and riparian habitats. Coniferous forests. Often prefer tall isolated tree or snag in open forest to nest in but will use snag/cavity tree, nesting box, under bridge or in culvert.	May Occur - Cnddb and WHR lists potential for occurrences. A few trees were noted within or immediately adjacent to the Project Area that could support nesting Purple Martins.
Strix occidentalis caurina (Northern Spotted Owl)	FT	ST	Requires large blocks of forest with permanent water and suitable nesting sites. Nest in snags or large trees with debris structure or broken tops.	May Occur - Ipac, Cnddb and WHR lists potential for occurrences. The Project Area does have nesting habitat.
Taxon: Mammals				
Arborimus pomo (Sonoma Red-Tree Vole)		SSC	Mature and other stands of Douglas-fir, redwood, or mixed evergreen trees in fog belt. Specializes on needles of Douglas-fir and grand fir. Water is obtained from fog drip on needles.	May Occur - WHR lists potential for occurrences. Habitat is present throughout the Project Area.
Bassariscus astutus (Ringtail)		FP	Occurs in various riparian habitats, brush stands of most forest and shrub habitats at low to middle elevations. Utilizes hollow trees, logs, snags, cavities in talus/rocky outcrops, and other recesses for cover. Nests in rock recesses, hollow trees, logs, snags, abandoned burrows, or woodrat nests. Usually within .6 miles from permanent water source.	May Occur - WHR lists potential for occurrences. Habitat is present; however, as Project Area is along a ridge top, habitat is marginal with more suitable habitat closer to the water courses.
Corynorhinus townsendii (Townsend's Big-Eared Bat)		SSC	Prefers mesic habitats, but found in all but subalpine and alpine habitats. Requires caves, mines, tunnels, buildings, or chimney trees. Extremely sensitive to human disturbance.	May Occur - Cnddb and WHR lists potential for occurrences. Some chimney trees/snags were noted within/adjacent to the Project Area.
Lasiurus frantzii (Western Red Bat)		SSC	Roosts in trees often along edge adjacent to streams, fields or urban areas. Family Groups roost together. Habitat mosaics	May Occur - WHR lists potential for occurrences. The majority of the Project Area is lacking forest edges with open areas; although marginal habitat does exist along the southeastern end of the Project Area.
Lasiurus cinereus (Hoary Bat)	WB:M		May be found at any locations in California. During migration, males found in foothills, deserts, and mountains; and females in lowlands and coastal valleys. Roost in dense foliage of medium to large trees. Preferred sites are hidden from above, with few branches below and have ground cover of low reflectivity. Females bare young while roosting in trees and may leave young in roosting site while foraging.	May Occur - Cnddb lists potential for occurrences. Habitat is present throughout the Project Area.
[Pekania] Martes pennanti (Fisher)		SSC	Intermediate to large-tree stages of coniferous forests and deciduous-riparian habitats with a high canopy closure. Cavities in large trees, snags, logs, rock areas, and slash or brush piles provide necessary cover.	May Occur - WHR lists potential for occurrences. Habitat is present throughout the Project Area.
Myotis evotis (Long-Eared Myotis)	WB:M		All brush, woodland, and forest habitats from sea level to 9,000'. Coniferous woodlands and forests are preferred. Forages among trees, over water, and over shrubs. Roosts in buildings, crevices, spaces under bark, and snags. Caves are primarily used as night roosts.	May Occur - cnddb lists potential for occurrences. Although caves are lacking for roosts, other roost sites are available throughout the Project Area.

Taxon: Amphibians				
Taricha rivularis (Red-Bellied Newt)		SSC	Broadleaved upland forest. North coast coniferous forests, redwood forests, riparian forests. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km (1/2 mile) to breed, typically in streams with moderate flow and clean, rocky substrate.	May Occur - Cnddb and WHR lists the potential of occurrences. Habitat is present, although as Project Area is located along the ridge top, the habitat is maginal with more suitable habitat closer to the watercourses.
Taxon: Reptile				
Taxon: Fisheries				
Taxon: Other				
Bombus occidentalis (Western Bumble Bee)		CA	Once common & widespread, now located in high meadows or coastal environments. Nest & hibernation sites in-ground in abandon rodent burrows or similar cavity, or above ground in log cavities or similar cavity, or dense tufts of grass and dead vegetation. Need floral resources and undisturbed nest sites and overwintering areas.	May Occur - Cnddb lists the potential for occurrences. The Project Area does not have large meadows or open areas full of flowers. Bumble bees were observed in various places throughout the Project Area.

Notes:

*CNPS List Only

**CalVTP List Only

1) Legal Status Definitions:

FE Federally Listed as Endangered (legally protected by ESA)

FT Federally Listed as Threatened (legally protected by ESA)

FD Federally Delisted

SE State Listed as Endangered (legally protected by CESA)

ST State Listed as Threatened (legally protected by CESA)

SR State Listed as Rare (legally protected by NPPA)

C Candidate for Federal or State Listing

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

CDF:S CalFire Sensitive

FP CDF Fully protected

WL CDFW Watch list

BCC USFWS Birds of Conservation Concern

WBWG:M or H Western Bat Working Group

2) California Rare Plant Ranks (CRPR):

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

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

CRPR Threat Ranks:

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

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

CBR Considered but Rejected

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

Species	Primary Lifeform	Global Rarity	State Rarity	Potential for Occurrence[2]
Sensitive Natural Communities				
Redwood Forest Alliance	Tree	G3	S3	Present within project area

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

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

- Douglas-fir Forest Alliance, (G5, S4)
- Coast Live Oak Forest Alliance (G5, S4)
- Chamise Shrub Alliance (G5, S5)
- Brome-Wild Oats Grassland Alliance (G5, S5)

Notes:

Legal Status Definitions:

Global Rarity

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

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

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

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

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

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

State Rarity

S1 (critically imperiled)

S2 (imperiled)

S3 (vulnerable)

S4 (No Threat Rank, apparently secure within California)

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

1 indicates very threatened status

2 indicates moderate threat

3 indicates few or no current known threats

IMPACT BIO-1

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

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

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

Botanical survey was conducted throughout the project area in 2023 by Salix Natural Resource Management, Inc.. During these surveys, the project area was visited three times throughout the growing season. All plants observed during site visits were recorded, and a list of plants that were observed is included in the botanical report. No special status plant species were observed in the project area. Other potential special status plant species that have a high likelihood to occur within the project area are included in Table 4.5-1. The complete botanical report is provided in Appendix B.1.

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

The 2023 botanical survey found no special status plant species. If future botanical surveys for SPR BIO-7 locate special status species, implementation of Mitigation Measure BIO-1b would be required to avoid loss of individual plants by establishing a no-disturbance buffer around the area occupied by the species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will be a minimum of 20 feet from special status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist, in consultation with CDFW and/or USFWS, determines that a smaller buffer will be sufficient to avoid loss of or damage to special status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity.

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

Pursuant to SPR HYD-4, Watercourse and Lake Protection Zones (WLPZs) from 50 to 100 feet and Equipment Limitation Zones (ELZs) from 30 to 50 feet from all aquatic habitat within the treatment areas would be implemented for mechanical, manual, prescribed burning, prescribed herbivory, and herbicide treatments, and would minimize some adverse effects on other species that could occur but were not observed in the 2023 botanical survey. Although WLPZs would avoid and minimize some adverse effects on special status plants typically associated with wet areas, all habitat potentially suitable cannot be avoided and establishing WLPZs and protective buffers may not fully prevent impacts on the species. As a result, SPR BIO-7 was implemented, or will be implemented for future projects.

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

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

IMPACT BIO-2

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

Special Status Birds

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

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

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special status birds can be clearly avoided by physically avoiding suitable habitat of the species or conducting treatments outside of the season of sensitivity (i.e., bird nesting season), then no mitigation would be required. Adverse effects on nesting special status birds would be avoided for treatments that would occur outside of the bird nesting season (February 1–September 15).

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

Under Mitigation Measures BIO-2a and BIO-2b, a no-disturbance buffer of 1,000 foot radius for Northern Spotted Owl, 660 foot radius for Bald eagle nests, 300 foot radius for Great Blue Heron and Great Egret, 500 ft radius for Osprey, sharp-shinned hawk and all other raptors (as recommended by CDFW 9/12/2023), and at least 100 feet around the nests of other special status birds, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified biologist. Additionally, trees containing Bald eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special status birds would be maintained because treatment activities would favor retention of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees. Additionally, treatments within a WLPZ would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Pursuant to Mitigation Measure BIO-2a, this determination for Bald Eagle, Great Blue Heron, Great Egret, Osprey, and Northern Spotted Owl must be made in

consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, Environmental Resource Solutions, Inc. would contact CDFW to seek technical input on the determination that habitat function would be maintained for Bald Eagle, Great Blue Heron, Great Egret, Osprey, and Northern Spotted. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Sonoma Tree Vole

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

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

Ringtail

Habitat in the project area is marginal, according to Attachment B. The maternity season is April 15 – July 31 according to CDFW recommendations 9/12/2023. Generally, ringtails are found in riparian areas or within shrub/lowland forest habitats close to riparian areas. They will den in rocky outcrops, often within riparian areas or lowland forest habitat. Do not disturb rock piles, particularly on the lower slopes where ringtails would most likely be found. Large-diameter trees and snags are also used as den sites, particularly on the lower slopes or within riparian areas.

Rocky areas or large-diameter trees/snags are not designated for removal or disruption during fuel hazard reduction projects. Impacts are unlikely due to low likelihood to occur and because the species is highly mobile. This species has state fully protected status and no federal status. Impacts on ringtail populations would be less than significant. If a ringtail is observed during operations, operations within ½ mile of that area will stop. The site location will be flagged and mapped, and a qualified wildlife biologist will be notified to determine appropriate mitigation measures. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Fisher

Habitat is suitable within the project area, according to Attachment B. The breeding season is February 1st – May 31st. In California, the original range of the fisher included the Northern Coast Range, Klamath Mountains, Southern Cascades, and western slopes of the Sierra Nevada. They have historically (1978 – 2008) been identified in Mendocino, Sonoma, and Lake Counties. The West Coast DPS of fishers is state listed as threatened and a species of concern.

Habitat for fishers is intermediate to large-tree stages of coniferous forests and deciduous riparian habitats with a high canopy closure. Forest structure appears to be more important than tree species for fisher habitat. Important forest structure for fishers includes a diversity of tree sizes, snags, downed trees and limbs, and understory vegetation. Natal dens are often high in cavities in both live and dead trees. Cavities in large trees, snags, logs, rocky areas; or shelters provided by slash or brush piles, and debris structures (mistletoe clumps, raptor and squirrel nests) provide cover for fishers.

Sonoma County is considered an area where fishers are rare or absent within the Range. Impacts are unlikely due to low presence and because the species is highly mobile. Cavities in large trees, snags, or logs provide potential den sites for fishers. They will also den in rocky outcrops. These structures (rocky areas and large-diameter trees/snags) are not designated for removal or disruption during fuel hazard reduction projects. WLPZ Protection zones protect larger trees with cavities and other potential den sites to be maintained and developed over time. WLPZ may also provide movement corridors.

If a fisher is observed during operations, operations within ½ mile of that area will stop. The site location will be flagged and mapped, and a qualified wildlife biologist will be notified to determine appropriate mitigation measures. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Red-Bellied Newt

Habitat is present in the project area. It is found within primarily redwood forests, but also occurs in mixed conifer, valley-foothill woodlands, montane hardwood, and hardwood-conifer habitats. They spend the dry season underground within root channels. The range for this species includes Sonoma County. Red-bellied newts may migrate a mile or more to and from the breeding stream. Migratory movements are stimulated primarily by rain.

Reproduction requires rapid-flowing streams with rocky substrate for breeding, egg-laying, and larval development. Other features of occupied streams include water temperatures ranging between 15 and 26 degrees Celius, a mix of coarse streambed substrates, and intermediate levels of canopy closure.

Migratory movements are usually correlated with the winter rains. Operations will be complete prior to winter or will cease when soils are saturated. Per SPR BIO-4, ground disturbance within riparian habitats and loss or degradation of riparian habitats will be minimized. There are no breeding streams within the project boundary. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Special Status Bats

Habitat potentially suitable for four special status bat species -- Townsend's Big-Eared Bat, Western Red Bat, Hoary Bat, and Long-Eared Myotis -- is present within forested habitat and human-made structures in the treatment areas. Per SPR BIO-1, if it is determined that adverse effects on special status bats can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special status bat maternity roosts would be avoided by conducting initial and maintenance treatments outside of the bat maternity season (March 15 – September 15).

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

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

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

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

Western Bumble Bee

Habitat in the project area is marginal, according to Attachment B. The grassland within the project area is not flower-rich. Per SPR Bio-2g, mechanical and manual treatments will not be implemented in the entire habitat area in a given year. Habitat will be divided into units with some units untreated to provide refuge for bumble bees. Prescribed burning within the grassland will occur from October through February to avoid the bumble bee flight season. The impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Conclusion

The potential for treatment activities to result in adverse effects on special status wildlife was examined in the PEIR. This

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

Biological resource SPRs that apply to project impacts under Impact BIO-2 are SPR BIO-1, SPR BIO-2, SPR BIO-9, SPR BIO-10, SPR BIO-12, SPR GEO-1, and SPR HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-3

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

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

Riparian habitat is present adjacent to streams in the treatment areas. Under SPR HYD-4, WLPZs ranging from 50 to 100 feet would be established adjacent to all Class II streams and ELZs from 30 to 50 feet, as determined on a site-specific basis, from all Class III streams, sufficient to prevent the degradation of downstream beneficial uses of water, for manual, mechanical, prescribed herbivory, prescribed burning, and herbicide treatments, which would limit the extent of treatment activities within riparian habitat. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized, as trees greater than 12 inches are favored for retention. Within the riparian habitat, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. If trees in the riparian habitat are generally smaller than 12 inches, the retention size parameter will be adjusted on a site-specific basis to ensure retention of the largest trees. Additionally, prior to any treatments in riparian habitat, Environmental Resource Solutions, Inc. would notify CDFW pursuant to California Fish and Game Code 1602, when required, as explained in SPR BIO-4.

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

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

IMPACT BIO-4

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Potential impacts resulting from maintenance activities would be similar to those resulting from initial

vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), the treatment area does not contain perennial or ephemeral streams that would be protected under federal and/or state government jurisdiction. The project area was designed to avoid streams and riparian areas.

Under SPR HYD-4, WLPZs ranging from 50 to 100 feet would be established adjacent to all Class II streams within the treatment areas, and buffers from 30 to 50 feet to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III streams within the treatment areas for manual, mechanical, prescribed herbivory, prescribed burning, and herbicide treatments.

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

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

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

IMPACT BIO-5

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

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

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Habitat function within treatment areas would be maintained because treatment activities, including maintenance treatments, would favor retention of living

trees (i.e., conifers, hardwoods) greater than 12 inches dbh which will maintain connectivity of a mature forest. Additionally, WLPZs ranging from 50 to 100 feet would be implemented adjacent to all Class II streams and buffers from 30 to 50 feet will be established on Class III streams in treatment areas, which could function as wildlife movement corridors, pursuant to SPR HYD-4. Biological resource SPRs that apply to project impacts under Impact BIO-5 are SPR BIO-1, SPR BIO-2, SPR BIO-3, and SPR HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-6

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for these species is present throughout treatment areas. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application, conducted during the nesting bird season (February 1– September 15) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the PEIR.

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

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

IMPACT BIO-7

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

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

IMPACT BIO-8

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

NEW BIOLOGICAL RESOURCE IMPACTS

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

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AQ-3 GEO-1 GEO-3 GEO-4 GEO-7 GEO-8	NA	LTS	No	Yes

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

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

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

Discussion

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

- Hugo very gravelly loam, 50-75% slopes;
- Hugo-Josephine complex, 50-75% slopes;
- Laughlin loam, 50-75% slopes;

Generally, soils within the project areas are well drained, have rapid runoff, and high erosion hazard rating. Parent material is residuum from sandstone. The project is entirely on a ridgetop and includes gently sloping to steeply sloping loam soils.

IMPACT GEO-1

Vegetation treatments would include manual and mechanical treatments, prescribed burning, prescribed herbivory, and ground-based herbicide application which could result in varying levels of soil disturbance and have the potential to increase rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the CalVTP PEIR. Mechanical treatments using heavy machinery such as a masticator or tracked chipper are

the most likely treatment to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas containing steep slopes. Equipment used to create or maintain piles for burning, impacts to soil from animals, or reduced vegetation cover from use of herbicides may also increase the risk of soil disturbance. Prescribed burning can increase the risk of hydrophobicity (repellency) which can increase erosion. This impact is within the scope of the CalVTP PEIR because the use of and type of equipment proposed, extent of vegetation removal, and intensity of prescribed burning, prescribed herbivory, and herbicides are consistent with those analyzed in the Cal VTP PEIR.

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

IMPACT GEO-2

Vegetation treatments would include manual and mechanical treatments, prescribed burning, prescribed herbivory, and ground-based herbicide application which could decrease the stability of slopes and increase the risk of landslides. There appear to be unstable areas near the edge of the treatment area, as evidenced by lidar hillshade maps. There is no recent movement on these features that is visible from the project edge. Scarps or ground cracks are not visible from the project edge. Mature trees are fairly vertical. No operations will be conducted on active or recently active unstable areas. Given the variable topography, risk of landslide activity remains. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the equipment proposed for use, the extent of vegetation removal, intensity of prescribed burning, prescribed herbivory and herbicides are consistent with those analyzed in the PEIR.

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

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

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

4.7 GREENHOUSE GAS EMISSIONS

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

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

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

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

Discussion

IMPACT GHG-1

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

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

IMPACT GHG-2

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

NEW IMPACTS RELATED TO GHG EMISSIONS

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

4.8 ENERGY RESOURCES

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

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

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

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

Discussion

IMPACT ENG-1

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

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

NEW ENERGY RESOURCE IMPACTS

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

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH, AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	HAZ-5 HAZ-6 HAZ-7 HAZ-8 HAZ-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	LTSM	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ-3	LTSM	No	Yes

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

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

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

Discussion

IMPACT HAZ-1

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

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

IMPACT HAZ-2

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

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

IMPACT HAZ-3

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

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

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

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

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

4.10 HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	HYD-1 HYD-4 BIO-4 GEO-4 GEO-6 AQ-3	NA	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	HYD-1 HYD-2 HYD-4 HYD-5 HYD-6 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 GEO-8 BIO-1 HAZ-1 HAZ-5	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	Yes	HYD-1 HYD-3 HYD-4 GEO-4	NA	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	HYD-1 HYD-5 BIO-4 HAZ-5 HAZ-7	NA	LTS	No	Yes

Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-4 HYD-6 GEO-1 GEO-2 GEO-4 GEO-5	NA	LTS	No	Yes

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

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

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

Discussion

The project area is within the Russian River Watershed. Hydrologic features in the project vicinity include the Russian River, Sweetwater Creek, and Fife Creek.

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

IMPACT HYD-1

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

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

IMPACT HYD-2

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

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

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

IMPACT HYD-3

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

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

IMPACT HYD-4

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

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

IMPACT HYD-5

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

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

NEW HYDROLOGY AND WATER QUALITY IMPACTS

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

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

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

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

Discussion

The project area is within the Resources and Rural Development (RRD), Timber Production (TP), Land Intensive Agriculture (LIA) and Agriculture and Residential (AR) zoning districts per the Sonoma County General Plan (County of Sonoma 2020). Most of the project area is within the RRD district. The next largest representation is the TP district. Very little project area is within the LIA and AR districts.

IMPACT LU-1

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

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

IMPACT LU-2

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

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

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

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

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

4.12 NOISE

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

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

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

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

Discussion

IMPACT NOI-1

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

Sensitive receptors adjacent to the project area are rural residences. Some of the rural residences occur on participating project parcels. The communities of Rio Nido and Guerneville, consisting of somewhat dense rural residences, are located more than 1,000 feet downslope from the project in most places. Treatment activities will not be located in one location for a long duration, as crews move along the length of the ridgeline throughout the project to implement the treatment, resulting in noise generating activities not lasting long in one location.

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

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

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

IMPACT NOI-2

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

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

NEW NOISE IMPACTS

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

4.13 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

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

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

Discussion

IMPACT UTIL-1

Initial and maintenance treatments would include prescribed burning, which may require an on-site water supply if the burn goes out of prescription. If needed, water would be supplied from the town of Guerneville or approved water sources owned by implementing entities, and transported via water trucks, fire trucks, or water trailer. The potential increased demand for water was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed in the PEIR.

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

IMPACT UTIL-2

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

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

IMPACT UTIL-3

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

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

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

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

4.14 RECREATION

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

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

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

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

Discussion

IMPACT REC-1

The proposed treatment would occur completely within private property and not within public recreation areas. Privately owned properties along the treatment area may be used for recreational activities by the owners or their associates with permission. Recreation activities include primarily hiking and cycling activity. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The potential for the proposed treatment project to impact recreation is within the scope of the PEIR.

NEW RECREATION IMPACTS

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

4.15 TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is This Impact within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Impact TRAN-1, pp. 3.15-9 – 3.15-10	No	NA	NA	NA	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2, pp. 3.15-10 – 3.15-11	Yes	AD-3 HYD-2 TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	SU	Impact TRAN-3, pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	SU	No	Yes

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

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

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

Discussion

IMPACT TRAN-1

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

IMPACT TRAN-2

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

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

IMPACT TRAN-3

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

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

NEW IMPACTS TO TRANSPORTATION

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

4.16 WILDFIRE

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

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

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

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

Discussion

IMPACT WIL-1

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

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

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

IMPACT WIL-2

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

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

NEW IMPACTS ON WILDFIRE

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

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