Appendix PD-3

Project-Specific Analysis/Addendum

for the

Garland Ranch Regional Park Fuel Management Project

CalVTP Project ID is 2023-24

PD-3: PROJECT-SPECIFIC ANALYSIS

PD-3.1: INTRODUCTION

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

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

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

If a later vegetation treatment project would have impacts that were not covered by the PEIR (and therefore would not qualify for a within the scope finding), then additional documentation may need to be prepared that accompanies the PEIR to demonstrate the project's CEQA compliance (State CEQA Guidelines Section 15168(c)(1)). If additional documentation is needed, it may be a Negative Declaration, Mitigated Negative Declaration, or an EIR, depending on the environmental impact differences encountered. In this situation, the PSA serves the same function as an initial study to identify which impacts were not covered by (and are therefore not within the scope of) the PEIR and, therefore, must be addressed in a Negative Declaration, Mitigated Negative Declaration, or an EIR, as well as documenting those impacts that are within the scope of the PEIR. Refer to Section PD-3.2.4 (under Checklist Answers) for additional explanation regarding the function of the PSA checklist.

PD-3.1.1: Project Proponents – Lead and Responsible Agency Roles

CAL FIRE is in charge of preventing and extinguishing wildfires within the SRA (PRC Sections 4113 and 4125). The treatable landscape within the SRA primarily encompasses private land (approximately 92 percent) on which CAL FIRE or counties under contract with CAL FIRE would implement vegetation treatments in coordination with the landowner. Additionally, there are many local, regional, and state agencies with land ownership or land management roles in the remainder of the treatable landscape (i.e., on public land) that will seek to implement vegetation treatments consistent with the CalVTP to reduce wildfire risks.

For the purposes of this PEIR and 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. If through the PSA a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

PD-3.1.2: Treatments Addressed in the PEIR

Proposed treatment projects qualifying as within the scope of the PEIR must be consistent with the treatments covered in the CalVTP, which are summarized in this section, and the geographic extent of the CalVTP, which is encompassed in the boundaries of the treatable landscape. Refer to PEIR Chapter 2, "Program Description" for a detailed description of the CalVTP.

TREATMENT TYPES

The CalVTP treatment types are:

- Wildland-Urban Interface Fuel Reduction: Located in WUI-designated areas, fuel reduction would generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands, and vice versa.
- Fuel Breaks: In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks.
- Ecological Restoration: Generally, outside of the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

TREATMENT ACTIVITIES

The WUI fuel reduction, fuel break, and ecological restoration treatment types would be implemented using various treatment "activities" that may be applied singularly or in combination. The CalVTP treatment activities are:

- Prescribed Burning: Includes pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment) and broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire-adapted plant communities; would be conducted under specific conditions related to fuels, weather, and other variables).

- Mechanical Treatment: Use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation.
- Manual Treatment: Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species.
- Prescribed Herbivory: Use of domestic livestock to reduce a target plant population thereby reducing fire fuels or competition of desired plant species.
- Herbicides: Chemical application designed to inhibit growth of target plant species.

TREATABLE LANDSCAPE

Approximately 20.3 million acres within the 31 million-acre SRA were identified that may be appropriate for vegetation treatments. This area is called the "treatable landscape." CAL FIRE's Fire and Resource Assessment Program (FRAP) modeled the areas where each of the three proposed treatment types could be implemented within the treatable landscape. Multiple treatment types can be implemented where modeled treatment areas for treatment types overlap. Qualifying treatments under the CalVTP would occur within the 20.3 million acres of treatable landscape. The boundaries of the treatable landscape are available on the Board's website.

PD-3.2: EVALUATION OF ENVIRONMENTAL IMPACTS

The PSA provided herein is to be used to determine whether later vegetation treatment projects in the treatable landscape have been covered in the PEIR to allow for approval without further environmental review and documentation (beyond what is needed to complete the PSA), or whether additional CEQA documentation is required (i.e., a Negative Declaration, Mitigated Negative Declaration or EIR). Environmental effects are not necessarily limited to those identified in the PSA checklist, which encompass all effects disclosed in the PEIR. For this reason, the checklist includes a row for "Other Impacts" under each resource area.

The determination as to whether an ND, MND, or EIR is required for impacts that are not within the scope of the PEIR is subject to the "fair argument" standard, which requires preparation of an EIR when there is a fair argument, based on substantial evidence in the record, that the proposed treatment project may have a significant effect on the environment.

Geographic area is one of the factors identified in CEQA Guidelines Section 15168(c) that agencies may consider when determining whether a project is within the scope of a program EIR. The geographic area analyzed in the CalVTP PEIR is the treatable landscape. Therefore, areas of projects that are outside the treatable landscape are not within the scope of the CalVTP Program EIR. However, in these circumstances, an addendum to the PEIR may be prepared to provide streamlined CEQA compliance for the treatment project if the project areas outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the treatable landscape.

An addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances. There is a proposed revision to or change in the project, compared to the PEIR, which is the inclusion of areas outside of the CalVTP treatable landscape (see Project Location description in the Environmental Checklist in Section PD-3.2.4). This PSA includes the criteria to support an Addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist (see Section PD-3.3) evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR.

In addition, MPRPD is proposing use of an air curtain burner or carbonator (pyrolysis) to process biomass in place of pile burning if feasible, pursuant to Mitigation Measure GHG-2. Evaluation of criteria air pollutant emissions from

these biomass processing technologies conducted by Ascent (2022) indicates that smoke and criteria air pollutant emissions can be substantially reduced, compared to open pile burning. Based on available information about emissions from biomass processing technologies, these technologies offer the opportunity to substantially reduce local exposure to PM from smoke, a potentially beneficial difference compared to pile burning. While the CalVTP PEIR does not explicitly address air curtain burning, the methodology falls within and is less impactful than pile burning, which is covered under the CalVTP PEIR. Use of an air curtain burner would be consistent with the discussion in the PEIR and would not constitute a new or substantially more severe significant impact than what was included in the PEIR. On this account, air curtain burning is being added as a biomass processing tool through the addendum.

PD-3.2.1: Determining Whether a Proposed Treatment is Within the Scope of the PEIR

The purpose of the PSA is to guide CAL FIRE and other project proponents in their determination of whether a proposed vegetation treatment project is within the scope of the CalVTP PEIR. A proposed vegetation treatment project is within the scope of the PEIR when it meets all of the following qualifications:

- Treatment Methods. The proposed treatment methods are consistent with the treatment types and activities described in Chapter 2, "Program Description" of the PEIR.
- Geographic Area. The proposed treatment site is within the geographic limits of the CalVTP's treatable landscape.
- Environmental Impacts. The environmental effects of the proposed treatment have been covered in the PEIR and none of the criteria for preparation of subsequent CEQA documentation are met (State CEQA Guidelines Sections 15168(c)(2), 15162).

PD-3.2.2: Documenting Whether Impacts of a Proposed Treatment Projects are Within the Scope of the PEIR

For the PSA to adequately document the impacts that are within the scope of this PEIR and do not require additional CEQA review and documentation, the PSA must identify the following:

- Relevant PEIR analysis. Identify the specific sections, impact numbers, and page numbers from this PEIR that contain information relevant to the proposed treatment project.
- Additional Studies Prepared and References Cited. Attach to the PSA site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the PEIR. Include copies of references cited in the PSA, which will be made available to the public by the project proponent upon request.
- Standard Project Requirements. Identify each standard project requirement (SPR) that is relevant to the treatment, which will demonstrate that the SPR will be integrated into treatment design. Some SPRs allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.
- Environmental Impacts. Identify which impacts in the PEIR would occur from implementation of the proposed vegetation treatment project. Because the intent of the PEIR is to disclose potentially significant impacts that are reasonably foreseeable to occur from any of the treatments within the extent of the treatable landscape, it is expected that, due to site-specific conditions, proposed vegetation treatment projects may result in impacts less severe than those identified in the PEIR. A project proponent may rely on the impact significance determination in the PEIR, and for significant impacts, apply the relevant mitigation measures. Alternatively, if an impact identified as significant in the PEIR

would be less than significant for the later treatment project, the project proponent may demonstrate with substantial evidence in the PSA that the project impact is less than significant and mitigation measure(s) are not needed. Similarly, potentially significant environmental effects identified in the PEIR may be minimized or found to be less than significant without mitigation in the future due to technological advances, further research, or industry response (e.g., air quality, greenhouse gas emissions, utilities and service systems); these effects and the reasons they are less severe than those identified in the PEIR will be documented in the PSA.

- Mitigation Measures. Identify each mitigation measure from the PEIR that is relevant to the proposed treatment project. In the PSA, explain any components of the mitigation measures that are not applicable to the treatment, and for any significance determination that is different than the PEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed vegetation treatment project. Some mitigation measures allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.

PD-3.2.3: Providing Substantial Evidence

The impact determinations and within-the-scope findings in the PSA, as well as any explanation for planned deviations, identified parameters, or feasibility determinations associated with SPR and mitigation measures, must be based on substantial evidence (defined in the CEQA Guidelines as "facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts"). Therefore, the PSA will include analytical discussions of the conclusions reached. Portions of the PEIR relied on for conclusions should be identified by section number and page number. Ancillary information (e.g., site-specific surveys) not included in the PEIR but relied on for conclusions or required by PEIR measures will be attached to the PSA. A list of references cited in the PSA will be included with the PSA and copies of such references made available to the public by the proponent agency upon request.

PD-3.2.4: Project-Specific Analysis

STANDARD PROJECT REQUIREMENTS, MITIGATION MEASURES, AND MONITORING AND REPORTING

The analysis must consider the measures identified in the PEIR that will avoid, reduce, or otherwise mitigate potential impacts of the project. These measures take the form of SPRs and mitigation measures. Some SPRs and mitigation measures apply to all projects, while others only apply to projects that include specific treatment types, treatment activities, or locations. Attachment A to this checklist provides a comprehensive list of SPRs and mitigation measures applicable to each project type. The project proponent should complete Attachment A and verify that all applicable SPRs and mitigation measures will be implemented, the timing of implementation, and identify the entity responsible for implementing and verifying or enforcing each measure. In effect, a completed Attachment A to the PSA will function as the Mitigation Monitoring and Reporting Program for the vegetation treatment project.

RESOURCE AREAS

The environmental resource areas in the PSA checklist are the same as those analyzed in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures", of the PEIR. The project proponent will review the environmental analysis in the PEIR for each corresponding resource area in the PSA checklist. The project proponent will consider whether required SPRs and mitigation measures would be effective in avoiding, reducing, or mitigating environmental impacts of the project considering the proposed activities and site-specific characteristics. SPRs are intended to be integrated into treatment design and implementation; therefore, project proponents should determine if it is necessary to

implement the SPR during preparation of the PSA, prior to treatment, or during treatment implementation. For example, implementation of SPR BIO-1 is intended to be carried out during PSA preparation; it will identify potentially affected biological resources and assess whether they can be avoided, which will determine whether other SPRs and mitigation measures must be implemented prior to or during treatments.

Written explanations supporting all conclusions should be provided in the discussion following the checklist questions for each resource area.

CHECKLIST ANSWERS

After verifying that the proposed treatment activities, treatment types, and geographic location of the treatment project are consistent with the PEIR, the primary functions of the checklist are to determine:

- whether any of the significant impacts of the later treatment project would be substantially more severe than those covered in the PEIR;
- whether the later treatment project would result in any new impacts that were not covered in the PEIR; and
- the type of CEQA document, if any, that is appropriate to examine impacts that are not within the scope of the PEIR.

Accordingly, the checklist questions presented for each resource area identify, for each impact addressed in the PEIR, whether the impact applies to the treatment project and if so, identify the SPRs and mitigation measures that are applicable to the treatment project. The checklist is also intended to identify whether the impact significance determination for the treatment project is different than the impact significance determination in the PEIR; if it is different, the checklist will identify whether the difference constitutes a substantially more severe significant impact and is therefore not within the scope of the PEIR. If it is determined that a substantially more severe significant impact that cannot be mitigated down to the same level as, or lower level than, identified in the PEIR would result from a later treatment project, an EIR must be prepared, unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate The MND or EIR may be limited to examining the impacts that are not within the scope of the PEIR.

"New" impacts are effects on the environment that were not addressed in the CalVTP PEIR.

For each new impact listed in the checklist, the project proponent should indicate whether the impact would be one of the following:

- New Impact that is Less Than Significant: The project would result in a new adverse impact that is not analyzed in the CalVTP PEIR; however, the impact would not be significant. In this case, the impact is not "within the scope" of the CalVTP PEIR and preparation of a Negative Declaration could be prepared. Pursuant to CEQA Guidelines Section 15168(d), a subsequent negative declaration could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Less Than Significant with Mitigation Incorporated: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR, but due to the project proponent's willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not "within the scope" of the CalVTP PEIR and a Mitigated Negative Declaration could be prepared, consistent with CEQA Guidelines Section 15168(d), which allows for use of a subsequent negative declaration to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.

- New Impact that is Potentially Significant: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR (which would be subject to the "fair argument" standard as a new impact), the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not "within the scope" of the CalVTP PEIR and preparation of an Environmental Impact Report (EIR) is required. The EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the PEIR, which are documented in the PSA.

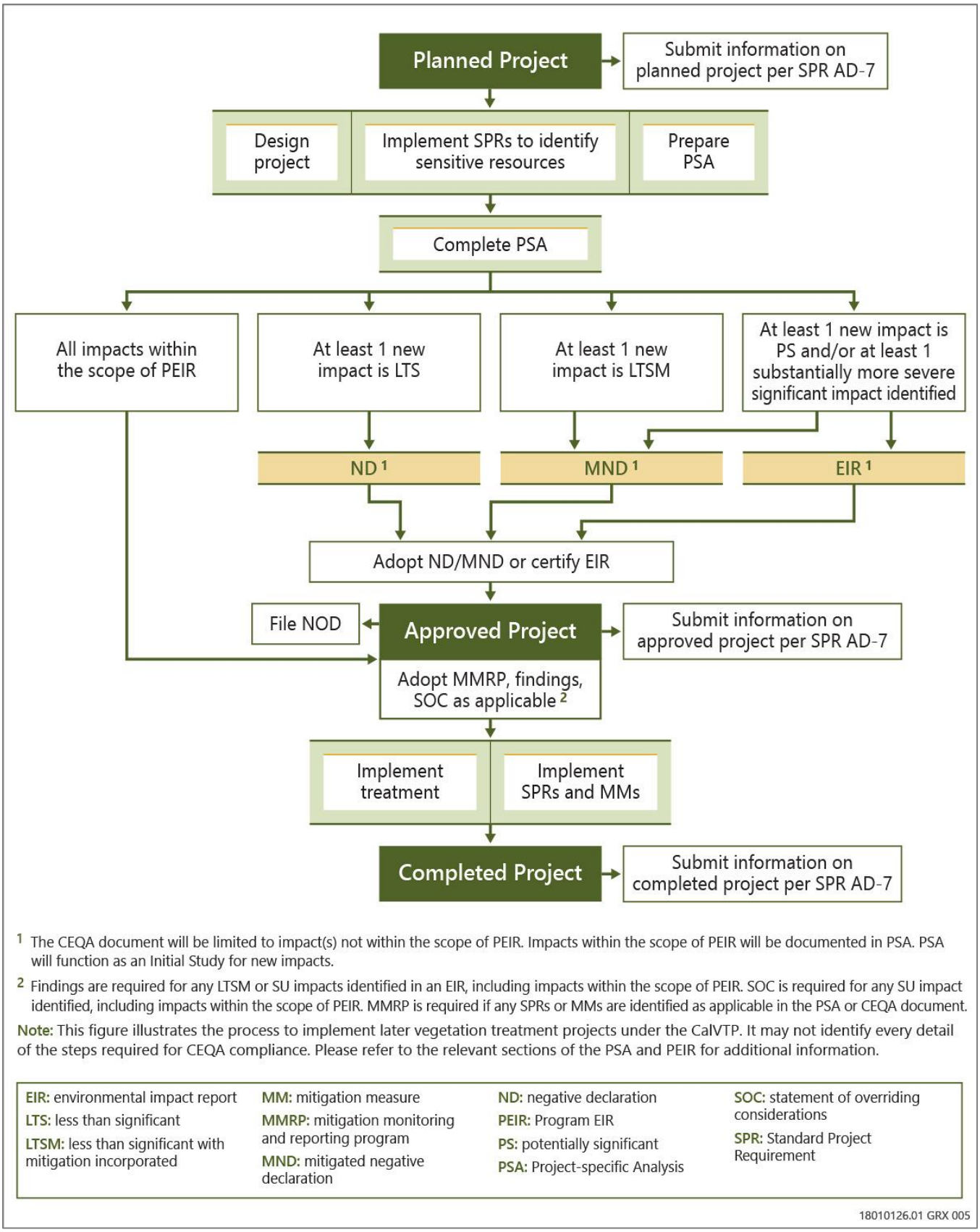
In summary, when additional environmental documentation is needed to augment the PEIR for CEQA compliance, the PSA checklist and accompanying analysis would serve the same function as an initial study that defines the topics to be addressed in the EIR, MND, or ND to cover the impacts that are not within the scope of the PEIR, as directed by State CEQA Guidelines Section 15168(d)(1). Pursuant to State CEQA Guidelines Section 15168(d), a later ND could be prepared, if the new impact would be less than significant, or MND, if the new impact or substantially more severe significant impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist. Refer to the CalVTP PSA Process flowchart presented in Figure 1.

AGENCY-SPECIFIC CEQA IMPLEMENTATION PROCEDURES

This PSA may be used by CAL FIRE, another public agency funded by grants from CAL FIRE or other state agencies, or a public agency with land ownership, land management, or other regulatory responsibilities in the treatable landscape that is proposing to implement, fund, or issue any approval for vegetation treatments consistent with the CalVTP PEIR. Each project proponent should follow their agency's CEQA implementation procedures, including filing of a Notice of Determination through the State Clearinghouse and/or applicable County Clerk's office.

PROJECT-SPECIFIC CEQA FINDINGS AND OVERRIDING CONSIDERATIONS

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must still adopt CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. Although each responsible agency must adopt its own findings (see CEQA Guidelines section 15096(h)), such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. A findings template intended to assist responsible agencies to formulate their own findings is attached to this PSA as Attachment B.



Source: Ascent Environmental Inc. 2019

Figure 1 CalVTP PSA Process

REPORTING REQUIREMENTS

Planned Projects

To assist with tracking actions under the CalVTP, project proponents will submit information to CAL FIRE on planned projects when beginning preparation of this PSA. The submittal will include the following:

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

Approved Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

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

Completed Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents will submit the following information to CAL FIRE after implementation of the treatment:

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

ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title: Garland Ranch Regional Park Fuel Management Project
2. Project Proponent Name and Address: Monterey Peninsula Regional Park District
   4860 Carmel Valley Road, Carmel CA 93923
3. Contact Person Information and Phone Number: Jake Smith
   Planning and Conservation Program Manager
   (831) 372-3196 ext. 116
4. Project Location: Garland Ranch Regional Park
   700 W Carmel Valley Road, Carmel Valley, CA 93924
   Unincorporated Monterey County

   USGS – Seaside Quadrangle, California
   Latitude (Y): 36.511494°
   Longitude (X): -121.775516°

   Treatment areas are in the northwestern portion of the park, along the Rancho Loop Trail.

   See Project Location Map (Figure 2) and Treatment Area Map (Figure 3)
5. Total Area to be Treated (acres): 12.2 acres
6. Description of Project:
   a. Initial Treatment
   PROJECT GOALS:

   Garland Ranch Regional Park (Park), managed by the Monterey Peninsula Regional Park District (MPRPD), and the surrounding community are located within the Wildland Urban Interface (WUI) area. There are three stands of invasive Eucalyptus trees in the northwestern portion of the Park, comprised primarily of blue gum (*Eucalyptus globulus*), that present a fire hazard condition due to the volume, combustibility, and continuous arrangement of plant material. Vertical continuity of fuels due to accumulation of vegetative debris at ground level (more than two feet thick in some locations) presents the opportunity for fire to travel upwards into the mid-canopy of trees, dense and multi-stemmed growth patterns of blue gum increase horizontal continuity of fuels with high canopy contact between trees, and aromatic oils in blue gum are highly flammable, even vaporizing on hot days. These factors in combination result in the high likelihood of conflagration in the event of a fire. If these stands were to ignite, they would produce long flames which could torch adjacent vegetation, producing and distributing embers far afield. Removal of the two smaller Eucalyptus stands, thinning of the larger main stand, and management of these areas would reduce fire risks within the WUI. In addition, these actions would promote resilience and recovery of native habitats and species, including adjacent sensitive riparian habitat, and maintain wildlife habitat and aesthetic values within the Park, such as providing a pleasing visual backdrop, aroma, shade, and a wind break for recreationalists.

   PROJECT LOCATION:

   The Park is located on the south side of Carmel Valley Road, within the Carmel Valley area of unincorporated Monterey County (Figure 2). The three project treatment areas encompass approximately 11.7 acres of the approximately 3,670-acre Park and are located in the northwestern section of the park along the Rancho

Loop Trail (Figure 3). A small portion of the proposed treatment area, approximately 0.5 acre, is also located on the adjacent parcel; work within this area would require an agreement with the landowner. The Main Stand is approximately 10.5 acres and is located on the northwest side of the Rancho Loop Trail. The Northeast Stand (0.4-acre) is located approximately 400 feet to the east of the Main Stand and the Southeast Stand (1.3-acres) is located approximately 715 feet to the southeast on the opposite side of the Rancho Loop Trail.

The project area is located within the State Responsibility Area (SRA) and the majority of the project area is located within the treatable landscape as described in the PEIR (CalVTP Final PEIR Volume II Section 2.4 page 4). However, approximately 3.2 acres of the project area is not within the treatable landscape because the boundary of the CalVTP treatable landscape was digitally developed using the California Department of Fish and Wildlife's (CDFW's) California Wildlife Habitat Relationships (CWHR) system, (as described in CalVTP Final PEIR Volume II Section 2.4 page 4), which identifies this area as "urban." The CWHR system was generated at a large scale that did not allow high mapping resolution, which resulted in exclusion of some suitable habitat areas from the treatable landscape. The CWHR system mapped "urban" areas within the project site; however, these areas are in actuality contiguous with the surrounding habitat and are therefore classified as Hardwood Woodland as described in the CWHR system. An additional 0.09 acre is also not within the treatable landscape because it extends into a Local Responsibility Area (LRA).

PROJECT DESCRIPTION:

The MPRPD strives to balance priorities for fire hazard reduction, native ecosystem preservation, natural and cultural resource protection, and public access and recreation. The following treatments for the three Eucalyptus stands have been developed to represent these values.

TREATMENT AREAS

Main Stand

Approximately 4.0 acres of the Main Stand of Eucalyptus would be thinned; selecting the largest and healthiest trees for retention. The Main Stand is a significant visual feature of the park on the Rancho Loop Trail. Eucalyptus stands of this type may be held in high regard by hikers who appreciate the shade, aesthetic value, and wind break these trees provide, and they may support seasonal raptor nests. Therefore, thinning, limbing up, and understory fuel reduction to allow for shade and visual attribute preservation, including maintaining wildlife habitat, while simultaneously reducing a substantial fire hazard risk will be implemented and is consistent with the thinning MPRPD has already conducted with inmate crews from the Gabilan Conservation Camp.

Within this stand, dead material would be removed (including 'jackpots' of large logs and bark/leaf litter accumulations) and tree branches limbed up to 15 feet to minimize fire ladders. Decreasing the ground fuel load and lifting the canopy will reduce the vertical continuity of fuels. Thinning the stand to remove unhealthy trees and minimize crown overlap will reduce the horizontal continuity of fuels. Both techniques will help prevent or slow the spread of future fire events to allow effective firefighting when necessary.

Approximately 5.1 acres within the Main Stand, located near the south-side of the Carmel river, intergrades with the adjacent riparian habitat. This portion of the Main Stand is not a significant visual feature of the park and while a hazard reduction treatment may be possible, removal of the Eucalyptus trees within this area will provide significant benefit to the riparian corridor by eliminating the spread of an invasive species within the native riparian corridor and reducing water consumption from the Carmel River. In addition, the western section of the Main Stand (approximately 1.4 acres) is located at the base of the steep, densely vegetated Snivley's Ridge, a fire within this portion of the stand could easily propel fire up the hill, especially with prevailing north winds. Difficult terrain and lack of access higher on the slope and the presence of residences immediately south of the Park make this treatment site a high priority for fire risk reduction and control.

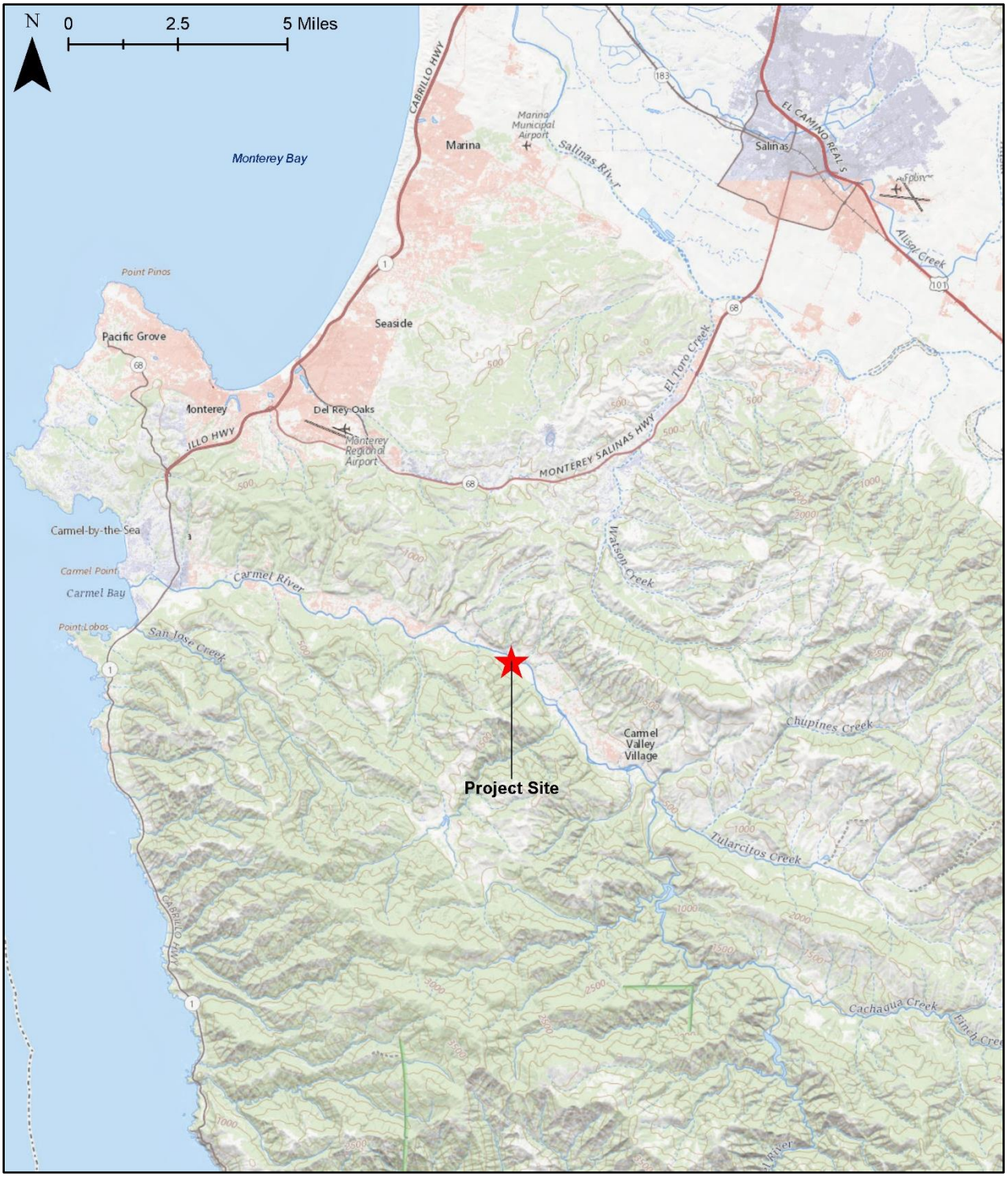


Figure 2 Project Location Map

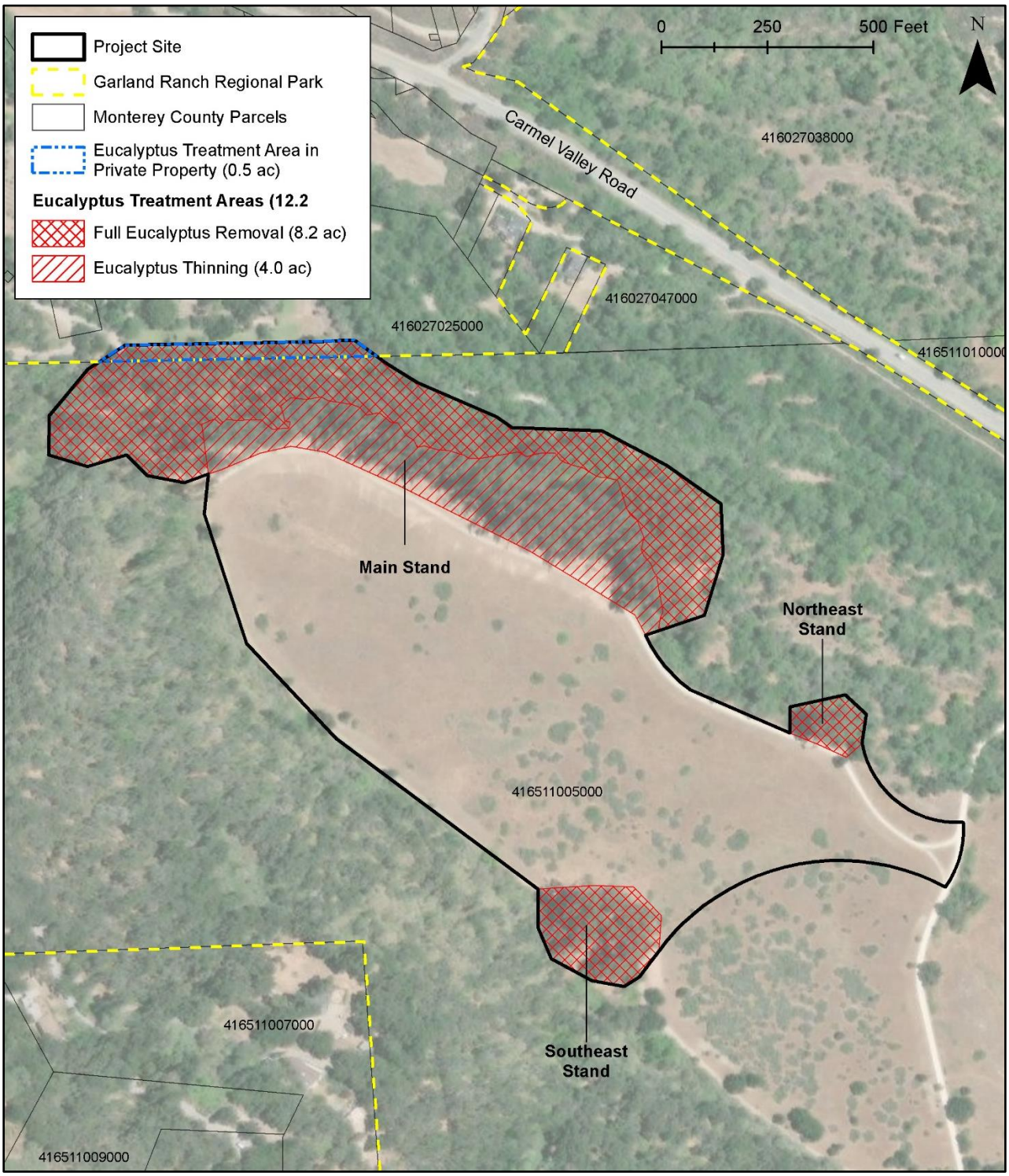


Figure 3 Treatment Area Map

Southeast Stand

The 1.3 acre Southeast Stand is also located at the northern base of Snively's Ridge. Similar to the portion of the main stand discussed above, this location presents a high fire hazard potential leading into difficult terrain as it could easily propel fire up the hill towards residences immediately south of the Park. As such, this treatment site is also a high priority for fire risk reduction and control. This stand is not a significant visual feature of the park and is an outlier stand which may provide further proliferation of blue gum Eucalyptus trees outside of the Main Stand. Therefore, the entire Southeast Stand would be removed.

Northeast Stand

The 0.4 acre Northeast Stand is located near the northern intersection of the Rancho Loop and Cooper Trail. Approximately 0.2 acre of this area occurs within the riparian corridor on the north side, similar to the main stand described above. The Northeast Stand is not a significant visual feature of the park and is an outlier stand that may provide further proliferation of blue gum Eucalyptus trees outside of the Main Stand. The location of these trees does not present a high fire hazard as it is positioned on flat terrain, and adjacent to riparian vegetation which is usually high in moisture content and not extremely flammable. However, non-native species trees located within or immediately adjacent to riparian areas can cause degradation to the healthy function of a riparian system. Therefore, all eucalyptus trees within the Northeast Stand would be removed.

TREATMENT TYPES

The proposed treatment type is WUI Fuels Reduction. Proposed treatment areas are natural areas that are adjacent to homes and structures, indicating that the project areas make up a WUI as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 8-10). Fuel reductions in the WUI will directly impact communities and assets at risk, serving as emergency access points along or near evacuation routes for the nearby communities and as an opportunity to slow or stop wildfires. WUI treatments would remove understory vegetation including dead, dying, hazard, and diseased trees of any diameter, ladder fuels, and live Eucalyptus or other non-native trees up to eight inches DBH to promote a healthier residual stand following treatments. Habitat quality will be enhanced through WUI fuel reductions where existing habitat has been degraded due to invasive species encroachment or the accumulation of fuels. As such, the project incorporates ecological goals as defined under Ecological Treatments in the CalVTP PEIR; however, the project is not considered an Ecological Treatment under CalVTP because it is located in the WUI (see CalVTP PEIR Section 2.5.1 Pages 15-16).

FUEL TYPES

Proposed treatments would occur in tree fuel types as described in the CalVTP PEIR Section 2.4.1 Page 4. A portion of the treatment area within the main stand and the northeast stand is mapped as "urban;" however, as described above in the Project Location discussion, this classification is an error due to mapping scale, and the habitat within these areas are contiguous with the surrounding habitats and are also tree fuel types. The tree fuel types are dominated by Eucalyptus stands; however, a portion of the Main Stand is also mixed with willow riparian forest. These Eucalyptus stands have generally closed canopies with moderate to dense understory fuels. The removal of understory vegetation and ladder fuels in the tree fuel types would reduce the risk of ground or surface fires spreading into the canopy. In addition, staging, access, and pile burning would occur within adjacent grass fuel types; however, grass fuel types would not be treated.

TREATMENT ACTIVITIES

Mechanical Vegetation Treatment

Mechanical treatments would primarily include masticating target vegetation and chipping biomass from manual and mechanical treatment activities. Equipment would include tractors/skidders/backhoe[1], chippers, masticators, and stump grinders. A water truck or other water containers may also be onsite during mechanical treatments as a precaution. Due to the limited size of the project site, it is likely that only one crew would operate at a time; however, no more than two crews would operate at the same time during treatment. In addition, mechanical and manual treatment are expected to occur at the same time and total crew size would be approximately 20 crew members for both treatment activities. Initial mechanical vegetation treatment would require three to four months to complete. Mechanical treatment activities may occur immediately adjacent to the top of bank of the Carmel River (a Class I watercourse as described in SPR-HYD-4 in the CalVTP PEIR Section 3.11.3 Page 22) to improve habitat and reduce undesirable wildfire hazards.

Small-diameter trees and downed woody debris would be removed 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) or chipping. Generally, mechanical treatments would:

- masticate or chip target live Eucalyptus trees and other non-native trees up to 10 inches dbh, downed Eucalyptus bark/woody debris, and woody shrubs;
- limit masticated or chipped material left on site to a depth no greater than six inches;
- fell trees in riparian areas away from the adjacent Carmel River;
- grind eucalyptus stumps in non-riparian areas;
- remove limbs of large trees up to 15 feet high;
- retain isolated large logs, but spread out to increase soil contact and natural breakdown speed;
- retain native oak and riparian trees and, to the extent feasible, native shrubs and other desirable species as determined by MPRPD;
- retain at least 75% of the overstory and 50% of the understory canopy of native riparian vegetation within the limits of riparian habitat.

Manual Vegetation Treatment

To implement manual treatments, crews would use hand tools and hand-operated power tools, including chainsaws, hand saws, brush cutters, and loppers, to cut, clear, and/or prune trees. Initial manual treatment would require three to four months to complete and would likely be completed at the same time as mechanical activities during the first year. As identified above, mechanical and manual treatment activities are expected to occur at the same time and total crew size would be approximately 20 crew members, with one to two crews operating at a time. Manual treatment activities may occur immediately adjacent to the top of bank of the Carmel River (a Class I watercourse as described in SPR-HYD-4 in the CalVTP PEIR Section 3.11.3 Page 22) to improve habitat and reduce undesirable wildfire hazards.

The same general guidelines for tree and vegetation removal and retention would be followed as described above for mechanical treatments; however, manual methods will include removing eucalyptus trees larger than 10 inches dbh. As described above, all eucalyptus trees will be removed within the southeast and

[1] Please note that these equipment types would be used to remove vegetation only. No excavation is proposed as part of the project.

northeast stands. In the main stand, all eucalyptus trees will be removed from the approximately 5.1 acre riparian area on the north side of the stand nearest to the Carmel River and the approximately 1.4 acre western section at the base of Snivley's Ridge; selected trees will be removed in the remainder of the stand to remove unhealthy trees, minimize crown overlap, and reduce the horizontal continuity of fuels. Some cut vegetation may be left on site by lopping or chipping with scattering on the landscape, while some vegetation may be pile burned, as described below. In addition, some of the larger diameter material may be off-hauled to a wood product processing facility or composting facility in accordance with the requirements of SPR UTIL-1 if processing on-site is not feasible.

Prescribed Burning

Biomass from manual and mechanical treatment that would be burned would be piled using equipment (e.g., skid steer, tractor, bulldozer or excavator[2]) or hand crews. Typically, dozers are equipped with a brush rake to reduce soil displacement and create "clean" piles. The piles would be located as close as safely possible to the burning location. Biomass would be burned in piles or, preferably, using an air curtain burner or carbonator. Burning would occur in the adjacent open field, 100 feet or more from tree and shrub vegetation. All grasses and other herbaceous vegetation would be removed or burned to bare soil within 30-40 feet of the burn location. The prescribed burn crew size will be determined based on the amount of material to be burned and the number of crew members necessary for safety purposes; however, due to the small size of the project it is expected that the crew size necessary for pile burning and/or use of an air curtain burner or carbonator would be much less than the average crew size of 45 workers identified in the CalVTP PEIR (Section 2.5.2 Page 21)

Herbicide Application

The blue gum Eucalyptus tree is identified as invasive by the California Invasive Plant Council (Cal-IPC). This species sprouts prolifically from wounds and cut stumps. Herbicide will be used to control re-growth and limit the necessity of maintenance treatments. Only ground-level application would occur; no aerial spraying of herbicides would occur. Herbicide treatments would typically use a one-to two-person crew, a transport vehicle, and herbicide application equipment. Several herbicide application methods are available for use by on-the-ground personnel, including paint-on stems/stumps, using backpack hand-applicators, hypo-hatchet tree injection, or hand placement of pellets. 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. Only herbicides identified in the CalVTP PEIR (Section 2.5.2 Page 27) would be applied. Imazapyr, Glyphosate, and Triclopyr (all herbicides identified in the CalVTP PEIR) are effective on Eucalyptus; however, the certified and licensed applicator would choose the best approved herbicide for treatment. In addition, only herbicides approved for use in aquatic environments would be used in riparian areas.

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Initial Treatment*]

☒ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☐ Ecological Restoration

[2] Please note that these equipment types would be used to move biomass (i.e., the cut vegetation) only. No excavation is proposed as part of the project.

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Initial Treatment*]

☐ Prescribed Burning (Broadcast), _____ acres

☒ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, _12.2__ acres

☒ Manual Treatment, _12.2__ acres

☐ Prescribed Herbivory, _____ acres

☒ Herbicide Application, _12.2__ acres

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Initial Treatment*]

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

As described above, blue gum Eucalyptus sprouts prolifically from wounds and cut stumps. In addition, new trees may emerge from seeds and Eucalyptus trees retained within the main stand would continue to shed bark and leaves. Native trees, shrubs and herbaceous species may begin to grow within the removal areas and between retained trees in the main stand. While native species are desirable for habitat health, they may be undesirable within the main stand if they result in vertical continuity of fuels. Undesirable non-native or invasive species may also begin to grow in these areas, which would require maintenance to prevent or slow spread into adjacent native communities.

Maintenance would occur approximately every one to three years, depending on the amount of sprouting from wounds and stumps, growth of new Eucalyptus trees or other vegetation, bark/woody debris accumulation, and infestation by other invasive species. The treatments applied would also depend on these factors. It is likely that the use of mechanical treatments and pile burning will be reduced during the maintenance period; however, these treatments would be used when necessary. Manual treatment and herbicide application are the most likely treatments to be used to maintain the Eucalyptus stands. All maintenance treatments would be implemented using the same methods and equipment as described above for the initial treatment.

In addition, prescribed herbivory may be used for maintenance, as described below:

Prescribed Herbivory

Prescribed herbivory using goats may be used for maintenance treatment within the Main Stand and/or Southeast Stand after the initial thinning treatments have been conducted. Prescribed herbivory would not be used in sensitive habitat areas (i.e., riparian areas) or within a 50-foot buffer, as required by SPR-HYD-3 in the PEIR. The use of prescribed herbivory can limit regrowth and assist with breaking down ground fuels through intensive hoof action as well as herbivory of leaves. As described in the CalVTP PEIR Section 2.5.2 Page 26, prescribed herbivory would occur when the target plant species is palatable and when feeding on the plants can damage them or reduce viable seeds. A herder, electric or non-electric fencing, mineral block, and/or a watering site may be used.

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☒ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☐ Ecological Restoration

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Treatment Maintenance*]

☐ Prescribed Burning (Broadcast), _____ acres

☒ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, _12.2__ acres

☒ Manual Treatment, _12.2__ acres

☒ Prescribed Herbivory, _4.7__ acres

☒ Herbicide Application, _12.2__ acres

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses: (Briefly describe the project's surroundings)
The Park is located within the Carmel Valley area of unincorporated Monterey County. The Park extends from Carmel Valley Road and the Carmel River at an elevation of approximately 200 feet at the base of the valley, south into the Santa Lucia Mountain Range with a maximum elevation of approximately 2,000 feet.

   The project area is located within the valley, immediately adjacent to the Carmel River on the north. Carmel Valley Road is on the opposite side of the Carmel River and low density residential and open space is present north of the road. To south of the project area are open areas of the Park and historic ranching buildings. Further to the south, beyond the Park boundaries lies the Santa Lucia Preserve, a low-density housing development and open space preserve. To the east and west of the project area are open areas of the park, as well as residential and commercial development. The nearest residence is located within 100 feet of the Main Stand to the west.

8. Other Public Agencies Whose Approval is Required: (e.g., permits)

   California Department of Fish and Wildlife – Lake and Streambed Alteration Agreement

   California Department of Fish and Wildlife – take authorization for candidate bumble bees (potential)

   State Water Resources Control Board – General Order

   Monterey Bay Air Resources District – Prescribed Burn Permit or other authorization

   Monterey Peninsula Water Management District – River Work Permit (potential)

   County of Monterey – Tree Removal permit (potential only if protected trees are removed on private property)

   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

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

   Pursuant to CalVTP SPR BIO-2, geographically affiliated Native American tribes were sent letters of notification of the project via certified mail on July 7, 2023 and August 14, 2023. Tribal contacts included:

   - Ed Ketchum and Valentin Lopez of the Amah Mutsun Tribal Band;
   - Irene Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista;
   - Jana Nason, Lorraine Escobar, Susan Morley, Tom Little Bear Nason, and Cari Herthel of the Esselen Tribe of Monterey County,
   - Carla Marie Munoz and Tony Cerda of the Costanoan Rumsen Carmel Tribe;
   - Ann Marie Sayers and Kanyon Sayers-Roods of the Indian Canyon Band of Costanoan Ohlone People;
   - Lydia Bojorquez and Isaac Bojorquez of the KaKoon Ta Ruk Band of Ohlone-Coastanoan Indians of the Big Sur Rancheria;
   - Louise Miranda-Ramirez and Christanne Najera of the Ohlone/Coastanoan-Esselen Nation;
   - Dee Dee Ybarra of the Rumsen Am:a Tur:ataj Ohlone; and
   - Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band.

A response was received from the Indian Canyon Band of Costanoan Ohlone People on July 21, 2023 and MPRPD and the Monterey County RCD met with tribal representatives on August 10, 2023. A response was received from the Costanoan Rumsen Carmel Tribe on July 10, 2023 and MPRPD and the Monterey County RCD met with tribal representatives on August 15, 2023. A response was received from the Esselen Tribe of Monterey County on August 14, 2023.

DETERMINATION

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

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

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

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

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

Jacob Smith
Signature

10/4/23
Date

Jacob Smith
Printed Name

Planning & Conservation Program Manager
Title

MPRPD
Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the CalVTP PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any "new impacts."
3. The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:
   - Briefly describe the impact of the proposed vegetation treatment project.
   - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in PEIR.
   - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed treatment is consistent with the treatment types and activities addressed in the PEIR as well as the associated intensity (i.e., duration).
   - Identify SPRs and MMs applicable to the treatment project.
   - (If applicable) Explain which components of the MM or SPR would be applied. This circumstance exists if the MM or SPR allows for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility. A site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination must be provided in the PSA.
   - (If applicable) Explain why the impact significance in the PSA is different than that found in the PEIR; substantiate the different (new) significance conclusion.
   - (If applicable) Explain why MM or SPRs identified for this impact in PEIR do not apply to this project. This circumstance may exist where a PS impact was identified in the PEIR, but the impact severity would be less for the treatment project or the MM does not otherwise apply.
4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. AND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.
6. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

PD-3.3: 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-5 AD-6 AES-2 AQ-2 AQ-3 REC-1	N/A	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-1 AES-3	N/A	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	None	N/A	N/A	N/A	N/A

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

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

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

Discussion

Impact AES-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed (pile) burning, and targeted ground application of herbicides. In addition, the maintenance treatment would include prescribed herbivory. 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 (CalVTP Final PEIR Section 3.2.3, pages 16-19). Laureles Grade is the nearest designated County Scenic Highway (California Department of Transportation [Caltrans], 2019). The project site is visible for a short duration along the Carmel Valley side of Laureles Grade Road and smoke from prescribed burning may be visible from the road. The majority of the proposed treatments would occur on public land managed by MPRPD. The treatment areas are located immediately adjacent to the Rancho Loop Trail. The treatment areas are also visible from other trails within the Park and all treatment activities have the potential to be viewed from various trails and vista points within the Park.

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-5, AD-6, AES-2, AQ-2, AQ-3, and REC-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 AES-2

Initial and maintenance treatments would include the WUI Fuel Reduction treatment type. The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the PEIR (CalVTP Final PEIR Section 3.2.3, pages 20-25). Public viewpoints of the treatment areas include trails within the Park and from Carmel Valley Road. In addition, the treatment areas are visible for a short duration from the Carmel Valley side of Laureles Grade Road, a designated County Scenic Highways (Caltrans, 2019). Removal of the Southeast and Northeast Stands would be an improvement to the visual environment because the trees are currently in stark contrast to the surrounding natural landscape and removal of the trees would open space for regrowth of native species. However, the Main Stand is a significant visual feature of the park on the Rancho Loop trail that may be held in high regard by hikers who appreciate the shade, aesthetic value, and wind break these trees provide. Therefore, as described in the Project Description above, a portion of Eucalyptus trees within the Main Stand will be maintained and thinning, limbing up, and understory fuel reduction will be implemented to allow for shade and visual attribute preservation, while simultaneously reducing a substantial fire hazard risk. In addition, the Main Stand currently provides a visual screen of the adjacent residences from the public viewpoints, which will be maintained pursuant to SPR AES-3. All Eucalyptus trees within the riparian habitat areas of the Main Stand will be removed; however, most of these trees are outside of the public viewshed and retention of native riparian trees will ensure that the area blends with the adjacent riparian areas and does not degrade the visual character of the area. Additionally, edge feathering would be implemented pursuant to SPR AES-1, as reasonable and appropriate, to break up or screen linear edge of cleared areas.

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. 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 no non-shaded fuel breaks are proposed.

New Aesthetic and Visual Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.2.1, "Environmental

Setting," and Section 3.2.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur as a result of the project.

PD-3.4: 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	N/A	N/A	LTS	No	Yes

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

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

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

Discussion

Impact AG-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed (pile) burning, and targeted ground application of herbicides. In addition, the maintenance treatment would include prescribed herbivory. The majority of the treatment area is blue gum Eucalyptus forest surrounded by riparian forest and coast live oak woodland. Riparian and oak trees are present along the margin of the Main Stand adjacent to the Carmel River. Treatment areas within the treatable landscape are mapped as Hardwood Woodland, a tree fuel type, by the CWHR system. Treatment areas outside the treatable landscape are mapped as "urban" by the CWHR system; however, this is an error due to the scale of the mapping and these areas are in actuality contiguous with the surrounding habitat. Treatments would include full removal of the invasive Eucalyptus trees within the southeast and northeast stands and high priority areas of the Main Stand, and thinning of Eucalyptus trees within the remainder of the Main Stand, as described in the Project Description above. Treatment within the retained portion of the Main Stand would focus on removing smaller diameter and unhealthy Eucalyptus trees, while maintaining native trees and larger, healthy Eucalyptus trees. In addition, treatment will include mastication, chipping, or removal of dense woody debris and bark. These treatments would improve forest stand conditions and would not result in conversion to a non-forest use. Vegetation management would improve forest stand conditions by removing invasive species, reducing competitive vegetation, and opening up ground space for natural seeding of native tree species, such as arroyo willow (*Salix lasiolepis*) and coast live oak (*Quercus agrifolia*).

The potential for proposed treatment activities to result in loss or conversion of forest land was examined in the PEIR (CalVTP Final PEIR Section 3.3.3, pages 7-8). This impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR. 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. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

The proposed project is consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to agriculture and forestry resources would occur.

PD-3.5: AIR QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4 AQ-1 AQ-2 AQ-3 AQ-4 AQ-6	AQ-1 GHG-2	PSU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1 NOI-4 NOI-5	N/A	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	None	N/A	N/A	N/A	N/A
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4 AQ-1 AQ-2 AQ-3 AQ-6	N/A	PSU	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	N/A	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4 AQ-2 AQ-3 AQ-6	N/A	PSU	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 proposed project is within the jurisdiction of the Monterey Bay Air Resources District (MBARD)[3].

Impact AQ-1

This project would require the use of vehicles, mechanical equipment, mechanized hand tools, herbicide application, and prescribed herbivory during initial and maintenance treatments, which would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS) or the national ambient air quality standards (NAAQS) thresholds. The potential for emissions of criteria to exceed CAAQS or NAAQS thresholds was analyzed in the PEIR (refer to Section 3.4.3, pages 26-33 in the Final PEIR). These proposed treatments, treatment equipment, and equipment use duration are consistent with the scope of the PEIR.

In addition, MPRPD is proposing the use of an air curtain burner or carbonator (pyrolysis) to process biomass in place of pile burning, if feasible, pursuant to Mitigation Measure GHG-2. Evaluation of criteria air pollutant emissions from these biomass processing technologies conducted by Ascent (2022) indicates that smoke and criteria air pollutant emissions can be substantially reduced compared to open pile burning. Use of an air curtain burner substantially reduces reactive organic gas (ROG) and particulate matter (PM) emissions by approximately 96 percent when compared to open pile burning, while on-site pyrolysis reduces ROG emissions by 98 percent and PM emissions by 100 percent. For nitrogen dioxide (NOx), air curtain burners are estimated to reduce NOx emissions by at least 73 percent and on-site pyrolysis is estimated to reduce NOx by 94 percent (Ascent 2022). Based on available information about emissions from biomass processing technologies, these technologies offer the opportunity to substantially reduce local exposure to PM from smoke, a potentially beneficial difference compared to pile burning. Use of an air curtain burner would be consistent with the discussion in the PEIR and would not constitute a new or substantially more severe significant impact than what was included in the PEIR.

The SPRs applicable to the project are AD-4, which requires public notification prior to prescribed burning operations, and AQ-1 through AQ-4 and AQ-6, which require compliance with air quality regulations, dust minimization, following all safety procedures required of a CAL FIRE crew, and preparation of a smoke management plan and burn plan if the pile burning triggers the threshold (17 CCR Section 80160). SPR AQ-5 would not apply because no naturally occurring asbestos is mapped within the project area. An air curtain burner or carbonator (pyrolysis) would be used, when feasible, to process biomass in place of off-hauling or open pile burning to reduce greenhouse gas (GHG) emissions, pursuant to Mitigation Measure GHG-2, which would also reduce emissions of criteria air pollutants, as described above. Mitigation Measure AQ-1 is also applicable to the project and would reduce the mass emissions of criteria air pollutants by implementing vehicle and equipment exhaust emission reduction techniques. The project proponent has determined the following components of mitigation measure AQ-1 to be feasible for reducing emissions: encouraging contractors to carpool, substituting gasoline-powered equipment or renewable diesel fuel equipment where feasible, and utilizing equipment with Best Available Control Technology. Equipment that meets the EPA's Tier 4 emission standards will be utilized if available. However, the impact would remain potentially significant and unavoidable due to the infeasibility of implementing specific emission reduction techniques, as stated in the PEIR (refer to Section 3.4.3 page 33 in the Final PEIR), and because of uncertainty in the extent of use of biomass producing technologies.

Impact AQ-2

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists within the Park, to diesel particulate matter emissions. There are no schools or hospitals within 1,500 feet of the treatment areas. Several rural residences are present in the area; however, the nearest sensitive receptor is greater than 100 feet from the treatment area. The proposed treatments will occur over a short

[3] Table 3.4-2 California Air District Mass Emissions Thresholds for Criteria Air Pollutants lists the "Monterey Bay Unified APCD" as the air district for Santa Cruz, Monterey, and San Benito Counties; however, the Monterey Bay Unified APCD changed their name to Monterey Bay Air Resources District (MBARD).

duration and would not occur next to the same people for an extended period of time, and exposure concentrations would decline with distance from activities because diesel PM dissipates rapidly from the source. The potential to expose people to diesel particulate matter was examined in the PEIR (CalVTP Final PEIR Section 3.4.3, pages 33-34). 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. Applicable SPRs are HAZ-1, which requires that all diesel and gasoline-powered equipment be properly maintained to comply with all state and federal emissions requirements, and NOI-4 and NOI-5, which require vegetation treatment activities and staging areas be located as far as possible from human receptors and restrict equipment idling time. 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 is mapped in the treatment area (USGS, 2011).

Impact AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants (TACs), which was examined in the PEIR (CalVTP Final PEIR Section 3.4.3, pages 35-37). The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and would maintain consistency with the rules and regulation set for the North Central Coast Air Basin, including the most recent Air Quality Management Plan developed by MBARD. Therefore, the potential for exposure to TACs is within the scope of the PEIR. In addition, an air curtain burner or carbonator would be used to burn biomass, if feasible, to reduce smoke emissions and associated TACs in comparison to pile burning. TACs resulting from the combustion of biomass are generally organic in nature and are, therefore, a subset of ROG emissions. Based on the evaluation conducted by Ascent (2022), the proposed use of air curtain burners or carbonators (pyrolysis) would reduce ROG emissions by at least 96 and 98 percent, respectively, when compared to pile burning of equivalent areas. Therefore, the exposure of persons to TACs and related health risks would likely be substantially lower with the use of air curtain burners as compared with pile burning.

The SPRs applicable to the project are AD-4, which requires public notification prior to prescribed burning operations, and AQ-1 through AQ-3, and AQ-6, which requires compliance with air quality regulations, following all safety procedures required of a CAL FIRE crew, and preparation of a smoke management plan and burn plan if the pile burning triggers the threshold (17 CCR Section 80160). All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs. No mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained 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.

Impact AQ-5

Use of vehicles and mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists within the Park, to objectionable odors from diesel exhaust. However, treatment activities would not take place near the same people for an extended period of time. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR (CalVTP Final PEIR Section 3.4.3, pages 37-38). This impact is within the scope of the PEIR because the exposure potential and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. SPRs are HAZ-1, which requires that all diesel and gasoline-powered equipment be properly maintained to comply with all state and federal emissions requirements, and NOI-4, and NOI-5, which require vegetation treatment activities and staging areas be located as far as possible from human receptors and restricts equipment idling time, are applicable to the treatments. 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, including pile burning and use of an air curtain burner or carbonator, 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 (CalVTP Final PEIR Section 3.4.3, page 38). 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. The use of an air curtain burner or carbonator for biomass processing would have much lower smoke emissions due to the increased combustion efficiency (Ascent, 2022). Impacts of emissions of smoke from the use of the air curtain burner would likely be less than significant, but would fall within the analysis of the PEIR, which identified the impacts of prescribed burning (including pile burning) as significant and unavoidable. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs. No 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 consistent with the treatment types and activities covered in the CalVTP PEIR. Emissions associated with an air curtain burner are the same type as those associated with pile burning; however, criteria air pollutant emissions are lower due to the high combustion efficiency. Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable regulatory and environmental conditions presented in Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," of the CalVTP Final PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

PD-3.6: 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-3 CUL-4 CUL-8	N/A	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 to CUL-4 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-2 CUL-6 CUL-8	N/A	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	N/A	N/A	LTS	No	Yes

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

New 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

Pursuant to SPR CUL-1, MPRPD contracted with Albion Environmental, Inc. (Albion; as a subconsultant to Denise Duffy & Associates, Inc. [DD&A]) to prepare a Phase I Cultural Resource Inventory for the Project. A records search from the California Historical Resources Information System's Northwest Information Center (NWIC) for a 1/4-mile radius of the project site, including areas within and outside of the treatable landscape, was provided to Albion on May 18, 2023 (NWIC File No. 22-1724). In addition to official maps and records, the following sources of information were consulted as part of the records search:

- National Register of Historic Places
- California Register of Historical Resources—Determined Eligible Properties
- California State Historic Property Data Files

- California Points of Historical Interest
- California Historical Landmarks
- Caltrans State and Local Bridge Survey
- Office of Historic Preservation Archaeological Determinations of Eligibility
- Special Research Collections at the UCSB Library (Aerial Images and Historic Maps)

On June 1, 2023, Albion archaeologists also conducted an intensive surface survey of the project site. The surveyed area consisted of the three treatment areas, the adjacent hiking trail (i.e., Rancho Loop Trail), and the entirety of open space inside the hiking trail (i.e., the annual grassland area proposed for stockpile of removed material and pile burning), as it was the best available view of unobstructed ground surface.

The NWIC records search identified no cultural resources within the boundary of the project site, and identified two previously recorded cultural resources within a 1/4-mile radius of the project site. Albion's background research did not identify any historic-era buildings or other built environment resources within the project area and no cultural materials were located during the pedestrian survey. In addition, results of a search of Native American Heritage Commission's (NAHC's) sacred lands were received on August 2, 2023, conducted pursuant to CalVTP SPR CUL-2, which returned negative results.

Also pursuant to CalVTP SPR CUL-2, an updated Native American contact list was received from the NAHC on August 2, 2023. On July 7, 2023 and August 14, 2023, letters inviting geographically affiliated tribes to consult were mailed by the Monterey County Resource Conservation District (RCD; in coordination with MPRPD) to the 17 tribal representatives indicated by NAHC and one tribal representative not indicated by the NAHC. Tribal contacts included:

- Ed Ketchum and Valentin Lopez of the Amah Mutsun Tribal Band;
- Irene Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista;
- Jana Nason, Lorraine Escobar, Susan Morley, Tom Little Bear Nason, and Cari Herthel of the Esselen Tribe of Monterey County,
- Carla Marie Munoz and Tony Cerda of the Costanoan Rumsen Carmel Tribe;
- Ann Marie Sayers and Kanyon Sayers-Roods of the Indian Canyon Band of Costanoan Ohlone People;
- Lydia Bojorquez and Isaac Bojorquez of the KaKoon Ta Ruk Band of Ohlone-Coastanoan Indians of the Big Sur Rancheria;
- Louise Miranda-Ramirez and Christanne Najera of the Ohlone/Coastanoan-Esselen Nation;
- Dee Dee Ybarra of the Rumsen Am:a Tur:ataj Ohlone; and
- Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band.

A response was received from the Indian Canyon Band of Costanoan Ohlone People on July 21, 2023 and MPRPD and the Monterey County RCD met with tribal representatives on August 10, 2023. A response was received from the Costanoan Rumsen Carmel Tribe on July 10, 2023 and MPRPD and the Monterey County RCD met with tribal representatives on August 15, 2023. A response was received from the Esselen Tribe of Monterey County on August 14, 2023.

Impact CUL-1

Vegetation treatment activities include manual, mechanical, and prescribed burn treatments, which could damage historical resources if present within a treatment area. The potential for these treatments to cause a substantial adverse change in significance to built historical resources was analyzed in the PEIR (CalVTP Final PEIR Section 3.5.3, pages 14-15). According to the NWIC records search and Albion's background research and pedestrian survey, conducted in accordance with SPRs CUL-1, CUL-3, and CUL-4, no built historical resources are present within or immediately adjacent to the project site. All crew members and contractors will be trained on the protection of

sensitive archaeological, historical, or tribal cultural resources and avoidance measures for any archaeological resources encountered or discovered during treatment in accordance with SPR 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 treatments would include mechanical treatments using heavy equipment that could disturb the ground surface during treatment as vegetation is removed; this may result in damage to unknown archaeological resources. According to the NWIC records search and Albion's background research and pedestrian survey, conducted in accordance with SPRs CUL-1, CUL-3, and CUL-4, no historical resources or cultural materials are known within the project site. The potential for treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources was examined in the PEIR (CalVTP Final PEIR Section 3.5.3, pages 15-16). This impact was identified as significant and unavoidable in the PEIR because of the large geographic extent of the treatable landscape and the possibility that there could be some rare instances where inadvertent damage of unknown resources may be extensive. However, for the proposed project, SPRs and Mitigation Measure CUL-2 would require every reasonable effort to identify and protect resources. Therefore, this impact would be less than significant. 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. SPRs applicable to this treatment include SPRs CUL-1 through CUL-4. SPRs CUL-5 and 7 are not applicable because no built historic or archeological resources are known within the project site based on the project-specific cultural analysis prepared by Albion. Mitigation Measure CUL-2 will also be implemented to further minimize impacts on unknown unique archaeological or subsurface historical resources by ceasing all activities within 100 feet of the discovered resource(s) until a qualified archaeologist is contacted and determines the significance of the find. 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-3

Vegetation treatment activities include manual, mechanical, and prescribed burn treatments, which could damage tribal cultural resources if present within a treatment area. As summarized above, geographically affiliated Native American tribes were notified of the project on July 7, 2023 and August 14, 2023 in accordance with SPR CUL-2. Responses were received from the Costanoan Rumsen Carmel Tribe, the Indian Canyon Band of Costanoan Ohlone People, and the Esselen Tribe of Monterey County. The potential for treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource was examined in the PEIR (CalVTP Final PEIR Section 3.5.3, page 17). 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. Specifically, SPR-6 requires that the project proponent, in consultation with the culturally affiliated tribe(s), develop effective protection measures for important tribal cultural resources located within treatment areas. Accordingly, the Tribe's recommendations have been integrated into SPR CUL-6, SPR CUL-8, and Mitigation Measure CUL-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.

Impact CUL-4

Vegetation treatments would include mechanical treatments using heavy equipment that could disturb the ground surface during treatment as vegetation is removed; this could uncover human remains if present within the treatment area. The potential for treatment activities to uncover human remains was examined in the PEIR (CalVTP Final PEIR Section 3.5.3, page 18). The potential for human remains to be uncovered during the implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and the level of ground disturbance are consistent with those analyzed in the PEIR. As stated in the PEIR, this project would comply with the California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097in 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. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a changed circumstance to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to archaeological, historical, or tribal cultural resources or human remains would occur.

PD-3.7: BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	AQ-4 BIO-1 BIO-7 BIO-6 BIO-9 HAZ-1	None	LTS	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	AD-2 AD-5 BIO-1 BIO-2 BIO-4 BIO-6 BIO-9 to BIO-11 GEO-1 GEO-6 HAZ-5 HAZ-6 HYD-1 HYD-3 to HYD-5	BIO-2a BIO-2b BIO-2c BIO-2g	LTS (all wildlife species except bumble bees) S&U (bumble bees)	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	AD-2 BIO-1 to BIO-4 BIO-6 BIO-9 BIO-11 GEO-1 to GEO-4 GEO-6 HAZ-5 HAZ-6 HYD-1 HYD-3 to HYD-5	BIO-4	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?
Would the project:								
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	AD-2 BIO-1 BIO-2 BIO-6 BIO-9 GEO-1 to GEO-4 GEO-6 HAZ-5 HAZ-6 HYD-1 HYD-3 to HYD-5	None	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	AD-2 BIO-1 to BIO-4 BIO-6 BIO-9 BIO-11 BIO-12 GEO-1 to GEO-4 GEO-6 HAZ-5 HAZ-6 HYD-1 to HYD-5	None	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 to BIO-4 BIO-6 BIO-9 BIO-11 BIO-12 GEO-1 GEO-3 GEO-4 HAZ-5 HAZ-6 HYD-1 HYD-3 to HYD-5	None	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD-3	N/A	No Impact	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?
Would the project:								
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	N/A	N/A	N/A	N/A	N/A

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

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

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

Discussion

The project is located in the Central California Coast Ecoregion, as shown on Figure 3.6-1 of the CalVTP PEIR (Section 3.6.1, page 2). Pursuant to SPR BIO-1 and SPR BIO-3, MPRPD contracted with DD&A to conduct a review of project-specific biological resources and a reconnaissance-level survey of the treatment areas to identify and document sensitive biological resources, including common habitat and vegetation types, presence of and/or habitat for special-status plants and wildlife, and sensitive habitats (i.e., sensitive natural communities, wetlands). Habitat and vegetation types in the treatment areas were identified in the field during the reconnaissance-level survey, conducted on June 5, 2023, and included the three treatment areas (12.2 acres) as well as the adjacent area where stockpile of removed material and pile burning would be conducted (21.0 acres). Pursuant to SPR BIO-3, survey methods followed CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018) and sensitive habitat was mapped using a Global Positioning System (GPS).

The treatment areas are comprised of Eucalyptus groves (6.9 acres) and riparian forest (5.3 acres), while the adjacent area that will be used for stockpile and pile burning is annual grassland (21.0 acres) (Figure 4). A complete description of these habitat types is provided in the Garland Ranch Regional Park Fuel Management Project Biological Resources Report (DD&A, 2023; Attachment B). Vegetation types identified in *A Manual of California Vegetation* (Sawyer et al., 2009) were utilized to determine if vegetation types identified as sensitive on CDFW's *California Natural Communities List* (CDFW, 2023a) are present within the project site; the black cottonwood and arroyo willow floristic alliance occurring within riparian areas is identified as sensitive. In addition, riparian areas are subject to the jurisdiction of CDFW under Section 1602 of the Fish and Game Code. The project was designed to avoid jurisdictional wetlands and/or waters of the U.S. and state; however, the Carmel River is located immediately adjacent to the Main Stand (Figure 5).

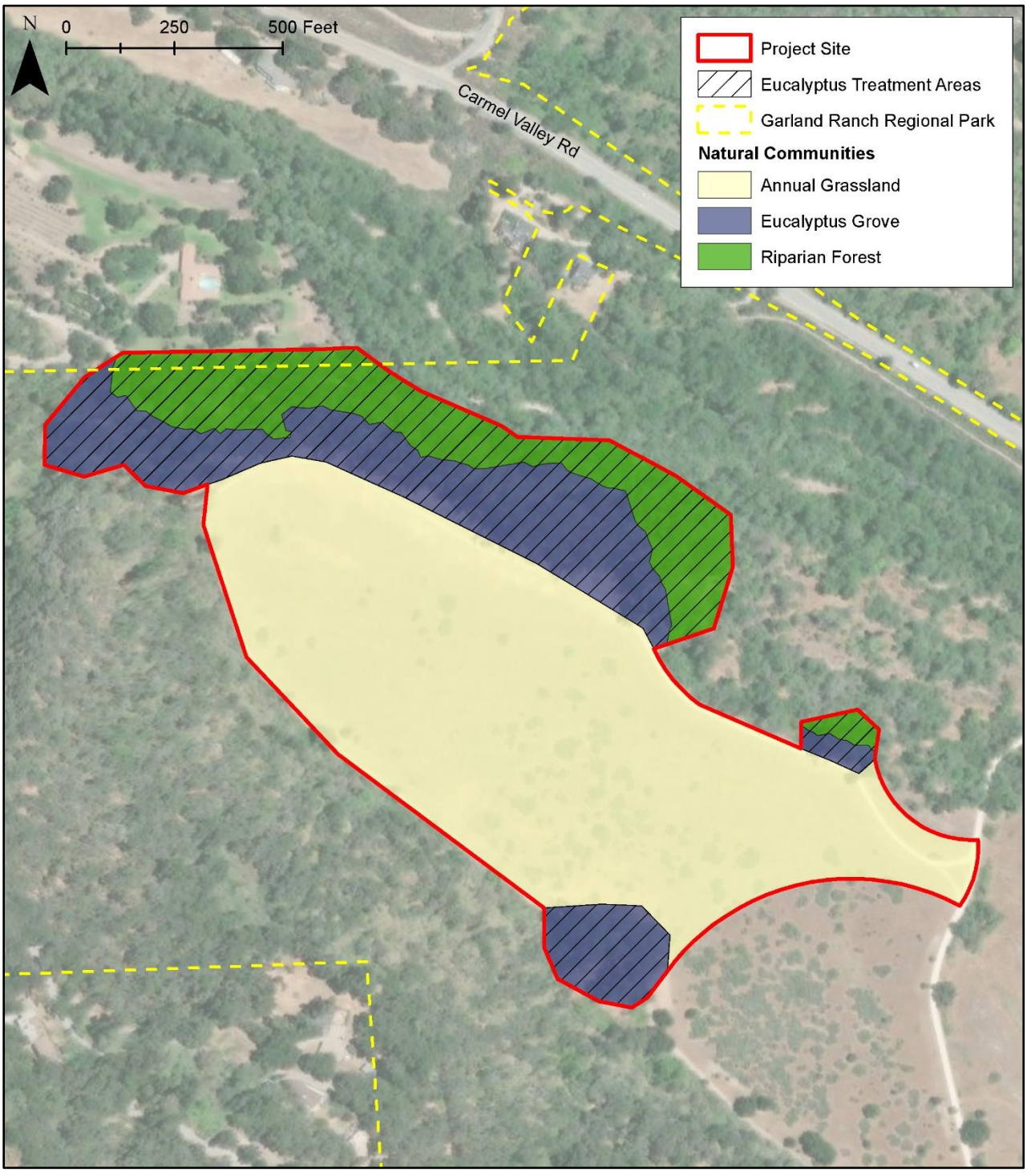


Figure 4 Natural Communities Map

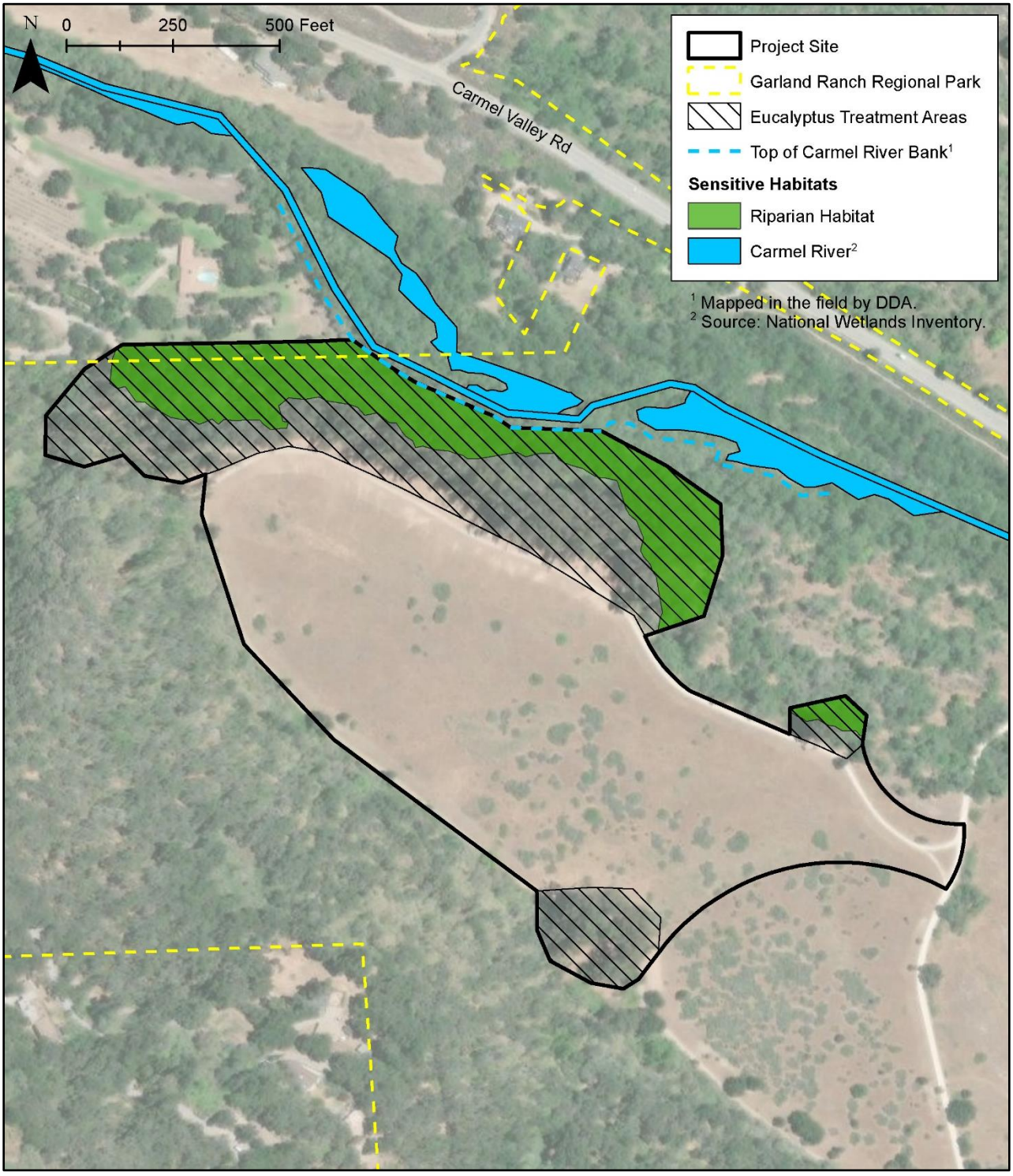


Figure 5 Sensitive Habitats Map

Table 3.7-1, below, includes a list of special-status plant and wildlife species with potential to occur within the treatment area. It was compiled by conducting a search of the California Natural Diversity Database (CNDDB) occurrences for the Seaside quadrangle and the seven surrounding U.S. Geological Survey quadrangles (CDFW, 2023b), the U.S. Fish and Wildlife Service (USFWS) Information Planning and Consultation website (USFWS, 2023), and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CNPS, 2023), and by reviewing Appendix BIO-3 Tables 1a, 1b, and 19 in the PEIR for special-status plants and wildlife that could occur in the Central California Coast Ecoregion.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, and habitat present within the treatment areas as assessed during reconnaissance surveys, a complete list of all species with potential to occur in the vicinity of the project was assembled (Attachment B). Nine of the special-status wildlife species from the complete list of species were determined to have a moderate or high potential to occur within the treatment area or adjacent grassland (where stockpile of removed material and pile burning would be conducted) based on the presence of suitable habitat and/or known occurrence in the vicinity (Table 3.7-1). One special-status fish species (south-central California coast steelhead [*Oncorhynchus mykiss irideus*]) is also known to occur in the Carmel River, located outside of, but immediately adjacent to the treatment area. In addition, raptors and other avian species protected under Fish and Game code may nest in trees and shrubs within the treatment areas.

DD&A conducted protocol-level surveys for special-status plants on June 5, 2023, with a focus on the four special-status plants that could occur within the treatment area based on the presence of suitable habitat (DD&A, 2023). Pursuant to SPR BIO-7, surveys followed CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), as well as USFWS's *Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants* (USFWS, 2000) and CNPS's *Botanical Survey Guidelines* (CNPS, 2001). No special-status plants were observed during protocol-level surveys. Three of the special-status plant species with the potential to occur bloom during June and were determined to be not present during the protocol-level survey. One of the special-status plant species identified as having potential to occur in the treatment area (Santa Cruz microseris [*Stebbinsoseris decipiens*]) is not known to bloom in June (blooms April-May); however, climatic conditions in 2023 extended the blooming period for many local species, and it is very likely this species would have been observed during the survey conducted in early June of 2023 if present. Therefore, Santa Cruz microseris has a low potential to occur. All other special-status plant species were determined to be not present or unlikely to occur based on the reasons presented in Attachment B and are not discussed further in Table 3.7-1.

Table 3.7-1 Special-Status Wildlife Species That May Occur in or Immediately Adjacent to the Project Site

Species	Status (USFWS/ CDFW/ CNPS)	General Habitat	Potential Occurrence in Project Site
MAMMALS			
Corynorhinus townsendii Townsend's big-eared bat	-- / CSC / --	Found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Typically roost during the day in limestone caves, lava tubes, and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees.	Moderate Suitable foraging and night roost habitat are present in the project site. No day or maternity roosting habitat present within the project site. The CNDDB reports one occurrence of this species within the quadrangles reviewed, located approximately nine miles west of the project site.

Species	Status (USFWS/ CDFW/ CNPS)	General Habitat	Potential Occurrence in Project Site
Neotoma macrotis luciana Monterey dusky-footed woodrat	-- / CSC / --	Forest and oak woodland habitats of moderate canopy with moderate to dense understory. Also occurs in chaparral habitats.	Moderate Suitable habitat is present within the project site. The CNDDB reports one occurrence of this species within the quadrangles reviewed, located approximately ten miles northeast of the project site. No woodrat nests were observed within the project site; however, this species is known to occur throughout the region.
Taxidea taxus American badger	-- / CSC / --	Dry, open grasslands, fields, pastures savannas, and mountain meadows near timberline are preferred. The principal requirements seem to be sufficient food, friable soils, and relatively open, uncultivated grounds.	Moderate Suitable habitat is present within the project site. No burrows of sufficient den size were observed during the June 2023 survey. The CNDDB reports nine occurrences of this species within the quadrangles reviewed, the nearest located approximately 4.8 miles north of the project site. This species has also been observed along Carmel Valley Road approximately nine miles east of the project site.
REPTILES AND AMPHIBIANS			
Anniella pulchra Northern California legless lizard	-- / CSC / --	Requires moist, warm habitats with loose soil for burrowing and prostrate plant cover, often forages in leaf litter at plant bases; may be found on beaches, sandy washes, and in woodland, chaparral, and riparian areas.	Moderate Suitable habitat is present within the project site. The CNDDB reports 47 occurrences of this species within the quadrangles reviewed, the nearest located 0.3 mile west of the project site and this species is known to occur within riparian habitat along the Carmel River.
Emys marmorata Western pond turtle	-- / CSC / --	Associated with permanent or nearly permanent water in a wide variety of habitats including streams, lakes, ponds, irrigation ditches, etc. Require basking sites such as partially submerged logs, rocks, mats of vegetation, or open banks.	Moderate Suitable upland habitat is present within the project site. The CNDDB reports 13 occurrences of this species within the quadrangles reviewed, including a 2002 non-specific occurrence mapped to the Carmel River which overlaps a portion of the project site. In addition, MPRPD has observed western pond turtles in the treatment area.
Rana draytonii California red-legged frog	FT / CSC / --	Lowlands and foothills in or near permanent or late-season sources of deep water with dense, shrubby, or emergent riparian vegetation. During late summer or fall adults are known to utilize a variety of upland habitats with leaf litter or mammal burrows.	High Suitable upland habitat is present within the project site. Suitable breeding habitat is present adjacent to the project site within the Carmel River. The CNDDB reports 57 occurrences of this species within the quadrangles reviewed, many mapped to the Carmel River and one which overlaps a portion of the project site.

Species	Status (USFWS/ CDFW/ CNPS)	General Habitat	Potential Occurrence in Project Site
Taricha torosa Coast Range newt (Monterey County south only)	-- / CSC / --	Occurs mainly in valley-foothill hardwood, valley-foothill hardwood-conifer, coastal scrub, and mixed chaparral but is known to occur in grasslands and mixed conifer types. Seek cover under rocks and logs, in mammal burrows, rock fissures, or man-made structures such as wells. Breed in intermittent ponds, streams, lakes, and reservoirs.	Moderate Suitable upland habitat is present within the project site. The nearest CNDDB occurrence is located approximately 5.5 miles west of the project site.
FISH			
Oncorhynchus mykiss irideus Steelhead (south-central California coast DPS)	FT / -- / --	Cold headwaters, creeks, and small to large rivers and lakes; anadromous in coastal streams.	Present Adjacent No suitable habitat is present within the project site. However, this species is known to occur within the segment of the Carmel River located directly adjacent to the project site.
INVERTEBRATES			
Bombus crotchii Crotch bumble bee	-- / SC / --	Occurs in open grassland and scrub at relatively warm and dry sites. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October. Generally nests underground, often in abandoned mammal burrows. Within California this species is known to occur in the Mediterranean, Pacific Coast, Western Desert, as well as Great Valley and adjacent foothill regions.	Moderate Suitable habitat is present within the project site. The CNDDB does not report any occurrences of this species within the quadrangles reviewed; however, this species has been observed at the Hastings Reserve, located approximately 14 miles from the project site. Mammal burrows and a variety of flowering annual plants were observed within grassland areas during the June 2023 survey.
Bombus occidentalis Western bumble bee	-- / SC / --	Found in a range of habitats, including mixed woodlands, farmlands, urban parks and gardens, montane meadows, and prairie grasslands. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late November. Generally nests underground, often in abandoned mammal burrows.	Moderate Suitable habitat is present within the project site. The CNDDB reports six occurrences of this species within the quadrangles reviewed, the nearest located approximately seven miles northwest of the project site. Mammal burrows and a variety of flowering annual plants were observed within grassland areas during the June 2023 survey.
Note: FT = listed as Threatened under the federal Endangered Species Act; SC = Candidate for listing under California Endangered Species Act; CSC = CDFW Species of Concern			

Impact BIO-1

As identified above, MPRPD contracted with DD&A to conduct a review of project-specific biological resources and a reconnaissance-level survey of the project site to identify and document sensitive biological resources pursuant to SPR BIO-1, and to conduct protocol-level surveys for special-status plants pursuant to SPR BIO-7. The survey was conducted on June 5, 2023 and focused on the four special-status plants that could occur within the treatment area based on the presence of suitable habitat (Attachment B; DD&A, 2023). No special-status plants were observed during protocol-level surveys. Three of the special-status plant species with the potential to occur bloom during June and were determined to be not present during the protocol-level survey. One of the special-status plant species identified as having potential to occur in the treatment area (Santa Cruz microseris) is not known to bloom in June

(blooms April-May); however, climatic conditions in 2023 extended the blooming period for many local species, and it is very likely this species would have been observed during the survey conducted in early June of 2023 if present. Therefore, Santa Cruz microseris has a low potential to occur. All other special-status plant species were determined to be not present based on the results of the protocol-level survey or unlikely to occur due to lack of suitable habitat.

Several additional SPRs would reduce potential indirect impacts to special-status plants that may occur outside of the project site. SPR BIO-6 would prevent the spread of plant pathogens in areas with sensitive biological resources, while SPR BIO-9 would prescribe measures to prevent the spread of invasive plants. SPR AQ-4 includes dust control measures such as speed limits and use of water trucks if road use creates excessive dust. Additionally, SPR HAZ-1 would require regular maintenance of equipment, which would reduce the potential fuel leaks and other spills from equipment. With implementation of the SPRs described above, impacts to special-status plants from the treatment project would be less than significant. No mitigation measures 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 BIO-2

As identified above, MPRPD contracted with DD&A to conduct a review of project-specific biological resources and a reconnaissance-level survey of the treatment areas to identify and document sensitive biological resources pursuant to SPR BIO-1. Nine of the special-status wildlife species from the complete list of species were determined to have a moderate or high potential to occur within the treatment area or adjacent grassland (where stockpile of removed material and pile burning would be conducted) based on the presence of suitable habitat and/or known occurrence in the vicinity (Table 3.7-1). In addition, one fish species (south-central California coast steelhead) is known to occur in the Carmel River, located outside of, but immediately adjacent to the treatment area. Initial and maintenance treatments could result in direct or indirect adverse effects on special-status wildlife species, as detailed below. The CalVTP PEIR groups species into life history categories that would respond similarly to the range of proposed treatment activities, which allows for the discussion of specific species added to special-status species lists subsequent to the release of the Final PEIR. The discussion of special-status species that may occur within the project site is categorized in the same manner as the PEIR.

GROUND-NESTING WILDLIFE

MONTEREY DUSKY-FOOTED WOODRAT

Suitable habitat for Monterey dusky-footed woodrat (MDFW) is present within the project site in the Eucalyptus grove and riparian habitats. The CNDDB reports only one occurrence of MDFW within the quadrangles reviewed, located approximately ten miles northeast of the project site; however, this species is known to occur throughout the region. Nests of this species were not observed within the project site during the June 2023 biological survey however, this species may move into the site prior to treatment activities. Therefore, MDFW has a moderate potential to occur within the project site.

Mechanical treatment activities would include cutting and masticating existing vegetation and manual treatment activities would include the use of hand tools (e.g., loppers) and hand-operated power tools (e.g., chainsaws) to prune, thin, or remove vegetation. Prescribed herbivory would include the use of domestic livestock (e.g., cows, goats, sheep) to reduce the target plant population and understory biomass. If mechanical, manual, and/or prescribed herbivory treatments occur during the breeding season, ground nests could be accidentally crushed by equipment or foot traffic from crews, by livestock, or otherwise damaged. This could result in the direct mortality of adults or young, if present. Additionally, MDFW could be alarmed by the presence of heavy equipment, personnel, and/or livestock which could result in nest abandonment, and potential mortality of young. In addition to breeding-season impacts, MDFW use their middens year-round; thus, potential adverse effects on this species as a result of mechanical, manual, and prescribed herbivory treatment activities would not be limited to the breeding season. The potential for treatment activities to result in adverse effects on special-status ground-nesting wildlife, including MDFW, was examined in the CalVTP PEIR (Section 3.6.3, pages 164-171).

SPR BIO-10 would be implemented, which requires focused surveys for MDFW nests within suitable habitats in treatment areas to be conducted by a qualified biologist within 14 days prior to implementation of all mechanical and manual treatments to determine whether MDFW nests are present or not. If an active nest is identified by a qualified biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around woodrat nests to the extent feasible to complete the work. If avoidance is not feasible, woodrat nests that cannot be avoided during treatments would be dismantled by a qualified biologist. If a litter of young is found or suspected, nest material would be replaced and the nest monitored by the qualified biologist until the young are capable of independent survival before proceeding with nest dismantling. In addition, the boundaries of the treatment areas would be flagged or fenced to avoid impacts to woodrat nests located outside of the treatment areas and treatment activities would be monitored by a qualified biologist and an individual of the crew designated to act as an on-site monitor. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-6, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5. 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.

BURROWING OR DENNING WILDLIFE

AMERICAN BADGER

Suitable habitat for American badger is present within grassland areas of the project site where stockpile of removed material and pile burning would be conducted. The CNDDB reports nine occurrences of American badger within the quadrangles reviewed, the nearest located approximately 4.8 miles north of the project site on the former Fort Ord. This species has also been observed along Carmel Valley Road approximately nine miles east of the project site. No suitable badger burrows were observed within the site during the June 2023 biological survey; however, badgers may move into the area prior to treatment activities. Therefore, American badger has a moderate potential to occur within the project site.

Treatment activities will not include ground-disturbing activities (e.g., grading or excavating) and the project would not result in permanent loss of habitat for American badger (i.e., habitat function would be maintained). However, treatment activities such as stockpile of removed vegetation in the grassland area and burning of biomass via pile burning or use of an air curtain burner or carbonator could result in injury, den abandonment, and/or mortality of individuals, if individuals are present within or directly adjacent to the project site during treatment activities. The potential for treatment activities to result in adverse effects on special-status burrowing and denning wildlife, including American badger, was examined in the CalVTP PEIR (Section 3.6.3, pages 161-164).

SPR BIO-10 would be implemented, which requires focused surveys for American badger dens within suitable habitats in treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 14 days prior to implementation of all mechanical and manual treatments to determine whether American badger dens are present or not. If American badger dens are detected during focused surveys, then additional surveys would be required to determine if the den is active or not. If an active den is identified by a qualified biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den to the extent feasible to complete the work. If avoidance is not feasible, American badger dens that cannot be avoided during treatments a qualified biologist would block the den entrance with soil, sticks, and debris to an incrementally greater degree over a three- to five-day period to discourage the use of the den. After the qualified biologist determines that badgers have stopped using active dens within the treatment area, the dens would be hand-excavated with a shovel to prevent re-use during treatment activities. In addition, prescribed burning would be implemented outside of the sensitive period of the species' life history (e.g., outside the breeding season), the boundaries of the treatment areas would be flagged or fenced to avoid impacts to American badger dens located outside of the treatment areas, and treatment activities would be monitored by a qualified biologist and an individual of the crew designated to act as an on-site monitor. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5. 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.

INSECTS AND OTHER TERRESTRIAL INVERTEBRATES

CROTCH BUMBLE BEE AND WESTERN BUMBLE BEE

The CNDDB reports six occurrences of western bumble bee (WBB) within the quadrangles reviewed, the nearest located approximately seven miles northwest of the project site. Leif Richardson of the Xerces Society for Invertebrate Conservation identifies that WBB formerly ranged along the coast as far south as Monterey County; however, the last recorded observation was made in 1983 (pers. comm. 2023). The CNDDB does not report any occurrences of crotch bumble bee (CBB) within the quadrangles reviewed; however, this species was observed in 2022 at the Hastings Reserve (located approximately 14 miles from the project site) and near the Monterey County-San Luis Obispo County line in the Santa Lucia Mountain Range (pers. comm. Leif Richardson of the Xerces Society for Invertebrate Conservation, 2023). Suitable habitat for the CBB and WBB is present within the project site in annual grassland areas where stockpile of biomass and pile burning would occur. Mammal burrows and a variety of flowering annual plants which could provide nectar for these species, including bicolor lupine, rose clover, purple clarkia, and vetch, were observed within grassland habitat during the June 2023 biological survey. The abundance of coyote brush, which flowers from August to November, suggests that sufficient nectar and pollen for the entire flight season of a CBB and WBB colony if present within the project site. Therefore, the CBB and WBB have a moderate potential to occur within the project site.

No grading or development is proposed within annual grassland habitat. Therefore, no permanent impacts to potential CBB and/or WBB nesting and foraging habitat would occur and habitat function for these species would be maintained. However, temporary impacts would occur as this area would be used for stockpiling of vegetation removed from the treatment areas and pile burning, including removing vegetation within a buffer surrounding the pile burn for safety purposes. If present within the site, project activities could result in mortality of CBB and/or WBB individuals or impacts to nests or overwintering colonies. This would be considered take of a candidate species for listing under CESA and a significant impact under CEQA. The potential for treatment activities to result in adverse effects on special-status insects, including CBB and WBB, was examined in the CalVTP PEIR (Section 3.6.3, pages 164-171).

Pursuant to its objectives, implementation of the CalVTP is intended to reduce the occurrence of high-intensity wildfire, which could beneficially decrease an existing threat to special-status bumble bees. SPR BIO-10 would be implemented, which requires focused surveys for special-status bumble bees within suitable grassland habitat areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist in accordance with CDFW's *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (2023c) or the most current CDFW protocol. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-9, GEO-6, HAZ-5, HAZ-6, and HYD-5.

Although the SPRs will avoid or reduce impacts to CBB and WBB and their habitat, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2g would be implemented, which would restrict prescribed burning within occupied or suitable habitat during the flight season and require consultation with CDFW. If consultation determines that mortality, injury, or disturbance of these Candidate-listed bumble bees or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c, which requires compensation for impacts. Mitigation Measure BIO-2c identifies that "compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified" in the measure. As such, MPRPD may pursue take authorization from CDFW for CBB and WBB.

The CalVTP PEIR identifies that "although Mitigation Measure BIO-2g would reduce impacts to foraging special-status bumble bees and their floral resources, substantial adverse effects could still occur to special-status bumble bee species during nesting and overwintering, because vegetation treatment activities, such as prescribed burning, soil disturbance, or use of heavy equipment, could kill individuals or crush or disturb overwintering or nesting colonies. Additionally, there is no established methodology for detecting overwintering or nesting colonies of these species. Because these species have not yet been well studied and colonies are likely difficult to detect, there is little evidence

to guide effective impact avoidance or minimization strategies to protect nesting or overwintering colonies. Mitigation Measure BIO-2g presents feasible impact avoidance and minimization measures that are based on emerging, early understanding of species protection; as their candidacy for listing is reviewed by CDFW, additional guidance may emerge and could be implemented by project proponents to reduce impacts. Project proponents can and should stay abreast of new information, as research and scientific understanding evolve. However, with the current state of the science and species knowledge, if underground colonies cannot be detected, they cannot be avoided and, in this case, the extent and severity of impacts to special-status bumble bees from vegetation treatment cannot be predicted with meaningful certainty. Therefore, given the rarity of these candidate species, if colonies were to be destroyed, it is possible that populations of these species would be reduced below self-sustaining levels, and treatment activities could substantially reduce the number or restrict the range of species. Over time, as avoidance strategies are developed with research and improved scientific understanding, adequate protection of the species may become feasible. However, at this time, recognizing the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts, for purposes of good faith, full disclosure under CEQA, this impact is designated in the PEIR to be potentially significant and unavoidable." Therefore, for the same reasons described in the PEIR, this impact for the proposed project is potentially significant and unavoidable and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

BATS

TOWNSEND'S BIG-EARED BAT

The CNDDB reports one occurrence of Townsend's big-eared bat within the quadrangles reviewed, located approximately nine miles west of the project site. This species may utilize any of the large trees within the project site for night roosts and may forage within the site; however, no suitable day or maternity roosting habitat is present within the project site. Therefore, Townsend's big-eared bat has a moderate potential to occur within the project site.

The potential for treatment activities to result in adverse effects on special-status bats was examined in the CalVTP PEIR (Section 3.6.3, pages 172-175). Mechanical and manual treatments would remove trees that may be used for night roosts. However, because all vegetation removal will be conducted during daylight hours and no daytime roosting habitat for this species is present within the project site, project activities would not directly impact Townsend's big-eared bat. Although trees that may be used by this species would be removed during treatment activities, the treatments will remove only non-native and invasive tree species and habitat conditions will be improved. Implementation of SPRs BIO-4, BIO-6, BIO-9, HAZ-5, HAZ-6, and HYD-5 would further avoid impacts to habitat for this species. No mitigation measures are necessary. 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.

FISH AND AQUATIC INVERTEBRATES

SOUTH-CENTRAL CALIFORNIA COAST STEELHEAD

No suitable habitat for the south-central California coast (S-CCC) steelhead is present within the treatment area; however, this species is known to occur within the adjacent Carmel River. The project will not include work within the Carmel River (i.e., no work will occur below top of bank); however, the project may include the removal of riparian understory vegetation and would require the use of heavy equipment in riparian habitat, which could result in hazardous material spills and introduction and spread of non-native, invasive species. The potential for treatment activities to result in adverse effects on fish, including S-CCC steelhead, was examined in the CalVTP PEIR (Section 3.6.3, pages 178-182).

A Watercourse and Lake Protection Zone (WLPZ) of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75%

surface cover[4] to act as a filter strip for raindrop energy dissipation for wildlife habitat. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5. Habitat function for S-CCC steelhead would be maintained and improved because initial and maintenance treatment activities would not occur within aquatic habitat and would remove non-native, invasive species from the riparian habitat. No mitigation measures are necessary. 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.

AMPHIBIANS AND REPTILES

NORTHERN CALIFORNIA LEGLESS LIZARD

Suitable habitat and soils for Northern California legless lizard are present throughout the entire project site where appropriate cover conditions occur, particularly in the riparian and eucalyptus habitats; in annual grassland areas, habitat would be limited to areas underneath shrubs. The CNDDB reports 47 occurrences of this species within the quadrangles reviewed, the nearest located 0.3 mile west of the project site. In addition, this species is known to occur within riparian habitat along the Carmel River. Therefore, Northern California legless lizard has a moderate potential to occur within the project site.

The project would not result in permanent loss of habitat for Northern California legless lizard (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. No grading or excavation is proposed as part of the project; however, mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. The potential for treatment activities to result in adverse effects on special-status reptiles, including Northen California legless lizard, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

Focused surveys for this species would not be feasible within the project site as protocols require multiple rounds of raking the soils to find individuals. The amount of eucalyptus duff within the project site precludes use of this protocol. As such, this species is assumed present and Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, MPRPD will require biological monitoring by a qualified biologist during treatment activities, relocation of individuals, flagging of areas for avoidance, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-6, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5. 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 POND TURTLE

The CNDDB reports 13 occurrences of western pond turtle within the quadrangles reviewed, including a 2002 non-specific occurrence mapped to the Carmel River which overlaps a portion of the project site. As such, this species is known to occur immediately adjacent to the project site. In addition, although this species is not typically found in Eucalyptus groves or areas with dense duff cover; MPRPD indicates that this species has been observed within the eucalyptus grove and riparian areas within the project site. Therefore, the western pond turtle has a moderate potential to occur within the project site, particularly where the site directly abuts the Carmel River. Portions of the annual grassland are also within 100 meters of the Carmel River; however, the annual grasses are likely too tall and dense to provide nesting habitat and western pond turtle presence within these areas is low. Eucalyptus and riparian habitats do not provide suitable nesting habitat for this species.

[4] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

The project would not result in permanent loss of habitat for western pond turtle (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if individuals are present above ground within the treatment areas. However, these treatment activities are unlikely to disturb below ground nests in the unlikely event they are present. The potential for treatment activities to result in adverse effects on special-status reptiles was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[5] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of western pond turtle as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for western pond turtle within treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether western pond turtles are present or not. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to western pond turtles, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b MPRPD will require biological monitoring by a qualified biologist during treatment activities, additional training of a designated member of the treatment crew to act as a biological monitor, relocation of individuals, flagging of areas for avoidance, limiting work within riparian areas to daylight hours, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species. In addition, in the unlikely event that a nest is encountered prior to or during treatment, a no-disturbance buffer (the size of which would be determined by a qualified biologist) would be established within which no treatment activities would occur. 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.

CALIFORNIA RED-LEGGED FROG

The CNDDB reports 57 occurrences of California red-legged frog (CRLF) within the quadrangles evaluated, many mapped to the Carmel River and one which overlaps a portion of the project site. CRLF may use the Carmel River for breeding and non-breeding aquatic habitat. Radiotelemetry data indicates that adult CRLF engage in straight-line breeding season movements irrespective of riparian corridors or topography and they may move up to two miles between non-breeding and breeding sites (Bulger et al., 2003).Therefore, the entire project site has the potential to be used as dispersal habitat by CRLF. During the non-breeding season, a wider variety of aquatic habitats are used including small pools in coastal streams, springs, water traps, and other ephemeral water bodies (USFWS, 1996). CRLF may also move up to 300 feet from aquatic habitats into surrounding uplands, especially following rains, where individuals may spend days or weeks (Bulger et al., 2003). Therefore, the 5.3 acres of riparian forest may provide suitable upland habitat. Although not a typical habitat for this species, the Eucalyptus groves in the Main Stand and Northeast Stand may also provide marginal upland habitat for this species. Therefore, CRLF has a high potential to occur within the project site, particularly where the site directly abuts the Carmel River.

Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. Additionally, due to the proximity of the Main Stand and Northeast Stand to the Carmel River and because this species could be present throughout the treatment areas while dispersing, there is no feasible way to avoid all potentially suitable habitat for these species. The potential for treatment activities to result in

[5] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

adverse effects on special-status amphibians, including CRLF, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[6] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of CRLF as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for CRLF within upland habitats in treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether CRLF are present or not. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to CRLF and their habitat, these measures may not avoid all impacts to the species. As such, pursuant to Mitigation Measure BIO-2a, MPRPD has consulted with Chad Mitcham of the USFWS to confirm that treatment activities will maintain habitat function and that there is no time period within which treatment could occur that would avoid mortality, injury, or disturbance of the species. Project-specific avoidance measures recommended by USFWS have been incorporated into Mitigation Measure BIO-2a and include biological monitoring during treatment activities, placement of flagging or exclusionary fencing to protect habitat areas outside of the treatment area, allowing animals to move outside of project areas on their own volition is present, and limiting work within the riparian areas to daylight hours.

Habitat function for CRLF would be maintained and improved because initial and maintenance treatment activities would not occur within aquatic habitat and would remove non-native and invasive species from the riparian habitat. Additionally, restoring the Carmel River watershed has been identified by USFWS as a recovery action for CRLF (USFWS, 2002). 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.

COAST RANGE NEWT

The CNDDB reports three occurrences of the Coast Range newt within the quadrangles reviewed, the nearest located approximately 5.5 miles west of the project site. Suitable breeding habitat for the Coast Range newt is present adjacent to, but not within, the project site in the Carmel River. Suitable upland habitat for this species is present within the project site in riparian habitat and Eucalyptus groves. Therefore, the Coast Range newt has a moderate potential to occur within the project site, particularly where the site directly abuts the Carmel River.

The project would not result in permanent loss of habitat for coast range newt (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. The potential for treatment activities to result in adverse effects on special-status amphibians, including coast range newt, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[7] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of coast range newt as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for coast range newt within suitable habitat areas (including all access routes, parking

[6] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).
[7] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether coast range newts are present or not. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to coast range newt, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b MPRPD will require biological monitoring by a qualified biologist during treatment activities, relocation of individuals, flagging of areas for avoidance, limiting work within riparian areas to daylight hours, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

CONCLUSION

The potential for treatment activities and maintenance treatments to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the affected life history categories of special-status wildlife species that would respond similarly to the range of proposed treatment activities were analyzed in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing vegetation treatments are consistent with those analyzed in the PEIR.

Impact BIO-3

As discussed above, a focused survey of vegetation types in the treatment areas as well as the adjacent area where stockpile of removed material and pile burning would be conducted was conducted pursuant to SPR BIO-1 and SPR BIO-3. The survey identified that one vegetation type occurring within the project site is identified as sensitive on CDFW's *California Natural Communities List*; the black cottonwood and arroyo willow floristic alliance occurring within riparian areas (5.3 acres). This vegetation type is also present immediately adjacent to the Main and Northeast Stands. Riparian areas are also subject to the jurisdiction of CDFW under Section 1602 of the Fish and Game Code.

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 within the riparian areas; however, retreatment at too great a frequency could result in additional adverse effects. Treatment activities in riparian areas have been designed to return vegetation composition and structure to their natural condition to maintain and improve riparian habitat function per SPR BIO-4. The project will remove non-native invasive trees, but does not propose to remove any healthy native riparian trees. Some native riparian understory species may be disturbed or removed during mastication of the duff or removal of ladder fuels or by trampling by equipment or crews; however, native plants would be retained to the extent feasible and roots would not be removed. Riparian understory plants are very resilient and are expected to quickly regrow following treatment activities. Therefore, these actions will not result in loss of habitat function or viability. However, the project would include use of heavy equipment in riparian habitat, which could result in soil compaction, hazardous material spills, and introduction and spread of non-native, invasive species within riparian areas. The potential for treatment activities, including maintenance treatments, to result in adverse effects on sensitive habitats was examined in the CalVTP PEIR (Section 3.6.3, pages 187-191).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[8] to act as a filter strip for raindrop energy dissipation for wildlife habitat. In addition, if prescribed herbivory is used during maintenance

[8] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

treatment, these activities would be excluded from riparian areas and a buffer of 50 feet, pursuant to SPR HYD-3, using wildlife-friendly fencing (as required by SPR BIO-11). Additional SPRs relevant to this impact include AD-2, BIO-2, BIO-6, BIO-9, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-5. No mitigation measures are necessary to further reduce impacts. 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-4

As discussed above, vegetation types in the treatment areas were identified in the field during the reconnaissance-level survey (conducted pursuant to SPR BIO-1 and BIO-3) and included the three treatment areas as well as the adjacent area where stockpile of removed material and pile burning would be conducted. No potentially jurisdictional state or federal wetlands were identified within the project site. However, the Carmel River is located immediately adjacent to the Main Stand. The reconnaissance survey did not include areas below the top of bank of the river; however, it is assumed that jurisdictional wetlands are present within the river in the vicinity of the project.

No project activities will occur below the top of bank of the Carmel River and therefore no direct impacts to jurisdictional wetlands would occur. In addition, the project will leave masticated or chipped mulch up to 6 inches deep, which will avoid or reduce potential erosion and sedimentation to the river and associated wetlands. However, the project could still result in indirect impacts to this sensitive resource due to erosion, sedimentation, or introduction of hazardous materials into the Carmel River. The potential for treatment activities, including maintenance treatments, to result in adverse effects on state and federally protected wetlands was examined in the CalVTP PEIR (Section 3.6.3, pages 192-193).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[9] to act as a filter strip for raindrop energy dissipation for wildlife habitat. In addition, if prescribed herbivory is used during maintenance treatment, these activities would be excluded from riparian areas and a buffer of 50 feet, pursuant to SPR HYD-3, using wildlife-friendly fencing (as required by SPR BIO-11). In turn, this would also exclude prescribed herbivory from any wetland areas within the Carmel River by greater than 50 feet. Additional SPRs relevant to this impact include AD-2, BIO-2, BIO-6, BIO-9, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-5. Implementation of Mitigation Measure BIO-4 would further ensure no impacts to state or federal wetlands occur as a result of the project. No mitigation measures are necessary to further reduce impacts. 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-5

The literature review and survey of biological resources within the project site, conducted pursuant to SPR BIO-1, identified that the treatment areas contain a modeled essential connectivity area characterized as "more permeable" and therefore likely functions as a wildlife movement corridor and provides connectivity with other natural habitats surrounding the treatment areas (Caltrans and CDFW, 2020). In addition, riparian areas, such as those occurring within the project site along the Carmel River, are known to provide important wildlife corridors. No known wildlife nursery sites or indications of nursery sites were identified within any treatment areas.

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors because suitable habitat is present in treatment areas. However, due to the nature of the proposed treatment activities, implementation of these actions would not result in a substantial change in the existing conditions that facilitate wildlife movement in the project site. Through removal of non-native, invasive plant species, habitat would be improved and the project site would function better for wildlife movement post-treatment. The

[9] HYD-4 allows for a reduced surface cover in non-riparian percentage if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the CalVTP PEIR (Section 3.6.3, pages 193-197).

SPRs that apply to project impacts are SPRs AD-2, BIO-1 through BIO-4, BIO-6, BIO-9, BIO-11, BIO-12, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, and HYD-1 through HYD-5. No mitigation measures are necessary. 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

Pursuant to its objectives, implementation of the CalVTP is intended to reduce the occurrence of high-intensity wildfire, which could beneficially decrease an existing threat to common wildlife species. In addition, habitat function for common wildlife species would be maintained and improved because initial and maintenance treatment activities would remove non-native, invasive species. However, 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 suitable habitat for these species is present throughout treatment areas. Treatment activities conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests during tree and understory brush removal, or disturbance to active nests from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock), potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on common wildlife species, including nesting avian species, was examined in the CalVTP PEIR (Section 3.6.3, pages 197-199).

Per SPR BIO-1 and BIO-12, if it is determined that adverse effects on habitat suitable for nesting birds can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further mitigation would not be required. To avoid impacts on raptors and other nesting birds, treatment activities will be implemented outside of the nesting season (February 15–August 31) when feasible. If treatment implementation outside of the nesting season is determined to be infeasible, then protocol-level surveys would be conducted by a qualified biologist no more than 14 days prior to initiation of treatment activities pursuant to SPR BIO-12. If an active nest is identified by a qualified biologist, a no-disturbance buffer would be established around the nest, treatment would be modified to avoid disturbance, treatment would be deferred in portions of the site that could disturb the active nest until the young have fledged or the nest becomes inactive, and/or other strategies to avoid or reduce impacts identified in SPR BIO-12.

SPRs designed to identify special-status species habitat (SPR BIO-1) and sensitive natural communities (SPR BIO-3), retain the habitat function and value of riparian habitat (SPR AD-2, BIO-4, BIO-6, BIO-9, BIO-11, HAZ-5, HAZ-6, HYD-1 and HYD-3 through HYD-5), as well as compliance with protective statutes (e.g., California Fish and Game Code sections 3503 and 3503.5 and the federal MBTA), would reduce the likelihood of impacts to other common species within the project site.

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-7

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the CalVTP PEIR (Section 3.6.3, page 199). The only applicable local ordinance relevant to biological resources is the Monterey County Preservation of Oak and Other Protected Trees Ordinance for the Carmel Valley Planning Area (Chapter 16.60). Removal or damage to a protected oak, madrone, or redwood tree as defined in the Code requires a tree removal permit from the County. The removal of more than three protected trees requires the preparation and implementation of a forest management plan.

Based upon the *Save Lafayette Trees v. East Bay Regional Park District (2021) 66 Cal.App.5th 21* case and the analysis therein, the local tree ordinance permitting requirement would not apply on MPRPD land. Public Resources Code Section 5541 allows a district to adopt, operate and maintain a system of public parks. Further Section 5558 provides that "The board shall, in general, do all acts necessary to the property execution of powers and duties granted to, and

imposed upon, it by this article, and to manage and control the business and affairs of the district." Section 5595 states that the article should be liberally construed to allow the district to carry out its purpose. The Court in this case considered these provisions when looking at whether a local tree ordinance was enforceable within a regional park owned and operated by such a district. The Court determined that the authority given to park districts was not subordinate to local regulatory authority except where the land is owned or controlled by the local regulatory authority, and that the district's park land was not subject to local tree ordinance permitting requirements. The only exception to this would be where the district board agreed to such regulatory authority. The MPRPD Master Plan, dated April 6, 1998 identifies under the Management Plan Policy, Section 7.4, that MPRPD shall obtain all required land use or coastal development permits prior to authorizing public use, dedication, or improvements to any MPRPD lands. However, this project is not an improvement project, but rather maintenance activities and therefore would not fall within this provision. Therefore, the Monterey County Tree ordinance is not applicable to treatment activities conducted on MPRPD property.

However, the Monterey County tree ordinance would apply to treatment activities conducted on private property within the project site (0.5 acre). Several coast live oak trees occur within the project site; however, a tree survey was not conducted to determine if oak trees occur on the private property. In addition, treatment activities are not anticipated to remove oak trees unless they are dead, dying, hazardous, or diseased. However, in the unlikely event that removal of a coast live oak tree is required on the private property, MPRPD may need to acquire a tree removal permit from the County prior to project activities pursuant to SPR AD-3. If removal of more than three coast live oak trees from the private property is required, a forest management plan may also need to be prepared and submitted to the County prior to oak tree removal activities. 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 treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in Section 3.6.1, "Environmental Setting," and Section 3.6.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to biological resources would occur.

PD-3.8: 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	AD-3 AQ-4 GEO-1 to GEO-6	N/A	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	No	None	N/A	None	N/A	N/A

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

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

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

Discussion

Soil types within the Main Stand and Northeast Stand consist mostly of Fluvents, Stony, while the Southeast Stand consists mostly of the Junipero-Sur Complex (Natural Resources Conservation Service [NRCS], 2019). Small areas of Tujunga Fine Sand (0-5% slopes) are also present along the southern margin of the Main Stand and Northeast Stand, and the northern margin of the Southeast Stand. Fluvents and Tujunga fine sand are entisols found on floodplains, while the Junipero-Sur Complex are mollisols found on mountain slopes. These soils are well-drained to excessively well-drained. The treatment areas are located within the Carmel Valley at the base of the adjacent mountains and are relatively flat and under 30% slope. As such, the project site has very little to no susceptibility for landslides. The Northeast Stand and the majority of the Main Stand are located within the 100-year floodplain.

Impact GEO-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed (pile) burning, and targeted ground application of herbicides. In addition, the maintenance treatment would include prescribed herbivory. These treatments 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 PEIR (CalVTP Final PEIR Section 3.7.3, pages 26-29). Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to erosion or loss of topsoil. Equipment used to create piles for burning may also increase the risk of soil disturbance. Prescribed herbivory may result in soil compaction that could reduce infiltration rate and an increase in overland flow, soil disturbance from hooves with a greater impact when soils have a high moisture content, and/or increased runoff and loss of topsoil as a result of vegetation removal. However, stumps and roots of Eucalyptus trees and other vegetation would be left in place to maintain soil stability, including within the Northeast and Southeast stands where the trees would be completely

removed. In addition, mechanical and manual treatments would masticate/chip material that would be left on site at a depth of six inches or less, which would significantly reduce potential for erosion on the site.

This impact is within the scope of the PEIR because the use of and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the PEIR. SPRs applicable to this treatment project are AD-3, AQ-4, GEO-1 through GEO-6, HYD-3, and 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 GEO-2

This impact does not apply to the proposed project because the relatively flat slopes within the project site have very little to no susceptibility to landslides.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting, of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to geology and soils would occur.

PD-3.9: 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	AD-3	N/A	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	PSU	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

The proposed project is in the North Central Coast Air Basin (NCCAB), where air quality is regulated by MBARD. MBARD has not yet adopted a threshold for construction-related[10] GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District [SMAQMD]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020, which identifies that proposed projects would result in a significant GHG related impact if the project emits more than 1,100 metric tons of CO_2e per year. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR (CalVTP Final PEIR Section 3.8.3, pages 10-11).

Consistent with the PEIR, GHG emissions would occur from equipment and vehicles used to implement treatments, as well as biomass processing (i.e., chipping, off-hauling, prescribed burning). However, due to the limited worker trips and the minor, short-term, and intermittent use of mechanical equipment, initial and maintenance treatment would not generate greenhouse gases that would exceed the threshold identified in the SMAQMD. This impact is within the

[10] Although this is not a "construction" project, vehicles and equipment used for treatments are the same as or similar to vehicles and equipment used for construction projects.

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. An air curtain burner or carbonator may instead be used for debris disposal, which would also emit GHGs, although less than open pile burning. Use of an air curtain burner or carbonator, when feasible, would also reduce the carbon emissions associated with chipping and avoid carbon emissions associated with off-hauling. Use of an air curtain burner or carbonator would not conflict with any of the existing plans and policies related to GHG emissions reductions. In addition, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. Therefore, the proposed project is consistent with all applicable plans, policies, and regulations related to the purpose of reducing GHG emissions and treatment activities area consistent with those analyzed in the PEIR. SPR AD-3 is applicable to this treatment. 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. 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

Use of vehicles and 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 (CalVTP Final PEIR Section 3.8.3, pages 11-17). 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.

MPRPD is proposing to use an air curtain burner or carbonator (pyrolysis) to process biomass in place of pile burning, if feasible, pursuant to Mitigation Measure GHG-2. Evaluation of these biomass processing technologies conducted by Ascent (2022) indicates that CO_2 emissions from the combustion of biomass can be substantially reduced, compared to open pile burning. Use of an air curtain burner substantially reduces reactive CO_2 emissions by approximately 54 percent when compared to pile burning, and although a percent reduction compared to open pile burning is not provided for pyrolysis in the study, the study does state that CO_2 emissions would also be reduced using this process. This is likely because both technologies combust biomass at high temperatures and produce larger quantities of ash and biochar than pile burning. Instead of being released into the atmosphere as emissions, ash and biochar retain some of the carbon from the original biomass fuel. Thus, the operation of an air curtain burner or carbonator would reduce GHG emissions, resulting in an environmental advantage compared to pile burning. Use of an air curtain burner or carbonator would be consistent with the discussion in the PEIR and would not constitute a new or substantially more severe significant impact than what was included in the PEIR.

As identified above, Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. 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. 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. 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 consistent with the treatment types and activities considered in the CalVTP PEIR. GHG emissions associated with an air curtain burner or carbonator are the same type as those associated with pile burning; however, GHG emissions are lower due to the increased retention of carbon in the ash and biochar. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside

the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

PD-3.10: 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	N/A	N/A	LTS	No	Yes

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

New 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 (CalVTP Final PEIR Section 3.9.3, pages 7-8). 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 consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to energy resources would occur.

PD-3.11: 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	N/A	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	BIO-4 HAZ-5 to HAZ-9	N/A	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	N/A	HAZ-3	LTS	No	Yes

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

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

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

Discussion

Impact HAZ-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed (pile) burning, and targeted ground application of herbicides. In addition, the maintenance treatment would include prescribed herbivory. These treatment activities may 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 (CalVTP Final PEIR Section 3.10.3, pages 14-15). SPR HAZ-1 is applicable to this treatment. 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.

Impact HAZ-2

Initial and maintenance treatments would include herbicide application to target plant species using ground-based methods, such as using a backpack sprayer or painting herbicide onto cut 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 (CalVTP Final PEIR Section 3.10.3, pages 15-18). This impact is within the scope of the PEIR because the types of herbicides (e.g., Imazapyr, Glyphosate, and Triclopyr) 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. In addition, only herbicides approved for use in aquatic environments would be used in riparian areas pursuant to SPR BIO-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 HAZ-3

Initial and maintenance treatments would include soil disturbance which could expose workers 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 or the environment to hazardous materials was examined in the PEIR (CalVTP Final PEIR Section 3.10.3, pages 18-19). This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites and soil disturbance or burning in those areas could expose people or the environment to hazards. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the treatment areas (California Department of Toxic Substances Control 2023; California Environmental Protection Agency 2023; State Water Resources Control Board 2023) (Attachment C). Therefore, this impact is 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. 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 Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

PD-3.12: 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	AQ-3 HYD-1 HYD-4 GEO-4 GEO-6	N/A	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	AD-2 BIO-1 BIO-4 GEO-1 to GEO-5 HAZ-1 HAZ-5 HYD-1 HYD-2 HYD-4	N/A	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	AD-2 BIO-1 BIO-4 GEO-3 GEO-4 HYD-1 HYD-3 HYD-4	N/A	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	BIO-4 HAZ-5 to HAZ-7 HYD-1 HYD-4 HYD-5	N/A	LTS	No	Yes

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

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

New 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 site is located in the Carmel River Watershed, which is within the Central Coast Hydrologic Region, as shown on Figure 3.11-1 of the PEIR (CalVTP Final PEIR Section 3.11.3, page 4). The northern boundary of the Main Stand treatment area directly abuts the Carmel River on its southern side; however, no work is proposed within the river (i.e., no work would occur below the ordinary high water mark). The Northeast Stand is located approximately 500 feet from the Carmel River.

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 would include prescribed burning (pile burning). Ash and debris from pile burning treatment areas could be washed by runoff into the adjacent Carmel River. However, pile burning is proposed within the open grassland area adjacent to the treatment areas in order to avoid impacts to the river; the grassland is located approximately 240 feet from the Carmel River. This is consistent with SPR HYD-4 and GEO-6 which require a WLPZ of 75 feet for Class I streams (streams used for domestic water supply or providing fish habitat) located on slopes less than 30%. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR (CalVTP Final PEIR Section 3.11.3, pages 25-27). 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. In addition, the project proposes to use an air-curtain burner or carbonator, if possible, which would reduce the amount of ash and debris and would allow for the placement of ash or carbon in areas where they would not be washed into watercourses or lakes. If the material is disposed of outside of the project site, the MPRPD will prepare an Organic Waste Disposition Plan prior to initiating treatment activities pursuant to SPR UTIL-1. SPRs applicable to this treatment are HYD-1, HYD-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 manual and mechanical treatments. The potential for mechanical treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Section 3.11.3, pages 27-29). 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. The treatment areas have been designed to avoid the Carmel River, as described above, and a WLPZ of 75 feet would be implemented pursuant to SPR HYD-4. Additional SPRs applicable to this treatment are AD-2, BIO-1, BIO-4, GEO-1 through GEO-5, HAZ-1, HAZ-5, HYD-1, and HYD-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.

Impact HYD-3

Maintenance treatments may include prescribed herbivory. The potential for mechanical treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Section 3.11.3, page 29). This impact is within the scope of the PEIR because the use of prescribed herbivory, including use of goats, to remove vegetation and associated impacts to water quality are consistent with those analyzed in the PEIR. The treatment areas have been designed to avoid the Carmel River, as described above, and a WLPZ of 75 feet would be implemented pursuant to SPR HYD-4. In addition, a buffer of 50 feet from sensitive habitats (i.e., the Carmel River and associated riparian habitat) would be implemented pursuant to SPR HYD-3. Additional SPRs applicable to this treatment are AD-2, BIO-1, BIO-4, GEO-3, GEO-4, HYD-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 HYD-4

Initial and maintenance treatments would include herbicide application, which can affect water quality through runoff, leaching, drift, and misapplication or spills. The potential for herbicide treatment activities to 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 was evaluated in the PEIR (CalVTP Final PEIR Section 3.11.3, pages 29-31). Potential impacts are within the scope of the activities and impacts addressed in the PEIR because the methods of herbicide application, transportation, storage, and disposal are consistent with those analyzed in the PEIR. Under the CalVTP, herbicide treatment activities are limited to ground-level application by hand, only herbicides approved for use in aquatic environments would be used in riparian areas (SPR BIO-4), and compliance to EPA labels is required (SPR HAZ-6). A portion of the proposed project treatment area is located within a WLPZ's and SPR HYD-5 prohibits non-aquatic herbicide formulations from being applied within 50 feet of a waterbody or riparian area and prohibits application during precipitation or within 24 hours of forecasted precipitation. In addition, a Spill Prevention and Response Plan will be prepared prior to herbicide treatment activities (SPR HAZ-5) and all herbicide containers must be triple rinsed and hazardous waste materials must be disposed of at an approved site (SPR HAZ-7).

Based on the compliance to EPA labels and SPR limitations, the potential for this project to result in a violation of 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 is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

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 (CalVTP Final PEIR Section 3.11.3, page 31). The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment, types of treatments, and treatment intensity are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AD-2, GEO-1 through GEO-6, HYD-1 through 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.

New Hydrology and Water Quality Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

PD-3.13: 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	N/A	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	N/A	N/A	LTS	No	Yes

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

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

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

Discussion

Section 3.12.2, pages 8-9 of CalVTP Final PEIR identifies that when state agencies, including CAL FIRE, are conducting governmental activities under the authority of state law or the State Constitution (in this case treatments implemented under the proposed CalVTP), they are exempt from local government plans, policies, and ordinances (unless a constitutional provision or statute directs otherwise). Nonetheless, CAL FIRE voluntarily seeks to operate consistently with local governance to the extent feasible. The CalVTP PEIR identifies that general plans and local coastal programs are relevant to land use and planning (CalVTP Final PEIR Section 3.12.2, pages 8-10).

The Park is located within unincorporated Monterey County. The area of the project site within the Park is designated Public/Quasi-Public in the 2010 Monterey County General Plan and Carmel Valley Master Plan (amended in 2013), which is Chapter 9B of the General Plan. The area of the project site on private property (0.5 acre) is designated as Permanent Grazing in the General Plan and Carmel Valley Master Plan. Title 21 – Zoning of the Monterey County Code identifies the entire project area as Permanent Grazing, with a minimum building site of 40-acres, and design control, site plan review, and residential allocation zoning overlays (PG/40-D-S-RAZ). Public parks are an allowed use within this zoning designation. The entire project site is located within an area designated as "highly sensitive" in Policy GMP-3.3, as shown on the Greater Monterey Peninsula Scenic Highway Corridors and Visual Sensitivity Map. In addition, Sections 16.16.050 (K) and 20.66.020 require setbacks from the top of bank of a river and environmentally sensitive habitat (e.g., riparian). However, all of these policies are specific to development, which is not part of the project and are therefore not applicable.

The Carmel Valley Master Plan regulates the removal of native oak, madrone, and redwood trees, and Monterey County Code Title 16 – Environment (Section 16.60.030- Regulations) references the Carmel Valley Master Plan's tree

removal policy and also identifies policies for landmark oak trees. Based upon the *Save Lafayette Trees v. East Bay Regional Park District (2021) 66 Cal.App.5th 21* case and the analysis therein, the local tree ordinance permitting requirement would not apply on MPRPD land. Public Resources Code Section 5541 allows a district to adopt, operate and maintain a system of public parks. Further Section 5558 provides that "The board shall, in general, do all acts necessary to the property execution of powers and duties granted to, and imposed upon, it by this article, and to manage and control the business and affairs of the district." Section 5595 states that the article should be liberally construed to allow the district to carry out its purpose. The Court in this case considered these provisions when looking at whether a local tree ordinance was enforceable within a regional park owned and operated by such a district. The Court determined that the authority given to park districts was not subordinate to local regulatory authority except where the land is owned or controlled by the local regulatory authority, and that the district's park land was not subject to local tree ordinance permitting requirements. The only exception to this would be where the district board agreed to such regulatory authority. The MPRPD Master Plan, dated April 6, 1998 identifies under the Management Plan Policy, Section 7.4, that MPRPD shall obtain all required land use or coastal development permits prior to authorizing public use, dedication, or improvements to any MPRPD lands. However, this project is not within the coastal zone and is not an improvement project, but rather maintenance activities, and therefore would not fall within this provision. Therefore, the Monterey County Tree ordinance is not applicable to treatment activities on MPRPD land. The MPRPD Master Plan does not include any other policies relevant to reducing wildfire risk or vegetation management within the Park. The Monterey County tree ordinance would, however, apply to any treatment activities conducted on private property within the project site.

The Monterey County Community Wildfire Protection Plan (MCCWPP) designates Garland Ranch Regional Park and the surrounding community as within the Wildland Urban Interface (WUI) area (Monterey Fire Safe Council, 2010). Section 6.3 'Hazardous Fuel Treatments' includes Eucalyptus as a listed exotic or invasive plant and broadly outlines acceptable treatment activities to include the following:

- Vegetation Thinning (Section 6.3.2),
- Tree Removal (Section 6.3.3)
- Vertical Separation (Section 6.3.4.1) (i.e., pruning of vegetation off the ground to provide vertical clearance),
- Horizontal Separation (Section 6.3.4.2) (i.e., pruning of vegetation that results in horizontal clearance between shrubs and trees),
- Dead/Dying Plant Removal (Section 6.3.5),
- Exotic/Invasive Plant Removal (Section 6.3.6),
- Chipping and Mastication (Section 6.3.8),
- Grazing (Section 6.3.9), and
- Prescribed Burning (Section 6.3.10),
- Lopping and Scattering (Section 6.3.13), and
- Herbicides (Section 6.3.15).

The MCCWPP also identifies that the "cooperative and coordinated utilization of the CAL FIRE VTP is important to the success of [the] MCCWPP."

Impact LU-1

Vegetation treatment activities would occur within the boundaries of the Park, which is owned and operated by MPRPD. In addition, if agreed upon by the landowner, treatment activities may occur on the parcel adjacent to the Main Stand. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the PEIR (CalVTP Final PEIR Section 3.12.3, pages 12-13). This impact is within the scope of the PEIR because the treatment locations, types, and activities are consistent with those analyzed in the PEIR. No conflicts with a land use plan or policy would occur because MPRPD would adhere to SPR AD-3. The proposed treatments have been designed to be consistent with the Monterey County General Plan, as applicable as described above, and MPRPD would acquire a tree removal permit or prepare a forest management plan if coast live oak trees would be removed (please refer to Impact BIO-7 in Section PD-3.7 above). This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact LU-2

As identified in the project description, the initial manual and mechanical treatments would require approximately 20 crew members to implement; maintenance manual and mechanical treatments would likely require fewer crew members. The prescribed burn crew size will be determined based on the amount of material to be burned and the number of crew members necessary for safety purposes; however, due to the small size of the project it is expected that the crew size necessary for pile burning and/or use of an air curtain burner or carbonator would be fewer the average crew size of 45 workers identified in the CalVTP PEIR (Section 2.5.2 Page 21). Herbicide application would be completed with a one- to two-person crew and prescribed herbivory would likely include a single herder.

The potential for treatments to result in substantial population growth as a result of increases in demand for employees was analyzed in the PEIR (CalVTP Final PEIR Section 3.12.3, page 14-15). 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 or less than the crew size analyzed in the PEIR for the types of treatments proposed. Employing local contractors will be encouraged where feasible to minimize the risk of impacting population and housing resources. There are no applicable SPR's for this impact. Based on the minimal crew size, the short duration of the initial and maintenance treatments, and attempting to hire local contractors, it is expected that any impact to population and housing as a result of this project would be less than significant. 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 project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing conditions that are pertinent to land use and planning, population and housing that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to land use and planning, population and housing would occur.

PD-3.14: 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 to NOI-6	N/A	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	N/A	LTS	No	Yes

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

New 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 noise-generating equipment, such as masticators and other heavy equipment, chippers, and chainsaws. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR (CalVTP Final PEIR Section 3.13.3, pages 9-12). 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.

Treatment activities would be required to comply with the Monterey County Code Noise Ordinance, as described in Monterey County Code Chapter 10.60. The ordinance applies to "any machine, mechanism, device, or contrivance" within 2,500 feet of any occupied dwelling unit and limits the noise generated to 85 dBA at a distance of 50 feet from the noise sources. Noise-generating treatment activities would be limited to the hours between 7 a.m. and 7 p.m., Monday through Saturday and no treatment-generated noise would be allowed on Sunday or national holidays, in compliance with the County ordinance and SPR NOI-1. Limiting noise-generating treatment activities to daytime hours Monday through Friday, would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening, nighttime, and weekend hours. There are no schools or hospitals within 1,500 feet of the treatment areas; however, there are several rural residences. The PEIR identifies that combined noise levels from mechanical and manual treatments would be approximately 87 dBA at 50 feet, which exceeds the Monterey County

Code Noise Ordinance. However, the nearest sensitive receptor is greater than 100 feet from the treatment area and sound levels would attenuate to below the threshold at this distance (refer to Section 3.13.1, "Environmental Setting," page 4 in the Final PEIR).

In addition, several SPRs would be implemented, including AD-3, NOI-1 to NOI-5. SPR NOI-6 would also apply for any properties where residences are within 1,500 feet of the treatment area. 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

Treatments would involve large trucks hauling heavy equipment to and from the treatment areas. 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 SENL was examined in the PEIR (CalVTP Final PEIR Section 3.13.3, page 12). 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. In accordance with SPR NOI-1, the haul trips associated with the treatments 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. 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. 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 Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to noise would occur.

PD-3.15: 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	REC-1	N/A	LTS	No	Yes

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

New 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 Park is open to the public for hiking, equestrian use, fishing, and other recreational and leisure activities. MPRPD also provides outdoor education and other outdoor programs for the public within the Park. Treatment activities would occur immediately adjacent to the Rancho Loop Trail, which would result in temporary closure of or limited access to the trail during active treatments and disruption of the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased traffic. Initial and maintenance treatments would not restrict access to or otherwise affect the other adjacent recreation sites or facilities. The potential for vegetation treatment and maintenance activities to disrupt recreation activities is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR (CalVTP Final PEIR Section 3.14.3, pages 6-7). SPR REC-1 is applicable to the treatments. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Recreation Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

PD-3.16: TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3 TRAN-1	N/A	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	AD-3 HYD-2 TRAN-1	GHG-2	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	N/A	AQ-1	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 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

Initial and maintenance treatments would temporarily increase vehicular traffic along State Route 1 and Carmel Valley Road. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR (CalVTP Final PEIR Section 3.15.3, pages 9-10). The proposed treatments would be short term and temporary increases in traffic related to treatments are within the scope of the PEIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the PEIR. In addition, the proposed treatments would not all occur concurrently and vehicle trips would be dispersed over time. SPRs applicable to this treatment are AD-3 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-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. The proposed treatments would include prescribed burning and smoke that could potentially affect visibility along nearby roadways such that a transportation hazard could occur. However, use of an air curtain burner or carbonator, if feasible pursuant to Mitigation Measure GHG-2, would reduce smoke emissions due to the increased combustion efficiency (Ascent, 2022). The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the PEIR (CalVTP Final PEIR Section 3.15.3, pages 10-11). 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

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to and from the treatment areas, and some material may be off-hauled. 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 (CalVTP Final PEIR Section 3.15.3, pages 11-13). 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 (Governor's Office of Planning and Research, 2018). Manual and mechanical treatments under the proposed project would, combined, require approximately 20 personnel and prescribed burning is expected to require crew sizes less than the average size (45 workers) identified in the PEIR due to the small size of the project and expected use of an air curtain burner or carbonator. Further, the project site is limited to approximately 12 acres, which will require limited equipment and off-hauling of only a portion of the removed material when on-site biomass processing is not feasible. Therefore, the crew sizes and project site are sufficiently small such that the total increase in VMT would not exceed 110 trips per day. In addition, the increase in vehicle trips would be temporary. A temporary increase in VMT is within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips are consistent with that analyzed in the PEIR. No SPRs are applicable to this impact. Mitigation Measure AQ-1 would encourage workers to carpool to work sites, and/or use public transportation for their commutes which could result in the reduction of vehicular trips associated with vegetation treatments; and thus, could potentially reduce VMT. 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 Transportation Impacts

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 Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to transportation would occur.

PD-3.17: PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	N/A	N/A	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 - 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	Yes	UTIL-1	GHG-2	PSU	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	UTIL-1	GHG-2	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 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 treatment would include prescribed burning (pile burning), which would require an on-site water supply if the burn goes out of prescription. If needed, water would be supplied from water trucks or other water containers. The potential increased demand for water was examined in the PEIR (CalVTP Final PEIR Section 3.16.3, page 9). 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 either with pile burning, burning in an air curtain burner or carbonator, by lopping and scattering or masticating/chipping biomass in areas where material cannot safely be burned, or by off-hauling of larger material if on-site disposal is not feasible. Use of an air-curtain burner or carbonator per Mitigation Measure GHG-2 would reduce the amount of ash and debris and would allow for the placement of ash or carbon in areas where they would not be washed into watercourses or lakes. If material is disposed of outside of the project site, the MPRPD will prepare an Organic Waste Disposition Plan prior to initiating treatment activities pursuant to SPR UTIL-1. Implementation of SPR UTIL-1 would also require that disposition of solid organic waste is adequately managed and is not transported to a facility that lacks the processing capacity. 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 (CalVTP Final PEIR Section 3.16.3, pages 10-12). Although the size of the project is relatively small and biomass would be processed on site whenever feasible, the impact would remain potentially significant and unavoidable due to the uncertainty in the extent of use of biomass producing technologies, as stated in the PEIR (refer to Section 3.16.3 page 12 in the Final 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.

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 either with pile burning, burning in an air curtain burner or carbonator, by lopping and scattering or masticating/chipping biomass in areas where material cannot safely be burned, or off-hauling. Use of an air-curtain burner or carbonator per Mitigation Measure GHG-2 would reduce the amount of ash and debris and would allow for the placement of ash or carbon in areas where they would not be washed into watercourses or lakes. If the material is disposed of outside of the project site, MPRPD would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste In addition, pursuant to SPR UTIL-1, MPRPD would prepare an Organic Waste Disposition Plan prior to initiating treatment activities that identifies the amount of solid organic waste to be transported offsite to a biomass power plant, wood product processing facility, and/or composting for processing and that biomass would not be disposed of in a landfill. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the PEIR (CalVTP Final PEIR Section 3.16.3, page 12). 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.

New Impacts to 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 Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," of the CalVTP Final PEIR. The project proponent has also determined that including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to public services and utilities that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to public services, utilities, or service systems would occur.

PD-3.18: WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AQ-3 HAZ-2 to HAZ-4	GHG-2	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	No	None	N/A	N/A	N/A	N/A

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

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

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

Discussion

Impact WIL-1

Vegetation treatment activities proposed would include mechanical, manual, and prescribed burn (pile burn) 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 under "Prescribed Burn Planning and Implementation" in Section 3.17.1, "Environmental Setting of the Final PEIR, implementing a prescribed burn requires extensive planning, including the preparation of a prescription burn plan, a smoke management plan, site-specific weather forecasting, public notification, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn (pile burn), fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire, and fire suppression (i.e., water trucks or other water containers) and safety equipment would be staged on site, as necessary. In addition, if feasible, the project proposes to use an air curtain burner or carbonator pursuant to Mitigation Measure GHG-2 in place of pile burning, which will provide additional containment of the prescribed burn and further reduce potential risks.

The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR (CalVTP Final PEIR Section 3.17.3, pages 14-15). 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 and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the PEIR. SPRs AQ-3, HAZ-2, HAZ-3, and HAZ-4, which include preparation of a burn plan in accordance with CAL FIRE requirements, equipment safety requirements, keeping fire extinguishers and other manual tools on

site, 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

The project would not expose people or structures to substantial risks related to post-fire landslides or flooding because the project would only implement pile burning and broadcast burning would not be implemented. In addition, the relatively flat slopes within the project site have very little to no susceptibility to landslide, mastication/chipping would leave material on the ground that would reduce stormwater runoff, and retained vegetation and roots would stabilize soils. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. Therefore, this impact does not apply to the project.

New Impacts to Wildfire

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in Section 3.17.1, "Regulatory Setting," and Section 3.17.2, "Environmental Setting," of the CalVTP Final PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to wildfire risk would occur.

PD-3.19: LIST OF PREPARERS

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ATTACHMENT A – STANDARD PROJECT REQUIREMENTS AND MITIGATION MEASURES CHECKLIST

- Applicable (Yes/No). Document whether the SPR or mitigation measure is applicable to the initial treatment and/or treatment maintenance (Yes or No), and whether it is applicable to initial treatment and/or treatment maintenance. The applicability should be substantiated in the Environmental Checklist Discussion.
- Timing. This column identifies the time frame in which the SPR or mitigation measure will be implemented (e.g., prior to treatment, during treatment, etc.).
- Implementing Entity. The implementing entity is the agency or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
- Verifying/Monitoring Entity. The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to Treatment	MPRPD	MPRPD
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to Treatment	MPRPD	MPRPD
SPR AD-4 Public Notifications for Prescribed Burning: At three least days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	At least three days prior to prescribed burning operations	MPRPD	MPRPD
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Initial Treatment: Yes Treatment Maintenance: Yes	One to three days prior to treatment activities	MPRPD	MPRPD
SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point); ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to, during, and following treatment Information has been submitted for the proposed project phase	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Mechanical and Manual Treatment	MPRPD	MPRPD
SPR AES-2 Avoid Staging within Viewsheds: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Air Quality Standard Project Requirements				
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to prescribed burning operations	MPRPD	MPRPD
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to prescribed burning operations	MPRPD	MPRPD
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during prescribed burning operations	MPRPD	MPRPD
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Record search of project area and 0.25-mile buffer surrounding project area has been conducted; see PSA for a summary of results.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Tribes have been contacted and SLF query completed; see PSA for a summary of consultation and SLF results.	MPRPD	MPRPD
SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Record review of project area and 0.25-mile buffer surrounding project area has been conducted; see PSA for a summary of results.	MPRPD	MPRPD
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Site-specific survey of project has been conducted; see PSA for a summary of results.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Implementation ▶ MPRPD shall invite up to one Native American monitor to be on site during treatment activities. Each Native American group will monitor for half of the projected work days of monitoring or as equitable as possible. The goal is equitable distribution of monitoring days in an effort to afford each Native American group the opportunity to participate in construction monitoring; however, the ever-changing treatment environment can pose a challenge to scheduling. MPRPD will strive to achieve equitable distribution of monitoring when coordinating the staffing and scheduling monitoring to support Project implementation as practicable. ▶ MPRPD, in coordination with the local Native American community, will develop and place signage near the treatment areas acknowledging the indigenous history/community of the land. At a minimum, the signage would include a website address(es) where the public can access digital resources created by the Native American community. ▶ MPRPD shall continue to communicate and coordinate with the Esselen Tribe of Monterey County to develop protection measures for resources important to the tribe, as described above in this SPR.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD/Monterey County RCD (Monterey County RCD, in coordination with MPRPD, has initiated consultation with culturally affiliated tribes. Protection measures for important tribal cultural resources are incorporated into this MMRP.)	MPRPD/Monterey County RCD
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment	MPRPD (Monterey County RCD, in coordination with MPRPD, has initiated consultation with culturally affiliated tribes. specific measures	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Implementation ▶ MPRPD shall invite representatives from the local Native American community to participate in the cultural resources training prior to implementation of treatment activities to aid those involved in the project with becoming more familiar with the indigenous history of the peoples of the land that is being worked on, as well as to share information about the treatment areas that acknowledges the Indigenous history/community of the land and are welcome to provide the crew brochures or access to digital resources created by the Native American community.			for tribal cultural resources education are incorporated into this MMRP.)	
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Initial data review and reconnaissance-level survey have been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Sensitive habitat survey and mapping have been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment MPRPD has consulted with DD&A qualified biologists to design treatments to retain and improve riparian habitat functions.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination;	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Protocol-level survey for special-status plants has been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Implementation ▶ A qualified biologist shall survey the project site for California red-legged frog, Coast Range newt, and western pond turtle no more than 48 hours prior to the commencement of treatment activities. If any Coast Range newt individuals are encountered Mitigation Measures BIO-2a and/or BIO-2b shall be implemented. ▶ Not more than 14 days prior to the start of treatment activities that, a qualified biologist shall conduct a survey of suitable habitat within the project site to locate existing Monterey dusky-footed woodrat nests and American badger dens. If any Monterey dusky-footed woodrat nests or American badger dens are encountered Mitigation Measure BIO-2b shall be implemented.	Initial Treatment: Yes Treatment Maintenance: Yes	No more than 48 hours prior to treatment for California red-legged frog, Coast Range newt, and western pond turtle. No more than 14 days prior to treatment for American badger and Monterey dusky-footed woodrat. During the flight season for special-status bumble bees according to the CDFW protocol.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If treatment activities are scheduled within the CBB and WBB flight season, MPRPD shall contract a qualified biologist to conduct a survey for an active CBB and WBB colony within grassland areas to be impacted by the project and an approximate 50-foot buffer. Surveys shall be conducted in accordance with CDFW's *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (2023) or the most current CDFW protocol. If protected bumble bee nests are found Mitigation Measure BIO-2g shall be implemented.				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: Yes	Prior to and during prescribed herbivory treatment	MPRPD	MPRPD
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur	Initial Treatment: Yes Treatment Maintenance: Yes	Survey no more than 3 weeks prior to treatment during active nesting season (February 1 – August 31) Avoidance and minimization measures to be implemented	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist.		prior to and during treatment if active nests are identified		

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National	Initial Treatment: Yes	During treatment if there is a 30 percent or	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Yes	more chance of rain within the next 24 hours		
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During mechanical activities that result in exposure of bare soil over 50% or more of the treatment area	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During and immediately following treatment	MPRPD	MPRPD
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During and immediately following treatment	MPRPD	MPRPD
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During prescribed burning treatment activities	MPRPD	MPRPD
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes	During manual treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
	Treatment Maintenance: Yes			
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During manual treatment activities	MPRPD	MPRPD
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to herbicide treatment activities	MPRPD	MPRPD
SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to herbicide treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During herbicide treatment activities	MPRPD	MPRPD
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ▶ low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ▶ spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During herbicide treatment activities	MPRPD	MPRPD
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to, during, and for at least 72 hours after herbicide treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.	Initial Treatment: No Treatment Maintenance: Yes	Prior to and during prescribed herbivory treatment	MPRPD	MPRPD

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/Monitoring Entity</th></tr>
<tr><td>

Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas.
Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.

This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.
</td><td></td><td></td><td></td><td></td></tr>
<tr><td>
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or
2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or
2) Aquatic habitat for nonfish aquatic species.
3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</td></tr>
<tr><td>< 30 % Slope</td><td>75</td><td>50</td><td rowspan="2">Sufficient to prevent the</td><td></td></tr>
<tr><td>30-50 % Slope</td><td>100</td><td>75</td><td></td></tr>
</table>
</td><td>Initial Treatment: Yes

Treatment Maintenance: Yes</td><td>Establish WLPZs prior to treatment (adjacent Carmel River is a Class I waterway)

Implement WLPZ protections during treatments (adjacent Carmel River is a Class I waterway)</td><td>MPRPD</td><td>MPRPD</td></tr>
</table>

Standard Project Requirements				Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
>50 % Slope	150	100	degradation of downstream beneficial uses of water. Determined on a site-specific basis.				

Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)

The following WLPZ protections will be applied for all treatments:

- Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
- Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
- Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.
- WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.
- Burn piles will be located outside of WLPZs.
- No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.
- Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during herbicide treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses: The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to mechanical treatment activities within 1,500 feet of noise-sensitive receptors	MPRPD	MPRPD
Recreation Standard Project Requirements				
SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent to will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	At least 2 weeks prior to treatments that require temporary closures of public recreation areas	MPRPD	MPRPD
Transportation Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Coordinate with agencies with jurisdiction over affected roadways prior to treatment to determine if a TMP is needed. Prepare TMP prior to treatment if needed. Implement TMP during treatments if needed.	MPRPD	MPRPD
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing	Initial Treatment: Yes Treatment Maintenance: Yes	Develop Organic Waste Disposition Plan prior to treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.		Implement Organic Waste Disposition Plan during treatment		

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Air Quality				
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: ▶ Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables;	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment if feasible	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. ▶ Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.				
Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center. Project-Specific Implementation The Project Archeologist shall communicate and coordinate with the Native American monitor(s) in regard to all data collection and the evaluation of all artifacts.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
Biological Resources				
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)	Initial Treatment: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. ▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. Maintain Habitat Function ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and	Treatment Maintenance: Yes			

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. Project-Specific Implementation ▶ If any life stage of California red-legged frog (CRLF) is observed during the pre-treatment survey, treatment activities will not commence until the USFWS is consulted and appropriate actions are taken to allow project activities to continue. CRLF shall not be handled unless authorized by the USFWS. ▶ A qualified biologist will monitor initial project activities for a sufficient time to train an individual of the work crew to act as an on-site monitor. The qualified biologist shall ensure that this designated monitor receives sufficient training in the identification of California red-legged frog (CRLF). The designated monitor will be the contact for any CRLF encounters and will conduct daily inspections of equipment and materials stored on site, and will actively look for CRLF during treatment activities. The qualified biologist shall remain available to come to the site if a CRLF is identified until all treatment activities are completed. The qualified biologist will also conduct regular scheduled and unscheduled visits to ensure the designated monitor is satisfactorily implementing all appropriate mitigation protocols. The qualified biologist and the designated monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the proposed project. The designated monitor and the qualified biologist are authorized to stop work if the avoidance and/or minimization measures are not				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
being followed. If any CRLF are found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the USFWS is consulted and appropriate actions are taken to allow project activities to continue. CRLF shall not be handled unless authorized by the USFWS. Because dusk and dawn are often the times when CRLF are most actively foraging and dispersing, all project activities within riparian areas should cease one half hour before sunset and should not begin prior to one half hour after sunrise.				
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. ▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. Project-Specific Implementation ▶ If any Coast Range newt or western pond turtle individuals are encountered during pre-treatment surveys or during treatment activities, they shall be allowed to move out of the area of their own volition. If this is not feasible, they shall be captured by a qualified biologist and relocated out of harm's way to the nearest suitable habitat at least 100 feet from the project site. ▶ Any Monterey dusky-footed woodrat nests identified within the project site during pre-treatment surveys shall be mapped and flagged for avoidance. Graphics depicting all Monterey dusky-footed woodrat nests shall be provided to the vegetation removal contractor. Any Monterey dusky-footed woodrat nests that cannot be avoided shall be dismantled according to the following procedures: ▪ Each active nest shall be dismantled by the qualified biologist to the degree that the woodrats leave the nest and seek refuge elsewhere. ▪ Nests shall be dismantled during the non-breeding season (between October 1 and December 31), if possible. ▪ If a litter of young is found or suspected, nest material shall be replaced and the nest left alone for 2-3 weeks; after this time, the nest will be rechecked to verify that young are capable of independent survival before proceeding with nest dismantling. ▶ Any potential American badger dens identified within the project site during pre-treatment surveys shall be mapped and flagged for avoidance. Graphics depicting all American badger dens shall be provided to the vegetation removal contractor. If avoidance of American badger dens is not feasible, the following measures shall be implemented: ▪ If the qualified biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel to prevent badgers from re-using them during construction. ▪ If the qualified biologist determines that potential dens may be active, the entrances of the dens shall be blocked with soil, sticks, and debris for three to five days to discourage the use of these dens prior to project disturbance. The den entrances shall be blocked to an incrementally greater degree over the three- to five-day period. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during treatment activities.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
A qualified biologist will monitor initial project activities for a sufficient time to train an individual of the work crew to act as an on-site monitor. The qualified biologist shall ensure that this designated monitor receives sufficient training in the identification of all special-status wildlife species potentially occurring within the treatment areas. The designated monitor will be the contact for any special-status wildlife species encounters and will conduct daily inspections of equipment and materials stored on site. The qualified biologist shall remain available to come to the site if a special-status wildlife species is identified until all treatment activities are completed. The qualified biologist will also conduct regular scheduled and unscheduled visits to ensure the designated monitor is satisfactorily implementing all appropriate mitigation protocols. The qualified biologist and the designated monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the proposed project. The designated monitor and the qualified biologist are authorized to stop work if the avoidance and/or minimization measures are not being followed.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and/or following treatment if necessary	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. ▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required. Project-Specific Implementation ▶ Project activities within the grassland habitat shall be limited to the minimum area necessary to complete the prescribed burning (i.e., pile burning) activities. Stockpile areas and an access route to the stockpile shall be clearly designated with fencing or flagging prior to treatment activities. Vegetation clearance and access routes shall be clearly designated with fencing or flagging prior to vegetation removal for pile burning activities. ▶ If protected bumble bee nests cannot be avoided, Mitigation Measure BIO-2c would be implemented.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ■ No special-status species are present in the wetland habitat ■ The wetland habitat function would be maintained. ■ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ■ Fire containment lines and pile burning are prohibited within the buffer ■ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during prescribed burn treatment activities	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.				
Hazardous Materials, Public Health and Safety				
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Database searches are complete; see results in the PSA	MPRPD	MPRPD

ATTACHMENT B – BIOLOGICAL RESOURCES REPORT

Garland Ranch Regional Park
Fuel Management Project
Biological Resources Report

August 2023

Prepared for

Monterey Peninsula Regional Park District
4860 Carmel Valley Road
Carmel, California 93923

Prepared by

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TABLE OF CONTENTS

Appendices

Figures

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1.0 INTRODUCTION

Monterey Peninsula Regional Park District (MPRPD) is proposing the Garland Ranch Regional Park (Park) Fuel Management Project (project or proposed project), located in Carmel Valley, California on County of Monterey (County) Assessor's Parcel Nos. 416-511-005-000 and 416-027-025-000 (**Figures 1** and **2**). The proposed project consists of the removal or thinning of three invasive blue gum Eucalyptus (*Eucalyptus globulus*) stands to promote the resilience and recovery of native habitats and species within the Park and to reduce wildfire risk in the area. The project is being proposed under the statewide California Vegetation Treatment Program (CalVTP).

The Park and the surrounding community are located within the Wildland Urban Interface (WUI) area. There are three stands of invasive Eucalyptus trees in the northwestern portion of the Park that present a fire hazard condition due to the volume, combustibility, and continuous arrangement of plant material. Vertical continuity of fuels due to accumulation of vegetative debris at ground level (more than two feet thick in some locations) presents the opportunity for fire to travel upwards into the mid-canopy of trees, dense and multi-stemmed growth patterns of blue gum increase horizontal continuity of fuels with high canopy contact between trees, and aromatic oils in blue gum are highly flammable, even vaporizing on hot days. These factors in combination result in the high likelihood of conflagration in the event of a fire. If these stands were to ignite, they would produce long flames which could torch adjacent vegetation, producing and distributing embers far afield. Removal of the two smaller Eucalyptus stands, thinning of the larger main stand, and management of these areas would reduce fire risks within the WUI. In addition, these actions would promote resilience and recovery of native habitats and species, including adjacent sensitive riparian habitat, and maintain wildlife habitat and aesthetic values within the Park, such as providing a pleasing visual backdrop, aroma, shade, and a wind break for recreationalists.

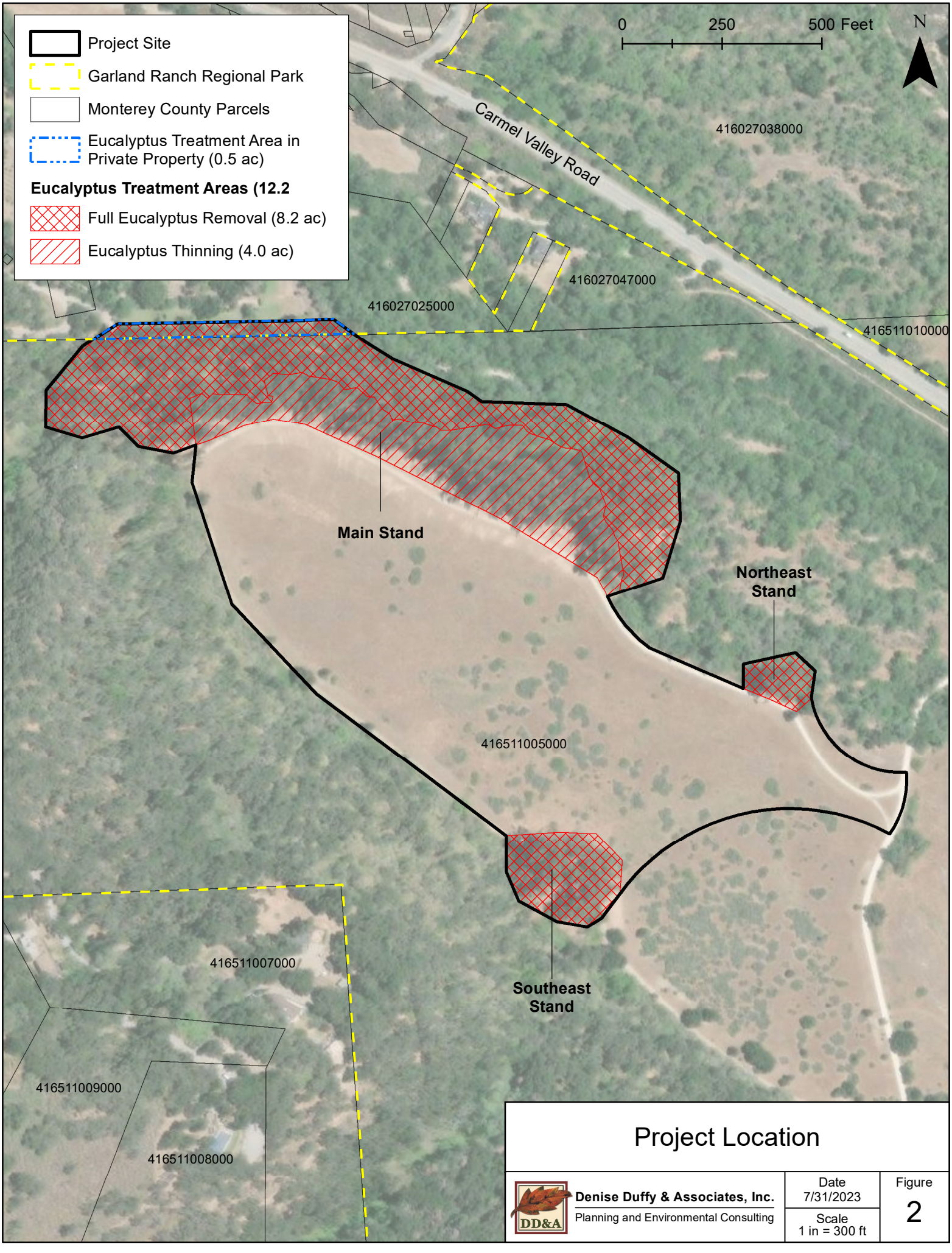
The CalVTP includes three treatment types: WUI Fuel Reduction, Fuel Breaks, and Ecological Restoration. Based on the information provided above, the project is a WUI Fuel Reduction treatment. The project incorporates ecological goals as defined under Ecological Restoration treatments as it will re-establish "the composition, structure, pattern, integrity, and ecological processes necessary to facilitate terrestrial and aquatic ecosystem sustainability, resilience, and health currently and in the future;" however, Ecological Restoration treatments under the CalVTP are located in areas outside of the WUI and the project is therefore not considered "Ecological Restoration" under the CalVTP (California Board of Forestry and Fire Protection, 2019).

To satisfy the reporting criteria of the CalVTP and other regulatory agencies, Denise Duffy & Associates, Inc. (DD&A) completed a biological assessment of the project site to determine if sensitive biological resources are present or have the potential to occur within and in the vicinity of the site. This report describes the existing biological resources within and adjacent to the project site, including any special-status species or sensitive habitats which occur or have the potential to occur in the area. This report also assesses the potential impacts to biological resources that may result from the project, and recommends appropriate avoidance, minimization, and mitigation measures, if necessary, to reduce those impacts to a less than significant level in accordance with the California Environmental Quality Act (CEQA) and the Program Environmental Impact Report (PEIR) for the CalVTP (California Board of Forestry and Fire Protection, 2019).

Project Vicinity

Denise Duffy & Associates, Inc. Planning and Environmental Consulting	Date 6/7/2023 Scale 1 in = 20,000 ft	Figure 1

Path: D:\GIS\GIS_Projects\2023-24 CV Fuelbreaks Bio\Map Products\Fig 1 - Project Vicinity.mxd



Project Location

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Date
7/31/2023

Scale
1 in = 300 ft

Figure
2

Path: D:\GIS\GIS_Projects\2023-24 CV Fuelbreaks Bio\Map Products\Fig 2 - Project Location.mxd

1.1 Project Description

The project consists of the removal or thinning of three Eucalyptus stands and their understories to reduce wildfire fuel loads and increase habitat quality in the Park. Vegetation proposed for removal includes dead, dying, hazardous, and diseased trees of any diameter, ladder fuels, and live Eucalyptus or other non-native trees up to eight inches diameter at breast height (dbh). In addition, staging, access, and pile burning would occur within the adjacent grassland area; however, grass fuels would not be treated. The three project treatment areas encompass approximately 11.7 acres of the approximately 3,670-acre Park. A small portion of the proposed treatment area, approximately 0.5 acre, is also located on the adjacent parcel, and work in that area would require an agreement with the landowner. In addition, the adjacent grassland area will be utilized to stockpile removed material and for pile burning; approximately 21.0 acres of grassland was evaluated in this document; however, it is unlikely that the entire area would be impacted (**Figure 2**). No ground disturbing activities (e.g., stump removal, excavation, or trenching) are proposed for this project.

1.1.1 Treatment Areas

Main Stand

Approximately 4.0 acres of the Main Stand of Eucalyptus would be thinned; selecting the largest and healthiest trees for retention. The Main Stand is a significant visual feature of the park on the Rancho Loop Trail. Eucalyptus stands of this type may be held in high regard by hikers who appreciate the shade, aesthetic value, and wind break these trees provide, and they may support seasonal raptor nests. Therefore, thinning, limbing up, and understory fuel reduction to allow for shade and visual attribute preservation, including maintaining wildlife habitat, while simultaneously reducing a substantial fire hazard risk would be implemented.

Within this stand, dead material would be removed (including 'jackpots' of large logs and bark/leaf litter accumulations) and tree branches limbed up to 15 feet to minimize fire ladders. Decreasing the ground fuel load and lifting the canopy will reduce the vertical continuity of fuels. Thinning the stand to remove nonnative and unhealthy trees and minimize crown overlap will reduce the horizontal continuity of fuels. Both techniques will help prevent or slow the spread of future fire events and promote regeneration of native species within the stand.

Approximately 5.1 acres within the Main Stand, located near the south-side of the Carmel river, intergrades with the adjacent riparian habitat. This portion of the Main Stand is not a significant visual feature of the park and while a hazard reduction treatment may be possible, removal of all of the Eucalyptus trees within this area will provide significant benefit to the riparian corridor by eliminating the spread of an invasive species within the native riparian corridor and reducing water consumption from the Carmel River. In addition, the western section of the Main Stand (approximately 1.4 acres) is located at the base of the steep, densely vegetated Snivley's Ridge. A fire within this portion of the stand could easily propel fire up the hill, especially with prevailing north winds. Difficult terrain, lack of access higher on the slope, and the presence of residences immediately south of the Park make this treatment site a high priority for fire risk reduction and control. Therefore, all Eucalyptus trees within this portion of the Main Stand will also be removed.

Southeast Stand

The 1.3 acre Southeast Stand is also located at the northern base of Snively's Ridge. Similar to the portion of the main stand discussed above, this location presents a high fire hazard potential leading into difficult terrain and it could easily propel fire up the hill towards residences immediately south of the Park. As such, this treatment site is a high priority for fire risk reduction and control. This stand is not a significant visual feature of the park and is an outlier stand which may provide further proliferation of blue gum Eucalyptus trees outside of the Main Stand. Therefore, the entire Southeast Stand would be removed.

Northeast Stand

The 0.4 acre Northeast Stand is located near the northern intersection of the Rancho Loop and Copper Trail. Approximately 0.2 acre of this area occurs within the riparian corridor on the north side, similar to the main stand described above. The Northeast Stand is not a significant visual feature of the park and is an outlier stand that may provide further proliferation of blue gum Eucalyptus trees outside of the Main Stand. The location of these trees does not present a high fire hazard as it is positioned on flat terrain and adjacent to riparian vegetation which is usually high in moisture content and not extremely flammable. However, non-native species trees located within or immediately adjacent to riparian areas can cause degradation to the healthy function of a riparian system. Therefore, all Eucalyptus trees within the Northeast Stand would be removed.

1.1.2 Treatment Activities

The following treatment activities would be implemented to reduce wildfire risk and promote the resilience and recovery of native habitats and species within the treatment areas. These treatment activities are consistent with the treatment activities described in the CalVTP PEIR.

Mechanical Vegetation Treatment

Mechanical treatments would primarily include masticating target vegetation and chipping biomass from manual and mechanical treatment activities. Equipment would include tractors/skidders/backhoe, chippers, masticators, and stump grinders. Initial mechanical vegetation treatment would require three to four months to complete. Small-diameter trees and downed woody debris 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) or chipping. Generally, mechanical treatments would:

- masticate or chip target live Eucalyptus trees and other non-native trees up to 10 inches dbh, downed Eucalyptus bark/woody debris, and woody shrubs;
- limit masticated or chipped material left on site to a depth no greater than six inches;
- grind Eucalyptus stumps in non-riparian areas;
- remove limbs of large trees up to 15 feet high;
- retain isolated large logs, but spread out to increase soil contact and natural breakdown speed; and
- retain native oak and riparian trees and, to the extent feasible, native shrubs and other desirable species as determined by MPRPD.

Manual Vegetation Treatment

To implement manual treatments, crews would use hand tools and hand-operated power tools, including chainsaws, hand saws, brush cutters, and loppers, to cut, clear, and/or prune trees. Initial manual treatment would require three to four months to complete and would likely be completed at the same time as mechanical activities during the first year.

The same general guidelines for tree and vegetation removal and retention would be followed as described above for mechanical treatments; however, manual methods would include removing Eucalyptus trees larger than 10 inches dbh. As described above, all Eucalyptus trees would be removed within the southeast and northeast stands. In the main stand, all Eucalyptus trees would be removed from the approximately 5.1 acre riparian area on the north side of the stand nearest to the Carmel River and the approximately 1.4 acre western section at the base of Snivley's Ridge; selected trees would be removed in the remainder of the stand to remove unhealthy trees, minimize crown overlap, and reduce the horizontal continuity of fuels. Some cut vegetation may be left on site by lopping or chipping with scattering on the landscape, while some vegetation may be pile burned, as described below. In addition, some of the larger diameter material may be off-hauled to a wood product processing facility or composting facility.

Prescribed Burning

Biomass from manual and mechanical treatment that would be burned would be piled using equipment (e.g., skid steer, tractor, bulldozer or excavator) or hand crews. Typically, dozers are equipped with a brush rake to reduce soil displacement and create "clean" piles. The piles would be located as close as safely possible to the burning location. Biomass would be burned in piles or, preferably, using an air curtain burner or carbonator. Burning would occur in the adjacent open field, 100 feet or more from tree and shrub vegetation. All grasses and other herbaceous vegetation would be removed or burned to bare soil within 30-40 feet of the burn location.

Herbicide Application

The blue gum Eucalyptus tree is identified as invasive by the California Invasive Plant Council (Cal-IPC). This species sprouts prolifically from wounds and cut stumps. Herbicide would be used to control re-growth and limit the necessity of maintenance treatments. Only ground-level application would occur; no aerial spraying of herbicides would occur. Several herbicide application methods are available for use by on-the-ground personnel, including paint-on stems/stumps, using backpack hand-applicators, hypo-hatchet tree injection, or hand placement of pellets. 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. Only herbicides identified in the CalVTP would be applied. Imazapyr, Glyphosate, and Triclopyr (all herbicides identified in the Cal CTP EIR) are effective on Eucalyptus; however, the certified and licensed applicator would choose the best approved herbicide for treatment of Eucalyptus. In addition, only herbicides approved for use in aquatic environments would be used in riparian areas.

1.1.3 Treatment Maintenance

As described above, blue gum Eucalyptus sprouts prolifically from wounds and cut stumps. In addition, new trees may emerge from seeds and Eucalyptus trees retained within the main stand would continue to

shed bark and leaves. Native trees, shrubs and herbaceous species may begin to grow within the removal areas and between retained trees in the main stand. While native species are desirable for habitat health, they may be undesirable within the main stand if they result in vertical continuity of fuels. Undesirable non-native or invasive species may also begin to grow in these areas, which would require maintenance to prevent or slow spread into adjacent native communities.

Maintenance would occur approximately every one to three years, depending on the amount of sprouting from wounds and stumps, growth of new Eucalyptus trees or other vegetation, bark/woody debris accumulation, and infestation by other invasive species. The treatments applied would also depend on these factors. It is likely that the use of mechanical treatments and pile burning would be reduced during the maintenance period; however, these treatments would be used when necessary. Manual treatment and herbicide application are the most likely treatments to be used to maintain the Eucalyptus stands. All maintenance treatments would be implemented using the same methods and equipment as described above for the initial treatment.

In addition, prescribed herbivory may used for maintenance, as described below.

Prescribed Herbivory

Prescribed herbivory using goats may be used for maintenance treatment within the Main Stand and/or Southeast Stand after the initial thinning treatments have been conducted. Prescribed herbivory would not be used in sensitive habitat areas (i.e., riparian areas) or within a 50-foot buffer. The use of prescribed herbivory can limit regrowth and assist with breaking down ground fuels through intensive hoof action as well as herbivory of leaves. Prescribed herbivory would occur when the target plant species is palatable and when feeding on the plants can damage them or reduce viable seeds. A herder, electric or non-electric fencing, mineral block, and/or a watering site may be used.

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2.0 METHODS

2.1 Personnel and Survey Dates

DD&A Senior Environmental Scientist Josh Harwayne and Associate Environmental Scientist Liz Camilo conducted a survey of the project site on June 5, 2023. The survey included walking the project site to identify general and sensitive habitat types, identifying all plant species to the intraspecific taxon necessary to eliminate them as being special-status species, and identifying potential habitat for special-status plant species. Concurrently, reconnaissance-level wildlife habitat surveys were conducted to identify suitable habitat and observe any special-status wildlife species. In addition, the top of bank of the Carmel River (on its south side within the vicinity of the project) was mapped. Data collected during the surveys were used to assess the environmental conditions of the project site and its surroundings, evaluate environmental constraints at the site and within the local vicinity, and provide a basis for recommendations to minimize and avoid impacts.

The project parcel was evaluated for botanical resources following the applicable guidelines outlined in *Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants* (U.S. Fish and Wildlife Service [Service], 2000), *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018), and California Native Plant Society (CNPS) *Botanical Survey Guidelines* (CNPS, 2001).

2.2 Special-Status Species

Special-status species are those plants and animals that have been formally listed or proposed for listing as endangered or threatened or are candidates for such listing under the ESA or the California Endangered Species Act (CESA). Listed species are afforded legal protection under the ESA and CESA. Species that meet the definition of rare or endangered under the CEQA Section 15380 are also considered special-status species. Animals on the CDFW's list of "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA. Additionally, the CDFW also includes some animal species that are not assigned any of the other status designations on their "Special Animals" list; however, these species have no legal or protection status.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in CNPS California Rare Plant Ranks (CRPR) 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380. In general, the CDFW requires that plant species on CRPR 1A (Plants presumed extirpated in California and Either Rare or Extinct Elsewhere), CRPR 1B (Plants rare, threatened, or endangered in California and elsewhere), CRPR 2A (Plants presumed extirpated in California, but more common elsewhere); and CRPR 2B (Plants rare, threatened, or endangered in California, but more common elsewhere) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2023) be fully considered during the preparation of environmental documents relating to CEQA. CNPS CRPR 4 species (plants of limited distribution) may, but generally do not, meet the definitions of Sections 2062 and 2067 of the CESA, and are not typically considered in environmental documents relating to CEQA. While other species (i.e., CRPR 3 or 4 species) are sometimes found in database searches or within the literature,

these were not included within the analysis as they did not meet the definitions of Section 2062 and 2067 of the CESA.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected in California under Fish and Game Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except otherwise provided by this code or any regulation adopted pursuant thereto." In addition, fully protected species under the Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

2.3 Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on CDFW's *California Natural Communities List* (i.e., those habitats that are rare or endangered within the borders of California) (CDFW, 2023a), those that are occupied by species listed under the ESA or are critical habitat in accordance with the ESA, and those that are defined as Environmentally Sensitive Habitat Areas under the California Coastal Act. Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act and Executive Order 11990 – Protection of Wetlands), state regulations (such as CEQA and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies).

2.4 Data Sources

The primary literature and data sources reviewed in order to determine the occurrence or potential for occurrence of sensitive biological resources within the project site are as follows:

- Current agency status information from the Service and CDFW for species listed, proposed for listing, or candidates for listing as threatened or endangered under the ESA or CESA, and those considered CDFW "species of special concern," including:
    - CNDDB occurrences reports from the Seaside quadrangle and the seven surrounding quadrangles, including Carmel Valley, Mt. Carmel, Marina, Monterey, Salinas, Spreckels, and Soberanes Point (CDFW, 2023b; **Appendix A**); and
    - Service IPaC Resource List (Service, 2023a; **Appendix B**).
- The CNPS *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2023);
- The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA-NRCS, 2023);
- The National Wetlands Inventory Wetlands Mapper (Service, 2023b); and
- The National Hydrographic Dataset (USGS, 2022).

From these resources, a list of special-status plant and wildlife species known or with the potential to occur within or adjacent to the project site was created (**Appendix C**). This list presents these species along with their legal status, habitat requirements, and a brief statement of the likelihood to occur.

2.4.1 Botany

Vegetation types identified in *A Manual of California Vegetation* (Sawyer et al., 2009) were utilized to determine if vegetation types identified as sensitive on CDFW's *California Natural Communities List* (CDFW, 2023a) are present within the project site. Information regarding the distribution and habitats of local and state vascular plants was also reviewed (Howitt and Howell, 1964 and 1973; Munz and Keck, 1973; Baldwin et al., 2012; Matthews and Mitchell, 2015; Jepson Flora Project, 2022). All plants observed within the project site during the evaluation were identified to species or intraspecific taxon necessary to eliminate them as being special-status species using keys and descriptions in *The Jepson Manual: Vascular Plants of California, Edition 2* (Baldwin et al., 2012) and *The Plants of Monterey County an Illustrated Field Key* (Matthews and Mitchell, 2015). Scientific nomenclature for plant species identified within this document follows Baldwin, et. Al, (2012); common names follow Matthews and Mitchell (2015). A full botanical inventory was not recorded for the project site but the dominant species within each habitat were noted. Dominant plant species are those which are more numerous than their competitors in an ecological community or make up more of the biomass; generally, the species that are most abundant. Most ecological communities are defined by their dominant species.

The California Invasive Plant Council (Cal-IPC) Inventory (Cal-IPC, 2023) was reviewed to determine if any invasive plant species are present within the project site.

2.4.2 Wildlife

The following literature and data sources were reviewed: CDFW reports on special-status wildlife (Remsen, 1978; Williams, 1986; Jennings and Hayes, 1994; Thelander, 1994; Thomson et. Al, 2016); California Wildlife Habitat Relationships Program species-habitat models (Zeiner et al., 1988 and 1990); and general wildlife references (Stebbins, 1972, 1985, and 2003).

2.5 Regulatory Setting

The following regulatory discussion describes the laws and ordinances that may be applicable to the project.

2.5.1 Federal Regulations

Federal Endangered Species Act

Provisions of the ESA of 1973 (16 USC 1532 et seq., as amended) protect federally listed threatened or endangered species and their habitats from unlawful take. Listed species include those for which proposed and final rules have been published in the Federal Register. The ESA is administered by the Service or National Oceanic and Atmospheric Administration Marine Fisheries Service (NMFS). In general, the NMFS is responsible for the protection of ESA-listed marine species and anadromous fish, whereas other listed species are under Service jurisdiction.

Section 9 of ESA prohibits the take of any fish or wildlife species listed under ESA as endangered or threatened. Take, as defined by ESA, is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or

collect, or attempt to engage in any such conduct." Harm is defined as "any act that kills or injures the fish or wildlife…including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife." In addition, Section 9 prohibits removing, digging up, and maliciously damaging or destroying federally listed plants on sites under federal jurisdiction. Section 9 does not prohibit take of federally listed plants on sites not under federal jurisdiction. If there is the potential for incidental take of a federally listed fish or wildlife species, take of listed species can be authorized through either the Section 7 consultation process for federal actions or a Section 10 incidental take permit process for non-federal actions. Federal agency actions include activities that are on federal land, conducted by a federal agency, funded by a federal agency, or authorized by a federal agency (including issuance of federal permits).

Clean Water Act

The U.S. Army Corps of Engineers (ACOE) and U.S. Environmental Protection Agency (EPA) regulate discharge of dredged and fill material into waters of the U.S. under Section 404 of the CWA. Waters of the U.S. are defined broadly as waters susceptible to use in commerce (including waters subject to tides, interstate waters, and interstate wetlands) and other waters (such as interstate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds) (33 CFR 328.3). Potential wetland areas are identified as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soils conditions."

Under Section 401 of the CWA, any applicant receiving a Section 404 permit from the USACE must also obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB). A Section 401 Water Quality Certification is issued when a project is demonstrated to comply with state water quality standards and other aquatic resource protection requirements.

2.5.2 State Regulations

California Endangered Species Act

The CESA was enacted in 1984. The California Code of Regulations (Title 14, §670.5) lists animal species considered endangered or threatened by the state. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the commission determines to be an endangered species or a threatened species. "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." A Section 2081 Incidental Take Permit from the CDFW may be obtained to authorize "take" of any state listed species.

California Native Plant Protection Act

The CNPPA of 1977 directed CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and Endangered plants in the State." The CNPPA prohibits importing rare and Endangered plants into California, taking rare and Endangered plants, and selling rare and Endangered plants. The CESA and CNPPA authorized the Fish and Game Commission to designate endangered, threatened, and rare species and to regulate the taking of these species (§2050-2098, Fish and Game Code). Plants listed as rare under the CNPPA are not protected under CESA; however, these plants may not be taken or possessed at any time

and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research.

California Fish and Game Code

Birds. Section 3503 of the Fish and Game Code states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Section 3503.5 prohibits the killing, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds-of-prey). Section 3511 prohibits take or possession of fully protected birds. Section 3513 prohibits the take or possession of any migratory nongame birds designated under the federal Migratory Bird Treaty Act (MBTA). Section 3800 prohibits take of nongame birds.

Fully Protected Species. The classification of fully protected was the state's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish (§5515), mammals (§4700), amphibians and reptiles (§5050), and birds (§3511). Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

Species of Special Concern. As noted above, the CDFW also maintains a list of wildlife "species of special concern." Although these species have no legal status, the CDFW recommends considering these species during analysis of project impacts to protect declining populations and avoid the need to list them as endangered in the future.

Lake or Streambed Alteration. Sections 1600-1607 of the Fish and Game Code require any agency that proposes a project that will substantially divert or obstruct the natural flow of or substantially change the bed or bank of a river, stream, or lake to notify CDFW before beginning construction. If CDFW determines that the project may substantially and adversely affect fish or wildlife resources, a Lake or Streambed Alteration Agreement will be required. CDFW's jurisdictional limits are usually defined by the tops of the stream or lake banks, or the outer edge of riparian vegetation, whichever is wider.

2.5.3 Local Regulations

Monterey County Code

The County of Monterey regulates the removal or significant trimming of native oak, madrone, and redwood trees in the County's Carmel Valley Planning Area, per the provisions in County Code Chapter 16.60 (Preservation of Oak and Other Protected Trees). Removal of a protected oak, madrone, or redwood tree as defined in the Code requires a tree removal permit from the County. The removal of more than three protected trees requires the preparation and implementation of a forest management plan.

However, based upon the *Save Lafayette Trees v. East Bay Regional Park District (2021) 66 Cal.App.5th 21* case and the analysis therein, the local tree ordinance permitting requirement would not apply to MPRPD. Public Resources Code Section 5541 allows a district to adopt, operate and maintain a system of public parks. Further Section 5558 provides that "The board shall, in general, do all acts necessary to the property execution of powers and duties granted to, and imposed upon, it by this article, and to manage and

control the business and affairs of the district." Section 5595 states that the article should be liberally construed to allow the district to carry out its purpose. The Court in this case considered these provisions when looking at whether a local tree ordinance was enforceable within a regional park owned and operated by such a district. The Court determined that the authority given to park districts was not subordinate to local regulatory authority except where the land is owned or controlled by the local regulatory authority, and that the district's park land was not subject to local tree ordinance permitting requirements. The only exception to this would be where the district board agreed to such regulatory authority.

The MPRPD Master Plan, dated April 6, 1998 identifies under the Management Plan Policy, Section 7.4, that MPRPD shall obtain all required land use or coastal development permits prior to authorizing public use, dedication, or improvements to any MPRPD lands. However, this project is not an improvement project, but rather maintenance activities and therefore would not fall within this provision. Therefore, the Monterey County Tree ordinance is not applicable to treatment activities on MPRPD land. The Monterey County tree ordinance would, however, apply to any treatment activities conducted on private property within the project site.

3.0 RESULTS

3.1 Natural Communities

3.1.1 Eucalyptus Groves

- *A Manual of California Vegetation* classification(s): Eucalyptus - tree of heaven - black locust groves (*Eucalyptus spp. - Ailanthus altissima - Robinia pseudoacacia* woodland semi-natural alliance)
- CDFW *California Natural Communities List*: Not sensitive

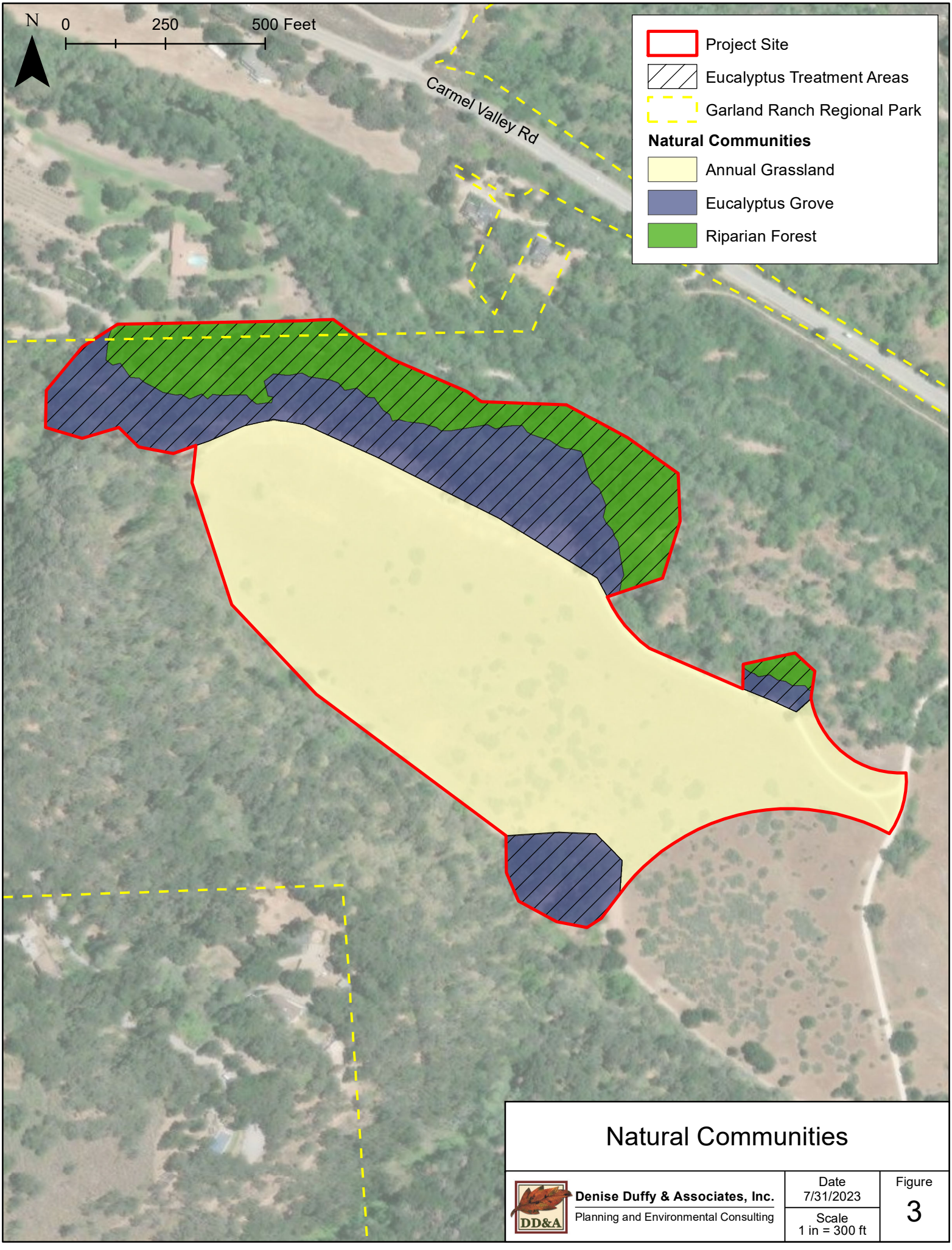
Eucalyptus habitats range from single-species thickets with little or no shrubby understory to scattered trees over a well-developed herbaceous and shrubby understory. In most cases, Eucalyptus (*Eucalyptus* spp.) trees form a dense stand with a closed canopy. Three Eucalyptus stands, dominated by a moderate to closed canopy of blue gum Eucalyptus, occur within the project site (**Figure 3**). The understories within the Northeast and Southeast stands are dominated by the same annual grasses and forbs as the adjacent annual grassland habitat (see the *Annual Grassland* discussion below), but poison oak (*Toxicodendron diversilobum*) and Italian thistle (*Carduus pycnocephalus*) are also common. The understory within the main stand is dense and is dominated by poison oak, but Italian thistle, cape ivy (*Delairea odorata*), and wood fern (*Dryopteris arguta*) are also present. Approximately 6.9 acres of Eucalyptus groves occur within the project site.

With over 700 species, Eucalyptus is a diverse genus of flowering trees that are native to Australia and were introduced to California during the gold rush (University of California, 2022). The main species planted are the blue gum, red gum (*E. camaldulensis*), red ironbark (*E. tricarpa*), and silver dollar gum (*E. polyanthemos*). These species were introduced worldwide because they can adapt and grow in severely dry regions that have been historically unable to maintain vegetation, and therefore, provide shade, shelter, windbreaks, and a source of timber in areas that otherwise would have been dominated by grasses (University of California, 2022). Although they are not native, Eucalyptus groves provide roosts, perches, and nest sites for a variety of bird species, including American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), barn owl (*Tyto alba*), red-tailed hawk (*Buteo jamaicensis*), and red-shouldered hawk (*Buteo lineatus*). Those Eucalyptus with stringy bark or a tendency for rapid deposition of litter also create micro habitats for a number of small vertebrate species, including lizards, snakes, and woodrats.

3.1.2 Riparian Forest

- *A Manual of California Vegetation* classification(s): Black cottonwood forest and woodland (*Populus trichocarpa - Salix lasiolepis* association)
- CDFW *California Natural Communities List*: Sensitive

Riparian habitats are those plant communities supporting woody vegetation found along rivers, creeks, streams, canyon bottom drainages, and seeps. They can range from a dense thicket of shrubs to a closed canopy of large mature trees. Within the project site, riparian vegetation is associated with the adjacent Carmel River. Black cottonwood (*Populus trichocarpa*) and arroyo willow (*Salix lasiolepis*) are dominant in the riparian tree canopy, but these areas are invaded by blue gum Eucalyptus. Poison oak and other understory species documented in the Eucalyptus groves (see the discussion above) also occur in the riparian



Natural Communities

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Date
7/31/2023

Scale
1 in = 300 ft

Figure
3

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habitat but the riparian understory is dominated by California blackberry (*Rubus ursinus*) and California mugwort (*Artemisia douglasiana*). The distribution of riparian habitat within the site was confirmed in the field to concur with the Federal Emergency Management Agency (FEMA) 100-year floodplain mapping. Approximately 5.3 acres of riparian habitat occur within the project site (**Figure 3**).

Riparian communities are characterized by unique ecological features that support a wide variety of plant species, stabilize creekbank soils, maintain water quality through filtration, and provide habitat for many resident and migrant wildlife, particularly birds and herpetofauna. These factors include flooding, rich and productive soils, a water table that is within reach of plant roots, and species of plants and wildlife that are adapted to the timing of fluvial events such as flooding and drought. Riparian corridors also function as linear migration routes for many wildlife species. As a result, riparian forests support a greater diversity of wildlife than any other habitat type in California (Griggs, 2009). Common species that may be found within the riparian habitat in the site include Sierran treefrog (*Pseudacris sierra*), Monterey ensatina (*Ensatina eschscholtzii eschscholtzii*), and various avian species.

3.1.3 Annual Grassland

- *A Manual of California Vegetation* classification(s): Wild oats and annual brome grasslands (*Avena* spp. - *Bromus* spp. herbaceous semi-natural alliance) and coyote brush scrub (*Baccharis pilularis* shrubland alliance)
- CDFW *California Natural Communities List*: Not sensitive

Throughout California, annual grasslands typically occur in open areas of valleys and foothills, usually on fine-textured clay or loam soils that are somewhat poorly drained (Holland, 1986). This natural community is often dominated by non-native annual grasses and forbs along with scattered native grasses and wildflowers. Within the project site, densely vegetated annual grasses and forbs intermingle with a sparse to moderate shrub layer of coyote brush (*Baccharis pilularis*) and occasional coast live oak (*Quercus agrifolia*) bushes. Dominant species in the herb layer include slender wild oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), black mustard (*Brassica nigra*), bicolor lupine (*Lupinus bicolor*), rose clover (*Trifolium hirtum*), purple clarkia (*Clarkia purpurea*), soft chess (*Bromus hordeaceus*), and vetch (*Vicia sativa*). Approximately 21.0 acres of annual grassland occur within the project site (**Figure 3**).

Annual grassland is an abundant natural community with a statewide distribution. The community protects the soil from erosion and provides the primary source of forage for grazing wildlife and domestic livestock. Common wildlife species which may occur within this habitat include pocket gopher (*Thomomys bottae*), ground squirrel (*Otospermophilus beecheyi*), European starling (*Sturnus vulgaris*), and western fence lizard (*Sceloporus occidentalis*).

3.2 Special-Status Species

Published occurrence data within the project area and surrounding USGS quadrangles were evaluated to compile a table of special-status species known to occur in the vicinity of the project site (see *Section 2.0 Methods*). Each of these species was evaluated for their likelihood to occur within and immediately adjacent to the project site (**Appendix C**). No special-status plant species were observed or have the potential to occur within the project site. Several special-status wildlife species have been determined to have a moderate or high potential to occur within or immediately adjacent to the project site. In addition, raptors

and other protected avian species have the potential to nest within trees present and adjacent to the site. These species are discussed further below. All other species are assumed unlikely to occur or have a low potential to occur based on the species-specific reasons presented in **Appendix C**, are therefore unlikely to be impacted by the project, and are not discussed further.

Townsend's Big-Eared Bat

The Townsend's big-eared bat (*Corynorhinus townsendii*) is a CDFW species of special concern. The Townsend's big-eared bat is a year-round resident in California occurring from low desert to mid-elevation montane habitats. It is found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Townsend's big-eared bats typically roost during the day in caves and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees. It hibernates in mixed sex aggregations of a few to several hundred individuals. Hibernation is more prolonged in colder areas. This species arouses periodically and moves to alternative roosts and actively forages and drinks throughout the winter. A single young is born per year between May and July. Females form maternity colonies of 35 to 200 individuals, while males roost individually. Townsend's big-eared bats feed primarily on small moths that are gleaned from vegetation.

The CNDDB reports one occurrence of this species within the quadrangles reviewed, located approximately nine miles west of the project site. No suitable day or maternity roosting habitat is present within the project site; however, this species may utilize any of the large trees within the project site for night roosts and may forage within the site. Therefore, Townsend's big-eared bat has a moderate potential to occur within the project site.

Monterey Dusky-Footed Woodrat

The Monterey dusky-footed woodrat (*Neotoma macrotis luciana*, MDFW) is a CDFW species of special concern. This is a subspecies of the dusky-footed woodrat *(Neotoma macrotis)*, which is common to oak woodlands and other forest types throughout California. Dusky-footed woodrats are frequently found in forest habitats with moderate canopy cover and a moderate to dense understory, including riparian forests; however, they may also be found in chaparral communities. Relatively large nests are constructed of grass, leaves, sticks, and feathers and are built in protected spots, such as rocky outcrops or dense brambles of blackberry and/or poison oak. Typical food sources for this species include leaves, flowers, nuts, berries, and truffles. Dusky-footed woodrats may be a significant food source for small- to medium-sized predators. Populations of this species may be limited by the availability of nest material. Within suitable habitat, nests are often found in close proximity to each other.

Suitable habitat for MDFW is present within the project site in the Eucalyptus and riparian habitats. The CNDDB reports only one occurrence of MDFW within the quadrangles reviewed, located approximately ten miles northeast of the project site; however, this species is known to occur throughout the region. Nests of this species were not observed within the project site during the June 2023 biological survey, but this species may move into the site prior to project activities. Therefore, MDFW has a moderate potential to occur within the project site.

American Badger

The American badger (*Taxidea taxus*) is a CDFW species of special concern. Badgers occupy a diversity of habitats within California. The principal requirements seem to be sufficient food, friable soils, and relatively open, uncultivated grounds. Grasslands, savannas, and mountain meadows near timberline are preferred. Badgers feed primarily on burrowing rodents such as gophers, squirrels, mice, and kangaroo rats, as well as some insects and reptiles. Badgers also break open beehives to eat both the brood and honey. They are active all year long and are nocturnal and diurnal. Mating occurs in summer and early fall, and two to five young are born in burrows that are dug in relatively dry, often sandy soil, usually with sparse overstory cover.

Suitable habitat for American badger is present within grassland areas of the project site. The CNDDB reports nine occurrences of American badger within the quadrangles reviewed, the nearest located approximately 4.8 miles north of the project site on the former Fort Ord. This species has also been observed along Carmel Valley Road approximately nine miles east of the project site. No suitable badger burrows were observed within the site during the June 2023 biological survey; however, badgers may move into the area prior to project activities. Therefore, American badger has a moderate potential to occur within the project site.

Northern California Legless Lizard

The Northern California legless lizard is a CDFW species of special concern. This fossorial (burrowing) species typically inhabits sandy or loose (friable) soils. Habitats known to support Northern California legless lizard include, but are not limited to, coastal dunes, valley and foothill grasslands, chaparral, and coastal scrub at elevations from near sea level to approximately 1,800 meters (6,000 feet). The Northern California legless lizard forages on invertebrates beneath the leaf litter or duff layer at the base of bushes and trees or under wood, rocks, and slash in appropriate habitats. The diet of this species likely overlaps to some extent with that of juvenile alligator lizards and perhaps some other salamanders. This species may be preyed upon by alligator lizards, snakes, birds, and small mammals. Little is known about the specific habitat requirements for courtship and breeding; however, the mating season for this species is believed to begin late spring or early summer, with one to four live young born between September and November.

Suitable habitat and soils for Northern California legless lizard is present throughout the entire project site where appropriate cover conditions occur, particularly in the riparian and eucalyptus habitats; in annual grassland areas, habitat would be limited to areas underneath shrubs. The CNDDB reports 47 occurrences of this species within the quadrangles reviewed, the nearest located 0.3 mile west of the project site. In addition, this species is known to occur within riparian habitat along the Carmel River. Therefore, Northern California legless lizard has a moderate potential to occur within the project site.

Western Pond Turtle

The western pond turtle is a CDFW species of special concern. This species is uncommon to common in permanent or nearly permanent aquatic resources in a wide variety of habitats throughout California, and requires basking sites such as partially submerged logs, rocks, mats of floating vegetation, or open mud banks. The home range of western pond turtles is typically quite restricted; however, ongoing research indicates that in many areas, turtles may leave the watercourse in late fall and move into upland habitats where they burrow into duff and/or soil and overwinter (Holland, 1994). In the central California coast, mating occurs from April to May and reproductive females lay one or two clutches of three to 11 eggs from

June to August (Rathbun et al. 1992). Female western pond turtles move overland up to 100 meters to find suitable sites for egg-laying. Nests are typically excavated in compact, dry soils in areas characterized by sparse vegetation, usually in short grasses or forbs (Holland 1994). Eggs hatch in about 10 to 12 weeks. Food sources include aquatic plant material, beetles, and a wide variety of aquatic invertebrates. Fish, frogs, and carrion have also been reported among their food sources (Stebbins, 1972).

The CNDDB reports 13 occurrences of western pond turtle within the quadrangles reviewed, including a 2002 non-specific occurrence mapped to the Carmel River which overlaps a portion of the project site. As such, this species is known to occur immediately adjacent to the project site. In addition, although this species is not typically found in Eucalyptus groves or areas with dense duff cover; MPRPD indicates that this species has been observed within the eucalyptus and riparian areas within the project site. Therefore, the western pond turtle has a moderate potential to occur within the project site, particularly where the site directly abuts the Carmel River. Portions of the annual grassland are also within 100 meters of the Carmel River; however, the annual grasses are likely too tall and dense to provide nesting habitat and western pond turtle presence within these areas is low. Eucalyptus and riparian habitats do not provide suitable nesting habitat for this species.

California Red-Legged Frog

The California red-legged frog (*Rana draytonii*, CRLF) is listed as a federally threatened species and a CDFW species of special concern. The CRLF is the largest native frog in California (44-131 mm snout-vent length) and was historically widely distributed in the central and southern portions of the state (Jennings and Hayes, 1994). Adults generally inhabit aquatic habitats with riparian vegetation, overhanging banks, or plunge pools for cover, especially during the breeding season (Jennings and Hayes, 1988). They may take refuge in small mammal burrows, leaf litter, or other moist areas during periods of inactivity or to avoid desiccation (Rathbun et al., 1993; Jennings and Hayes, 1994). Radiotelemetry data indicates that adults engage in straight-line breeding season movements irrespective of riparian corridors or topography and they may move up to two miles between non-breeding and breeding sites (Bulger et al., 2003). During the non-breeding season, a wider variety of aquatic habitats are used including small pools in coastal streams, springs, water traps, and other ephemeral water bodies (Service, 1996). CRLF may also move up to 300 feet from aquatic habitats into surrounding uplands, especially following rains, where individuals may spend days or weeks (Bulger et al., 2003).

This species requires still or slow-moving water during the breeding season where it can deposit large egg masses, which are most often attached to submergent or emergent vegetation. Breeding typically occurs between December and April depending on annual environmental conditions and locality. Eggs require six to 12 days to hatch, and metamorphosis generally occurs after 3.5 to seven months, although larvae are also capable of over-wintering. Following metamorphosis, generally between July and September, juveniles are 25-35 mm in size. Juvenile CRLF appear to have different habitat needs than adults. Jennings and Hayes (1988) recorded juvenile frogs mostly from sites with shallow water and limited shoreline or emergent vegetation. Additionally, it was important that there be small one-meter breaks in the vegetation or clearings in the dense riparian cover to allow juveniles to sun themselves and forage, but to also have close escape cover from predators. Jennings and Hayes also noted that tadpoles have different habitat needs and that in addition to vegetation cover, tadpoles use mud. It is speculated that CRLF larvae are algae grazers, however, foraging larval ecology remains unknown (Jennings, et al., 1993).

It has been shown that occurrences of CRLF are negatively correlated with presence of non-native, invasive bullfrogs (Moyle, 1973; Jennings and Hayes, 1986 and 1988), although both species are able to persist at certain locations, particularly in the coastal zone. It is estimated that CRLF has disappeared from approximately 75 percent of its former range and has been nearly extirpated from the Sierra Nevada, Central Valley, and much of southern California (Service, 1996).

The CNDDB reports 57 occurrences of CRLF within the quadrangles evaluated, many mapped to the Carmel River and one which overlaps a portion of the project site. Suitable breeding habitat for CRLF may be present adjacent to, but not within, the project site in the Carmel River. Suitable upland habitat for CRLF is present within the project site in riparian habitat and, although not a typical habitat for this species, the Eucalyptus groves in the Main Stand and Northeast Stand may provide marginal upland habitat for this species. Therefore, CRLF has a high potential to occur within the project site, particularly where the site directly abuts the Carmel River.

Coast Range Newt

The Coast Range newt (*Taricha torosa*) is a CDFW species of special concern. This species occurs commonly in the Coast Ranges from central Mendocino County south to northern San Diego County, primarily in valley-foothill hardwood, valley-foothill hardwood-conifer, coastal scrub, and mixed chaparral, but is also known from annual grassland and mixed conifer habitat types. The elevation range extends from sea level to 6,000 feet. Juveniles and terrestrial adults prey on earthworms, snails, slugs, sowbugs, and insects (Stebbins, 1972). Adults at breeding ponds have been observed to take the eggs of their own species and other amphibians, as well as trout, adult and larval aquatic insects, small crustaceans, snails, and clams. Aquatic larvae eat many small aquatic organisms, especially crustaceans. Terrestrial individuals seek cover under surface objects, such as rocks and logs, or in mammal burrows, rock fissures, or human-made structures, such as wells. Aquatic larvae find cover beneath submerged rocks, logs, debris, and undercut banks. Breeding and egg-laying occur in intermittent streams, rivers, permanent and semi-permanent ponds, lakes, and large reservoirs. Eggs are laid in small clusters on the submerged portion of emergent vegetation, on submerged vegetation, and on the underside of rocks off the bottom. Terrestrial individuals are relatively inactive in subterranean refuges most of the year. Migrations to and from breeding areas usually occur at night during or just following rains.

The CNDDB reports three occurrences of the Coast Range newt within the quadrangles reviewed, the nearest located approximately 5.5 miles west of the project site. Suitable breeding habitat for the Coast Range newt is present adjacent to, but not within, the project site in the Carmel River. Suitable upland habitat for this species is present within the project site in riparian habitat and Eucalyptus groves. Therefore, the Coast Range newt has a moderate potential to occur within the project site, particularly where the site directly abuts the Carmel River.

South-central California Coast Steelhead

The south-central California coast steelhead (*Oncorhynchus mykiss irideus*; S-CCC steelhead) is designated as federally Threatened in all naturally spawned populations (and their progeny) in streams from the Pajaro River (inclusive) located in Santa Cruz County, CA, to (but not including) the Santa Maria River (71 FR 833-862) in San Luis Obispo County. The designation of critical habitat for steelhead became effective on January 2, 2006. Primary constituent elements include freshwater spawning sites, freshwater rearing sites, freshwater migration corridors, estuarine areas, nearshore marine areas, and offshore areas.

The present distribution and abundance of steelhead in California has been greatly reduced from historical levels. In general, steelhead migrate to sea as two-year-old fish, spend two years in the ocean, and then return to fresh water to spawn. Peak spawning for steelhead occurs from December through April in small streams and tributaries. Unlike Pacific salmon, steelhead do not necessarily die after spawning, although repeat spawning rates are generally low and vary considerably among populations. Steelhead have traditionally been grouped into seasonal runs according to their peak migration period; in California there are well-defined winter, spring, and fall runs.

Although no suitable habitat for S-CCC steelhead is present within the treatment areas, this species is known to occur within the adjacent Carmel River.

Crotch Bumble Bee and Western Bumble Bee

The crotch bumble bee (CBB; *Bombus crotchii*) and western bumble bee (WBB; *Bombus occidentalis*) are a candidate species for listing under CESA. The CBB was historically common in the southern two-thirds of California, but now appears to be absent from most of it, especially in the center of its historic range (Xerces Society for Invertebrate Conservation [The Xerces Society] et, al., 2018). The WBB was formerly common from the Pacific coast to the Colorado Rocky Mountains; however, populations from central California to southern British Columbia, Canada and west of the Sierra-Cascade Ranges have declined sharply since the late 1990s (Koch et. al., 2012; Williams et. al., 2014).

Bumble bees are insects that live in colonies made up of one queen, female workers and, near the end of the season, reproductive members of the colony (new queens, or gynes, and males). Unlike their close relative the honeybee, bumble bee colonies do not persist with the same queen for several years. Instead, bumble bee colonies die at the end of each season, and a new colony is founded each year. Mated, overwintered queens emerge from hibernation in the early spring to found a new colony. Once locating a nest site, the queen will construct a wax honeypot for nectar storage and will lay her first clutch of eggs on a mass of pollen moistened with nectar in a small wax cup. After hatching, the larvae feed on the pollen for approximately two weeks before spinning a silk cocoon and pupating for another two weeks. The adult bees that emerge are female worker bees that forage for resources, tend new clutches of eggs and larvae, regulate nest temperature, and defend the nest. The queen will then remain in the nest and lay more eggs, and at some time in the summer the colony will switch over to production of males and new queens. Adult males do not forage for the colony but will leave the nest to feed at flowers and search for mates. Newly emerged queens leave the nest during the day to feed on pollen and nectar in order to build fat reserves that will carry them through a winter of hibernation. Queens usually mate only once with one male before finding a suitable overwintering site and entering a period of torpor. The new queen having reproduced, the colony declines and the males, workers, and old queen will die before winter (Williams et. al., 2014).

Typical habitat types for CBB and WBB include open grassy areas, urban parks and gardens, chaparral and shrub areas, and mountain meadows where abundant floral resources are present (Williams et. al., 2014; The Xerces Society et. al., 2018). CBB and WBB require plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October or November, respectively. Both species are generalist foragers and has been reported to visit a wide variety of flowering plants; however, both have a very short tongue that is best suited to open flowers with short corollas. The plant families most commonly associated with CBB include Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, and Boraginaceae. Select food genera for WBB include, but is not limited to, *Ceanothus, Geranium, Grindelia, Lupinus, Monardella, Rubus, Solidago, Melilotus, Cirsium, Trifolium, Centaurea,*

Chrysothamnus, *Penstemon,* and *Eriogonum* (Koch et. al., 2012; Williams et. al., 2014; The Xerces Society et. al., 2018).

Like most other species of bumble bees, CBB and WBB typically nest underground. Most reports of nests are from underground cavities, such as old squirrel or other animal nests, and in open west-southwest slopes bordered by trees. A few nests have also been reported from above-ground locations such as in logs among railroad ties or under buildings (Hatfield et. al., 2015; The Xerces Society et, al., 2018; Thorpe et. al., 1983). Very little is known about overwintering sites utilized by most bumble bees, including CBB and WBB; however, they generally overwinter in soft, disturbed soil or under leaf litter of other debris (Goulson, 2010; Williams et. al., 2014; The Xerces Society et. al., 2018). One report identified that hibernacula was two inches deep "in a steep west slope of the mound of earth" and a closely related European species, has been reported to hibernate beneath trees (Hatfield et. al., 2015; The Xerces Society et, al., 2018). Additionally, a recent study at the former Fort Ord on the Monterey Peninsula that studied potential overwintering habitat found individuals of two species (*B. melanopygus* and *B. vosnesenskii*) hibernating in the duff below Monterey cypress trees, while none were observed in areas where the groundcover consisted of pine needle duff, grassy meadow, or the invasive iceplant (*Carpobrotus* sp.) (Williams et. al., 2019).

Suitable habitat for the CBB and WBB is present within the project site in annual grassland areas. Mammal burrows and a variety of flowering annual plants which could provide nectar for these species, including bicolor lupine, rose clover, purple clarkia, and vetch, were observed within grassland habitat during the June 2023 biological survey. The abundance of coyote brush, which flowers from August to November, suggests that sufficient nectar and pollen for the entire flight season of a CBB and WBB colony if present within the project site. The CNDDB reports six occurrences of WBB within the quadrangles reviewed, the nearest located approximately seven miles northwest of the project site. Leif Richardson of the Xerces Society for Invertebrate Conservation identifies that WBB formerly ranged along the coast as far south as Monterey County; however, the last recorded observation was made in 1983 (pers. comm. 2023). The CNDDB does not report any occurrences of CBB within the quadrangles reviewed; however, this species was observed in 2022 at the Hastings Reserve (located approximately 14 miles from the project site) and near the Monterey County-San Luis Obispo County line in the Santa Lucia Mountain Range (pers. comm. Leif Richardson of the Xerces Society for Invertebrate Conservation, 2023). Therefore, the CBB and WBB have a moderate potential to occur within the project site.

Raptors and Other Protected Avian Species

Raptors, their nests, and other nesting birds are protected under California Fish and Game Code. While the life histories of these species vary, overlapping nesting and foraging similarities allow for their concurrent discussion. Most raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest habitats, as well as open grasslands, are used most frequently for nesting. Breeding occurs February through mid-August, with peak activity May through July. Prey for these species include small birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges.

Various species of raptors and other nesting birds, such as red-tailed hawk, red-shouldered hawk, American kestrel (*Falco sparverius*), great horned owl (*Bubo virginianus*), turkey vulture (*Cathartes aura*), American crow, common raven, barn owl, and tree swallow (*Tachycineta bicolor*), have a potential to nest within any

of the large trees present within and directly adjacent to the project site. Other common avian species may also nest within the brushy understory of the eucalyptus and riparian habitats.

3.3 Sensitive Habitats

3.3.1 Riparian Habitat

The rich soils and presence of water that make riparian ecosystems so diverse also function as productive land for agriculture and are desirable locations of development. As a result, much of the historic riparian habitat within California has been lost to agricultural conversion, urbanization, and flood control activities. To combat this habitat loss, CDFW supports a policy of minimizing the destruction or degradation of riparian habitat. Riparian areas are subject to the jurisdiction of CDFW under Section 1602 of the Fish and Game Code. Additionally, the black cottonwood and arroyo willow floristic alliance occurring within riparian areas is identified as sensitive on CDFW's *California Natural Communities List* (CDFW, 2023a). As described above, approximately 5.3 acres of riparian habitat occur within the project site (**Figure 4**). Riparian habitat also occurs immediately adjacent to the Main Stand and the Northeast Stand.

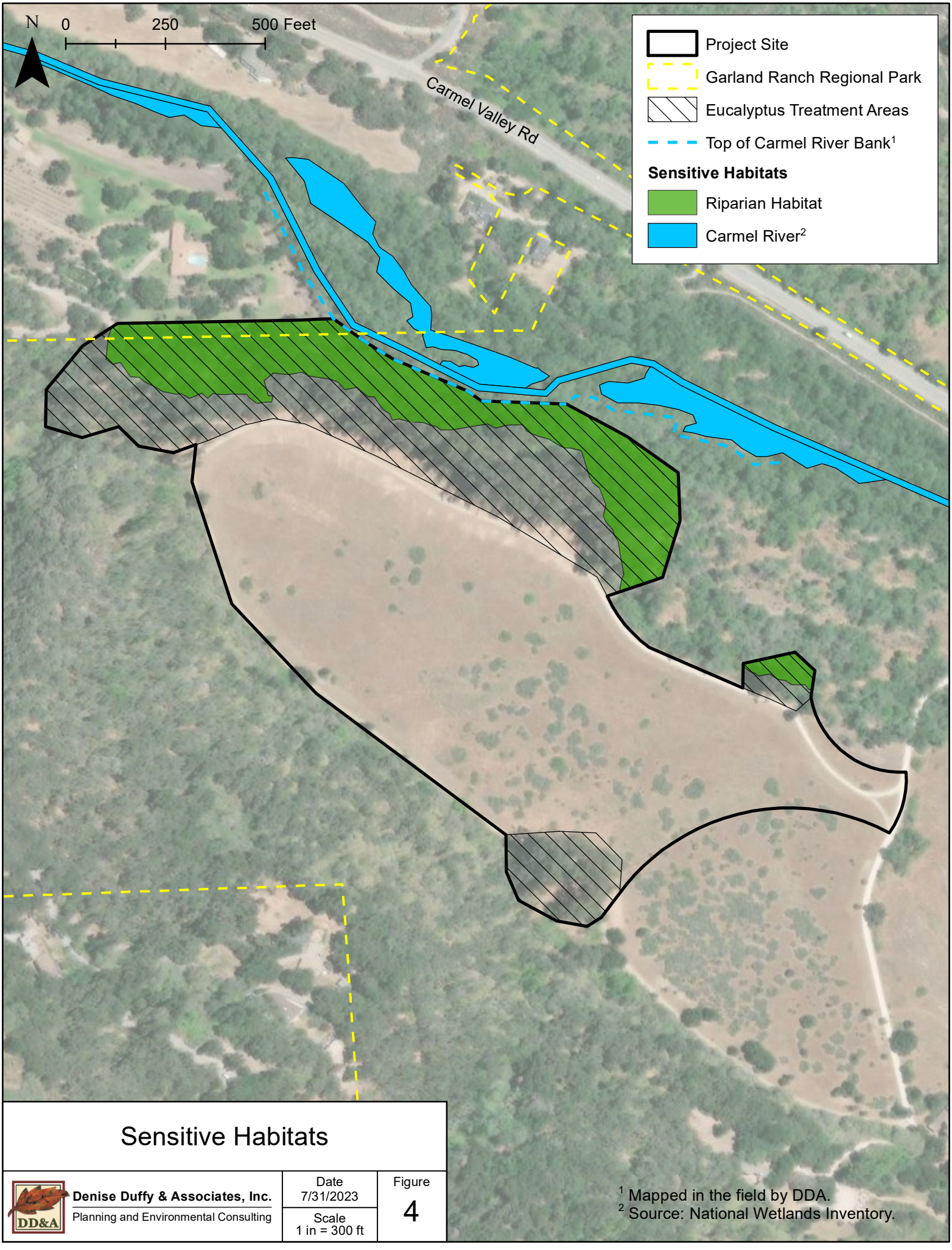
3.3.2 Waters of the U.S.

The Carmel River is considered jurisdictional waters of the U.S. and state, and potential wetlands of the U.S. and/or state may be present directly adjacent to river below the ordinary high water mark. As the project site is located outside of ordinary high water, potentially jurisdictional wetlands and other waters are not present within the site.

3.3.3 Critical Habitat

The entire project site lies within Critical Habitat Mapping Unit MNT-2 for the California red-legged frog (*Rana draytonii*, CRLF), which the Service designated on April 13, 2006 (71 FR 19244-19346) and revised on March 17, 2010 (75 FR 12816-12959). The primary physical and biological features of CRLF critical habitat are aquatic breeding habitat, non-breeding aquatic habitat, upland habitat, and dispersal habitat. No aquatic resources are present within the project site; the site provides only critical dispersal and upland habitat for CRLF. Approximately 33.2 acres of critical dispersal habitat for CRLF (the entire project site) and 5.3 acres of critical upland habitat for CRLF (riparian habitat) are present within the project site (**Figure 4**). However, critical habitat requirements do not apply to activities that are not conducted on federal land or that do not involve a federal agency.

Critical habitat for south-central California Coast (S-CCC) steelhead (*Oncorhynchus mykiss iredeus*) occurs directly adjacent to, but not within, the project site in the Carmel River (**Figure 4**). The lateral extent of critical habitat for steelhead is the stream channel's width, defined by the ACOE in 33 CFR 329.11 as the ordinary high-water mark. In areas for which ordinary high water has not been defined pursuant to 33 CFR 329.11, the width of the stream channel is defined by its bank full elevation. As the project site is located outside of ordinary high water, critical habitat for S-CCC steelhead is not present within the project site.



Sensitive Habitats

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Planning and Environmental Consulting

Date	Figure
7/31/2023	4
Scale: 1 in = 300 ft	

[1] Mapped in the field by DDA.
[2] Source: National Wetlands Inventory.

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3.4 Protected Trees

Scattered coast live oak trees are present within the project site. As described in *Section 2. Methods*, coast live oak trees are protected under County Code Chapter 16.60; however, the County tree ordinance would only apply to treatment activities conducted on private property. If the project would result in removal or significant damage to a coast live oak tree located within private property, a tree removal permit from the County would be required prior to construction. Removal of more than three oak trees from the private property would require a forest management plan.

3.5 Habitat Connectivity and Nursery Sites

The California Essential Habitat Connectivity Project (California Department of Transportation [Caltrans] and CDFW, 2020) identifies large remaining blocks of intact habitat or natural landscape and models linkages between them to provide a basis for management of these important areas, particularly as corridors for wildlife. The California Essential Habitat Connectivity Project identifies that the project site contains a modeled essential connectivity area characterized as "more permeable" and therefore likely functions as a wildlife movement corridor and provides connectivity with other natural habitats surrounding the site. In addition, riparian corridors, such as the Carmel River riparian corridor located within and adjacent to the project site, are known to provide important movement corridors for wildlife. No known wildlife nursery sites or indications of nursery sites were identified within any treatment areas.

4.0 IMPACTS AND MITIGATION MEASURES

The following impact analysis is formatted to be consistent with the Project Specific Analysis (PSA) that will be prepared for the project under the CalVTP PEIR. The relevant Standard Project Requirements (SPRs) and Mitigation Measures from the PEIR are referenced below and provided in Appendix D. Appendix D also includes project-specific measures are to avoid or reduce potential impacts to sensitive biological resources.

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

This Biological Resources Report includes a review of project-specific biological resources and a reconnaissance-level survey of the project site conducted pursuant to SPR BIO-1, and to conduct protocol-level surveys for special-status plants conducted pursuant to SPR BIO-7. No special-status plants were observed during protocol-level surveys. All other special-status plant species were determined to be not present based on the results of the protocol-level survey or unlikely to occur due to lack of suitable habitat (Appendix C).

Several additional SPRs would reduce potential indirect impacts to special-status plants that may occur outside of the project site. SPR BIO-6 would prevent the spread of plant pathogens in areas with sensitive biological resources, while SPR BIO-9 would prescribe measures to prevent the spread of invasive plants. SPR AQ-4 includes dust control measures such as speed limits and use of water trucks if road use creates excessive dust. Additionally, SPR HAZ-1 would require regular maintenance of equipment, which would reduce the potential fuel leaks and other spills from equipment. With implementation of the SPRs described above, impacts to special-status plants from the treatment project would be less than significant. No mitigation measures are applicable to this impact.

Impact BIO-2: Would the Project Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications?

This Biological Resources Report includes a review of project-specific biological resources and a reconnaissance-level survey of the treatment areas conducted pursuant to SPR BIO-1. Nine of the special-status wildlife species from the complete list of species were determined to have a moderate or high potential to occur within the treatment area or adjacent grassland (where stockpile of removed material and pile burning would be conducted) based on the presence of suitable habitat and/or known occurrence in the vicinity (Appendix C). In addition, one fish species (south-central California coast steelhead) is known to occur in the Carmel River, located outside of, but immediately adjacent to the treatment area. Initial and maintenance treatments could result in direct or indirect adverse effects on special-status wildlife species, as detailed below. The CalVTP PEIR groups species into life history categories that would respond similarly to the range of proposed treatment activities, which allows for the discussion of specific species added to special-status species lists subsequent to the release of the Final PEIR. The discussion of special-status species that may occur within the project site is categorized in the same manner as the PEIR.

Ground-nesting Wildlife

Monterey Dusky-Footed Woodrat

Suitable habitat for MDFW is present within the project site in the Eucalyptus grove and riparian habitats. Nests of this species were not observed within the project site during the June 2023 biological survey however, this species may move into the site prior to treatment activities.

Mechanical treatment activities would include cutting and masticating existing vegetation and manual treatment activities would include the use of hand tools (e.g., loppers) and hand-operated power tools (e.g., chainsaws) to prune, thin, or remove vegetation. Prescribed herbivory would include the use of domestic livestock (e.g., cows, goats, sheep) to reduce the target plant population and understory biomass. If mechanical, manual, and/or prescribed herbivory treatments occur during the breeding season, ground nests could be accidentally crushed by equipment or foot traffic from crews, by livestock, or otherwise damaged. This could result in the direct mortality of adults or young, if present. Additionally, MDFW could be alarmed by the presence of heavy equipment, personnel, and/or livestock which could result in nest abandonment, and potential mortality of young. In addition to breeding-season impacts, MDFW use their middens year-round; thus, potential adverse effects on this species as a result of mechanical, manual, and prescribed herbivory treatment activities would not be limited to the breeding season. The potential for treatment activities to result in adverse effects on special-status ground-nesting wildlife, including MDFW, was examined in the CalVTP PEIR (Section 3.6.3, pages 164-171).

SPR BIO-10 would be implemented, which requires focused surveys for MDFW nests within suitable habitats in treatment areas to be conducted by a qualified biologist. If an active nest is identified by a qualified biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around woodrat nests to the extent feasible to complete the work. If avoidance is not feasible, woodrat nests that cannot be avoided during treatments would be dismantled by a qualified biologist. If a litter of young is found or suspected, nest material would be replaced and the nest monitored by the qualified biologist until the young are capable of independent survival before proceeding with nest dismantling. In addition, the boundaries of the treatment areas would be flagged or fenced to avoid impacts to woodrat nests located outside of the treatment areas and treatment activities would be monitored by a qualified biologist and an individual of the crew designated to act as an on-site monitor. Project-specific measures for MDFW have been added to SPR BIO-10 and Mitigation Measure BIO-2b. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-6, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5.

Burrowing or Denning Wildlife

American Badger

Suitable habitat for American badger is present within grassland areas of the project site where stockpile of removed material and pile burning would be conducted. No suitable badger burrows were observed within the site during the June 2023 biological survey; however, badgers may move into the area prior to treatment activities.

Treatment activities will not include ground-disturbing activities (e.g., grading or excavating) and the project would not result in permanent loss of habitat for American badger (i.e., habitat function would be maintained). However, treatment activities such as stockpile of removed vegetation in the grassland area and burning of biomass via pile burning or use of an air curtain burner or carbonator could result in injury, den abandonment, and/or mortality of individuals, if individuals are present within or directly adjacent to the project site during treatment activities. The potential for treatment activities to result in adverse effects on special-status burrowing and denning wildlife, including American badger, was examined in the CalVTP PEIR (Section 3.6.3, pages 161-164).

SPR BIO-10 would be implemented, which requires focused surveys for American badger dens within suitable habitats in treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 14 days prior to implementation of all mechanical and manual treatments to determine whether American badger dens are present or not. If American badger dens are detected during focused surveys, then additional surveys would be required to determine if the den is active or not. If an active den is identified by a qualified biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den to the extent feasible to complete the work. If avoidance is not feasible, American badger dens that cannot be avoided during treatments a qualified biologist would block the den entrance with soil, sticks, and debris to an incrementally greater degree over a three- to five-day period to discourage the use of the den. After the qualified biologist determines that badgers have stopped using active dens within the treatment area, the dens would be hand-excavated with a shovel to prevent re-use during treatment activities. In addition, prescribed burning would be implemented outside of the sensitive period of the species' life history (e.g., outside the breeding season), the boundaries of the treatment areas would be flagged or fenced to avoid impacts to American badger dens located outside of the treatment areas, and treatment activities would be monitored by a qualified biologist and an individual of the crew designated to act as an on-site monitor. Project-specific measures for American badger have been added to SPR BIO-10 and Mitigation Measure BIO-2b. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5.

Insects and Other Terrestrial Invertebrates

Crotch Bumble Bee and Western Bumble Bee

Suitable habitat for the CBB and WBB is present within the project site in annual grassland areas where stockpile of biomass and pile burning would occur.

No grading or development is proposed within annual grassland habitat. Therefore, no permanent impacts to potential CBB and/or WBB nesting and foraging habitat would occur and habitat function for these species would be maintained. However, temporary impacts would occur as this area would be used for stockpiling of vegetation removed from the treatment areas and pile burning, including removing vegetation within a buffer surrounding the pile burn for safety purposes. If present within the site, project activities could result in mortality of CBB and/or WBB individuals or impacts to nests or overwintering colonies. This would be considered take of a candidate species for listing under CESA and a significant impact under CEQA. The potential for treatment activities to result in adverse effects on special-status insects, including CBB and WBB, was examined in the CalVTP PEIR (Section 3.6.3, pages 164-171).

Pursuant to its objectives, implementation of the CalVTP is intended to reduce the occurrence of high-intensity wildfire, which could beneficially decrease an existing threat to special-status bumble bees. SPR BIO-10 would be implemented, which requires focused surveys for special-status bumble bees within suitable grassland habitat areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist in accordance with CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (2023c) or the most current CDFW protocol. Project-specific measures for WBB and CBB have been added to SPR BIO-10. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-9, GEO-6, HAZ-5, HAZ-6, and HYD-5.

Although the SPRs will avoid or reduce impacts to CBB and WBB and their habitat, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2g would be implemented, which would restrict prescribed burning within occupied or suitable habitat during the flight season and require consultation with CDFW. Project-specific measures for WBB and CBB have been added to Mitigation Measure BIO-2g. If consultation determines that mortality, injury, or disturbance of these Candidate-listed bumble bees or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c, which requires compensation for impacts. Mitigation Measure BIO-2c identifies that "compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified" in the measure. As such, MPRPD may pursue take authorization from CDFW for CBB and WBB.

The CalVTP PEIR identifies that "although Mitigation Measure BIO-2g would reduce impacts to foraging special-status bumble bees and their floral resources, substantial adverse effects could still occur to special-status bumble bee species during nesting and overwintering, because vegetation treatment activities, such as prescribed burning, soil disturbance, or use of heavy equipment, could kill individuals or crush or disturb overwintering or nesting colonies. Additionally, there is no established methodology for detecting overwintering or nesting colonies of these species. Because these species have not yet been well studied and colonies are likely difficult to detect, there is little evidence to guide effective impact avoidance or minimization strategies to protect nesting or overwintering colonies. Mitigation Measure BIO-2g presents feasible impact avoidance and minimization measures that are based on emerging, early understanding of species protection; as their candidacy for listing is reviewed by CDFW, additional guidance may emerge and could be implemented by project proponents to reduce impacts. Project proponents can and should stay abreast of new information, as research and scientific understanding evolve. However, with the current state of the science and species knowledge, if underground colonies cannot be detected, they cannot be avoided and, in this case, the extent and severity of impacts to special-status bumble bees from vegetation treatment cannot be predicted with meaningful certainty. Therefore, given the rarity of these candidate species, if colonies were to be destroyed, it is possible that populations of these species would be reduced below self-sustaining levels, and treatment activities could substantially reduce the number or restrict the range of species. Over time, as avoidance strategies are developed with research and improved scientific understanding, adequate protection of the species may become feasible. However, at this time, recognizing the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts, for purposes of good faith, full disclosure under CEQA, this impact is designated in the PEIR to be potentially significant and unavoidable."

Bats

Townsend's Big-Eared Bat

Townsend's big-eared bat may utilize any of the large trees within the project site for night roosts and may forage within the site; however, no suitable day or maternity roosting habitat is present within the project site.

The potential for treatment activities to result in adverse effects on special-status bats was examined in the CalVTP PEIR (Section 3.6.3, pages 172-175). Mechanical and manual treatments would remove trees that may be used for night roosts. However, because all vegetation removal will be conducted during daylight hours and no daytime roosting habitat for this species is present within the project site, project activities would not directly impact Townsend's big-eared bat. Although trees that may be used by this species would be removed during treatment activities, the treatments will remove only non-native and invasive tree species and habitat conditions will be improved. Implementation of SPRs BIO-4, BIO-6, BIO-9, HAZ-5, HAZ-6, and HYD-5 would further avoid impacts to habitat for this species. No mitigation measures are necessary.

Fish and Aquatic Invertebrates

South-Central California Coast Steelhead

No suitable habitat for the south-central California coast (S-CCC) steelhead is present within the treatment area; however, this species is known to occur within the adjacent Carmel River. The project will not include work within the Carmel River (i.e., no work will occur below top of bank); however, the project may include the removal of riparian understory vegetation and would require the use of heavy equipment in riparian habitat, which could result in hazardous material spills and introduction and spread of non-native, invasive species. The potential for treatment activities to result in adverse effects on fish, including S-CCC steelhead, was examined in the CalVTP PEIR (Section 3.6.3, pages 178-182).

A Watercourse and Lake Protection Zone (WLPZ) of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[1] to act as a filter strip for raindrop energy dissipation for wildlife habitat. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5. Habitat function for S-CCC steelhead would be maintained and improved because initial and maintenance treatment activities would not occur within aquatic habitat and would remove non-native, invasive species from the riparian habitat. No mitigation measures are necessary.

[1] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

Amphibians and Reptiles

Northern California Legless Lizard

Suitable habitat and soils for Northern California legless lizard are present throughout the entire project site where appropriate cover conditions occur, particularly in the riparian and eucalyptus habitats; in annual grassland areas, habitat would be limited to areas underneath shrubs.

The project would not result in permanent loss of habitat for Northern California legless lizard (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. No grading or excavation is proposed as part of the project; however, mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. The potential for treatment activities to result in adverse effects on special-status reptiles, including Northen California legless lizard, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

Focused surveys for this species would not be feasible within the project site as protocols require multiple rounds of raking the soils to find individuals. The amount of eucalyptus duff within the project site precludes use of this protocol. As such, this species is assumed present and Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, MPRPD will require biological monitoring by a qualified biologist during treatment activities, relocation of individuals, flagging of areas for avoidance, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species. Project-specific measures for Northern California legless lizard have been added to SPR BIO-10 and Mitigation Measure BIO-2b. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-6, BIO-9, BIO-11, GEO-6, HAZ-5, HAZ-6, and HYD-5.

Western Pond Turtle

Western pond turtle is known to occur immediately adjacent to the project site within the Carmel River. In addition, although this species is not typically found in Eucalyptus groves or areas with dense duff cover; MPRPD indicates that this species has been observed within the eucalyptus grove and riparian areas within the project site. Portions of the annual grassland are also within 100 meters of the Carmel River; however, the annual grasses are likely too tall and dense to provide nesting habitat and western pond turtle presence within these areas is low. Eucalyptus and riparian habitats do not provide suitable nesting habitat for this species.

The project would not result in permanent loss of habitat for western pond turtle (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if individuals are present above ground within the treatment areas. However, these treatment activities are unlikely to disturb below ground nests in the unlikely event they are present. The potential for treatment activities to result in adverse effects on special-status reptiles was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface

cover[2] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of western pond turtle as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for western pond turtle within treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether western pond turtles are present or not. Project-specific measures for western pond turtle have been added to SPR BIO-10. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to western pond turtles, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b MPRPD will require biological monitoring by a qualified biologist during treatment activities, additional training of a designated member of the treatment crew to act as a biological monitor, relocation of individuals, flagging of areas for avoidance, limiting work within riparian areas to daylight hours, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species. In addition, in the unlikely event that a nest is encountered prior to or during treatment, a no-disturbance buffer (the size of which would be determined by a qualified biologist) would be established within which no treatment activities would occur. Project-specific measures for western pond turtle have been added to Mitigation Measure BIO-2b.

California Red-legged Frog

CRLF are known to use the Carmel River, located immediately adjacent to the Main Stand, for breeding and non-breeding habitat. Radiotelemetry data indicates that adult CRLF engage in straight-line breeding season movements irrespective of riparian corridors or topography and they may move up to two miles between non-breeding and breeding sites (Bulger et al., 2003).Therefore, the entire project site has the potential to be used as dispersal habitat by CRLF. During the non-breeding season, a wider variety of aquatic habitats are used including small pools in coastal streams, springs, water traps, and other ephemeral water bodies (USFWS, 1996). CRLF may also move up to 300 feet from aquatic habitats into surrounding uplands, especially following rains, where individuals may spend days or weeks (Bulger et al., 2003). Therefore, the 5.3 acres of riparian forest may provide suitable upland habitat. Although not a typical habitat for this species, the Eucalyptus groves in the Main Stand and Northeast Stand may also provide marginal upland habitat for this species. Therefore, CRLF has a high potential to occur within the project site, particularly where the site directly abuts the Carmel River.

Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. Additionally, due to the proximity of the Main Stand and Northeast Stand to the Carmel River and because this species could be present throughout the treatment areas while dispersing, there is no feasible way to avoid all potentially suitable habitat for these species. The potential for treatment activities to result in adverse effects on special-status amphibians, including CRLF, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

[2] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[3] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of CRLF as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for CRLF within upland habitats in treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether CRLF are present or not. Project-specific measures for CRLF have been added to SPR BIO-10. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to CRLF and their habitat, these measures may not avoid all impacts to the species. As such, pursuant to Mitigation Measure BIO-2a, MPRPD has consulted with Chad Mitcham of the USFWS to confirm that treatment activities will maintain habitat function and that there is no time period within which treatment could occur that would avoid mortality, injury, or disturbance of the species. Project-specific avoidance measures recommended by USFWS have been incorporated into Mitigation Measure BIO-2a and include biological monitoring during treatment activities, placement of flagging or exclusionary fencing to protect habitat areas outside of the treatment area, allowing animals to move outside of project areas on their own volition is present, and limiting work within the riparian areas to daylight hours.

Habitat function for CRLF would be maintained and improved because initial and maintenance treatment activities would not occur within aquatic habitat and would remove non-native and invasive species from the riparian habitat. Additionally, restoring the Carmel River watershed has been identified by USFWS as a recovery action for CRLF (USFWS, 2002). 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.

Coast Range Newt

Suitable breeding habitat for the Coast Range newt is present adjacent to, but not within, the project site in the Carmel River. Suitable upland habitat for this species is present within the project site in riparian habitat and Eucalyptus groves. Therefore, the Coast Range newt has a moderate potential to occur within the project site, particularly where the site directly abuts the Carmel River.

The project would not result in permanent loss of habitat for coast range newt (i.e., habitat function would be maintained) and habitat would be improved by removing non-native, invasive plant species. Mechanical manual, and prescribed herbivory treatment activities could crush or otherwise disturb this species if present within the treatment areas. The potential for treatment activities to result in adverse effects on special-status amphibians, including coast range newt, was examined in the CalVTP PEIR (Section 3.6.3, pages 182-185).

[3] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[4] to act as a filter strip for raindrop energy dissipation for wildlife habitat. However, this measure would not result in full avoidance of coast range newt as individuals may be present further than 75 feet from the river. SPR BIO-10 would be implemented, which requires focused surveys for coast range newt within suitable habitat areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) to be conducted by a qualified biologist within 48 hours prior to implementation of all mechanical and manual treatments to determine whether coast range newts are present or not. Additional SPRs relevant to this impact include AD-2, AD-5, BIO-1, BIO-2, BIO-4, BIO-6, BIO-9, BIO-11, GEO-1, GEO-3, GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-3 through HYD-5.

Although the SPRs will avoid or reduce impacts to coast range newt, these measures may not avoid all impacts to the species. As such, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b MPRPD will require biological monitoring by a qualified biologist during treatment activities, relocation of individuals, flagging of areas for avoidance, limiting work within riparian areas to daylight hours, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species.

<u>Impact BIO-3:</u> Would the Project Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function?

This Biological Resources Report includes a focused survey of vegetation types in the treatment areas as well as the adjacent area where stockpile of removed material and pile burning would be occur, conducted pursuant to SPR BIO-1 and SPR BIO-3. The survey identified that one vegetation type occurring within the project site is identified as sensitive on CDFW's *California Natural Communities List*; the black cottonwood and arroyo willow floristic alliance occurring within riparian areas. Riparian areas are also subject to the jurisdiction of CDFW under Section 1602 of the Fish and Game Code.

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 within the riparian areas; however, retreatment at too great a frequency could result in additional adverse effects. Treatment activities in riparian areas have been designed to return vegetation composition and structure to their natural condition to maintain and improve riparian habitat function per SPR BIO-4. The project will remove non-native invasive trees, but does not propose to remove any healthy native riparian trees. Some native riparian understory species may be disturbed or removed during mastication of the duff or removal of ladder fuels or by trampling by equipment or crews; however, native plants would be retained to the extent feasible and roots would not be removed. Riparian understory plants are very resilient and are expected to quickly regrow following treatment activities. Therefore, these actions will not result in loss of habitat function or viability. However, the project would include use of heavy equipment in riparian habitat, which could result in soil compaction, hazardous material spills, and introduction and spread of non-native, invasive species within riparian areas. The

[4] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

potential for treatment activities, including maintenance treatments, to result in adverse effects on sensitive habitats was examined in the CalVTP PEIR (Section 3.6.3, pages 187-191).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[5] to act as a filter strip for raindrop energy dissipation for wildlife habitat. In addition, if prescribed herbivory is used during maintenance treatment, these activities would be excluded from riparian areas and a buffer of 50 feet, pursuant to SPR HYD-3, using wildlife-friendly fencing (as required by SPR BIO-11). Additional SPRs relevant to this impact include AD-2, BIO-2, BIO-6, BIO-9, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-5. No mitigation measures are necessary to further reduce impacts.

Impact BIO-4: Would the Project Substantially Affect State or Federally Protected Wetlands?

This Biological Resources Report identifies vegetation types present in the project site, as identified in the field during the survey conducted pursuant to SPR BIO-1 and BIO-3. No potentially jurisdictional state or federal wetlands were identified within the project site. However, the Carmel River is located immediately adjacent to the Main Stand. The reconnaissance survey did not include areas below the top of bank of the river; however, it is assumed that jurisdictional wetlands are present within the river in the vicinity of the project.

No project activities will occur below the top of bank of the Carmel River and therefore no direct impacts to jurisdictional wetlands would occur. In addition, the project will leave masticated or chipped mulch up to 6 inches deep, which will avoid or reduce potential erosion and sedimentation to the river and associated wetlands. However, the project could still result in indirect impacts to this sensitive resource due to erosion, sedimentation, or introduction of hazardous materials into the Carmel River. The potential for treatment activities, including maintenance treatments, to result in adverse effects on state and federally protected wetlands was examined in the CalVTP PEIR (Section 3.6.3, pages 192-193).

A WLPZ of 75 feet adjacent to the Carmel River would be implemented per SPR HYD-4, which will prevent hazardous materials spills and deposits of slash and debris, and will retain at least 75% surface cover[6] to act as a filter strip for raindrop energy dissipation for wildlife habitat. In addition, if prescribed herbivory is used during maintenance treatment, these activities would be excluded from riparian areas and a buffer of 50 feet, pursuant to SPR HYD-3, using wildlife-friendly fencing (as required by SPR BIO-11). In turn, this would also exclude prescribed herbivory from any wetland areas within the Carmel River by greater than 50 feet. Additional SPRs relevant to this impact include AD-2, BIO-2, BIO-6, BIO-9, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, HYD-1, and HYD-5. Implementation of Mitigation Measure BIO-4 would further ensure no impacts to state or federal wetlands occur as a result of the project. No mitigation measures are necessary to further reduce impacts.

[5] HYD-4 allows for a reduced surface cover percentage in non-riparian areas if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

[6] HYD-4 allows for a reduced surface cover in non-riparian percentage if coordination with a registered professional forester and/or documentation in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

Impact BIO-5: Would the Project Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries?

Treatment areas contain a modeled essential connectivity area characterized as "more permeable" and therefore likely functions as a wildlife movement corridor and provides connectivity with other natural habitats surrounding the treatment areas. In addition, riparian areas, such as those occurring within the project site along the Carmel River, are known to provide important wildlife corridors. No known wildlife nursery sites or indications of nursery sites were identified within any treatment areas.

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors because suitable habitat is present in treatment areas. However, due to the nature of the proposed treatment activities, implementation of these actions would not result in a substantial change in the existing conditions that facilitate wildlife movement in the project site. Through removal of non-native, invasive plant species, habitat would be improved and the project site would function better for wildlife movement post-treatment. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the CalVTP PEIR (Section 3.6.3, pages 193-197).

SPRs that apply to project impacts are SPRs AD-2, BIO-1 through BIO-4, BIO-6, BIO-9, BIO-11, BIO-12, GEO-1 through GEO-4, GEO-6, HAZ-5, HAZ-6, and HYD-1 through HYD-5. No mitigation measures are necessary.

Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife?

Pursuant to its objectives, implementation of the CalVTP is intended to reduce the occurrence of high-intensity wildfire, which could beneficially decrease an existing threat to common wildlife species. In addition, habitat function for common wildlife species would be maintained and improved because initial and maintenance treatment activities would remove non-native, invasive species. However, 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 suitable habitat for these species is present throughout treatment areas. Treatment activities conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests during tree and understory brush removal, or disturbance to active nests from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock), potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on common wildlife species, including nesting avian species, was examined in the CalVTP PEIR (Section 3.6.3, pages 197-199).

Per SPR BIO-1 and BIO-12, if it is determined that adverse effects on habitat suitable for nesting birds can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further mitigation would not be required. To avoid impacts on raptors and other nesting birds, treatment activities will be implemented outside of the nesting season (February 15–August 31) when feasible. If treatment implementation outside of the nesting season is determined to be infeasible, then protocol-level surveys would be conducted by a qualified biologist no more than 14 days prior to initiation of treatment activities pursuant to SPR BIO-12. If an active nest is identified by a qualified biologist, a no-disturbance buffer would be established around the nest, treatment would be modified to avoid disturbance, treatment

would be deferred in portions of the site that could disturb the active nest until the young have fledged or the nest becomes inactive, and/or other strategies to avoid or reduce impacts identified in SPR BIO-12.

SPRs designed to identify special-status species habitat (SPR BIO-1) and sensitive natural communities (SPR BIO-3), retain the habitat function and value of riparian habitat (SPR AD-2, BIO-4, BIO-6, BIO-9, BIO-11, HAZ-5, HAZ-6, HYD-1 and HYD-3 through HYD-5), as well as compliance with protective statutes (e.g., California Fish and Game Code sections 3503 and 3503.5 and the federal MBTA), would reduce the likelihood of impacts to other common species within the project site.

Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources?

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the CalVTP PEIR (Section 3.6.3, page 199). The only applicable local ordinance relevant to biological resources is the Monterey County Preservation of Oak and Other Protected Trees Ordinance for the Carmel Valley Planning Area (Chapter 16.60). As discussed above in Section 2.5, Regulatory Setting, the Monterey County Tree ordinance is not applicable to treatment activities conducted on MPRPD property. However, the Monterey County tree ordinance would apply to treatment activities conducted on private property within the project site (0.5 acre).

Several coast live oak trees occur within the project site; however, a tree survey was not conducted to determine if oak trees occur on the private property. In addition, treatment activities are not anticipated to remove oak trees unless they are dead, dying, hazardous, or diseased. However, in the unlikely event that removal of a coast live oak tree is required on the private property, MPRPD may need to acquire a tree removal permit from the County prior to project activities pursuant to SPR AD-3. If removal of more than three coast live oak trees from the private property is required, a forest management plan may also need to be prepared and submitted to the County prior to oak tree removal activities.

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APPENDIX A

California Natural Diversity Database Report

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Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Seaside (3612157) OR Marina (3612167) OR Salinas (3612166) OR Monterey (3612158) OR Spreckels (3612156) OR Soberanes Point (3612148) OR Carmel Valley (3612146) OR Mt. Carmel (3612147))
 AND Taxonomic Group IS (Fish OR Amphibians OR Reptiles OR Birds OR Mammals OR Mollusks OR Arachnids OR Crustaceans OR Insects OR Ferns OR Gymnosperms OR Monocots OR Dicots OR Lichens OR Bryophytes OR Fungi)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Agrostis lacuna-vernalis vernal pool bent grass	PMPOA041N0	None	None	G1	S1	1B.1
Allium hickmanii Hickman's onion	PMLIL02140	None	None	G2	S2	1B.2
Ambystoma californiense pop. 1 California tiger salamander - central California DPS	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
Anniella pulchra Northern California legless lizard	ARACC01020	None	None	G3	S2S3	SSC
Arctostaphylos edmundsii Little Sur manzanita	PDERI04260	None	None	G2	S2	1B.2
Arctostaphylos hookeri ssp. hookeri Hooker's manzanita	PDERI040J1	None	None	G3T2	S2	1B.2
Arctostaphylos montereyensis Toro manzanita	PDERI040R0	None	None	G2?	S2?	1B.2
Arctostaphylos pajaroensis Pajaro manzanita	PDERI04100	None	None	G1	S1	1B.1
Arctostaphylos pumila sandmat manzanita	PDERI04180	None	None	G1	S1	1B.2
Astragalus tener var. tener alkali milk-vetch	PDFAB0F8R1	None	None	G2T1	S1	1B.2
Astragalus tener var. titi coastal dunes milk-vetch	PDFAB0F8R2	Endangered	Endangered	G2T1	S1	1B.1
Athene cunicularia burrowing owl	ABNSB10010	None	None	G4	S3	SSC
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	
Bombus occidentalis western bumble bee	IIHYM24252	None	Candidate Endangered	G3	S1	
Buteo regalis ferruginous hawk	ABNKC19120	None	None	G4	S3S4	WL
Castilleja ambigua var. insalutata pink Johnny-nip	PDSCR0D403	None	None	G4T2	S2	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Centromadia parryi ssp. congdonii Congdon's tarplant	PDAST4R0P1	None	None	G3T2	S2	1B.1
Charadrius nivosus nivosus western snowy plover	ABNNB03031	Threatened	None	G3T3	S3	SSC
Chorizanthe minutiflora Fort Ord spineflower	PDPGN04100	None	None	G1	S1	1B.2
Chorizanthe pungens var. pungens Monterey spineflower	PDPGN040M2	Threatened	None	G2T2	S2	1B.2
Clarkia jolonensis Jolon clarkia	PDONA050L0	None	None	G2	S2	1B.2
Coelus globosus globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
Collinsia multicolor San Francisco collinsia	PDSCR0H0B0	None	None	G2	S2	1B.2
Cordylanthus rigidus ssp. littoralis seaside bird's-beak	PDSCR0J0P2	None	Endangered	G5T2	S2	1B.1
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
Coturnicops noveboracensis yellow rail	ABNME01010	None	None	G4	S1S2	SSC
Cypseloides niger black swift	ABNUA01010	None	None	G4	S2	SSC
Danaus plexippus plexippus pop. 1 monarch - California overwintering population	IILEPP2012	Candidate	None	G4T1T2Q	S2	
Delphinium californicum ssp. interius Hospital Canyon larkspur	PDRAN0B0A2	None	None	G3T3	S3	1B.2
Delphinium hutchinsoniae Hutchinson's larkspur	PDRAN0B0V0	None	None	G2	S2	1B.2
Delphinium umbraculorum umbrella larkspur	PDRAN0B1W0	None	None	G3	S3	1B.3
Emys marmorata western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
Eremophila alpestris actia California horned lark	ABPAT02011	None	None	G5T4Q	S4	WL
Ericameria fasciculata Eastwood's goldenbush	PDAST3L080	None	None	G2	S2	1B.1
Eriogonum nortonii Pinnacles buckwheat	PDPGN08470	None	None	G2	S2	1B.3
Erysimum ammophilum sand-loving wallflower	PDBRA16010	None	None	G2	S2	1B.2
Erysimum menziesii Menzies' wallflower	PDBRA160R0	Endangered	Endangered	G1	S1	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Eucyclogobius newberryi tidewater goby	AFCQN04010	Endangered	None	G3	S3	
Eumetopias jubatus Steller sea lion	AMAJC03010	Delisted	None	G3	S2	
Euphilotes enoptes smithi Smith's blue butterfly	IILEPG2026	Endangered	None	G5T1T2	S2	
Falco mexicanus prairie falcon	ABNKD06090	None	None	G5	S4	WL
Fritillaria liliacea fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
Gilia tenuiflora ssp. arenaria Monterey gilia	PDPLM041P2	Endangered	Threatened	G3G4T2	S2	1B.2
Hesperocyparis goveniana Gowen cypress	PGCUP04031	Threatened	None	G1	S1	1B.2
Hesperocyparis macrocarpa Monterey cypress	PGCUP04060	None	None	G1	S1	1B.2
Horkelia cuneata var. sericea Kellogg's horkelia	PDROS0W043	None	None	G4T1?	S1?	1B.1
Horkelia marinensis Point Reyes horkelia	PDROS0W0B0	None	None	G2	S2	1B.2
Hydrobates homochroa ashy storm-petrel	ABNDC04030	None	None	G2	S2	SSC
Lasiurus cinereus hoary bat	AMACC05032	None	None	G3G4	S4	
Lasthenia conjugens Contra Costa goldfields	PDAST5L040	Endangered	None	G1	S1	1B.1
Laterallus jamaicensis coturniculus California black rail	ABNME03041	None	Threatened	G3T1	S2	FP
Lavinia exilicauda harengus Monterey hitch	AFCJB19013	None	None	G4T3	S3	SSC
Layia carnosa beach layia	PDAST5N010	Threatened	Endangered	G2	S2	1B.1
Legenere limosa legenere	PDCAM0C010	None	None	G2	S2	1B.1
Linderiella occidentalis California linderiella	ICBRA06010	None	None	G2G3	S2S3	
Lupinus tidestromii Tidestrom's lupine	PDFAB2B3Y0	Endangered	Endangered	G1	S1	1B.1
Malacothamnus palmeri var. involucratus Carmel Valley bush-mallow	PDMAL0Q0B1	None	None	G3T2Q	S2	1B.2
Malacothrix saxatilis var. arachnoidea Carmel Valley malacothrix	PDAST660C2	None	None	G5T2	S2	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Meconella oregana Oregon meconella	PDPAP0G030	None	None	G2G3	S2	1B.1
Microseris paludosa marsh microseris	PDAST6E0D0	None	None	G2	S2	1B.2
Monardella sinuata ssp. nigrescens northern curly-leaved monardella	PDLAM18162	None	None	G3T2	S2	1B.2
Monolopia gracilens woodland woollythreads	PDAST6G010	None	None	G3	S3	1B.2
Neotoma macrotis luciana Monterey dusky-footed woodrat	AMAFF08083	None	None	G5T3	S3	SSC
Oncorhynchus mykiss irideus pop. 9 steelhead - south-central California coast DPS	AFCHA0209H	Threatened	None	G5T2Q	S2	
Pelecanus occidentalis californicus California brown pelican	ABNFC01021	Delisted	Delisted	G4T3T4	S3	FP
Phrynosoma blainvillii coast horned lizard	ARACF12100	None	None	G4	S4	SSC
Pinus radiata Monterey pine	PGPIN040V0	None	None	G1	S1	1B.1
Piperia yadonii Yadon's rein orchid	PMORC1X070	Endangered	None	G1	S1	1B.1
Plagiobothrys chorisianus var. chorisianus Choris' popcornflower	PDBOR0V061	None	None	G3T1Q	S1	1B.2
Plagiobothrys uncinatus hooked popcornflower	PDBOR0V170	None	None	G2	S2	1B.2
Potentilla hickmanii Hickman's cinquefoil	PDROS1B370	Endangered	Endangered	G1	S1	1B.1
Ramalina thrausta angel's hair lichen	NLLEC3S340	None	None	G5?	S2S3	2B.1
Rana boylii pop. 6 foothill yellow-legged frog - south coast DPS	AAABH01056	Proposed Endangered	Endangered	G3T1	S1	
Rana draytonii California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
Reithrodontomys megalotis distichlis Salinas harvest mouse	AMAFF02032	None	None	G5T1	S2	
Riparia riparia bank swallow	ABPAU08010	None	Threatened	G5	S3	
Rosa pinetorum pine rose	PDROS1J0W0	None	None	G2	S2	1B.2
Sidalcea malachroides maple-leaved checkerbloom	PDMAL110E0	None	None	G3	S3	4.2
Sorex ornatus salarius Monterey shrew	AMABA01105	None	None	G5T1T2	S1S2	SSC

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Spea hammondii western spadefoot	AAABF02020	None	None	G2G3	S3S4	SSC
Stebbinsoseris decipiens Santa Cruz microseris	PDAST6E050	None	None	G2	S2	1B.2
Sulcaria spiralifera twisted horsehair lichen	NLT0042560	None	None	G3G4	S2	1B.2
Taricha torosa Coast Range newt	AAAAF02032	None	None	G4	S4	SSC
Taxidea taxus American badger	AMAJF04010	None	None	G5	S3	SSC
Thamnophis hammondii two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC
Tortula californica California screw moss	NBMUS7L090	None	None	G2G3	S2?	1B.2
Trifolium buckwestiorum Santa Cruz clover	PDFAB402W0	None	None	G2	S2	1B.1
Trifolium hydrophilum saline clover	PDFAB400R5	None	None	G2	S2	1B.2
Trifolium polyodon Pacific Grove clover	PDFAB402H0	None	Rare	G1	S1	1B.1
Trifolium trichocalyx Monterey clover	PDFAB402J0	Endangered	Endangered	G1	S1	1B.1

Record Count: 91

APPENDIX B

IPaC Resource List

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IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Monterey County, California

Local office

Ventura Fish And Wildlife Office

(805) 644-1766
(805) 644-3958
FW8VenturaSection7@FWS.Gov

2493 Portola Road, Suite B

2493 Portola Road, Suite B
Ventura, CA 93003-7726

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Condor Gymnogyps californianus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8193	Endangered
California Least Tern Sterna antillarum browni Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8104	Endangered
Least Bell's Vireo Vireo bellii pusillus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Marbled Murrelet Brachyramphus marmoratus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/4467	Threatened
Southwestern Willow Flycatcher Empidonax traillii extimus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered
Western Snowy Plover Charadrius nivosus nivosus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened

NAME	STATUS
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

Amphibians

NAME	STATUS
California Red-legged Frog Rana draytonii Wherever found There is **final** critical habitat for this species. Your location overlaps the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened
California Tiger Salamander Ambystoma californiense There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2076	Threatened
Foothill Yellow-legged Frog Rana boylii No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5133	Proposed Endangered

Fishes

NAME	STATUS
Tidewater Goby Eucyclogobius newberryi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/57	Endangered

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Smith's Blue Butterfly Euphilotes enoptes smithi — Endangered
Wherever found
There is **proposed** critical habitat for this species.
https://ecos.fws.gov/ecp/species/4418

Crustaceans

NAME	STATUS
Vernal Pool Fairy Shrimp Branchinecta lynchi	Threatened

Wherever found
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/498

Flowering Plants

NAME	STATUS
Clover (tidestrom''s) Lupine Lupinus tidestromii	Endangered

Wherever found
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/4459

Contra Costa Goldfields Lasthenia conjugens — Endangered
Wherever found
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/7058

Marsh Sandwort Arenaria paludicola — Endangered
Wherever found
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/2229

Monterey Spineflower Chorizanthe pungens var. pungens — Threatened
Wherever found
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/396

Yadon's Piperia Piperia yadonii Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/4205	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME	TYPE
California Red-legged Frog Rana draytonii https://ecos.fws.gov/ecp/species/2891#crithab	Final

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how

this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Allen's Hummingbird Selasphorus sasin This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jan 1 to Aug 31
Belding's Savannah Sparrow Passerculus sandwichensis beldingi This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8	Breeds Apr 1 to Aug 15
Black Swift Cypseloides niger This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8878	Breeds Jun 15 to Sep 10
Black-chinned Sparrow Spizella atrogularis This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9447	Breeds Apr 15 to Jul 31

Bullock's Oriole Icterus bullockii — Breeds Mar 21 to Jul 25
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

California Gull Larus californicus — Breeds Mar 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

California Thrasher Toxostoma redivivum — Breeds Jan 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Common Yellowthroat Geothlypis trichas sinuosa — Breeds May 20 to Jul 31
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/2084

Golden Eagle Aquila chrysaetos — Breeds Jan 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1680

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Long-eared Owl asio otus — Breeds Mar 1 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3631

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9410

Oak Titmouse Baeolophus inornatus — Breeds Mar 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9656

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Tricolored Blackbird Agelaius tricolor — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3910

Western Grebe aechmophorus occidentalis — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/6743

Wrentit Chamaea fasciata — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Yellow-billed Magpie Pica nuttalli — Breeds Apr 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9726

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey

effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

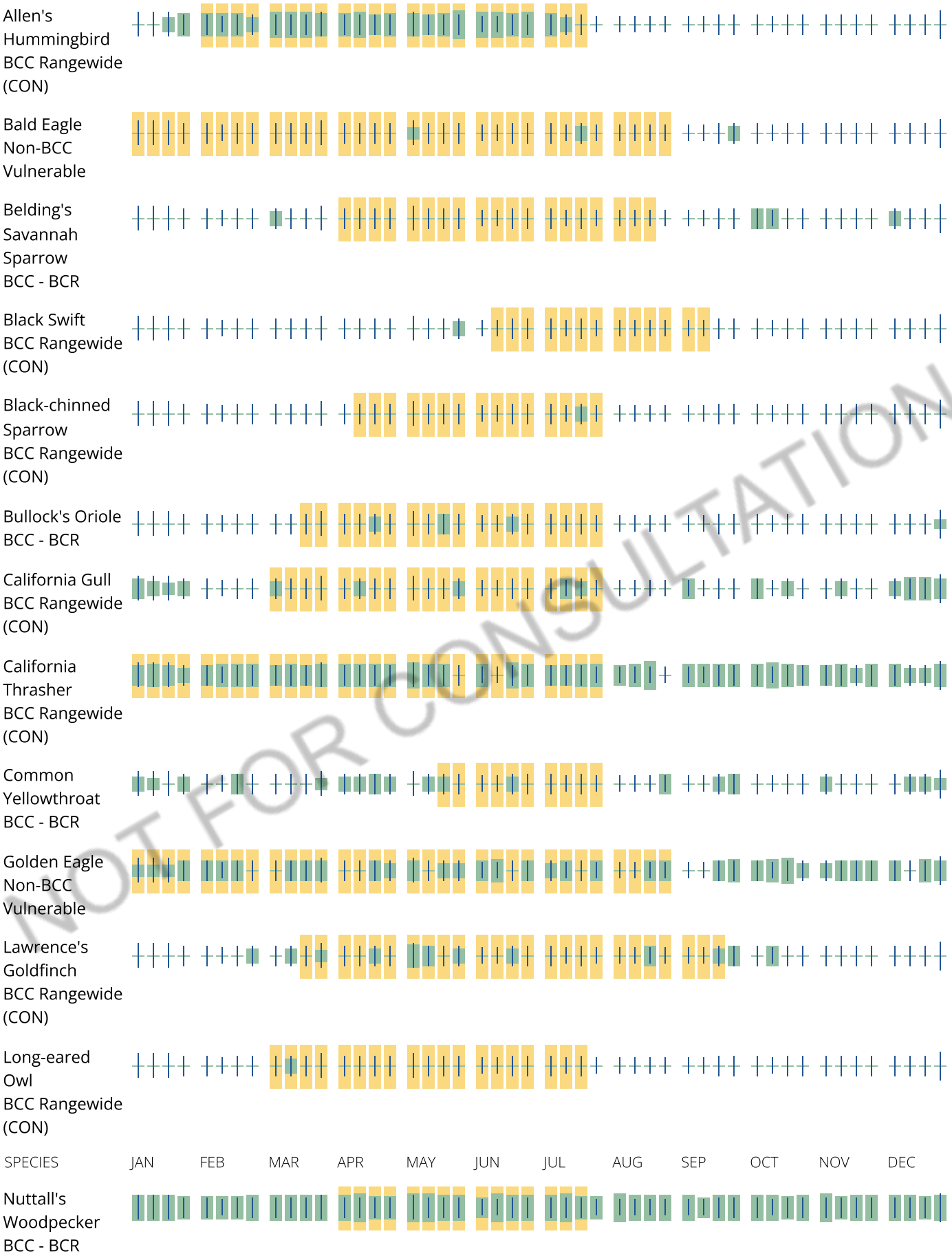
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

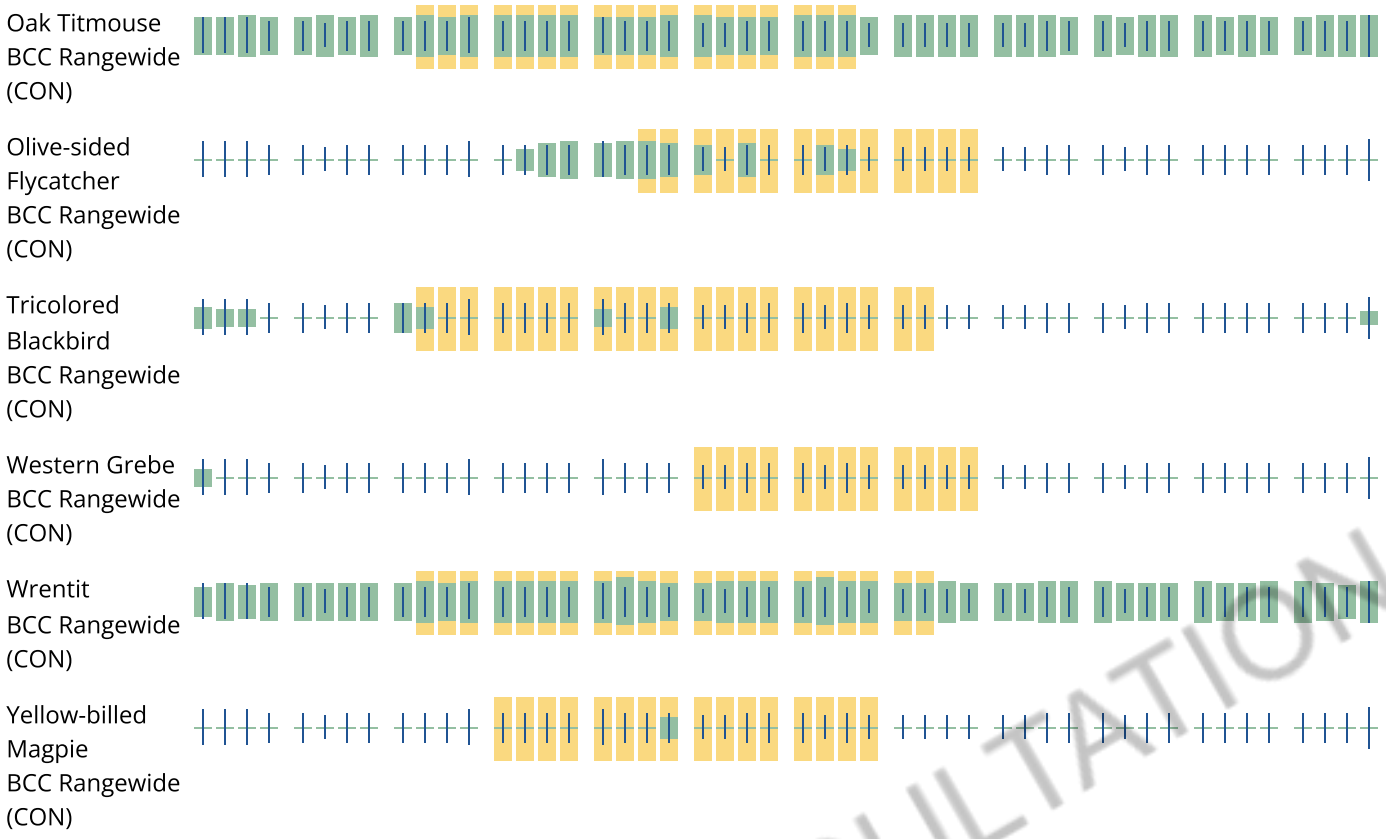
Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact

Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER FORESTED/SHRUB WETLAND

- PFO/SSA
- PFOA
- PSSA

RIVERINE

- R3UBH

A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

APPENDIX C

Special-Status Species Table

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Special-Status Species Table

Marina, Salinas, Monterey, Seaside, Spreckels, Soberanes Point, Mt. Carmel, and Carmel Valley Quadrangles

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
MAMMALS			
Corynorhinus townsendii Townsend's big-eared bat	-- / CSC / --	Found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Typically roost during the day in limestone caves, lava tubes, and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees.	**Moderate** Suitable foraging and night roost habitat are present in the project site. No day or maternity roosting habitat present within the project site. The CNDDB reports one occurrence of this species within the quadrangles reviewed, located approximately nine miles west of the project site.
Neotoma macrotis luciana Monterey dusky-footed woodrat	-- / CSC / --	Forest and oak woodland habitats of moderate canopy with moderate to dense understory. Also occurs in chaparral habitats.	**Moderate** Suitable habitat is present within the project site. The CNDDB reports one occurrence of this species within the quadrangles reviewed, located approximately ten miles northeast of the project site. No woodrat nests were observed within the project site; however, this species is known to occur throughout the region and may move into the site prior to project activities.
Sorex ornatus salarius Monterey ornate shrew	-- / CSC / --	Mostly moist or riparian woodland habitats and within chaparral, grassland, and emergent wetland habitats where there is a thick duff or downed logs.	**Low** Suitable habitat is present within the project site. The CNDDB reports five occurrences of this species within the quadrangles reviewed, the nearest located approximately 7.5 miles west of the project site. However, all five occurrences are historical, the latest reported in 1938 and the project site may be outside of the known range for this species.
Taxidea taxus American badger	-- / CSC / --	Dry, open grasslands, fields, pastures savannas, and mountain meadows near timberline are preferred. The principal requirements seem to be sufficient food, friable soils, and relatively open, uncultivated grounds.	**Moderate** Suitable habitat is present within the project site. No burrows of sufficient den size were observed during the June 2023 biological survey; however, this species has the potential to move onto the site prior to project activities. The CNDDB reports nine occurrences of this species within the quadrangles reviewed, the nearest located approximately 4.8 miles north of the project site on the former Fort Ord. This species has also been observed along Carmel Valley Road approximately nine miles east of the project site.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
BIRDS			
Agelaius tricolor Tricolored blackbird (nesting colony)	-- / ST&CSC / --	Nest in colonies in dense riparian vegetation (particularly willow thickets), along rivers, lagoons, lakes, and ponds. Forages over grassland or aquatic habitats.	**Low** Marginal habitat is present within the project site. The arroyo willow within the project site is likely not dense enough to support this species.
Athene cunicularia Burrowing owl (burrow sites & some wintering sites)	-- / CSC / --	Year-round resident of open, dry grassland and desert habitats, and in grass, forb and open shrub stages of pinyon-juniper and ponderosa pine habitats. Frequent open grasslands and shrublands with perches and burrows. Use rodent burrows (often California ground squirrel) for roosting and nesting cover. Pipes, culverts, and nest boxes may be substituted for burrows in areas where burrows are not available.	**Low** Marginal habitat is present within the grassland habitat in the project site; however, no burrows of sufficient size or depth to support this species were observed during the June 2023 biological survey. In addition, the presence of trees surrounding the site (habitat for predators) would likely deter burrowing owls. The nearest CNDDB occurrence is located approximately eight miles northwest of the project site.
Brachyramphus marmoratus Marbled murrelet	FT / SE / --	Occur year-round in marine subtidal and pelagic habitats from the Oregon border to Point Sal. Partial to coastlines with stands of mature redwood and Douglas-fir. Requires dense mature forests of redwood and/or Douglas-fir for breeding and nesting.	**Not Present** No suitable habitat is present within the project site.
Charadrius alexandrinus nivosus Western snowy plover	FT / CSC / --	Sandy beaches on marine and estuarine shores, also salt pond levees and the shores of large alkali lakes. Requires sandy, gravelly or friable soil substrate for nesting.	**Not Present** No suitable habitat within the project site.
Coccyzus americanus occidentalis Western yellow-billed cuckoo	FT / SE / --	Inhabits extensive deciduous riparian thickets or forests with dense, low-level or understory foliage, slow-moving watercourses, backwaters, or seeps. Willow almost always a dominant component of the vegetation.	**Low** Suitable habitat is present within the project site. However, the CNDDB does not report any occurrences of this species in the quadrangles reviewed. The project site is likely outside of the currently know range for this species.
Coturnicops noveboracensis Yellow rail	-- / CSC / --	Wet meadows and coastal tidal marshes. Occurs year round in California, but in two primary seasonal roles: as a very local breeder in the northeastern interior and as a winter visitor (early Oct to mid-Apr) on the coast and in the Suisun Marsh region	**Not Present** No suitable habitat is present within the project site.
Cypseloides niger Black swift	-- / CSC / --	Regularly nests in moist crevice or cave on sea cliffs above the surf, or on cliffs behind, or adjacent to, waterfalls in deep canyons. Forages widely over many habitats.	**Not Present** No suitable habitat is present within the project site.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Empidonax traillii extimus Southwestern willow flycatcher	FE / SE / --	Breeds in riparian habitat in areas ranging in elevation from sea level to over 2,600 meters. Builds nest in trees in densely vegetated areas. This species establishes nesting territories and builds, and forages in mosaics of relatively dense and expansive areas of trees and shrubs, near or adjacent to surface water or underlain by saturated soils. Not typically found nesting in areas without willows (*Salix sp.*), tamarisk (*Tamarix ramosissima*), or both.	**Low** Suitable habitat is present within the project site. However, the CNDDB does not report any occurrences of this species in the quadrangles reviewed. The project site is likely outside of the currently know range for this species.
Gymnogyps californianus California condor	FE / SE /--	Roosting sites in isolated rocky cliffs, rugged chaparral, and pine covered mountains 2000-6000 feet above sea level. Foraging area removed from nesting/roosting site (includes rangeland and coastal area - up to 19-mile commute one way). Nest sites in cliffs, crevices, potholes.	**Unlikely** No suitable habitat is present within the project site.
Hydrobates homochroa Ashy storm-petrel (nesting colony)	-- / CSC / --	Tied to land only to nest, otherwise remains over open sea. Nests in natural cavities, sea caves, or rock crevices on offshore islands and prominent peninsulas of the mainland.	**Not Present** No suitable habitat is present within the project site.
Laterallus jamaicensis coturniculus California black rail	-- / ST&CFP / --	Inhabits freshwater marshes, wet meadows & shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that does not fluctuate during the year & dense vegetation for nesting habitat.	**Not Present** No suitable habitat is present within the project site.
Pelecanus occidentalis californicus California brown pelican	-- / CFP / --	Found in estuarine, marine subtidal, and marine pelagic waters along the California coast. Usually rests on water or inaccessible rocks, but also uses mudflats, sandy beaches, wharfs, and jetties.	**Not Present** No suitable habitat is present within the project site.
Rallus obsoletus obsoletus California Ridgway's rail	FE / SE&CFP / --	Salt and brackish marshes.	**Not Present** No suitable habitat is present within the project site.
Riparia riparia Bank swallow (nesting)	-- / ST / --	Nest colonially in sand banks. Found near water; fields, marshes, streams, and lakes.	**Unlikely** No suitable habitat is present within the project site.
Sterna antillarum browni California least tern	FE / SE / --	Prefers undisturbed nest sites on open, sandy/gravelly shores near shallow-water feeding areas in estuaries. Sea beaches, bays, large rivers, bars.	**Not Present** No suitable habitat is present within the project site. The CNDDB does not report any occurrences of this species within the quadrangles reviewed.
Vireo bellii pusillus Least Bell's Vireo	FE / SE / --	Riparian areas and drainages. Breed in willow riparian forest supporting a dense, shrubby understory. Oak woodland with a willow riparian understory is also used in some areas, and individuals sometimes enter adjacent chaparral, coastal sage scrub, or desert scrub habitats to forage.	**Low** Suitable habitat is present within the project site. However, the CNDDB does not report any occurrences of this species in the quadrangles reviewed. The project site is likely outside of the currently know range for this species.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
REPTILES AND AMPHIBIANS			
Ambystoma californiense California tiger salamander	FT / ST / --	Annual grassland and grassy understory of valley-foothill hardwood habitats in central and northern California. Need underground refuges and vernal pools or other seasonal water sources.	**Low** Suitable upland and dispersal habitat is present; however, no suitable breeding is present habitat within or adjacent to the project site. The project site is outside of the 2.2 km dispersal range of any known breeding resources. Although potential breeding ponds are within 2.2 km of the project site, the potential for this species to occur within the project site is low and take of this species as a result of the project is unlikely.
Anniella pulchra Northern California legless lizard	-- / CSC / --	Requires moist, warm habitats with loose soil for burrowing and prostrate plant cover, often forages in leaf litter at plant bases; may be found on beaches, sandy washes, and in woodland, chaparral, and riparian areas.	**Moderate** Suitable habitat is present within the project site. The CNDDB reports 47 occurrences of this species within the quadrangles reviewed, the nearest located 0.3 mile west of the project site and this species is known to occur within riparian habitat along the Carmel River.
Emys marmorata Western pond turtle	-- / CSC / --	Associated with permanent or nearly permanent water in a wide variety of habitats including streams, lakes, ponds, irrigation ditches, etc. Require basking sites such as partially submerged logs, rocks, mats of vegetation, or open banks.	**Moderate** Suitable upland habitat is present within the project site. The CNDDB reports 13 occurrences of this species within the quadrangles reviewed, including a 2002 non-specific occurrence mapped to the Carmel River which overlaps a portion of the project site. In addition, MPRPD has observed western pond turtles in the area.
Phrynosoma blainvillii Coast horned lizard	-- / CSC / --	Associated with open patches of sandy soils in washes, chaparral, scrub, and grasslands.	**Unlikely** No suitable habitat is present within the project site.
Rana boylii Foothill yellow-legged frog	FC / SE / --	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats, including hardwood, pine, and riparian forests, scrub, chaparral, and wet meadows. Rarely encountered far from permanent water.	**Low** Suitable habitat is present within the project site. The CNDDB reports eight occurrences of this species within the quadrangles reviewed, the nearest mapped to the Carmel River approximately 1.5 miles upstream of the project site. However, all documented occurrences of this species in the area are historical (1968 and earlier). Therefore, the potential for this species to occur within the project site is low and take of this species as a result of the project is unlikely.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Rana draytonii California red-legged frog	FT / CSC / --	Lowlands and foothills in or near permanent or late-season sources of deep water with dense, shrubby, or emergent riparian vegetation. During late summer or fall adults are known to utilize a variety of upland habitats with leaf litter or mammal burrows.	**High** Suitable upland habitat is present within the project site. Suitable breeding habitat is present adjacent to the project site within the Carmel River. The CNDDB reports 57 occurrences of this species within the quadrangles reviewed, many mapped to the Carmel River and one which overlaps a portion of the project site. There are multiple CNDDB occurrences within 1.0 mile (1.6 km) of the project site.
Spea hammondii Western spadefoot	-- / CSC / --	Grasslands with shallow temporary pools are optimal habitats for the western spadefoot. Occur primarily in grassland habitats but can be found in valley and foothill woodlands. Vernal pools are essential for breeding and egg laying.	**Unlikely** No suitable habitat is present within the project site.
Taricha torosa Coast Range newt (Monterey County south only)	-- / CSC / --	Occurs mainly in valley-foothill hardwood, valley-foothill hardwood-conifer, coastal scrub, and mixed chaparral but is known to occur in grasslands and mixed conifer types. Seek cover under rocks and logs, in mammal burrows, rock fissures, or man-made structures such as wells. Breed in intermittent ponds, streams, lakes, and reservoirs.	**Moderate** Suitable upland habitat is present within the project site. The nearest CNDDB occurrence is located approximately 5.5 miles west of the project site.
Thamnophis hammondii Two-striped garter snake	-- / CSC / --	Associated with permanent or semi-permanent bodies of water bordered by dense vegetation in a variety of habitats from sea level to 2400m elevation.	**Low** Marginal habitat is present within the project site. The CNDDB reports only one occurrence of this species of this species within the quadrangles reviewed, located approximately nine miles northeast of the project site.
FISH			
Eucyclogobius newberryi Tidewater goby	FE / -- / --	Brackish water habitats, found in shallow lagoons and lower stream reaches. Tidewater gobies appear to be naturally absent (now and historically) from three large stretches of coastline where lagoons or estuaries are absent and steep topography or swift currents may prevent tidewater gobies from dispersing between adjacent localities. The southernmost large, natural gap occurs between the Salinas River in Monterey County and Arroyo del Oso in San Luis Obispo County.	**Not Present** No suitable habitat is present within the project site. The project site is outside the known range of this species.
Lavinia exilicauda harengus Monterey hitch (Pajaro/Salinas hitch)	-- / CSC / --	Found only within the Pajaro and Salinas River systems. Can occupy a wide variety of habitats, however, they are most abundant in lowland areas with large pools or small reservoirs that mimic such conditions. May be found in brackish water conditions within the Salinas River lagoon during the early summer months when the sandbar forms at the mouth of the river.	**Not Present** No suitable habitat is present within the project site. The project site is outside the known range of this species.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Oncorhynchus mykiss irideus Steelhead (south-central California coast DPS)	FT / -- / --	Cold headwaters, creeks, and small to large rivers and lakes; anadromous in coastal streams.	**Present Adjacent** No suitable habitat is present within the project site. However, this species is known to occur within the segment of the Carmel River located directly adjacent to the project site.
Spirinchus thaleichthys Longfin smelt	FC / ST / --	Euryhaline, nektonic & anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefers salinities of 15-30 PPT, but can be found in completely freshwater to almost pure seawater.	**Not Present** No suitable habitat is present within the project site.
INVERTEBRATES			
Bombus crotchii Crotch bumble bee	-- / SC / --	Occurs in open grassland and scrub at relatively warm and dry sites. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October. Generally nests underground, often in abandoned mammal burrows. Within California this species is known to occur in the Mediterranean, Pacific Coast, Western Desert, as well as Great Valley and adjacent foothill regions.	**Moderate** Suitable habitat is present within the project site. The CNDDB does not report any occurrences of this species within the quadrangles reviewed; however, this species has been observed at the Hastings Reserve, located approximately 14 miles from the project site. Mammal burrows and a variety of flowering annual plants were observed within grassland areas during the June 2023 biological surveys.
Bombus occidentalis Western bumble bee	-- / SC / --	Found in a range of habitats, including mixed woodlands, farmlands, urban parks and gardens, montane meadows, and prairie grasslands. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late November. Generally nests underground, often in abandoned mammal burrows.	**Moderate** Suitable habitat is present within the project site. The CNDDB reports six occurrences of this species within the quadrangles reviewed, the nearest located approximately seven miles northwest of the project site. Mammal burrows and a variety of flowering annual plants were observed within grassland areas during the June 2023 biological surveys.
Branchinecta lynchi Vernal pool fairy shrimp	FT / -- / --	Require ephemeral pools with no flow. Associated with vernal pool/grasslands from near Red Bluff (Shasta County), through the central valley, and into the South Coast Mountains Region. Require ephemeral pools with no flow.	**Not Present** No suitable habitat is present within the project site.
Danaus plexippus Monarch butterfly	-- / SC / --	Overwinters in coastal California using colonial roosts generally found in Eucalyptus, pine and acacia trees. Overwintering habitat for this species within the Coastal Zone represents ESHA. Local ordinances often protect this species as well.	**Low** Suitable habitat is present within the project site in the large eucalyptus grove. However, overwintering locations for this species are generally known and this species has never been documented within the project site. The nearest CNDDB occurrence is located approximately eight miles west of the project site.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Euphilotes enoptes smithi Smith's blue butterfly	FE / -- / --	Most commonly associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz Counties. Plant hosts are *Eriogonum latifolium* and *E. parvifolium.*	**Not Present** No suitable habitat is present within the project site. The host plants for these species were not observed within the project site during the June 2023 biological survey.
PLANTS			
Agrostis lacuna-vernalis Vernal pool bent grass	-- / -- / 1B	Vernal pool Mima mounds at elevations of 115-145 meters. Annual herb in the Poaceae family; blooms April-May. Known only from Butterfly Valley and Machine Gun Flats of Ft. Ord National Monument.	**Unlikely** No suitable habitat within the project site. The project site is below the known elevation range for this species.
Allium hickmanii Hickman's onion	-- / -- / 1B	Closed-cone coniferous forests, maritime chaparral, coastal prairie, coastal scrub, and valley and foothill grasslands at elevations of 5-200 meters. Bulbiferous perennial herb in the Alliaceae family; blooms March-May.	**Unlikely** Marginally suitable habitat is present within the project site; however, grassland areas within the project site are not mesic enough to support this species.
Arctostaphylos hookeri ssp. *hookeri* Hooker's manzanita	-- / -- / 1B	Closed-cone coniferous forest, chaparral, cismontane woodland, and coastal scrub on sandy soils at elevations of 85-536 meters. Evergreen shrub in the Ericaceae family; blooms January-June.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Arctostaphylos montereyensis Toro manzanita	-- / -- / 1B	Maritime chaparral, cismontane woodland, and coastal scrub on sandy soils at elevations of 30-730 meters. Evergreen shrub in the Ericaceae family; blooms February-March.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Arctostaphylos pajaroensis Pajaro manzanita	-- / -- / 1B	Chaparral on sandy soils at elevations of 30-760 meters. Evergreen shrub in the Ericaceae family; blooms December-March.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Arctostaphylos pumila Sandmat manzanita	-- / -- / 1B	Openings of closed-cone coniferous forests, maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub on sandy soils at elevations of 3-205 meters. Evergreen shrub in the Ericaceae family; blooms February-May.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Arenaria paludicola Marsh sandwort	FE / SE / 1B	Known from only two natural occurrences in Black Lake Canyon and at Oso Flaco Lake. Sandy openings of freshwater of brackish marshes and swamps at elevations of 3-170 meters. Stoloniferous perennial herb in the Caryophyllaceae family; blooms May-August.	**Not Present** No suitable habitat is present within the project site. The project site is outside of the currently known range for this species. Not observed during the June 2023 biological survey.
Astragalus tener var. *tener* Alkali milk-vetch	-- / -- / 1B	Playas, valley and foothill grassland on adobe clay, and vernal pools on alkaline soils at elevations of 1-60 meters. Annual herb in the Fabaceae family; blooms March-June.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Astragalus tener var. *titi* Coastal dunes milk-vetch	FE / SE / 1B	Sandy soils in coastal bluff scrub, coastal dunes, coastal prairie (mesic); elevation 3-164 feet. Annual herb in the Fabaceae family; blooms March-May.	**Unlikely** No suitable habitat is present within the project site.
Castilleja ambigua var. insalutata Pink Johnny-nip	-- / -- / 1B	Coastal prairie and coastal scrub at elevations of 0-100 meters. Annual herb in the Orobanchaceae family; blooms May-August.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Centromadia parryi ssp. *congdonii* Congdon's tarplant	-- / -- / 1B	Valley and foothill grassland on heavy clay, saline, or alkaline soils at elevations of 0-230 meters. Annual herb in the Asteraceae family; blooms May-November.	**Not Present** Soil conditions within the site are unlikely to support this species. Not observed within the project site during the June 2023 biological survey.
Chorizanthe minutiflora Fort Ord spineflower	-- / -- / 1B	Sandy openings of maritime chaparral and coastal scrub at elevations of 55-150 meters. Only known occurrences on Fort Ord National Monument. Annual herb in the Polygonaceae family; blooms April-July.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Chorizanthe pungens var. *pungens* Monterey spineflower	FT / -- / 1B	Maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland on sandy soils at elevations of 3-450 meters. Annual herb in the Polygonaceae family; blooms April-July.	**Not Present** Marginal habitat is present within the project site; however, this species was not observed within the project site during the June 2023 biological survey.
Clarkia jolonensis Jolon clarkia	-- / -- / 1B	Cismontane woodland, chaparral, riparian woodland, and coastal scrub at elevations of 20-660 meters. Annual herb in the Onagraceae family; blooms April-June.	**Not Present** Suitable habitat is present within the project site; however, this species was not observed within the project site during the June 2023 biological survey.
Collinsia multicolor San Francisco collinsia	-- / -- / 1B	Closed-cone coniferous forest and coastal scrub, sometimes on serpentinite soils, at elevations of 30-250 meters. Annual herb in the Plantaginaceae family; blooms March-May.	**Unlikely** No suitable habitat within the project site.
Cordylanthus rigidus ssp. *littoralis* Seaside bird's-beak	-- / SE / 1B	Closed-cone coniferous forests, maritime chaparral, cismontane woodlands, coastal dunes, and coastal scrub on sandy soils, often on disturbed sites, at elevations of 0-425 meters. Annual hemi-parasitic herb in the Orobanchaceae family; blooms April-October.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Delphinium californicum ssp. *interius* Hospital Canyon larkspur	-- / -- / 1B	Openings in chaparral, coastal scrub, and mesic areas of cismontane woodland at elevations of 230-1095 meters. Perennial herb in the Ranunculaceae family; blooms April-June.	**Not Present** No suitable habitat within the project site. The project site is below the known elevation range for this species. Not observed within the project site during the June 2023 biological survey.
Delphinium hutchinsoniae Hutchinson's larkspur	-- / -- / 1B	Broadleaved upland forest, chaparral, coastal scrub, and coastal prairie at elevations of 0-427 meters. Perennial herb in the Ranunculaceae family; blooms March-June.	**Not Present** No suitable habitat within the project site. The project site is below the known elevation range for this species. Not observed within the project site during the June 2023 biological survey.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Delphinium umbraculorum Umbrella larkspur	-- / -- / 1B	Cismontane woodland at elevations of 400-1600 meters. Perennial herb in the Ranunculaceae family; blooms April-June.	**Not Present** No suitable habitat within the project site. The project site is below the known elevation range for this species. Not observed within the project site during the June 2023 biological survey.
Ericameria fasciculata Eastwood's goldenbush	-- / -- / 1B	Openings in closed-cone coniferous forest, maritime chaparral, coastal dunes, and coastal scrub on sandy soils at elevations of 30-275 meters. Evergreen shrub in the Asteraceae family; blooms July-October.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Eriogonum nortonii Pinnacles buckwheat	-- / -- / 1B	Chaparral and valley and foothill grassland on sandy soils, often on recent burns, at elevations of 300-975 meters. Annual herb in the Polygonaceae family; blooms May-September.	**Not Present** Suitable habitat is present; however, the project site is below the known elevation range for this species. Not observed within the project site during the June 2023 biological survey.
Erysimum ammophilum Sand-loving wallflower	-- / -- / 1B	Openings in maritime chaparral, coastal dunes, and coastal scrub on sandy soils at elevations of 0-60 meters. Perennial herb in the Brassicaceae family; blooms February-June.	**Not Present** Not observed within the project site during the June 2023 biological survey.
Erysimum menziesii Menzies' wallflower	FE / SE / 1B	Coastal dunes at elevations of 0-35 meters. Perennial herb in the Brassicaceae family; blooms March-September.	**Not Present** Not observed within the project site during the June 2023 biological survey.
Fritillaria liliacea Fragrant fritillary	-- / -- / 1B	Cismontane woodland, coastal prairie, coastal scrub, and valley and foothill grassland, often serpentinite, at elevations of 3-410 meters. Bulbiferous perennial herb in the Liliaceae family; blooms February-April.	**Unlikely** Suitable habitat is present within the project site; however, suitable soil conditions are not present.
Gilia tenuiflora ssp. *arenaria* Monterey gilia	FE / ST / 1B	Openings in maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub on sandy soils at elevations of 0-45 meters. Annual herb in the Polemoniaceae family; blooms April-June.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.
Hesperocyparis goveniana Gowen cypress	FT / -- / 1B	Closed-cone coniferous forest and maritime chaparral at elevations of 30-300 meters. Evergreen tree in the Cupressaceae family. Natively occurring only at Point Lobos near Gibson Creek and the Huckleberry Hill Nature Preserve near Highway 68.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey. The project site is outside the native range of this species.
Hesperocyparis macrocarpa Monterey cypress	-- / -- / 1B	Closed-cone coniferous forest at elevations of 10-30 meters. Evergreen tree in the Cupressaceae family. Natively occurring only at Cypress Point in Pebble Beach and Point Lobos State Park; widely planted and naturalized elsewhere.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey. The project site is outside the native range of this species.
Horkelia cuneata ssp. *sericea* Kellogg's horkelia	-- / -- / 1B	Openings of closed-cone coniferous forests, maritime chaparral, coastal dunes, and coastal scrub on sandy or gravelly soils at elevations of 10-200 meters. Perennial herb in the Rosaceae family; blooms April-September.	**Not Present** No suitable habitat within the project site. Not observed during the June 2023 biological survey.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Horkelia marinensis Point Reyes horkelia	-- / -- / 1B	Coastal dunes, coastal prairie, and coastal scrub on sandy soils at elevations of 5-350 meters. Perennial herb in the Rosaceae family; blooms May-September.	**Not Present** No suitable habitat within the project site. Not observed during the June 2023 biological survey.
Lasthenia conjugens Contra Costa goldfields	FE / -- / 1B	Mesic areas of valley and foothill grassland, alkaline playas, cismontane woodland, and vernal pools at elevations of 0-470 meters. Annual herb in the Asteraceae family; blooms March-June.	**Not Present** Marginally suitable habitat is present within the project site; however, grassland areas within the project site are not mesic enough to support this species. Not observed within the project site during the June 2023 biological survey.
Layia carnosa Beach layia	FT / SE / 1B	Coastal dunes and coastal scrub on sandy soils at elevations of 0-60 meters. Annual herb in the Asteraceae family; blooms March-July.	**Not Present** No suitable habitat within the project site. Not observed during the June 2023 biological survey.
Legenere limosa Legenere	-- / -- / 1B	Vernal pools and wetlands at elevations of 1-880 meters. Annual herb in the Campanulaceae family; blooms April-June.	**Not Present** No suitable habitat within the project site. Not observed during the June 2023 biological survey.
Lupinus tidestromii Tidestrom's lupine	FE / SE / 1B	Coastal dunes at elevations of 0-100 meters. Perennial rhizomatous herb in the Fabaceae family; blooms April-June.	**Not Present** No suitable habitat within the project site. Not observed during the June 2023 biological survey.
Malacothamnus palmeri var. *involucratus* Carmel Valley bush-mallow	-- / -- / 1B	Chaparral, cismontane woodland, and coastal scrub at elevations of 30-1100 meters. Perennial deciduous shrub in the Malvaceae family; blooms May-October.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Malacothrix saxatilis var. *arachnoidea* Carmel Valley malacothrix	-- / -- / 1B	Chaparral and coastal scrub on rocky soils at elevations of 25-1036 meters. Perennial rhizomatous herb in the Asteraceae family; blooms June-December.	**Not Present** No suitable habitat within the project site. Not observed within the project site during the June 2023 biological survey.
Meconella oregana Oregon meconella	-- / -- / 1B	Coastal prairie and coastal scrub at elevations of 250-620 meters. Annual herb in the Papaveraceae Family; blooms March-April.	**Unlikely** No suitable habitat is present within the project site. The project site is outside the elevation range of the species.
Microseris paludosa Marsh microseris	-- / -- / 1B	Closed-cone coniferous forest, cismontane woodland, coastal scrub, and valley and foothill grassland at elevations of 5-300 meters. Perennial herb in the Asteraceae family; blooms April-July.	**Not Present** Marginally suitable habitat is present within the project site; however, grassland areas within the project site are not mesic enough to support this species. Not observed within the project site during the June 2023 biological survey.
Monardella sinuata ssp. *nigrescens* Northern curly-leaved monardella	-- / -- / 1B	Chaparral, coastal dunes, coastal scrub, and lower montane coniferous forest (ponderosa pine sandhills) on sandy soils at elevations of 0-300 meters. Annual herb in the Lamiaceae family; blooms April-September.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Monolopia gracilens Woodland woollythreads	-- / -- / 1B	Openings of broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland on serpentinite soils at elevations of 100-1200 meters. Annual herb in the Asteraceae family; blooms February-July.	**Not Present** Suitable habitat is present within the project site; however, the project site is below the known elevation range and this species was not observed within the project site during the June 2023 biological survey.
Pinus radiata Monterey pine	-- / -- / 1B	Closed-cone coniferous forest and cismontane woodland at elevations of 25-185 meters. Evergreen tree in the Pinaceae family. Only three native stands in CA at Ano Nuevo, Cambria, and the Monterey Peninsula; introduced in many areas.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey. The project site is outside of the native range of this species.
Piperia yadonii Yadon's rein orchid	FE / -- / 1B	Sandy soils in coastal bluff scrub, closed-cone coniferous forest, and maritime chaparral at elevations of 10-510 meters. Annual herb in the Orchidaceae family; blooms February-August.	**Not Present** No suitable habitat is present within the project site. *Piperia* stalks were not observed within the project site during the June 2023 biological survey.
Plagiobothrys chorisianus var. *chorisianus* Choris's popcorn-flower	-- / -- / 1B	Mesic areas of chaparral, coastal prairie, and coastal scrub at elevations of 15-160 meters. Annual herb in the Boraginaceae family; blooms March-June.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.
Potentilla hickmanii Hickman's cinquefoil	FE / SE / 1B	Coastal bluff scrub, closed-cone coniferous forests, vernally mesic meadows and seeps, and freshwater marshes and swamps at elevations of 10-149 meters. Perennial herb in the Rosaceae family; blooms April-August.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.
Ramalina thrausta Angel's hair lichen	-- / -- / 2B	North coast coniferous forest on dead twigs and other lichens. Epiphytic fructose lichen in the Ramalinaceae family. In northern CA it is usually found on dead twigs, and has been found on *Alnus rubra*, *Calocedrus decurrens*, *Pseudotsuga menziesii*, *Quercus garryana*, and *Rubus spectabilis*. In Sonoma County it grows on and among dangling mats of *R. menziesii* and *Usnea* spp.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey. None of the host species are present within the project site.
Rosa pinetorum Pine rose	-- / -- / 1B	Closed-cone coniferous forest at elevations of 2-300 meters. Perennial shrub in the Rosaceae family; blooms May-July. Possible hybrid of *R. spithamea*, *R. gymnocarpa*, or others; further study needed.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.

Species	Status (Service/CDFW/CNPS)	General Habitat	Potential Occurrence in Project Site
Stebbinsoseris decipiens Santa Cruz microseris	-- / -- / 1B	Broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, and openings in valley and foothill grassland, sometimes on serpentinite, at elevations of 10-500 meters. Annual herb in the Asteraceae family; blooms April-May.	**Low** Suitable habitat is present within the project site. The CNDDB reports two occurrences of this species within the quadrangles reviewed, the nearest located approximately two miles north of the project site. Although this species typically blooms from April-May, climatic conditions in 2023 have extended the blooming period for many local species. As such, it is very likely this species would have been observed during the survey conducted in early June of 2023 if present.
Sulcaria spiralifera Twisted horsetail lichen	-- / -- / 1B	California North Coast coniferous forest at elevations of 0–30 meters. Often found on conifers, including *Picea sitchensis*, *Pinus contorta* var. *contorta*, *Pseudotsuga menziesii*, *Abies grandis*, and *Tsuga heterophylla*. Fruticose lichen in the Parmeliaceae family.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey. None of the host species are present within the project site.
Tortula californica California screw moss	-- / -- / 1B	Valley and foothill grassland and chenopod scrub on sandy soils at elevations of 10-1460 meters. Moss in the Pottiaceae family.	**Not Present** Suitable habitat is present within the project site; however, this species was not observed within the project site during the June 2023 biological survey.
Trifolium buckwestiorum Santa Cruz clover	-- / -- / 1B	Gravelly margins of broadleaved upland forest, cismontane woodland, and coastal prairie at elevations of 105-610 meters. Annual herb in the Fabaceae family; blooms April-October.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.
Trifolium hydrophilum Saline clover	-- / -- / 1B	Marshes and swamps, mesic and alkaline valley and foothill grassland, and vernal pools at elevations of 0-300 meters. Annual herb in the Fabaceae family; blooms April-June.	**Not Present** Marginally suitable habitat is present within the project site; however, grassland areas within the project site are not mesic enough to support this species. Not observed within the project site during the June 2023 biological survey.
Trifolium polyodon Pacific Grove clover	-- / SR / 1B	Mesic areas of closed-cone coniferous forest, coastal prairie, meadows and seeps, and valley and foothill grassland at elevations of 5-120 meters. Annual herb in the Fabaceae family; blooms April-July.	**Not Present** Marginally suitable habitat is present within the project site; however, grassland areas within the project site are not mesic enough to support this species. Not observed within the project site during the June 2023 biological survey.
Trifolium trichocalyx Monterey clover	FE / SE / 1B	Sandy openings and burned areas of closed-cone coniferous forest at elevations of 30-240 meters. Annual herb in the Fabaceae family; blooms April-June.	**Not Present** No suitable habitat is present within the project site. Not observed within the project site during the June 2023 biological survey.

STATUS DEFINITIONS

Federal

FE = listed as Endangered under the federal Endangered Species Act
FT = listed as Threatened under the federal Endangered Species Act
FC = Candidate for listing under the federal Endangered Species Act
-- = no listing

State

SE = listed as Endangered under the California Endangered Species Act
ST = listed as Threatened under the California Endangered Species Act
SC = Candidate for listing under California Endangered Species Act
SR = listed as Rare under the California Endangered Species Act
CFP = California Fully Protected Species
CSC = CDFW Species of Concern
-- = no listing

California Native Plant Society

1B = California Rare Plant Rank 1B species; plants rare, threatened, or endangered in California and elsewhere
2B = California Rare Plant Rank 2B species; plants rare, threatened, or endangered in California, but more common elsewhere
-- = no listing

POTENTIAL TO OCCUR

Present = known occurrence of species within the site; presence of suitable habitat conditions; or observed during field surveys
High = known occurrence of species in the vicinity from the CNDDB or other documentation; presence of suitable habitat conditions
Moderate = known occurrence of species in the vicinity from the CNDDB or other documentation; presence of marginal habitat conditions within the site
Low = species known to occur in the vicinity from the CNDDB or other documentation, lack of suitable habitat or poor quality
Unlikely = species not known to occur in the vicinity from the CNDDB or other documentation, no suitable habitat is present within the site
Not Present = species was not observed during surveys or no obligate habitat is present within the site

APPENDIX D

CalVTP PEIR Standard Project Requirements (SPRs) and Mitigation Measures Relevant to Biological Resources
(Includes Project-Specific Implementation)

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Standard Project Requirements and Mitigation Measures Checklist

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

- **Applicable (Yes/No).** Document whether the SPR or mitigation measure is applicable to the initial treatment and/or treatment maintenance (Yes or No), and whether it is applicable to initial treatment and/or treatment maintenance. The applicability should be substantiated in the Environmental Checklist Discussion.
- **Timing.** This column identifies the time frame in which the SPR or mitigation measure will be implemented (e.g., prior to treatment, during treatment, etc.).
- **Implementing Entity**. The implementing entity is the agency or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
- **Verifying/Monitoring Entity**. The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to Treatment	MPRPD	MPRPD
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to Treatment	MPRPD	MPRPD
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD
Air Quality Standard Project Requirements				
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and	Initial Treatment: Yes Treatment Maintenance: Yes	During Treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Initial data review and reconnaissance-level survey have been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can	Initial Treatment: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Yes			
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of A Manual of California Vegetation (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Sensitive habitat survey and mapping have been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment MPRPD has consulted with DD&A qualified biologists to design treatments to retain and improve riparian habitat functions.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue	Initial Treatment: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on Phytopthora diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Yes			
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to treatment Protocol-level survey for special-status plants has been conducted, see PSA and Appendix B for results.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles;	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Implementation ▶ A qualified biologist shall survey the project site for California red-legged frog, Coast Range newt, and western pond turtle no more than 48 hours prior to the commencement of treatment activities. If any Coast Range newt individuals are encountered Mitigation Measures BIO-2a and/or BIO-2b shall be implemented. ▶ Not more than 14 days prior to the start of treatment activities that, a qualified biologist shall conduct a survey of suitable habitat within the project site to locate existing Monterey dusky-footed woodrat nests and American badger dens. If any Monterey dusky-footed woodrat nests or American badger dens are encountered Mitigation Measure BIO-2b shall be implemented. ▶ If treatment activities are scheduled within the CBB and WBB flight season, MPRPD shall contract a qualified biologist to conduct a survey for an active CBB and WBB colony within grassland areas to be impacted by the project and an approximate 50-foot buffer. Surveys shall be conducted in accordance with CDFW's *Survey Considerations for California Endangered*	Initial Treatment: Yes Treatment Maintenance: Yes	No more than 48 hours prior to treatment for California red-legged frog, Coast Range newt, and western pond turtle. No more than 14 days prior to treatment for American badger and Monterey dusky-footed woodrat. During the flight season for special-status bumble bees according to the CDFW protocol.	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Species Act (CESA) Candidate Bumble Bee Species (2023) or the most current CDFW protocol. If protected bumble bee nests are found Mitigation Measure BIO-2g shall be implemented.				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: No Treatment Maintenance: Yes	Prior to and during prescribed herbivory treatment	MPRPD	MPRPD
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted	Initial Treatment: Yes Treatment Maintenance: Yes	Survey no more than 3 weeks prior to treatment during active nesting season (February 1 – August 31) Avoidance and minimization measures to be implemented prior to and during treatment if active nests are identified	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▶ Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment if there is a 30 percent or more chance of rain within the next 24 hours	MPRPD	MPRPD
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During treatment	MPRPD	MPRPD
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could	Initial Treatment: Yes Treatment Maintenance: Yes	During mechanical activities that result in exposure of bare soil over 50% or more of the treatment area	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.				
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During and immediately following treatment	MPRPD	MPRPD
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	During prescribed burning treatment activities	MPRPD	MPRPD
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to):	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to herbicide treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. ▶ Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to herbicide treatment activities	MPRPD	MPRPD
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/ Monitoring Entity</th></tr>
<tr><td>vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments:
Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.
Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas.
Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.
This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.</td><td>Initial Treatment:
No

Treatment Maintenance:
Yes</td><td>Prior to and during prescribed herbivory treatment</td><td>MPRPD</td><td>MPRPD</td></tr>
<tr><td>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths<table><tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr><tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or
2) Fish always or seasonally present onsite, includes habitat</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or
2) Aquatic habitat for nonfish aquatic species.
3) Excludes Class III waters that are</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr></table></td><td>Initial Treatment:
Yes

Treatment Maintenance:
Yes</td><td>Establish WLPZs prior to treatment (adjacent Carmel River is a Class I waterway)

Implement WLPZ protections during treatments (adjacent Carmel River is a Class I waterway)</td><td>MPRPD</td><td>MPRPD</td></tr>
</table>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity

	to sustain fish migration and spawning.	tributary to Class I waters.	completion of timber operations.	
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ				
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
30-50 % Slope	100	75		
>50 % Slope	150	100		

Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)

The following WLPZ protections will be applied for all treatments:

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during herbicide treatment activities	MPRPD	MPRPD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Biological Resources				
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c.	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▶ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. Project-Specific Implementation ▶ If any life stage of California red-legged frog (CRLF) is observed during the pre-treatment survey, treatment activities will not commence until the USFWS is consulted and appropriate actions are taken to allow project activities to continue. CRLF shall not be handled unless authorized by the USFWS. ▶ A qualified biologist will monitor initial project activities for a sufficient time to train an individual of the work crew to act as an on-site monitor. The qualified biologist shall ensure that this designated monitor receives sufficient training in the identification of California red-legged frog (CRLF). The designated monitor will be the contact for any CRLF encounters and will conduct daily inspections of equipment and materials stored on site, and will actively look for CRLF during treatment activities. The qualified biologist shall remain available to come to the				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
site if a CRLF is identified until all treatment activities are completed. The qualified biologist will also conduct regular scheduled and unscheduled visits to ensure the designated monitor is satisfactorily implementing all appropriate mitigation protocols. The qualified biologist and the designated monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the proposed project. The designated monitor and the qualified biologist are authorized to stop work if the avoidance and/or minimization measures are not being followed. If any CRLF are found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the USFWS is consulted and appropriate actions are taken to allow project activities to continue. CRLF shall not be handled unless authorized by the USFWS. Because dusk and dawn are often the times when CRLF are most actively foraging and dispersing, all project activities within riparian areas should cease one half hour before sunset and should not begin prior to one half hour after sunrise.				
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. ▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. Project-Specific Implementation ▶ If any Coast Range newt or western pond turtle individuals are encountered during pre-treatment surveys or during treatment activities, they shall be allowed to move out of the area of their own volition. If this is not feasible, they shall be captured by a qualified biologist and relocated out of harm's way to the nearest suitable habitat at least 100 feet from the project site. ▶ Any Monterey dusky-footed woodrat nests identified within the project site during pre-treatment surveys shall be mapped and flagged for avoidance. Graphics depicting all Monterey dusky-footed woodrat nests shall be provided to the vegetation removal contractor. Any				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Monterey dusky-footed woodrat nests that cannot be avoided shall be dismantled according to the following procedures: ▪ Each active nest shall be dismantled by the qualified biologist to the degree that the woodrats leave the nest and seek refuge elsewhere. ▪ Nests shall be dismantled during the non-breeding season (between October 1 and December 31), if possible. ▪ If a litter of young is found or suspected, nest material shall be replaced and the nest left alone for 2-3 weeks; after this time, the nest will be rechecked to verify that young are capable of independent survival before proceeding with nest dismantling. ▶ Any potential American badger dens identified within the project site during pre-treatment surveys shall be mapped and flagged for avoidance. Graphics depicting all American badger dens shall be provided to the vegetation removal contractor. If avoidance of American badger dens is not feasible, the following measures shall be implemented: ▪ If the qualified biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel to prevent badgers from re-using them during construction. ▪ If the qualified biologist determines that potential dens may be active, the entrances of the dens shall be blocked with soil, sticks, and debris for three to five days to discourage the use of these dens prior to project disturbance. The den entrances shall be blocked to an incrementally greater degree over the three- to five-day period. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during treatment activities. A qualified biologist will monitor initial project activities for a sufficient time to train an individual of the work crew to act as an on-site monitor. The qualified biologist shall ensure that this designated monitor receives sufficient training in the identification of all special-status wildlife species potentially occurring within the treatment areas. The designated monitor will be the contact for any special-status wildlife species encounters and will conduct daily inspections of equipment and materials stored on site. The qualified biologist shall remain available to come to the site if a special-status wildlife species is identified until all treatment activities are completed. The qualified biologist will also conduct regular scheduled and unscheduled visits to ensure the designated monitor is satisfactorily implementing all appropriate mitigation protocols. The qualified biologist and the designated monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the proposed project. The designated monitor and the qualified biologist are authorized to stop work if the avoidance and/or minimization measures are not being followed.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by	Initial Treatment: Yes Treatment Maintenance:	Prior to and/or following treatment if necessary	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. ▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information.	Yes			

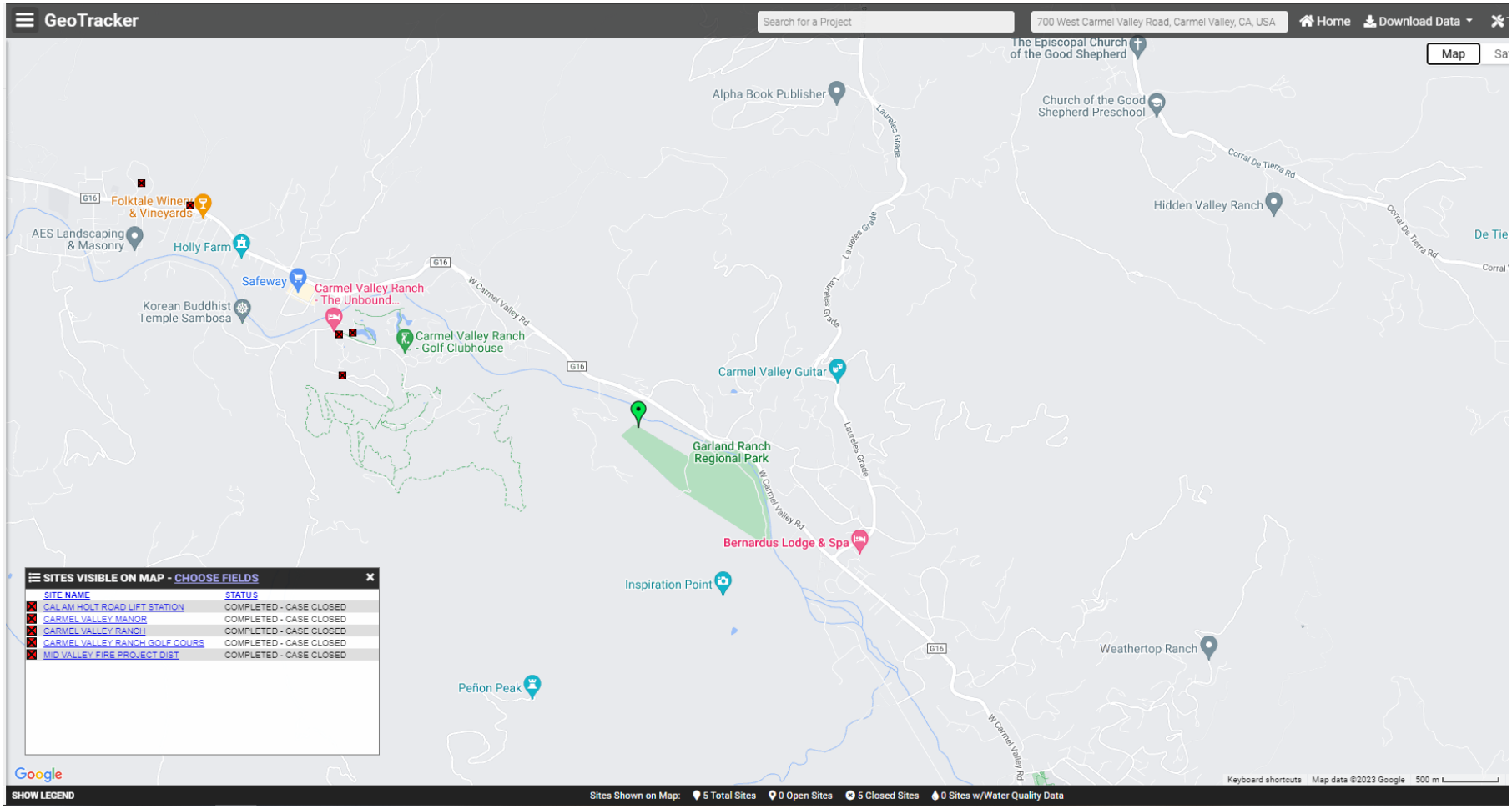
Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required. Project-Specific Implementation ▶ Project activities within the grassland habitat shall be limited to the minimum area necessary to complete the prescribed burning (i.e., pile burning) activities. Stockpile areas and an access route to the stockpile shall be clearly designated with fencing or flagging prior to treatment activities. Vegetation clearance and access routes shall be clearly designated with fencing or flagging prior to vegetation removal for pile burning activities. ▶ If protected bumble bee nests cannot be avoided, Mitigation Measure BIO-2c would be implemented.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and	Initial Treatment: Yes Treatment Maintenance: Yes	Prior to and during treatment	MPRPD	MPRPD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity
the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer ▪ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				

ATTACHMENT C – HAZARDOUS DATABASE RESULTS

State Water Resources Control Board GeoTracker:



Department of Toxic Substances EnviroStor: