



# THE CALIFORNIA VEGETATION TREATMENT PROGRAM ENVIRONMENTAL CHECKLIST



## INTRODUCTION

The California Department of Forestry and Fire Protection (CAL FIRE), in cooperation with the Truckee Tahoe Airport District (TTAD) and under a conservation easement with the Truckee Donner Land Trust (TDLT), proposes to implement vegetation treatments on up to 1,465 acres of land (Waddle Ranch Vegetation Treatment Project or proposed project) in Placer and Nevada Counties, near the town of Truckee (Figure 1). The proposed treatment type (i.e., fuel break) and the treatment activities (i.e., manual treatments, mechanical treatments, and prescribed burning) are consistent with those evaluated in the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (Program EIR). Maintenance treatments would involve the same vegetation treatment type and activities used in the initial treatments. CAL FIRE is the lead agency pursuant to the California Environmental Quality Act (CEQA). TTAD, recognizing its role as landowner and cooperative role in project implementation, is a responsible agency under CEQA.

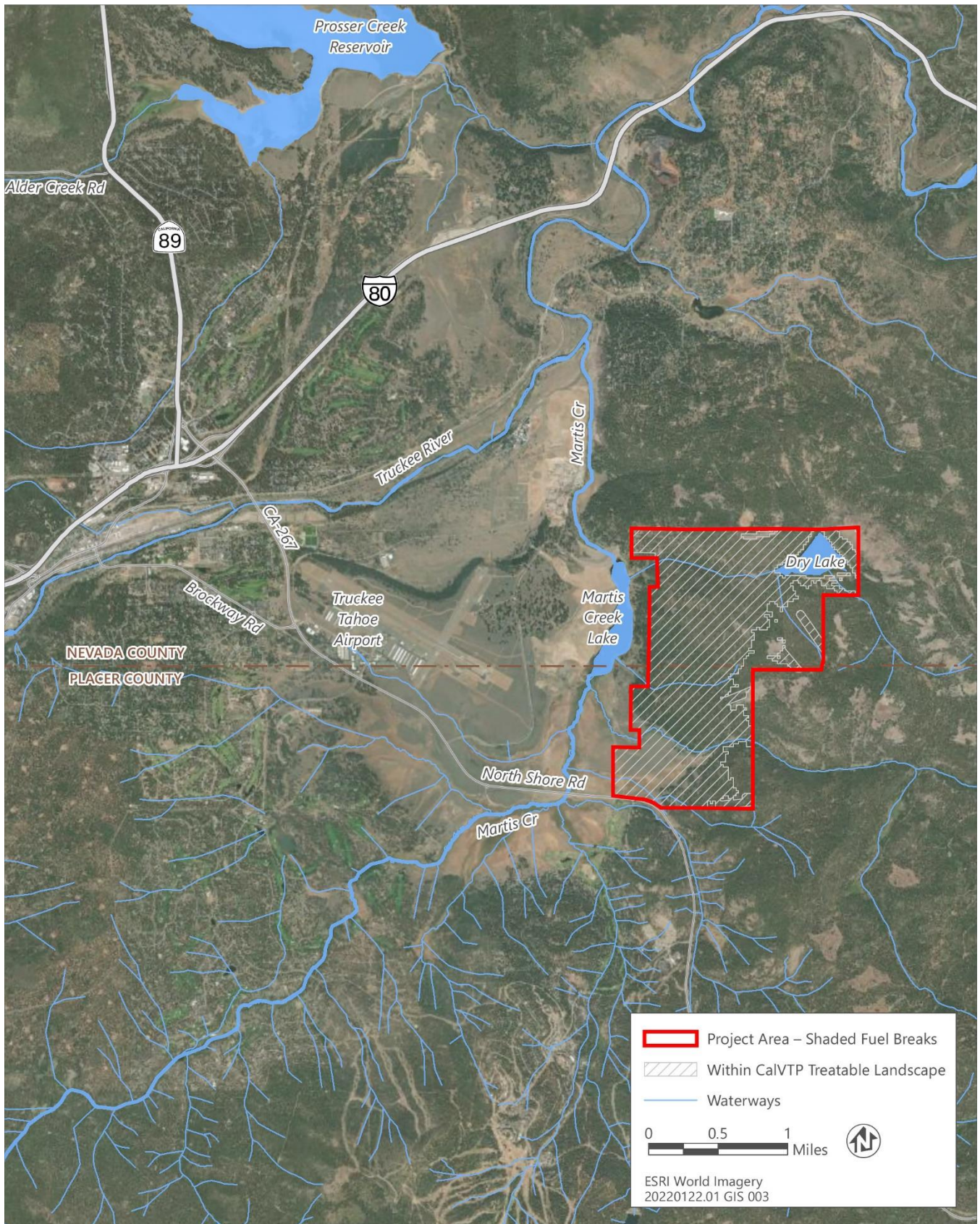
This document serves as a project-specific analysis (PSA) to evaluate whether the proposed treatments would be within the scope of the CalVTP Program EIR. As stated above, the treatment type and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment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

Portions of the project area extend outside of the treatable landscape described in the CalVTP Program EIR. In total, these areas outside the treatable landscape encompass approximately 318 acres of the 1,465-acre project area (Figure 2); they are small sections dispersed throughout the project area (refer to Chapter 2, "Treatment Description"). The scattered array of acres outside of the mapped CalVTP treatable landscape is due to the digital expression of the CalVTP treatable landscape that resulted in a pixelated mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., State Responsibility Area [SRA] and Local Responsibility Area [LRA]), the method resulted in some treatable landscape areas that are shown on maps to be disjointed and scattered and some that are in held areas surrounded by the mapped treatable landscape. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the Program EIR would be applicable to the adjacent areas.

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, but the proposed revision or change in the project, compared to the Program EIR, is the inclusion of areas outside of and adjacent to the CalVTP treatable landscape. The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the Addendum to the Program EIR.







Source: adapted by Ascent in 2023.

**Figure 2. Project Area**

This document serves as both a PSA and an Addendum to the CalVTP Program EIR (PSA/Addendum) for CAL FIRE review and analysis under CEQA regarding the proposed Waddle Ranch Vegetation Treatment Project within and outside the treatable landscape covered by the Program EIR. It provides environmental information supported by substantial evidence to CAL FIRE in its consideration of various discretionary approvals, including grant funding allocations and resource support for implementation of the work by TTAD or its contractor(s).

This PSA/Addendum and attachments together support the finding that the proposed project is within the scope of the CalVTP Program EIR or, if not entirely within the scope, does not otherwise warrant additional CEQA documentation. Each resource topic below includes a discussion of impacts related to that resource area followed by discussions of standard project requirements (SPRs) and mitigation measures (MMs) that are applicable for avoiding, minimizing, and mitigating impacts for that resource area. Additional analysis and information supporting the impact discussions can be found in the corresponding attachments. A within the scope finding requires the following components:

- Description of the impact of the proposed treatment project (see impact discussions under Sections EC-1 through EC-16 below and Attachment B),
- Summary of the impact in the CalVTP Program EIR (see impact discussions under Sections EC-1 through EC-16 below),
- Evidence the project impact is addressed by the Program EIR and would not constitute a new or substantially more severe significant impact (see impact discussions under Sections EC-1 through EC-16 below and Attachment B),
- Identification of CalVTP SPRs and MMs applicable to the proposed project (see SPR and MM discussions under Sections EC-1 through EC-16 below and Attachment A), and
- Conclusion regarding consistency with the Program EIR (see impact discussions under Sections EC-1 through EC-16 below).

This PSA/Addendum also serves as a mitigation monitoring and reporting program (MMRP) in accordance with CEQA and the State CEQA Guidelines (Public Resources Code Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097). A MMRP is required for approval of the proposed project because this PSA/Addendum identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. SPRs, which are environmental protection features included as part of the project description, have been incorporated to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. The numbering of SPRs and mitigation measures follows the numbering used in the Program EIR. SPRs and mitigation measures that are referenced in more than one resource topic are not duplicated in Attachment A. Instructions for project-specific implementation of certain SPRs and Mitigation Measures has been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. The MMRP requirements covered in this PSA/Addendum are described below.

- SPRs and Mitigation Measures – Brief discussions indicating whether an SPR or mitigation measure is applicable to this project are included under each resource section below.
- Implementing Entity & Timing Relative to Implementation – This identifies the agency responsible for implementing the measure and time frame in which the SPR or mitigation measure would be implemented for each applicable SPR/mitigation measure.
- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.

Regarding reporting, TTAD would document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting a project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.



## PROJECT INFORMATION

1. **Project Title:** Waddle Ranch Vegetation Treatment Project
2. **CAL FIRE Project Number** **RX-North-055-NEU**
3. **CalVTP I.D. Number** **2023-18**
4. **Project Proponent Name and Address:** Truckee Tahoe Airport District  
10356 Truckee Airport Rd  
Truckee, CA 96161
5. **Contact Person Information and Phone Number:**  
Jeff Dowling, RPF 2486  
Jeffreydowling53@gmail.com  
775-845-8974

### 6. Project Location:

The project area is south and east of the Town of Truckee and east of California State Route (SR) 267. The property is located in both Placer and Nevada Counties in Portions of Sections 15, 16, 17, 20 and 21, T17N, R17E, MDBM. Elevation ranges from 5,800-6,600 feet and aspects are primarily south and west.

7. **Total Area to be Treated (acres):** **1,465**

### 8. Description of Project:

The proposed project consists entirely of fuel break treatment type. Existing shaded fuel breaks are present on approximately 517 acres of the 1,465-acre project area, and these would be maintained following standards described in the CalVTP. The proposed treatment activities that would be used to implement the project are manual treatments, mechanical treatments, and prescribed burning (pile and broadcast burning).

The project area is generally composed of forest fuel types, with some open areas of grasslands and a component of understory shrub vegetation along the forest margins and in the lower canopy of portions of the forest. Approximately 1,500 structures, some within Town of Truckee, are located adjacent to the project to the north and east of the project area.

Initial treatments have been implemented on approximately 850 acres of the 1,465-acre project area under a Timber Harvest Plan (THP), which is now completed and closed. These treatments were accomplished using manual and mechanical vegetation removal (thinning). While these areas have undergone initial treatment under the THP, ongoing maintenance of these areas using non-commercial methods would be subject to CEQA and covered using this PSA. Current stocking varies from 85 square feet per acre basal area on the thinned stands to 180 square feet per acre on non-thinned stands. Previously treated areas also removed the smaller biomass. The project objective is to restore the existing landscape to a more fire resilient condition while increasing forest health and reducing the risk and intensity of wildfire. Proposed vegetation treatments would decrease fire intensity and increase forest health by reducing the fuel load, increasing canopy spacing, and reducing ladder fuels, while allowing fire to be reintroduced to the ecosystem. Target stand conditions would leave a well-spaced forest with 15-30 feet of crown spacing (75-100 square feet of basal area/acre). The proposed project includes initial treatment and ongoing maintenance treatments.

SPRs and mitigation measures, as presented for each resource area under the "Evaluation of Environmental Impacts" and detailed in Attachment A, will be implemented before, during, or after treatments as applicable to the treatment type and treatment activities.

## TREATMENT TYPE

The proposed project would implement the Fuel Break treatment type. This treatment type is described in more detail below and is consistent with this treatment type as described in the CalVTP Program EIR. Desired conditions are as follows:

- Trees would be removed so that target stand conditions would leave a forest with 15 to 30 feet of crown spacing
- 75 square feet of basal area per acre would be retained
- One snag per acre and logs that provide wildlife habitat or are difficult to remove due to considerations such as slope or topography would be retained for wildlife habitat when feasible.
- Chips would be scattered at an average depth of 3 inches

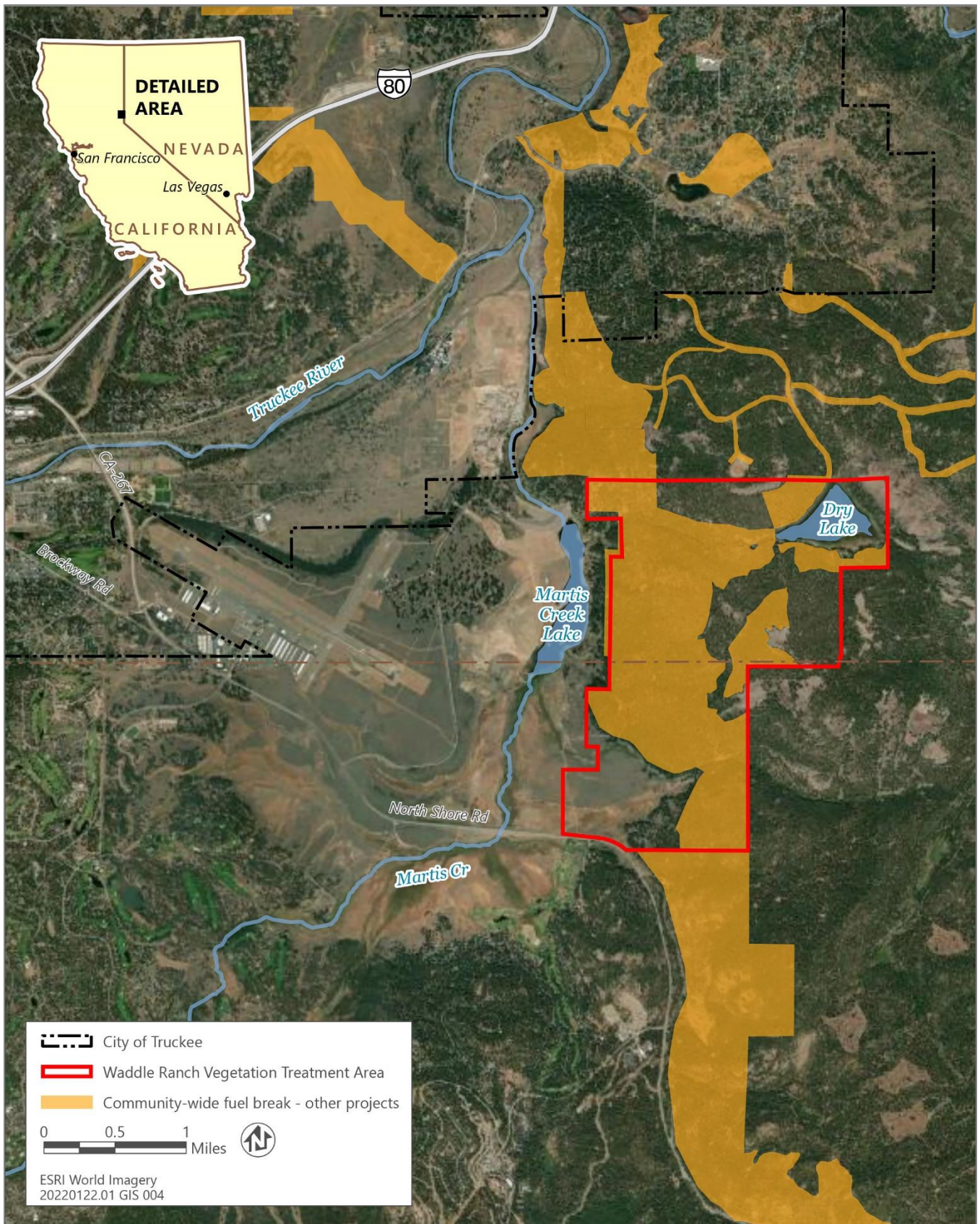
Where existing habitat within the project area is degraded, such as by the infestation of non-native plant species and overgrowth, treatments would also help enhance habitat quality by reducing overcrowding of understory vegetation and trees, targeting invasive plants for removal, and reducing the risk of catastrophic wildfire.

## Fuel Break

Fuel breaks are established in strategic areas where flammable vegetation can be modified to reduce fire spread to structures and/or natural resources, while providing a safer location for firefighters to fight fires. The project would consist of the maintenance of existing and creation of new shaded fuel breaks (see Figure 2). Shaded fuel breaks are often used in forest settings. Typically, the tree canopy is thinned to reduce the potential for a crown fire to move through the canopy; however, larger trees would remain. The shade of the retained canopy also helps reduce the potential for rapid re-growth of shrubs and sprouting hardwoods and can reduce rill and gully erosion. No non-shaded fuel breaks would be created or maintained as a part of this project.

This project area would serve as a portion of the community-wide fuel break stretching north to south from the Waddle Ranch Preserve to Lake Tahoe (Figure 3). This large-scale fuel break would reduce wildfire risk and support fire suppression by providing responders with staging areas and access around Truckee and the surrounding communities. This collaboration between a variety of landowners extends to approximately two miles north of and approximately five miles southeast of the Waddle Ranch Vegetation Treatment project area. In collaboration with these neighboring landowners, the Waddle Ranch Vegetation Treatment Project would provide a critical fuel break to protect the neighboring communities.

Treatment would return target forest stands to healthy conditions with 15 to 30-foot crown spacing and reduction of understory ladder fuels, while retaining snags and logs for habitat when feasible.



Source: adapted by Ascent in 2023.

**Figure 3. Community-Wide Fuel Break Stretching North to South from the Waddle Ranch Preserve to Lake Tahoe and north to Truckee**

## TREATMENT ACTIVITIES

The proposed vegetation treatment activities are manual treatments, mechanical treatments, and prescribed burning (pile and broadcast burning). Each of these treatment activities are described in more detail below and are consistent with the treatment activities described in the CalVTP. The treatment activities used in specific locations would be determined based on factors such as vegetation type, previous fuel management, slope/accessibility, landowner objectives, and funding. For the purposes of this analysis, all of the proposed treatment activities are assumed to occur across the entire project area.

Treatments may occur all year except when limited by biological restrictions, burn prescriptions, and access for vehicles and equipment during wet conditions. Although there is the potential for prescribed burning to occur during nighttime and weekend hours, all treatment activities using equipment would be limited to daytime hours on Monday through Saturday, between the hours of 7:00 a.m. and 4:00 p.m.

### Manual Vegetation Treatment

Manual vegetation treatment techniques would include lopping and scattering, pruning, and hand cutting of shrubs, bushes, and small live trees. To implement manual treatments, crews of approximately five to 40 members would use hand tools and hand-operated power tools, including chainsaws, hand saws, brush cutters, and loppers, to cut, clear, and prune trees, herbaceous vegetation, and woody shrubs and increase space between trees. Typically, treatments would require several days to several months to complete, depending on the treatment area size, steepness of terrain, and type and density of vegetation. Manual treatment activities may occur within 100 feet of Class II or III streams to improve habitat and reduce undesirable wildfire hazards. Cut vegetation would be left on-site by lopping or chipping with scattering on the landscape. In some areas, removed vegetation would be piled for later pile burning. The same general guidelines for tree and vegetation removal and retention would be followed as described above under "Treatment Type."

### Mechanical Vegetation Treatment

Mechanical treatments would primarily involve cutting and masticating target vegetation and chipping biomass from manual and mechanical treatment activities. To implement mechanical treatments, crews of approximately two to 20 members would operate mechanical vegetation equipment including tractors/skidders, chippers, excavators, dozers, dozer transport, tow chippers, track chippers, and masticators. Up to four crews may operate at the same time. Typically, treatments would require several days to several months to complete.

Small-diameter trees, downed woody debris, and woody shrubs would be masticated to increase tree spacing and reduce fire fuel loads in targeted areas. The biomass would be disposed of through the process of mastication (which essentially mulches the vegetation). In some areas, prescribed burning may be used to dispose of chipped and masticated materials. All mechanized equipment would operate on slopes less than 35 percent, except during construction of control lines for broadcast burns, where bull dozers may operate on slopes up to 50 percent.

### Prescribed Burning

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

- **Pile burning**<sup>1</sup>: Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) or hand crews and burned appropriately. Typically, dozers are equipped with a brush rake to reduce soil displacement and create "clean"

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<sup>1</sup> Pile burning is a mechanism to consume biomass; however, the impact analysis in the CalVTP Program EIR considers pile burning under prescribed burning to account for similar impacts as broadcast burning, which is also considered under prescribed burning. Similarly, mastication and chipping are biomass processing methods that have similar impacts to and are considered under mechanical treatments.



piles. Pile burning would occur in an understory or in areas with little to no live overstory, including areas that have experienced previous wildfire.

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

TTAD would implement broadcast understory burns to partially remove understory and groundcover vegetation during periods when weather and vegetation conditions allow the desired fire intensity to meet treatment objectives and do not create risks associated with maintaining control of the prescribed burn (e.g., during periods of relatively high humidity and high fuel moisture content). The goal is to conduct a low-intensity burn that burns only target ground and litter fuels, creating a mosaic of existing habitat types. Prescribed broadcast burning would be low severity and typically retain approximately 70 percent of vegetation, including root systems. Prescribed burning may require the construction of new control lines or enhancement of existing control lines using manual or mechanical treatments, primarily through mowing, using hand tools, or using a skid steer.

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

## Biomass Disposal

Biomass created during the proposed vegetation treatments described above would be disposed of primarily by the following means:

- Masticating (mulching) vegetative debris and placing it on the ground concurrently with vegetation removal.
- Chipping materials within 100 feet on either side of a road, and chipped biomass would be spread over treatment areas. Chips may be broadcast throughout a treatment area to an average depth of 3 inches.
- Lopping and scattering within the treatment boundaries.
- Pile burning, which may be used to dispose of cut, chipped, and masticated materials.
- Broadcast burning.
- Air curtain burning<sup>2</sup>.
- No biomass would be hauled off-site.

Biomass would be primarily disposed of through mastication, chipping, or burning. Mechanically masticated (shredded) material and chipped material would remain onsite and would be distributed uniformly with an average depth not exceeding 3 inches. Areas where masticated or chipped material exceeds this depth would require redistribution of the material to onsite locations or processing using pile burning or an air curtain burner. This unit is self-contained and can be towed with a standard heavy-duty pickup truck. During treatments, it would be stationed on level areas that have been previously disturbed or previously burned by prescribed burning that are devoid of vegetation. Staging

<sup>2</sup> Air curtain burners have been designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning (refer to additional information in Section 3 under EC.7, "Greenhouse Gas Emissions"). Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods, including the use of air curtain burners, to reduce the greenhouse gas (GHG) emissions from pile burning.

of the equipment would occur entirely within the project area. Once the burning is complete, wood ash and biochar are left behind to enhance the soil. A small U.S. Environmental Protection Agency (EPA) Tier 4 diesel engine powers this system. At full power, it consumes one-third of a gallon of diesel fuel per hour.

## TREATMENT MAINTENANCE

Approximately 850 acres of the 1,465-acre project area have already received initial treatment and subsequent treatment would be discretionary as dictated by an RPF. Maintenance of areas initially treated under the proposed project would follow TTAD existing general land management practices and would be based on real-time monitoring of site conditions. Treatment maintenance methods would involve the same vegetation treatment activities used in the initial treatment. Periodic treatment maintenance would occur as needed, determined by qualified staff who would monitor stand conditions in the project area. Target stand conditions include a well-spaced forest with 15–30 feet of crown spacing (75–100 square feet of basal area/acre).

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

### 9. Treatment Types

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

### 10. Treatment Activities

- Prescribed (Broadcast) Burning, **1,465** acres
- Prescribed (Pile) Burning, **1,465** acres
- Mechanical Treatment, **1,465** acres
- Manual Treatment, **1,465** acres
- Prescribed Herbivory, **0** acres
- Herbicide Application, **0** acres

### 11. Fuel Type

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

### 12. Geographic Scope

- The treatment site is entirely within the CalVTP treatable landscape
- The treatment site is NOT entirely within the CalVTP treatable landscape

### 13. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings)

The Truckee-Tahoe Regional Airport operates beyond the eastern boundary of the project area, opposite from Martis Creek Lake. Martis Creek Lake National Recreation Area is located directly east of the project area, and includes a campground and recreational facilities operated by the U.S. Army



Corps of Engineers. The project area is bordered on the southwest by SR-267. To the north, east, and south, the project is bounded by private and U.S. Forest Service-managed lands. The project area is entirely within the Waddle Ranch Preserve, which was purchased by the Truckee Donner Land Trust and the Trust for Public Land in 2007. The Land Trust holds a conservation easement on the property. The Preserve contains trails and picnic areas throughout, and is open to the public for day use. Vegetation is characterized by eastside pine forest, which is also called Jeffrey pine forest and woodland, with Jeffrey pine (*Pinus jeffreyi*) being dominant and Ponderosa pine (*Pinus ponderosa*) a lesser constituent. The current forest is composed of white fir (*Abies concolor*) and Jeffrey pine forest with brush (*Ceanothus* spp.; *Arctostaphylos* spp., *Cercocarpus* spp., *Artemisia tridentata*) understory along the southern and western aspects, with increasing association of fir mistletoe (*Arceuthobium abietinum*) and bark canker disease (*Cytospora* spp.) along the northern aspects. The forest condition is showing signs of stress possibly associated with bark beetles, root disease, and drought. The understory brush species are denser near open ridgetops, and areas along watercourses and wet meadows are dominated by willows and alder. Scattered rock outcrops and ridgetops contain patches of annual and perennial herbaceous native plants.

The project area is at a high risk for wildfire, as years of drought, fire exclusion, and bark beetle infestations have left the forest overly dense with a high proportion of dead or dying standing trees, and overgrowth of understory vegetation which could serve as ladder fuel to bring wildfire into the upper canopy. The project area is mapped almost entirely within the “very high” fire hazard severity zone by CAL FIRE, with patches designated as “high” or “moderate.” This project area would serve as a critical wildfire protection zone for the Truckee-Tahoe airport to the east, and would serve to provide critical wildfire resilience enhancement for fires traveling from the wildlands in the north and east toward the town of Truckee to the west, and to the cities of Incline Village, Kings Beach, and the rural communities north of Lake Tahoe to the south. This area also would provide enhanced protection for SR-267, which serves as a critical wildfire evacuation route for residents along the north shore of Lake Tahoe (Figure 3).

**14. Other public agencies whose approval is required:** (e.g., permits)

Northern Sierra Air Quality Management District (NSAQMD) – smoke management plan and burn permit.

**15. Native American Consultation.** Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation before the release of an environmental impact report, negative declaration, or mitigated negative declaration. For treatment projects that require additional CEQA review and documentation, have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to CalVTP SPR CUL-2, TTAD contacted Native American tribes in Placer and Nevada Counties as listed on CAL FIRE’s Native American Contact List (NACL) on November 21, 2022. The tribes contacted were: United Auburn Indian Community of the Auburn Rancheria, Washoe Tribe of Nevada and California, Colfax-Todd Valley Consolidated Tribe and Shingle Springs Band of Miwok Indians.

The Shingle Springs Band of Miwok Indians responded on February 8, 2023, requesting Archaeological Records information on the project. A response to this request was sent on June 5, 2023, and no further communication was received from the tribe.

TTAD contacted the Native American Heritage Commission to request a query of the Sacred Lands File on September 6<sup>th</sup>, 2023, and on October 16<sup>th</sup>, 2023, a negative response was received.

**16. Use of PSA for Treatment Maintenance:**

Prior to retreating any area within the project boundary, the project proponent would verify that site conditions described in the PSA are still relevant. Initial treatment activities would occur within ten years of PSA approval, and maintenance treatments would occur in phases every one to five years, as needed. Maintenance treatment would be evaluated by a forester per unit every 5 years. Mechanical, manual, or prescribed fire follow-up may be necessary. Maintenance treatment using prescribed burning may be implemented within the fire return intervals appropriate for the vegetation within the project area, which is approximately every 10 years if necessary, with 20 years being a maximum return interval.

**17. Standard Project Requirements and Mitigation Measures.**

- All applicable SPRs and Mitigation Measures are feasible and would be implemented.
- There is NO new information which would render mitigation measures previously considered infeasible or not considered in the CalVTP Program EIR now feasible OR such mitigation measures have been adopted. [Guidelines Sec.15162(a)(3); PRC Sec. 21166(c)].
- All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented (provide explanation).



## DETERMINATION

### On the basis of this initial evaluation:

- I find that all of the effects of the proposed project (a) have been analyzed adequately in the CalVTP Program EIR, (b) have been avoided or mitigated pursuant to the CalVTP Program EIR, and (c) all applicable mitigation measures and Standard Project Requirements identified in the CalVTP Program EIR will be implemented. The proposed project is therefore **WITHIN THE SCOPE** of the CalVTP Program EIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- I find that treatments in proposed project areas outside the CalVTP treatable landscape do not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, this ADDENDUM is adopted to address the project areas outside geographic extent presented in the Program EIR.
- I find that the proposed project will have effects that were not examined in the CalVTP Program EIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP Program EIR. A **NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project will have effects that were not examined in the CalVTP Program EIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the CalVTP Program EIR, 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 environmental effects that were not examined in the CalVTP Program EIR. Because these effects are or may be significant and cannot be clearly mitigated, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature:  Date: 6/24/2024

Printed Name: George Morris III Title: Northern Region Chief

CALIFORNIA DEPARTMENT OF  
FORESTRY AND FIRE PROTECTION

Agency

## EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for each Impact, Standard Project Requirement (SPR) and Mitigation Measure (MM) identified in the Project-Specific Analysis Checklist (PSA Checklist). The information provides clarity for review and/or provides direction to the field staff that will implement the project utilizing the checklist (persons familiar with the project and preparation of the document may be different through the life span of the document). Answers should consider whether the proposed project would result in new or more substantial environmental effects than described in the California Vegetation Treatment Program (CalVTP) Program EIR, after incorporation of applicable SPRs and MM required by the CalVTP Program EIR.
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP Program EIR for each environmental topic.
3. Once the project proponent has evaluated the environmental effect that may occur, then the checklist answers must indicate whether the impact is:

(Definitions located in Chapter 3 – “Environmental Settings, Impacts, and Mitigation Measures, 3.1.4 – Terminology Used in the Program EIR”)

- **Less Than Significant (LTS)** - An impact either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible mitigation measures.
- **Less Than Significant with Mitigation (LTSM)** - An impact was identified within the Program EIR which was viewed in totality as potentially significant and/or significantly unavoidable and the mitigation measures and SPRs and MMs provided in the Program EIR would be implemented mitigating to a point of less than significance.
- **Potential Significant (PS)** - An impact treated as if it were a significant impact. “Potentially” is used to convey that not every qualifying treatment would result in impacts to the reasonably maximum degree that they are disclosed in this Program EIR.
- **Potentially Significant and unavoidable (PSU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. “Potentially” is used to convey that not every qualifying treatment would result in impacts to the reasonably maximum degree that they are disclosed in this Program EIR
- **Significantly Unavoidable (SU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
- **Not applicable (N/A)**

If the impact is equal to or less than the impact identified in the Program EIR, the Program EIR can be utilized without a Negative Declaration, Mitigated Negative Declaration or EIR. If there are one or more entries where the impact is evaluated to be greater than the impact in the Program EIR, additional documentation is required.

4. Where a Negative Declaration, Mitigated Negative Declaration is required, the environmental review would be guided by the directions for use of the Program EIR with later activities in Section 15168. Where an EIR is required, the environmental review would be guided by Sections 15162 and 15163. When preparing any environmental document, the environmental analysis may incorporate



by reference the analysis from the CalVTP Program EIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP Program EIR.

5. 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.
6. Standard Project Requirements (SPR) and Mitigations Measures (MM).
  - **Applicable (Yes/No).** Document whether the SPR or mitigation measure is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
  - **Implementing Entity.** Most cases this would be CAL FIRE. The implementing entity is the individual 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.** Most cases this would be CAL FIRE. The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

**NOTE:** the cited SPRs and MMs are summarized to manage the templet's size. Refer to the approved CalVTP language attached for the full list of requirements.

## EC-1 AESTHETICS AND VISUAL RESOURCES

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>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</b>	Impact AES-1, 3.2	LTS	<u>SPR AES-2</u> <u>SPR AQ-2, 3</u> <u>SPR REC-1</u>	Yes	LTS	<input checked="" type="checkbox"/>

The Waddle Ranch preserve is owned by the Truckee-Tahoe Airport District (TTAD) under a conservation easement with the Truckee Donner Land Trust (TDLT), which manages the area for recreational public access. The project area is accessible to the public, and popular public recreation trails are in the project area. The project area is within the Martis Valley viewshed and campsites and other recreation areas have a view of the project area. The project area is located on the north side of US Highway (HWY) 267, which is not a state scenic highway, and is 2.5 miles south of US HWY 80, which is a designated eligible state scenic highway (Caltrans 2023).

The proposed project would implement manual treatments, mechanical treatments, and prescribed burning. Although the presence of large mechanical equipment could contrast with the natural environment within a viewshed if visible (such as in the grass fuel type, adjacent to a roadway, or from recreation access points), the treatment and its visibility would be temporary and would not dominate a view or block any views from scenic vistas or state scenic highways. Additionally, the project area is densely vegetated with trees and shrubs and is characterized by varied topography, which would substantially reduce the visibility of treatments from public viewpoints. The treatments would not substantially degrade the existing visual character or quality of an area given that the activity would be limited in geographic extent. Furthermore, manual and mechanical treatments currently occur within the project area under a past timber harvest plan (THP); the proposed treatments would not introduce a new disturbance to the visual character of the landscape. SPR AES-2 would be implemented during implementation of vegetation treatments, which would avoid the staging of equipment within a viewshed thereby reducing the visual presence of treatment-related materials and equipment. There may be some short-term degradation of scenic vistas or damage to scenic resources along US HWY 80, an eligible state scenic highway, because smoke from prescribed burning may be visible from US HWY 80 while the treatment is being implemented. However, due to the topography and distance between the highway and treatment area, active mechanical and manual treatments would not be visible from US HWY 80. Prescribed burning treatments would be regulated by local jurisdictions and would be temporary, which would limit the smoke exposure in the region and its potential effects on viewsheds and scenery. For these reasons, prescribed burning would not substantially degrade any scenic vistas.

The potential for the proposed treatments activities to result in degradation of the visual character of an area and degradation of public viewpoints was examined in the Program EIR. 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 Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing scenic resources are

essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact AES-2:</b> 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	Impact AES-2, 3.2	LTS	<u>SPR AES-1</u> <u>SPR AES-3</u> <u>SPR AD-4</u> <u>SPR REC-1</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include shaded fuel breaks. Public viewpoints within and near the project area from which completed treatments would be visible include public trails, camping sites, public and private roadways, and recreation areas in and around the project area. Manual and mechanical treatment would not be visible from any state scenic highway (i.e., US HWY 80) due to intervening topography and distance from viewers. Treatment activities would change vegetation density but would retain larger trees, leaving mature vegetation to provide partial screening in the project area. Similar treatments have already taken place in the region and project area through the THP. The long-term visual character of the treatment areas after implementation of the proposed shaded fuel break treatments would remain consistent with the current natural, vegetated landscape and would not constitute a substantial adverse change or degrade the current visual character of the landscape.

The potential for the proposed fuel break to result in long-term degradation of the visual character of an area was examined in the Program EIR. 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 Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. The proposed treatments would be consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact AES-3:</b> 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	Impact AES-3, 3.2	SU	<u>MM AES-3</u>	No	N/A	<input checked="" type="checkbox"/>
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Treatments would not include creation of any non-shaded fuel breaks in the project area. Additionally, past treatment activities conducted in the project area have not included installation of any non-shaded fuel breaks. Therefore, no non-shaded fuel breaks are associated with the project, and impact is not relevant to the Waddle Ranch Vegetation Treatment Project.

<b>Other Impacts to Aesthetics:</b> Would the project result in other impacts to aesthetics that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, “Environmental Setting,” and Section

3.2.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR AES-1 Vegetation Thinning and Edge Feathering:</b> This SPR only applies to mechanical and manual treatment activities within all treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>

Prior to treatment, the condition of the topographical features will be evaluated and treatment planned to create irregular vegetation densities and treatment area size to mimic natural conditions. Feathering the edges of treatment areas will be implemented where otherwise an unnatural transition would be created by new treatment activities. Initial treatments have been conducted on approximately 850 acres of the 1,465-acre treatment area under an existing Timber Harvest Plan; in these areas, some edges were not feathered, and an unnatural transition exists as part of baseline conditions. Therefore, implementation of this SPR would not be necessary. Treatment activities under the PSA would improve the natural transitional appearance of clearing edges when feasible on newly treated areas.

<b>SPR AES-2 Avoid Staging within Viewsheds:</b> This SPR applies to all treatment activities and all treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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The project area is open to public recreation and may be visible from scenic vistas. Treatment activities may be visible from State Route 267, public trails, and recreation sites in the region. Therefore, equipment staging areas would be located away from these public roadways, access points, and viewsheds as feasible.

<b>SPR AES-3 Provide Vegetation Screening:</b> This SPR applies to all treatment activities and all treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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The project area is open to public recreation and in a wildland-urban interface environment. Initial treatments have been conducted on approximately 850 acres of the 1,465-acre treatment area under an existing Timber Harvest Plan; in these areas, and where areas have undergone initial treatments under the THP, the baseline condition of the project area may lack vegetation screening. Treatment activities under the PSA would seek to provide vegetation screening adjacent to public areas when possible, however, vegetation screening may remain infeasible to introduce to some areas previously treated under the THP. Vegetation screening would be provided where feasible in areas visible to the public, such as along trails and roadways used for public access.

<b>MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks</b>	No	N/A	N/A
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This mitigation measures does not apply because the project would not include creation or maintenance of any non-shaded fuel breaks.



## EC-2 AGRICULTURE AND FOREST RESOURCES

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact AG-1:</b> Result Directly 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	Impact AG-1, 3.3	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

The dominant vegetation communities in the project area are eastside pine with Jeffery pine dominant and Ponderosa pine also present. The current forest is mainly white fir and Jeffery pine with a dominant understory of ceanothus along the southern and western aspects. Associations of mistletoe and cytospera, both common infestations, are present along the northern aspects in the project area. Areas along watercourses and wet meadows are dominated by alder and willows. Within the meadows and grasslands in the south west section of the project area, and around Dry Lake in the north east section of the project area, the existing tree canopy cover is less than 10 percent native tree cover; therefore these areas would not meet the definition of forest land as defined in Public Resources Code Section (PRC) 12220(g), which defines “forest land” as land that can support 10 percent native tree cover of any species under natural conditions. The majority of the project area would meet the definition of forest land. The potential for the proposed treatment type and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use was examined in the Program EIR.

For those areas where the existing native tree cover exceeds 10 percent, consistent with the Program EIR, the vegetation remaining after treatments in those areas would continue to meet the definition of forest land as defined in PRC Section 12220(g). The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact to forest land is substantially the same as described in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Agriculture and Forest Resources:</b> Would the project result in other impacts to agriculture and forest resources that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.3.1, “Environmental Setting,” and Section 3.3.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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

Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the Program EIR.

## EC-3 AIR QUALITY

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact AQ-1:</b> Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS and conflict with Regional Air Quality Plans	Impact AQ-1, 3.4	PSU	<u>SPR AD-4</u> <u>SPR AQ-2</u> , 6 <u>MM AQ-1</u>	Yes	PSU	<input checked="" type="checkbox"/>

Use of vehicles, mechanical equipment, prescribed (broadcast) burning, and pile burning would result in emissions of criteria pollutants that could exceed California ambient air quality standard or national ambient air quality standard thresholds. The proposed project falls within the jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD). The potential for emissions of criteria pollutants to exceed California Ambient Air Quality Standards or National Ambient Air Quality Standards thresholds was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the impacts addressed in the Program EIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the Program EIR. TTAD proposes the use of air curtain burning to process biomass, pursuant to Mitigation Measure GHG-2. Evaluation of criteria air pollutant emissions from these 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 pile burning. For NO<sub>x</sub>, air curtain burners are estimated to reduce NO<sub>x</sub> emissions by at least 73 percent (Ascent 2022). Despite the substantial reduction in criteria air pollutant emissions afforded by use of these biomass processing technologies, Impact AQ-1 must still be recognized as potentially significant and unavoidable because of uncertainties in the extent of their use and resulting reduction in project emissions. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This impact would remain potentially significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a substantially more severe significant impact.

<b>Impact AQ-2:</b> Expose People to Diesel Particulate Matter Emissions and Related Health Risk	Impact AQ-2, 3.4	LTS	<u>SPR HAZ-1</u> <u>SPR NOI-4</u> <u>SPR NOI-5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter was examined in the Program EIR. The proposed treatments would occur over a short duration and would neither occur in the same area, nor expose the same people to particulates for an extended period of

time. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, 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 Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact AQ-3:</b> Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	Impact AQ-3, 3.4	LTS	<u>SPR AQ- 4,</u> 5	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to this proposed treatment because no naturally occurring asbestos is within the project area (NRCS 2023).

<b>Impact AQ-4:</b> Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	Impact AQ-4, 3.4	PSU	<u>SPR AD-4</u> <u>SPR AQ- 2,</u> 6	Yes	LTS	<input checked="" type="checkbox"/>
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Prescribed burn treatments could expose people to toxic air contaminants. The potential for prescribed burning to expose people to toxic air contaminants was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures, because at a state-wide scale, it was acknowledged that unpredictable changes in weather could occur during prescribed burns that may result in short-term exposure of people to concentrations of toxic air contaminants (TAC) and associated levels of acute health risk with a Hazard Index greater than 1.0. For this project, TTAD would implement SPR AD-4, which requires public notification before prescribed burning, and SPR AQ-2, which requires a smoke management to be submitted to the NSAQMD plan prior to burning. An approved smoke management plan would limit prescribed burning to permissible burn days with ideal weather conditions. Additionally, SPR AQ-6 requires which requires a prescribed burn to be implemented according to all safety procedures required by CAL FIRE. Prescribed burning that is conducted under the requirements of CAL FIRE involves active monitoring of wind speed, humidity, and other weather factors to maintain safe burning conditions and ensure that toxic air contaminants do not reach sensitive receptors. If the weather conditions reach certain thresholds, the burn will be cancelled and rescheduled for a day where conditions are safe for burning. For this project, abiding by CAL FIRE requirements will provide weather monitoring and protocols that would allow the project to avoid impacts related to unpredictable weather patterns. Additionally, abiding by the smoke management plan will prevent smoke from prescribed burning from reaching sensitive receptors, and providing notifications ahead of time will allow potentially sensitive receptors to avoid entering the area where smoke is present.

Air curtain burners may further reduce the risk of toxic air contaminants during a prescribed burn when they are utilized instead of pile burning. The use of air curtain burners is proposed when 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 evaluation conducted by Ascent (2022), use of air curtain burning would reduce ROG emissions by 96 percent 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 burning as compared with pile burning.

The duration and parameters of the pile and broadcast burn treatments are within the scope of the activities addressed in the Program EIR, and impacts would be reduced with the implementation of standard project requirements and with the use advanced biomass processing



technologies (i.e., air curtain burning). Therefore, the potential for exposure to TACs is also within the scope of impacts covered in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. With the implementation of applicable SPRs, this impact would be less than significant, and this would not constitute a substantially more severe significant impact than was examined in the Program EIR.

<b>Impact AQ-5:</b> Expose People to Objectionable Odors from Diesel Exhaust	Impact AQ-5, 3.4	LTS	<u>SPR HAZ-1</u> <u>SPR NOI-4, 5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The use of vehicles and mechanical equipment during initial and maintenance treatments could expose human receptors to objectional odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the Program EIR. The release of objectional odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions, and sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact AQ-6:</b> Expose People to Objectionable Odors from Smoke During Prescribed Burning	Impact AQ-6, 3.4	PSU	<u>SPR AD-4</u> <u>SPR AQ- 2, 6</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Pile burning and broadcast burning treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because the potential exists at the state-wide scale for short-term exposure to odorous smoke emissions from unpredictable weather changes to occur. SPR AD-4 requires public notification before prescribed burning, and SPR AQ-2 requires a smoke management to be submitted to the NSAQMD prior to burning. An approved smoke management plan would limit prescribed burning to permissible burn days with ideal weather conditions. The project proponent would also implement SPR AQ-6, which requires a prescribed burn to be implemented according to all safety procedures required by CAL FIRE. Prescribed burning that is conducted under the requirements of CAL FIRE involves active monitoring of wind speed, humidity, and other weather factors to maintain safe burning conditions and ensure that toxic air contaminants do not reach sensitive receptors. If the weather conditions reach certain thresholds, the burn will be cancelled and rescheduled for a day where conditions are safe for burning. For this project, abiding by CAL FIRE requirements will provide weather monitoring and protocols to avoid impacts related to unpredictable weather patterns, and therefore would ensure that prescribed burning would only be conducted when conditions would not expose people to objectionable odors.

The use of air curtain burners is proposed to reduce smoke emissions and associated odors in comparison to pile burning. When compared to pile burning, air curtain burning would substantially reduce smoke because the combustion is more efficient, and because smoke is filtered during the process. The duration and parameters of the prescribed burning treatments are within the scope of the activities addressed in the Program EIR. Impacts would be further reduced with the use of proposed air curtain burning. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and sensitive receptors in the areas outside the treatable landscape are

essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same both inside and outside of the treatable landscape, as described above.

With implementation of applicable SPRs, this impact would be less-than significant, and for the reasons explained above, would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Air Quality:</b> Would the project result in other impacts to air quality that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.4.1, “Regulatory Setting,” and Section 3.4.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR AQ-1 Comply with Air Quality Regulations:</b> This SPR applies to all treatment activities and all treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>

All pile and broadcast burns are required to comply with applicable air quality regulations for the air district with jurisdiction in the project area. A Burn Permit would be obtained from NSAQMD prior to burning per the requirements of Rule 307 (NSAQMD 1991) and all burning activities would comply with the Air Quality Management District rules.

<b>SPR AQ-2 Submit Smoke Management Plan:</b> This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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TTAD would prepare a Smoke Management Plan to be submitted to the NSAQMD prior to treatments.

<b>SPR AQ-3 Create Burn Plan:</b> The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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A burn plan would be prepared by TTAD prior to prescribed burning activities.

<b>SPR AQ-4 Minimize Dust:</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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To minimize dust during treatment activities, TTAD will implement the measures listed under SPR AQ-4 in Attachment A.

<b>SPR AQ-5 Avoid Naturally Occurring Asbestos:</b> This SPR applies to all treatment activities and treatment types.	No	N/A	<u>N/A</u>
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This SPR does not apply; there is no naturally occurring asbestos mapped in the project area. However, if naturally occurring asbestos not identified on current maps is discovered within the project area during treatment activities, then the area shall be avoided.

<b>SPR AQ-6: Prescribed Burn Safety Procedures:</b> Prescribed burns will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP).	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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A burn boss will prepare an Incident Action Plan which identifies burn dates; burn hours; weather limitations; specific burn prescription; communication plan; medical plan; traffic plan; and other special instructions. The Incident Action Plan would also identify personnel to coordinate with the local air district for onsite briefings, posting notifications, and weather monitoring during burning.

<b>MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques</b> Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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The components of Mitigation Measure AQ-1 that have been determined by TTAD to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment rather than diesel-powered equipment whenever possible and encouraging carpooling to the project area. Equipment meeting Tier 4 emission standards and the use of renewable diesel fuel would be implemented to the extent feasible.

## EC-4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact CUL-1:</b> Cause a Substantial Adverse Change in the Significance of Built Historical Resources	Impact CUL-1, 3.5	LTS	<u>SPR CUL-1</u> , 7, 8	Yes	LTS	<input checked="" type="checkbox"/>

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources.

The results of the records search at the North Central Information Center (NCIC) identified several historic features associated with timber harvest activities dating from 1870 through the early 1900s. No additional structures (i.e., buildings, bridges, roadways) over 50 years old that were not previously recorded were identified in the project area during the cultural survey.

The potential for these treatment activities to result in disturbance, damage, or destruction of remnant historic structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR because treatment activities and the intensity of ground disturbance of the treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter remnant historic structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact CUL-2:</b> Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	Impact CUL-2, 3.5	SU	<u>SPR CUL-1</u> , 2, 3, 4, 5, 8 <u>MM CUL-2</u>	Yes	LTSM	<input checked="" type="checkbox"/>
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Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; this has the potential to result in damage to previously unknown archaeological resources.

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the Program EIR. This impact was identified as significant and unavoidable in the Program EIR 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.

For this project, inadvertent damage causing an adverse change in significance of unknown archaeological resources would be avoided with implementation of the relevant SPRs and mitigation measures. Pursuant to SPR CUL-1, an archaeological and historical resource record search was conducted by the North Central Information Center (NCIC) on November 21, 2022, and no prehistoric sites were present within the project area. Native American Tribes were also contacted pursuant to SPR CUL-2 with the location and summary of the project. With implementation of SPR CUL-3, pre-field research was conducted as part of the cultural resource investigation. Archaeological surveys were



completed as required by SPR CUL-4. Conducting record searches, contacting Native American groups, conducting cultural resource surveys, and avoiding known unique archaeological and subsurface historical resources would avoid or minimize the risk of disturbance, damage, or destruction of these resources by identifying, avoiding, or protecting these sensitive subsurface resources from damage that could be caused by treatment activities. Additionally, implementation of Mitigation Measure CUL-2 would reduce impacts to unknown unique archaeological or subsurface historical resources because it would protect in place, recover information, record, or otherwise treat the discovered resource appropriately. With implementation of the relevant SPRs and mitigation measures, the project will avoid substantial adverse changes in the significance of unique archaeological resources or subsurface historical resources.

This impact is within the scope of the Program EIR because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above.

With implementation of applicable SPRs and after application of mitigation measures, this impact would be less-than significant, and for the reasons explained above, would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource</b>	Impact CUL-3, 3.5	LTS	<u>SPR CUL-1</u> , 2, 3, 4, 5, 6, 8	Yes	LTS	<input checked="" type="checkbox"/>
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Based on CAL FIRE's tribal contact list, Native American contacts in Placer and Nevada Counties were contacted on December 12, 2022. One response was received from a Native American tribe. The Shingle Springs Band of Miwok Indians responded on February 8, 2023, requesting copies of the NCIC archaeological records request for the project. No other responses were received. The Native American Heritage Commission (NAHC) was sent an email on September 6<sup>th</sup>, 2023, requesting a query of the Sacred Lands File. A negative response to this request was received on October 16<sup>th</sup>, 2023.

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the Program EIR. This impact is within the scope of the Program EIR because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the Program EIR. As explained in the Program EIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs, which may be tailored to the tribal cultural resources in the project area in coordination with tribes, would avoid any substantial adverse change to any tribal cultural resource. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact CUL-4: Disturb Human Remains</b>	Impact CUL-4, 3.5	LTS	<u>N/A</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use masticators, loaders, and skidders, which could uncover human remains. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment activities and intensity of ground disturbance

are consistent with those analyzed in the Program EIR. Additionally, consistent with the Program EIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Archeological, Historical, and Tribal Cultural Resources:</b> Would the project result in other impacts to archeological, historical, or tribal cultural resources that are not evaluated in the CalVTP Program EIR?				No	N/A	☑
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE and TTAD have considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, “Environmental Setting,” and Section 3.5.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project 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 Program EIR. No changed circumstances are present, therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR CUL-1 Conduct Record Search:</b> For treatments led by CAL FIRE, an archaeological and historical resource record search will be conducted per the “Archaeological Review Procedures for CAL FIRE Projects” (current edition dated 2010). This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior	<u>CAL FIRE</u>

Consistent with SPR CUL-1, a records search of the project area was performed by the NCIC. Results were returned on November 21, 2022 (File No. NEV-22-76). The results identified several historic sites associated with timber harvest activities from 1870 through the early 1900s. Also, several prehistoric cultural resources have been recorded adjacent to and within the project area. All identified cultural resources will be protected from treatment activities per the protection measures described in the confidential archaeological report.

<b>SPR CUL-2 Contact Geographically Affiliated Native American Tribes:</b> The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List, which may be obtained from the CAL FIRE website, as appropriate. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior	<u>CAL FIRE</u>
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Based on CAL FIRE’s tribal contact list, Native American contacts in Placer and Nevada Counties were contacted on December 12, 2022. One response was received from a Native American tribe within the 100-day window. The Shingle Springs Band of Miwok Indians

responded on February 8, 2023, requesting copies of the NCIC archaeological records for the project. No other tribal responses were received. The Native American Heritage Commission (NAHC) was sent an email on September 6<sup>th</sup>, 2023, requesting a query of the Sacred Lands File. A negative response to this request was received on October 16<sup>th</sup>, 2023.

<b>SPR-CUL-3 Pre-field Research:</b> The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types	Yes	TTAD Prior	<u>CAL FIRE</u>
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Pre-field research included review of site records from the NCIC and reference materials. The Native American Heritage Commission (NAHC) was sent an email on October 16<sup>th</sup>, 2023, requesting a query of the Sacred Lands File, and a negative response to this request was received on October 16<sup>th</sup>, 2023.

<b>SPR CUL-4 Archaeological Surveys:</b> The project proponent will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types.	Yes	TTAD Prior	<u>CAL FIRE</u>
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An archaeological survey was conducted for the project area by an archaeologically trained resource professional prior to the start of treatments.

<b>SPR CUL-5 Treatment of Archaeological Resources:</b> If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. This SPR applies to all treatment activities and treatment types.	Yes	TTAD Prior	<u>CAL FIRE</u>
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All identified resources will be avoided. Notification letters will be sent to culturally affiliated tribes if cultural resources are identified.

<b>SPR CUL-6 Treatment of Tribal Cultural Resources:</b> If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types.	Yes	TTAD Prior-During	<u>CAL FIRE</u>
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Identified resources will be avoided. Appropriate protection measures have been developed and incorporated into the ASR in consultation with a professional archaeologist.

<b>SPR CUL-7 Avoid Built Historical Resources:</b> If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. This SPR applies to all treatment activities and treatment types.	Yes	TTAD Prior-During	<u>CAL FIRE</u>
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No built historical resources were identified in the NCIC record search or project area surveys. Built environment historical sites, if present within the project area, will be avoided during project implementation.

<p><b>SPR CUL-8 Cultural Resource Training:</b> The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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A TTAD forester will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological or tribal cultural resources prior to the start of treatments.

<p><b>MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources</b> If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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Should project activities reveal cultural or archaeological resources, CAL FIRE’s standard post-review discovery procedures will be implemented, which require work to cease within 100 feet of the discovery and the Unit Archaeologist and Unit Forester to be contacted. Work will not resume until direction is provided by the Archaeologist.

## EC-5 BIOLOGICAL RESOURCES

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications</b>	Impact BIO-1, 3.6	PS	<u>SPR BIO-1</u> , 2, 7, 9 <u>SPR AD-1</u> <u>SPR AQ-3</u> , 4, <u>SPR GEO-1</u> , 3, 4, 5, 7 <u>SPR HYD-5</u> <u>MM BIO-1a</u> , 1b, 1c	Yes	LTSM	<input checked="" type="checkbox"/>

Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, and prescribed burning) could result in adverse effects on special-status plant species. Desktop research and field reconnaissance of the project area conducted per SPR BIO-1, determined that the following twenty-two (22) special-status plant species could occur or are known to occur within the project area: Galena Creek rockcress (*Boechera rigidissima*), upswept moonwort (*Botrychium ascendens*), scalloped moonwort (*Botrychium crenulatum*), North American moonwort (*Botrychium neolunaria*), Davy’s sedge (*Carex davyi*), woolly-fruited sedge (*Carex lasiocarpa*), mud sedge (*Carex limosa*), English sundew (*Drosera anglica*), Donner Pass buckwheat (*Eriogonum umbellatum* var. *torreyanum*), subalpine aster (*Eurybia merita*), American manna grass (*Glyceria grandis*), Plumas ivesia (*Ivesia sericoleuca*), Santa Lucia dwarf rush (*Juncus luciensis*), Gray’s lomatium (*Lomatium grayi*), broad-nerved hump moss (*Meesia uliginosa*), Nuttall’s ribbon-leaved pondweed (*Potamogeton ephydrus*), Robbins’ pondweed (*Potamogeton robbinsii*), alder buckthorn (*Rhamnus alnifolia*), marsh skullcap (*Scutellaria galericulata*), cut-leaf checkerbloom (*Sidalcea multifida*), hairy marsh hedge-nettle (*Stachys pilosa*), and northern slender pondweed (*Stuckenia filiformis* ssp. *alpina*). Additional information on these special-status plant species is located in Table EC-5-1 at the end of this section. The complete list of all special-status plant species considered and their potential to occur is presented in Attachment B, “Biological Resources.”

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

Where special-status plants are identified during these surveys (SPR BIO-7), Mitigation Measures BIO-1a and BIO-1b would be implemented to avoid loss of identified special-status plants. Per Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which mechanical, manual, and prescribed burning treatments would not occur unless a qualified RPF or biologist

determines, based on substantial evidence, that the species would benefit from treatment in the occupied habitat area. In the case of plants listed pursuant to CESA or ESA, the determination of beneficial effects would need to be made in consultation with the California Department of Fish and Wildlife (CDFW) and/or USFWS. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts may be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants will be carried out by a qualified RPF or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance, maintain habitat function for the special-status plant species present. In addition, SPR BIO-2 would require biological resource training for workers and SPR BIO-9 would prevent noxious weed spread from treatment activities to areas that have special-status plants.

The potential for treatment activities to result in adverse effects on special-status plant species was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR because the proposed treatment types and activities and the intensity of disturbance that would result from implementing the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the potential for special-status plant species to occur within the project area is essentially the same within and outside the treatable landscape; therefore, the potential impact related to special-status plant species is also the same as described above. SPRs applicable to the proposed project are BIO-1, 2, 7, 9; AQ-3 and 4; GEO-1, 3, 4, 5, 7; and HYD-5. Mitigation measures BIO-1a and BIO-1b are also applicable to the proposed project. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<p><b>Impact BIO-2:</b> Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications</p>	<p>Impact BIO-2, 3.6</p>	<p>PS / SU</p>	<p><u>SPR BIO-1</u>, 2, 3, 4, 5, 8, 10, 11 <u>SPR AD-1</u> <u>SPR HYD-1</u>, 3, 4, 5 <u>SPR HAZ-5</u>, 6 <u>MM BIO-2a</u>, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 3a, 3b, 3c, 4</p>	<p>Yes</p>	<p>LTSM</p>	<p><input checked="" type="checkbox"/></p>
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Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, and prescribed burning) could result in adverse effects on special-status wildlife. Desktop research and field reconnaissance of the project area conducted per SPR BIO-1 determined that the following eighteen (18) special-status wildlife species could occur or are known to occur in the project area: Southern long-toed salamander (*Ambystoma macrodactylum sigillatum*), Sierra Nevada yellow-legged frog (*Rana sierrae*), northern goshawk (*Accipiter gentilis*), willow flycatcher (*Empidonax traillii*), bald eagle (*Haliaeetus leucocephalus*), yellow warbler (*Setophaga petechia*), California spotted owl (*Strix occidentalis occidentalis*), Lahontan mountain sucker (*Catostomus lahontan*), Lahontan cutthroat trout (*Oncorhynchus clarkia henshawi*), mountain whitefish (*Prosopium williamsoni*), western bumble bee (*Bombus occidentalis*), monarch butterfly (*Danaus plexippus*), Sierra Nevada mountain beaver (*Aplodontia rufa californica*), ringtail (*Bassariscus astutus*), wolverine (*Gulo gulo*), Sierra Nevada snowshoe hare (*Lepus americanus tahoensis*), western white-tailed jackrabbit (*Lepus townsendii townsendii*), and fisher (*Pekania pennanti*). Additional



information on these special-status wildlife species is located in Table EC-5-1 at the end of this section. The complete list of all special-status wildlife species considered and their potential to occur is presented in Attachment B, "Biological Resources."

SPR BIO-1 requires that no-disturbance buffers are established to avoid direct impacts to special-status wildlife species which can be physically avoided (Attachment A). SPR BIO-2 requires that biological resources training is required for all crew members and contractors prior to beginning a treatment project, and that the training will describe the appropriate work practices necessary to effectively implement biological SPRs and MMs.

If SPR BIO-1 determines that suitable habitat for special-status wildlife species is present and cannot be avoided, SPR BIO-10 requires that a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery 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. Species-specific details regarding survey requirements for each species are outlined in Attachment A.

SPR BIO-12 requires that common nesting birds including raptors and their nests are protected, and the required surveys, nest buffers, and treatment modifications would avoid impacts on special-status bird species.

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), TTAD will avoid adverse effects to the species by implementing measures outlined in Mitigation Measure BIO-2a, which applies to Sierra Nevada yellow-legged frog, special-status nesting birds, ringtail, and wolverine. 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), then TTAD will avoid or minimize adverse effects to the species by implementing Mitigation Measure BIO-2b, which applies to southern long-toed salamander, California spotted owl, special-status birds, Sierra Nevada mountain beaver, Sierra Nevada snowshoe hare, western white-tailed jackrabbit, and fisher. Mitigation measure BIO-2e will also be applied to retain special-status butterfly host plants and to avoid adverse impacts on monarch butterfly. Additionally, the requirements of SPR BIO-3, BIO-4, BIO-5, BIO-8, BIO-11, HYD-1, HYD-3, HYD-4, HYD-5, HAZ-5, and HAZ-6 will ensure that habitat function is maintained for special-status wildlife species.

Western bumble bee could occur in the project area. When the Program EIR was developed in 2019, very limited guidance was available on western bumble bee ecology, and protocol for detecting overwintering or nesting bumble bees was not yet determined. Given the statewide scope of potential effects analyzed and for purposes of good faith and full disclosure under CEQA, this impact was designated in the Program EIR as potentially significant and unavoidable. However, addressing the potential effect at a project-specific level may result in a different significance conclusion if evidence supports it. With implementation of Mitigation Measure BIO-2g and applicable SPRs, habitat function for western bumble bee would be maintained during and after treatment implementation, and this impact would be reduced to less than significant.

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the Program EIR. This impact on special-status wildlife is within the scope of the Program EIR because the proposed treatment types and activities and the intensity of disturbance that would result from implementing the proposed treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the potential for special-status wildlife species to occur within the project area is essentially the same within and outside the treatable landscape; therefore, the potential impact related to special-status wildlife species is also the same, as described above. SPRs applicable to the proposed project are BIO-1, 2, 3, 4, 5, 10; and HYD-1, 4. Mitigation measures BIO-2a, 2b, 2g, 3a, 4 are also applicable to the proposed project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact BIO-3:</b> Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	Impact BIO-3, 3.6	PS	SPR BIO-1, 2, 3, 4, 5, 6, 8, 9 SPR AD-1 SPR HYD-4, 5 MM BIO-3a, 3b, 3c	Yes	LTSM	<input checked="" type="checkbox"/>
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Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat, potentially sensitive natural communities, and montane chaparral. A reconnaissance survey was conducted in the project area pursuant to SPR BIO-1, and the following eight sensitive natural communities have the potential to occur in the project area: Green leaf manzanita – Pinemat manzanita chaparral; bush chinquapin chaparral; silver sagebrush wet shrubland; Rothrock's sagebrush; needle spike-rush stand; aspen groves; water birch thicket; and black cottonwood forest and woodland (see Attachment B for detailed information on each sensitive natural community). Three of these sensitive natural communities are considered to have potential to occur because quaking aspen is present within the project area and is a component of these sensitive natural communities (aspen groves, water birch thicket, and black cottonwood forest and woodland).

Riparian habitat is present within some portions of the project area. Under SPR HYD-4, WLPZs would be established for watercourses within the project area based on the widths and protective measures established for each water and slope class defined in Table I of 14 California Code of Regulations Section 916.5 (CalVTP Final Program EIR Section 3.7-24). While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the treatment areas has not been mapped and riparian habitat may be present outside of the areas incorporated within WLPZs.

Prior to implementation of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat and sensitive natural communities within the treatment areas. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). The potential spread of plant pathogens would be avoided by implementing SPR BIO-6, and the potential spread of invasive plants and noxious weeds would be avoided with the implementation of SPR BIO-9. Treatments would also be designed to avoid the loss of sensitive natural communities and oak woodland habitat by following the requirements of Mitigation Measure BIO-3a, which requires that fuel breaks do not remove more than 20 percent of native vegetation relative cover from a stand of sensitive natural community vegetation in communities with a rank of S3, and that a qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design to ensure that the project maintain habitat functions

of the sensitive natural community or oak woodland habitat area. Additionally, TTAD would apply SPR BIO-2, which will require biological resource training for all workers, including instruction on effective implementation of SPRs and Mitigation Measures.

The potential for treatment activities, including maintenance treatments, to result in adverse effects on sensitive habitats and sensitive natural communities was examined in the Program EIR. This impact on sensitive habitats and sensitive natural communities is within the scope of the Program EIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same, as described above. SPRs applicable to the proposed project are BIO-1, 2, 3, 4, 5, 6, 9; and HYD-4. Mitigation measure BIO-3a is also applicable to the proposed project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact BIO-4:</b> Substantially Affect State or Federally Protected Wetlands	Impact BIO-4, 3.6	PS	<u>SPR AD-1</u> <u>SPR BIO-1</u> <u>SPR HYD-1, 3, 4</u> <u>MM BIO-4</u>	Yes	LTSM	<input checked="" type="checkbox"/>
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Initial and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. An aquatic resource delineation has not been conducted and wetlands are mapped in the treatment area by the National Wetlands Inventory (USFWS 2023). Additional wetlands may be present throughout the project area that have not been identified or mapped, as well as seasonal wetlands, springs, and seeps. Based on review and survey of project-specific biological resources, the project area contains one perennial (Class I) stream, and two intermittent (Class III) streams, one reservoir (Lake Ella/Dry Lake), as well as freshwater emergent wetland and forested/shrub wetland features. Manual treatment activities may occur within 100 feet of Class III streams to improve habitat and reduce undesirable wildfire hazards. In portions of the project area where prescribed burning is proposed, no prescribed burning will occur within the riparian habitat associated with the wetlands. In some areas, removed vegetation would be piled for later pile burning or broadcast burning. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR. This impact on wetlands is within the scope of the Program EIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wetlands is also the same, as described above. SPRs applicable to the proposed project are BIO-1; and HYD-5. Mitigation measure BIO-4 is also applicable to the proposed project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact BIO-5:</b> Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	Impact BIO-5, 3.6	PS	SPR AD-1 SPR BIO-1, 4, 5, 10, 11 SPR HYD-1, 4 MM BIO-5	Yes	LTSM	<input checked="" type="checkbox"/>
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Treatment activities (i.e., mechanical treatments, manual treatments, and prescribed burning) could result in adverse effects on wildlife movement corridors and nursery sites. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nursery sites was examined in the Program EIR.

Based on a review of the California Natural Diversity Database Essential Connectivity Areas, the project area is not within a regional wildlife corridor or inside of a natural landscape block (CNDDDB 2023). The project area is likely used for local movement by wildlife (e.g., American black bear). The implementation of mechanical treatments, manual treatments, and prescribed burning for implementation and creation of fuel breaks would not result in landscape level conversion of existing habitat types in the project area. Therefore, treatments would not cause substantial loss of existing movement habitat or result in the construction of any permanent barrier to wildlife movement.

Approximately 850 acres of the project area has been treated by previous timber harvest work and is regularly used by the public for recreation. Treatment activities may temporarily interrupt wildlife movement in the portions of the project area where activities are occurring; however, the proposed treatments would not be implemented throughout the entire project area in any given year; therefore, land would remain available within the project area to facilitate wildlife movement and a substantial adverse effect on movement would not occur.

There are no known common wildlife nursery sites (e.g., deer fawning areas, wading bird rookeries) within the project area and no indications of nursery sites were identified during multiple field surveys of the project area. However, habitat suitable for wildlife nursery sites including deer fawning areas may be present in the project area. This impact on wildlife movement corridors and nursery sites is within the scope of the Program EIR because effects on wildlife movement corridors and nursery sites was covered in the Program EIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the potential for wildlife movement corridors and wildlife nurseries within the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to wildlife movement corridors and wildlife nurseries is also the same, as described above. SPRs applicable to the proposed project are BIO-1,4, 5, 10; and HYD-4. Mitigation measure BIO-5 is also applicable to the proposed project. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact BIO-6:</b> Substantially Reduce Habitat or Abundance of Common Wildlife	Impact BIO-6, 3.6	LTS	SPR AD-1 SPR BIO-1, 2, 3, 4, 5, 12	Yes	LTS	<input checked="" type="checkbox"/>
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Treatment activities (i.e., mechanical treatments, manual treatments, and prescribed burning) could result in adverse effects on the habitat or abundance of common wildlife. The potential for treatment activities to adversely affect the habitat or abundance of common wildlife was examined in the Program EIR.

The vegetation communities (see Table B-1 in Attachment B) within the project area provide nesting habitat for common ground nesting and shrub nesting birds as well as common tree and cavity nesting species. The implementation of treatments in grassland, montane chaparral, and forest habitat would result in temporary disturbance of nesting habitat but would not result in substantial permanent habitat removal or

landscape level type conversion. Treatments implemented in montane chaparral will be designed to avoid type conversion of vegetation and to maintain montane chaparral habitat function. For fuel break treatments in montane chaparral habitat, treatments will be designed to maintain a minimum percent cover to maintain habitat function. Approximately 850 acres of the project area has been treated by previous timber harvest work and is regularly used by the public for recreation. Therefore, the adverse effects of the treatments on habitat for common nesting birds would not be substantial and habitat function would be maintained for common wildlife.

Treatment activities may occur within portions of the nesting bird season (February 1–August 31). Therefore, treatment activities could result in direct loss of active nests or disturbance to active nests of cavity, ground, and shrub nesting species due to auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. This impact on habitat or abundance of common wildlife, including nesting birds, is within the scope of the Program EIR because effects on habitat or abundance of common wildlife were covered in the Program EIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the habitat characteristics within the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to the reduction of common wildlife habitat and common wildlife abundance is also the same, as described above. SPRs applicable to the proposed project are BIO-1, 2, 3, 4, 5, 12. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact BIO-7:</b> Conflict with Local Policies or Ordinances Protecting Biological Resources	Impact BIO-7, 3.6	No Impact	<u>SPR AD-1,</u> <u>AD-3</u>	Yes	N/A	No Impact
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The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the Program EIR. Two ordinances relevant to biological resources were identified for the project area. The project area is near the town of Truckee, CA, but is not within its sphere of influence or subject to its local ordinances. The project area is also bisected by the Nevada and Placer county line. As explained below, the project is exempt from compliance with the Placer County ordinance and would comply with the Nevada County ordinance.

Placer County Article 19.50.060 Exemptions states: “A tree permit is not required for the removal of a protected tree under the following circumstances (except for subsection C, a landmark tree is not subject to the exemptions set forth below):..... Exemption B: Tree removal necessary to comply with the California Department of Forestry and Fire Protection (CAL FIRE) fire safety regulations (i.e., clearing around homes) or tree removal undertaken as a part of a fuel reduction/fire safety/fire protection program in conformance with commonly accepted CAL FIRE policies.

Nevada County Ordinance No. 2521 states: “The Nevada County Board of Supervisors supports the improved parcel defensible space obligations found in Cal. Pub. Res. Code § 4291 and as adopted in the County of Nevada's local amendments to the California Building Standards Code. However, PRC 4291 does not address hazardous vegetation and combustible material abatement beyond the property line of a parcel on which a protected building or structure is located or the potential impact that hazardous vegetation beyond a property line could have on an adjacent improved parcel. This Article extends and supplements state law, utilizing the same treatment requirements as provided by PRC 4291, to ensure defensible space is maintained on parcels adjacent to improved parcels and along emergency access and evacuation routes and fire access easements so that landowners benefit from defensible space on adjacent parcels where appropriate.” Project work as designed will assist neighboring properties on the north side of the project area to conform with Ordinance No. 2521 and PRC 4291.

The project area is on private land. Per SPR AD-3 treatments would be designed and implemented in a manner that is consistent with applicable local plans (e.g., general plans), policies, and ordinances to the extent the project is subject to them and there would be no conflict with local ordinances as a result of implementation of treatment activities. Therefore, there would be no impact, consistent with the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above.

<b>Impact BIO-8:</b> Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	Impact BIO-8, 3.6	No Impact	N/A	No	N/A	No Impact
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Implementation of the proposed project would not conflict with the provisions of an adopted natural community conservation plan (NCCP), habitat conservation plan (HCP), or other approved habitat plan because there are no adopted NCCPs, HCPs or other adopted plans within or adjacent to the project area.

<b>Other Impacts to Biological Resources:</b> Would the project result in other impacts to biological resources that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE 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 the CalVTP Program EIR (refer to Section 3.6.1, “Environmental Setting,” and Section 3.6.2, “Regulatory Setting,” in Volume II of the Final Program EIR).

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project 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 Program EIR. 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. The use of air curtain burners would not cause impacts in addition to those discussed in the Program EIR. Therefore, no new impact related to biological resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR BIO-1: Review and Survey Project-Specific Biological Resources.</b>	Yes	TTAD	CAL FIRE
1. <b>Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.</b>	Yes	Prior-During	
2. <b>Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.</b>	Yes		
This SPR applies to all treatment activities and treatment types.			



The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CNPS 2023) and CDFW's California Natural Diversity Database (CNDDDB) (CNDDDB 2023) were reviewed on March 30, 2023, for specific information on documented observations of special-status species previously recorded in the project area and vicinity. A search of the CNDDDB and CNPS Inventory was conducted for the following U.S. Geological Survey 7.5' quadrangles surrounding the project area: Martis Peak, Hobart Mills, Boca, Mt. Rose, Mt. Rose NW, Marlette Lake, Kings Beach, Tahoe City, and Truckee. For special-status plants, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database (CNPS 2023) records were also consulted. In addition, Appendix BIO-3 (Table 13a, Table 13b, and Table 19) in Volume II of the Final Program EIR were reviewed for sensitive natural communities, habitat information, and special-status plants and wildlife that could occur in the Sierra Nevada ecoregion. These database queries identified 26 special-status plants and 21 special-status wildlife species in the 9-quadrangle search area.

Following the database queries, a reconnaissance survey of the project area was conducted on May 16 and 17, and June 12, 2023. Based on this reconnaissance survey, the database queries, habitat suitability, habitat quality, other reports of occurrence, distance from known detections, other biological factors, and consultation with biologists from Ascent, it was determined that 22 special-status plants and 18 special-status wildlife species could or are known to occur within the project area. A summary table of the special-status plant and wildlife species that could occur or are known to occur within the project area is located at the end of this section. The complete list of all special-status plant and wildlife species considered and their potential to occur is presented in Attachment B, "Biological Resources."

Based on the results of the data review and reconnaissance-level survey, it was determined that for aquatic special-status wildlife, suitable habitat is present but adverse effects can be clearly avoided. For example, while Lahontan mountain sucker, Lahontan cutthroat trout, and mountain whitefish have the potential to occur in creeks in and near the project area, habitat suitable for these species (aquatic streams) can be fully avoided to meet the requirements of SPR BIO-1 through the implementation of SPR HYD-1, SPR HYD-4, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, and SPR GEO-8. If based on the data review and reconnaissance-level survey required by SPR BIO-1, 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.

As required through the Project Specific implementation of SPR BIO-1, the following items will be incorporated:

- Special-status plants
  - To avoid impacts on the annual and perennial geophyte species identified in Table EC-5-1, non-ground-disturbing treatment activities (i.e., manual treatments) will be implemented only during the dormant season for these species (i.e., when the plant has no aboveground parts), which would generally occur during the winter, if feasible. If the limited operating period for annual and perennial geophyte species (i.e., only non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys will be required per SPR BIO-7. Note that ground-disturbing treatment activities (i.e., mechanical treatments) may result in impacts on these plant species even when dormant, and will not be conducted without prior implementation of SPR BIO-7).

- **Special-status wildlife**
  - To avoid impacts on Sierra Nevada yellow-legged frog, a no-disturbance buffer of 200 feet will be implemented adjacent to all perennial (i.e., Class I and Class II) streams, as well as ponds and lakes in areas greater than approximately 3,500 feet in elevation, if feasible. If the 200-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented within suitable habitat areas.
  - To avoid impacts on special-status nesting birds including northern goshawk, willow flycatcher, bald eagle, and yellow warbler, a limited operating period for mechanical treatments, manual treatments, and prescribed burning from February 1 to August 31 will be implemented, if feasible. If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 will be implemented.
  - To avoid impacts on California spotted owl, the following measures will be implemented:
    - To determine whether a documented California spotted owl nesting occurrence is present within 0.25 mile of the treatment area, a qualified RPF or biologist will review California spotted owl occurrence data in the CNDDDB and the project proponent will contact U.S. Forest Service biologists from Tahoe National Forest or Plumas National Forest, as applicable, to obtain any recent survey and occurrence data for California spotted owl that have not been made publicly available (e.g., in the CNDDDB).
    - If present, potential impacts on the nesting occurrence will be avoided by implementing a limited operating period within 0.25 mile of the occurrence during the spotted owl nesting season (March 1–August 15) for mechanical treatments, manual treatments, and pile burning activities, if feasible. If the limited operating period is determined to be infeasible, then SPR BIO-10 will be implemented.
  - To avoid impacts on Sierra Nevada mountain beaver, a limited operating period for manual treatments, mechanical treatments, pile burning, and conducted within 200 feet of aquatic habitat from February 1 to July 31 will be implemented, if feasible. If conducting some treatments within 200 feet of aquatic habitat outside of the Sierra Nevada mountain beaver maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 will apply.
  - To avoid impacts on ringtail, a limited operating period for manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments, and prescribed burning from April 15 to June 30 will be implemented, if feasible. If conducting some manual treatments that use hand-operated power tools (e.g., chainsaws) or mechanical treatments outside of the ringtail maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented.
  - To avoid impacts on wolverine, a limited operating period for all treatments from January 1 to June 30 will be implemented within suitable denning habitat for the species, if feasible. If conducting treatments outside of the wolverine maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented.
  - To avoid impacts on Sierra Nevada snowshoe hare and western white-tailed jackrabbit, within habitat determined to be suitable for the species by a qualified RPF or biologist, a limited operating period for mechanical treatments and prescribed burning activities from April 1 to June 30 will be implemented, if feasible. If conducting some mechanical and prescribed burning treatments outside of the Sierra Nevada snowshoe hare maternity season (April 1–June 30) is determined to be infeasible, then SPR BIO-10 will be implemented.

- To avoid impacts on fisher, within habitat determined to be suitable for the species by a qualified RPF or biologist, a limited operating period for manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments, and prescribed burning activities from March 1 to June 30 will be implemented, if feasible. If conducting some hand-operated manual treatment, mechanical treatment, and prescribed burning treatments outside of the fisher maternity season (May 1–June 30) is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented.

For some special-status plants, sensitive natural communities, and special-status wildlife species, suitable habitat is present and adverse effects cannot be clearly avoided using physical buffers or by limiting the time of treatment. For these biological resources, where suitable habitat is present and adverse effects cannot be clearly avoided, surveys may be required per SPR BIO-10 to rule out the presence of these species, or mitigation measures per MM BIO-1b, MM BIO-2a, and MM BIO-2b would be implemented.

<b>SPR BIO-2: Require Biological Resource Training for Workers.</b> The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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Biological resource training for workers will be conducted prior to and during implementation of treatments, as necessary.

<b>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats.</b> If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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SPR BIO-1 determined that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. A qualified RPF or biologist will conduct a survey following the CDFW “*Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*” prior to the start of treatment activities (CDFW 2018). Sensitive natural communities and other sensitive habitats, including montane chaparral and riparian habitat, within the project area will be mapped by a qualified biologist, RPF, or botanist during this survey.

<b>SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function.</b> Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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Waterways in the project area and vicinity are shown on Figure 2. Class II and Class III watercourses that support riparian habitat occur in the project area. No Class I watercourses are known to occur. WLPZs and ELZs will be established adjacent to all Class II and Class III streams within the project area. No herbicide treatment is proposed. Treatments in riparian habitats will retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and will largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, prior to treatments in riparian habitat, TTAD will notify CDFW pursuant to California Fish and Game Code 1602, when required.

<p><b>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub.</b> The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. These SPR requirements apply to all treatment activities and all treatment types. Additional measures will be applied to ecological restoration treatment types</p>	Yes	TTAD Prior-During	CAL FIRE
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Montane chaparral is present within the project area. The 1,465-acre project area contains approximately nine acres of montane chaparral. These areas were surveyed and observed species include greenleaf manzanita (*Arctostaphylos patula*), pinemat manzanita (*Arctostaphylos nevadensis*), snowbrush ceanothus (*Ceanothus velutinus*), and creeping snowberry (*Symphoricarpos mollis*). The species composition of these areas is consistent with the green leaf manzanita - Pinemat manzanita chaparral sensitive natural community and have a CA State rank of S3S4. Natural communities with a numeric range rank (e.g., S2S3) are used to indicate any range of uncertainty about the status of the species or community. Due to this uncertainty of the actual rarity of the green leaf manzanita - pinemat manzanita chaparral natural community, the nine acres of the natural community within the project area will be treated as a S3-vulnerable and therefore sensitive natural community. Additionally, all chaparral habitats are considered sensitive habitat types based on Senate Bill 1260, Statutes of 2018, in that they warrant additional consideration because this statute prohibits type conversion of these vegetation communities.

Pursuant to SPR BIO-3, treatments will be designed to maintain the characteristics and membership rules of any vegetation alliance that is designated as a sensitive natural community. SPR BIO-5 requires avoidance of the environmental effects of type conversion within chaparral and that the habitat function of these communities be maintained. The project area has had multiple previous timber harvests and treatments, and montane chaparral represents less than one percent of the project area. The spatial scale within which the effects of type conversion are evaluated for this project comprises TTAD-owned lands spanning the East Martis Creek and West Martis Creek Watersheds. This spatial scale is appropriate because the surrounding open space areas in the watersheds contain a similar proportion of chaparral habitat as seen in the treatment area. This is a substantial landscape scale at which ecologically functional habitat capable of meeting the resource needs of species that rely on these habitats can be maintained within the watershed. A larger landscape scale was not deemed appropriate because TTAD does not control the management of habitats outside of their property and therefore has no ability to preserve ecological function of those habitats although, the majority of these outside lands are under various protected status as parks and open space.

Fuel break treatments could occur in up to a maximum of 9.13 acres of montane chaparral habitat. Montane chaparral constitutes approximately 0.62 percent of the 1,464-acre treatment area, and the surrounding landscape to the south, east, and north is composed of open forested land with a similar percentage of montane chaparral. Within the TTAD-owned lands, the chaparral areas will be retained. This treatment would not constitute a landscape-level conversion of montane chaparral to other habitat types because treatments would be designed such that there would not be an overall loss of habitat function for montane chaparral at the landscape level.

Where treatment occurs in montane chaparral habitat, TTAD would design treatment to habitat function. This includes maintaining at least 35 percent relative density of chaparral vegetation and implementing maintenance treatments at a frequency that allows regeneration of the characteristic species of each montane chaparral community. For example, greenleaf manzanita is an obligate seeder that requires fire to establish a sufficient seedbank for regeneration. Therefore, manual and mechanical treatments that remove mature, seed-producing shrubs can deplete the seedbank of greenleaf manzanita. Additionally, many obligate seeding chaparral shrubs, like greenleaf manzanita, require heat and charate to break seed dormancy and stimulate germination. This ecological process cannot be replicated by mechanical disturbances and therefore, these treatments would not be applied to chaparral vegetation types dominated by greenleaf manzanita and

other chaparral species that require fire for regeneration, unless prescribed fire can be applied following mechanical treatments, Treatments within montane chaparral communities will be designed to replicate the natural disturbance regime of the vegetation type present.

Due to some chaparral species (i.e., pinemat manzanita) producing new sprouts from an established burl or lignotuber, treatments within chaparral characterized by this type of species should be designed to maintain the root system and root crown of the dominant montane chaparral shrubs. Mechanical treatments may include cutting, crushing/compacting, or chopping existing vegetation. Manual treatments may include chipping, lopping and scattering, pruning, and hand cutting of existing vegetation. For both mechanical and manual treatments, chaparral shrubs would not be uprooted during treatments and the root crown would be maintained to allow dominant shrubs with lignotubers to sprout new shoots following treatment.

Because the treatments would be designed to maintain 35 percent relative density of montane chaparral, replicate the natural disturbance regime of the vegetation type present, and maintain root crowns of resprouting shrubs, ecological function of the montane chaparral communities within the project area would be maintained over the long term. For those chaparral communities dominated by obligate seeders (i.e. greenleaf manzanita), mature nurse shrubs and a mixture of shrubs in all age classes would be maintained to allow for reseeding and regeneration of the characteristic shrub species. While the project is a fuel break treatment type, it is a non-traditional landscape-level fuel break which, in combination with the surrounding properties, will serve to protect the nearby communities from wildfire. As such, the treatment will primarily be composed of shaded fuel break, and when non-shaded fuel breaks are established, their location will be flexible to avoid sensitive habitat areas such as montane chaparral.

The treatment of this vegetation, either through mechanical treatment, manual treatment, or prescribed burning, will not represent a substantial change in the composition of the montane chaparral habitat and type conversion will not occur.

<p><b>SPR BIO-6: Prevent Spread of Plant Pathogens.</b> 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 best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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There are no known plant pathogens in the project area. It is likely that personnel and equipment assigned to work on the project would be from the local area; therefore, the likelihood of pathogens entering from other areas would be low. However, because crews and associated equipment (e.g., chainsaws, hand tools) and vehicles could have been used outside of the project vicinity either fighting wildfires or implementing other fuel treatment projects, TTAD will implement Best Management Practices (BMPs) listed under SPR BIO-6 in Attachment A to prevent the spread of plant pathogens.

<p><b>SPR BIO-7: Survey for Special-Status Plants.</b> 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.” This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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It has been determined that habitat potentially suitable for special-status plants may be present in the project area for 21 special-status plant species (see Table EC-5-1 or Attachment B). Protocol-level surveys for the special-status plant species identified in Attachment B will be conducted in habitat suitable for special-status plants prior to initiation of treatments. Protocol-level surveys are required to occur during the during the time of year when the species is identifiable, typically during the species blooming period.

If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, SPR BIO-7 requires that 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 way that would make it unsuitable for the target species to reestablish following treatment.

Project-specific implementation guidance for this SPR includes the following:

- For special-status plants not listed under ESA or CESA, if the limited operating period for annual and perennial geophyte species (i.e., non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys for these species will be conducted prior to implementation of treatments.



- Protocol-level surveys will be conducted for special-status plants listed under ESA or CESA and perennial non-listed species prior to implementation of treatments.

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

<b>SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs.</b> This SPR applies to all treatment activities and only the ecosystem restoration treatment type.	No	N/A	<u>N/A</u>
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The project area is outside of the Coastal Zone; therefore, this SPR does not apply.

<b>SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife.</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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During the May and June 2023 reconnaissance surveys, invasive plant species such as woolly mullein and nonnative grasses were noted within the project area. TTAD will implement BMPs listed under SPR BIO-9 in Attachment A to prevent the spread of invasive plants, noxious weeds, and invasive wildlife.

<b>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites.</b> 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) 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. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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If SPR BIO-1 determines that suitable habitat is present and cannot be avoided, focused surveys will be required prior to treatment activities in suitable habitat for southern long-toed salamander, Sierra Nevada yellow-legged frog, northern goshawk, willow flycatcher, bald eagle, yellow warbler, California spotted owl, western bumble bee, monarch butterfly, Sierra Nevada mountain beaver, ringtail, wolverine, Sierra Nevada snowshoe hare, Western white-tailed jackrabbit, and fisher, as well as wildlife nursery sites, unless it is assumed that the species will occur within the project area and feasible mitigation (MM BIO-2a or MM BIO 2b) is implemented. SPR BIO-10 does not require survey for fish species, because fully aquatic species such as fish will be adequately protected and avoided by implementation of SPR HYD-1, HYD-4, and SPR BIO-4. SPR BIO-10 includes the following project-specific implementation based on individual species' ecological needs:

- Because no-disturbance buffers for southern long-toed salamanders are not feasible, to avoid impacts on southern long-toed salamanders, focused surveys (i.e., walk and turn surveys) will be conducted in habitat suitable for the species within 500 feet of aquatic habitat (i.e., streams, ponds, wetlands, seeps) prior to implementing treatment activities within 500 feet of aquatic habitat. If the species is detected during focused surveys, then Mitigation Measure BIO-2b will be implemented.
- To avoid impacts to Sierra Nevada yellow-legged frog, if the 100-foot no-disturbance buffer from aquatic habitat for the species is determined to be infeasible, focused visual encounter surveys will be conducted for the species prior to treatment activities, or presence will be assumed within 100 feet of aquatic habitat.

- Surveys will be conducted at least three times within 10 years prior to treatment activities. Three surveys may be conducted within a single summer with early season (14 days after snow melt), mid-season, and late season (before cold temperatures trigger movement to winter habitats). Alternatively, the three surveys may be conducted in consecutive calendar years, where the snowpack is at least 80 percent of normal (USFWS 2017). Visual encounter surveys will be conducted within 100 feet of aquatic features potentially suitable for Sierra Nevada yellow-legged frogs within the project area and will include all life stages of the species. If Sierra Nevada yellow-legged frogs of any life stage are identified during focused surveys, USFWS and CDFW will be notified. If three surveys with negative findings of Sierra Nevada yellow-legged frogs have been conducted within the last 10 years, prior to treatment activities no further measures are required. If Sierra Nevada yellow-legged frogs are detected during surveys, or if presence is assumed, Mitigation Measure BIO-2a will be implemented.
- If the limited operating period for nesting birds is determined to be infeasible, to avoid impacts on special-status birds (i.e., northern goshawk, willow flycatcher, bald eagle, yellow warbler), focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing treatment activities during the nesting bird season (February 1–August 31). If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for bald eagle and willow flycatcher) and BIO-2b (for northern goshawk and yellow warbler) will be implemented.
- If the limited operating period for California spotted owl is determined to be infeasible, to avoid impacts on the species, protocol-level surveys for California spotted owl will be conducted by a qualified RPF or biologist within a 0.25-mile buffer surrounding the treatment area prior to implementation of treatment activities. Surveys for California spotted owl will be conducted pursuant to the Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation Areas (USFWS 2006). If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b will be implemented.

Because limited operating periods for special-status bumble bees are not feasible to avoid impacts on western bumble bee, a focused survey for the species will be conducted prior to implementing treatments in habitat suitable for the species or presence will be assumed. The survey protocol for rusty-patched bumble bee (USFWS 2018) or a subsequently published protocol for western bumble bee may be adapted for the special-status bumble bees in the project area. If special-status bumble bees are detected during focused surveys or assumed to be present in the project area, Mitigation Measure BIO-2g will be implemented. If a focused survey is conducted, surveyor will review CDFW's June 2023 guidance document, Survey Considerations for CESA Candidate Bumble Bees (CDFW 2023).

- Because no-disturbance buffers and limited operating periods for monarch are not feasible, to avoid impacts on monarch butterflies, a focused survey for the species will be conducted, including noninvasive visual surveys for butterflies. If the presence of monarch butterflies is assumed or the species is detected during focused surveys, Mitigation Measure BIO-2e will be implemented.
- If the limited operating period for Sierra Nevada mountain beaver is determined to be infeasible, to avoid impacts on the species, focused surveys (i.e., burrow searches) for Sierra Nevada mountain beavers will be conducted prior to implementing treatment activities during the Sierra Nevada mountain beaver maternity season (approximately February 1–July 31) within 200 feet of suitable aquatic habitat. If an active Sierra Nevada mountain beaver burrow is identified by a qualified RPF or biologist, Mitigation Measure BIO-2b will be implemented.
- If the limited operating period for ringtail is determined to be infeasible, to avoid impacts on the species, focused surveys for ringtail, including non-invasive survey methods (e.g., trail cameras, track plates, hair snares), will be conducted prior to implementing manual

treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments and prescribed burning during the ringtail maternity season (April 15–June 30). If presence of ringtail is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.

- If the limited operating period for Sierra Nevada snowshoe hare is determined to be infeasible, to avoid impacts on the species, focused surveys for Sierra Nevada snowshoe hare, including searches for nests (also known as forms), will be conducted prior to implementing mechanical treatments and prescribed burning during the Sierra Nevada snowshoe hare maternity season (April 1–June 30). If an active nest is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2b will be implemented.
- If the limited operating period for western white-tailed jackrabbit is determined to be infeasible, to avoid impacts on western white-tailed jackrabbit, a focused survey for occupancy of these species will be conducted prior to implementing mechanical treatments and prescribed burning in habitat suitable for the species during the maternity season (April 1–June 30). Survey techniques to determine occupancy may include non-invasive survey methods (e.g., trail cameras, track plates, hair snares). If occupancy of the species is determined during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2b will be implemented.
- If the limited operating period for fisher is determined to be infeasible, to avoid impacts on the species, focused surveys for fisher, including non-invasive survey methods (e.g., trail cameras, track plates, hair snares), will be conducted prior to implementing manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments and prescribed burning during the fisher maternity season (May 1–June 30) within habitat suitable for the species. If presence of fisher is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2b will be implemented.
- Wolverine:
  - If it is determined that following the limited operating periods for wolverine are not feasible, to avoid impacts on wolverine, the following measures will be implemented:
    - To determine whether wolverine have been documented in or in the vicinity of the project area, a qualified RPF or biologist will contact CDFW (Sandra Jacks, Sr. Environmental Scientist Supervisor, [Sandra.Jacks@wildlife.ca.gov](mailto:Sandra.Jacks@wildlife.ca.gov); or Kelsey Vella, Sr. Environmental Scientist Specialist, [Kelsey.Vella@wildlife.ca.gov](mailto:Kelsey.Vella@wildlife.ca.gov)) before implementation of treatment activities to obtain general information about documented wolverine activity within or in the vicinity of a treatment area that has not been made publicly available.
    - If wolverine activity (e.g., occurrences) has been documented in a treatment area, pursuant to information provided by CDFW, then treatment activities will not be initiated in the treatment area until CDFW have provided further guidance. Mitigation Measure BIO-2a will be implemented.
    - If wolverine activity has not been documented in the project area pursuant to information provided by CDFW, and CDFW concurs that the species is unlikely to occur in the treatment area, then the project will proceed without surveys.
    - If wolverine occurrences have not been documented in the project area, but presence of wolverine cannot be ruled out by CDFW (e.g., a documented occurrence is close to the treatment area, there is otherwise not enough information available to rule out potential presence), then focused surveys for wolverine activity will be conducted within the treatment area and a buffer of 0.5 mile surrounding the treatment area. Focused surveys will be conducted by a qualified RPF or biologist and will

include the use of passive techniques such as remote photography, track plates, or snow tracking, as described in Zielinski and Kucera 1995. The RPF or biologist will review the project site for suitable wolverine denning habitat, which is typically characterized by areas of low human disturbance with boulder fields, talus slopes, and presence of abundant food sources such as cached carcasses or live prey (Biodiversity Legal Foundation 2000). If the species is detected during focused surveys, then Mitigation Measure BIO-2a will be implemented and treatment activities will not be initiated in the treatment area until CDFW have provided further guidance. Additional surveys may be required to determine whether an active wolverine natal den or rendezvous site is present within or adjacent to a treatment area. While kits are still too young to travel, the female leaves them in a “rendezvous site” and forages alone, typically a small den or burrow (Biodiversity Legal Foundation 2000). If an active den or rendezvous site is detected in or adjacent to a treatment area, then Mitigation Measure BIO-2a will apply.

<b>SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory).</b> This SPR applies only to prescribed herbivory and all treatment types.	No	N/A	<u>N/A</u>
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This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

<b>SPR BIO-12. Protect Common Nesting Birds, Including Raptors.</b> 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 Program EIR. The active nesting season or peak nesting season will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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For treatments implemented during the nesting bird season (February 1–August 31), a survey for common nesting birds will be conducted within the project area prior to treatment activities. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests will be avoided by modifying treatments to avoid disturbance to the nests, deferring treatment until the nests are no longer active as determined by an RPF or qualified biologist, or establishing an appropriate buffer around the nests. Buffers will be established by a qualified biologist or RPF based on rationale such as species sensitivity, vegetative cover, nest height, and topography that will attenuate noise and visual disturbance. In addition, trees with raptor nests will be retained, whether or not the nest is occupied.

<b>MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA.</b> If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).	No	N/A	<u>N/A</u>
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This mitigation measure does not apply because no special-status plants listed under ESA or CESA were determined to have potential to occur in the project area (Attachment B, Table B-2).

<p><b>MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA.</b> If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement measures to avoid loss of individuals and maintain habitat function of occupied habitat.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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Measures listed below (see Attachment A, MM BIO-1b) will be implemented to avoid loss of individuals and maintain habitat function of occupied habitat for the 22 special-status plants not listed under ESA or CESA.

If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat:

- Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape.
- Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank.
- Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation.
- No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer.

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

<p><b>MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants.</b> If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.</p>	<p>No</p>	<p>N/A</p>	<p><u>N/A</u></p>
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This mitigation measure does not apply to the project. TTAD will implement Mitigation Measures BIO-1a and BIO-1b to avoid impacts to species; therefore, no compensatory mitigation will be required.

<p><b>MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)</b></p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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The measures listed in Attachment A will be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetation cover, nesting trees, host plants) for Sierra Nevada yellow-legged frog, willow flycatcher, bald eagle, California spotted owl, Lahontan cutthroat trout, and wolverine.

In addition, TTAD consulted with CDFW and USFWS in conformance with the requirements of MM BIO-2a. PRC 4123 consultation with CDFW was initiated on June 26, 2023, with a follow-up call on June 28, 2023. CDFW consultation pursuant to MM BIO-2a was initiated with a memo submitted to Sandra Jacks and Kelsey Vella on August 31, 2023. CDFW responded on September 15, 2023 and confirmed that they reviewed the documents and had no comments on the project. USFWS consultation was initiated with a notification sent to Ryan Olah on August 31, 2023. Sam Sosa responded on September 11, 2023 with some follow-up questions. A response providing additional detail was submitted to USFWS was submitted on September 12<sup>th</sup>, and Sam followed up on September 29<sup>th</sup> with no further comments. CDFW and USFWS reviewed the relevant requirements and did not request any additional changes to the project-specific measures for the Waddle Ranch Vegetation Treatment Project.

The following project-specific implementation has been added to Mitigation Measure BIO-2a for the Waddle Ranch Vegetation Treatment Project in consultation with USFWS and CDFW:

If California Fully Protected Species or species listed under ESA or CESA are observed during focused or protocol-level surveys (conducted pursuant to SPR BIO-10) or assumed present, the project proponent will avoid adverse effects to the species by implementing the following.

- Sierra Nevada yellow-legged frog
  - Treatment activities within 100 feet of aquatic habitat that is occupied or assumed to be occupied by Sierra Nevada yellow-legged frog will be limited to manual treatments and broadcast burning.



- Daily inspection of the day's treatment area within 100 feet of aquatic habitat occupied or assumed to be occupied by Sierra Nevada yellow-legged frog will be performed by a qualified biologist, RPF, or biological technician. The biologist, RPF, or biological technician will monitor all activities within 100 feet of aquatic habitat.
- If Sierra Nevada yellow-legged frogs are encountered within the project area, all project activities which have the potential to result in harassment, injury, or death will stop within 100 feet of the frog. If Sierra Nevada yellow-legged frogs are encountered, CDFW and USFWS will be notified. Frogs will be allowed to leave the construction area of their own volition.
- Special-status birds
  - If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of 660 feet will be established around active bald eagle nests, at least 100 feet around the nests of willow flycatcher nests, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle nests will not be removed pursuant to the Bald and Golden Eagle Protection Act.
- Ringtail
  - If the limited operating period for ringtail is determined to be infeasible and ringtails are detected during focused surveys implemented under SPR BIO-10, then additional surveys will be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist a no disturbance buffer will be established around the den, the size of which will be determined through consultation with CDFW.
  - If the limited operating period for ringtail is determined to be infeasible and presence of ringtails is assumed, then the following avoidance and minimization measures will be required:
    - **Year-Round Take Avoidance Measures.** During mechanical treatment activities in heavy brush habitat (e.g., dense conifer saplings, blackberry, shrubs), and after the standard equipment warm-up period, heavy machinery activities in heavy brush habitat will be conducted slowly and cautiously. For example, the head of a masticator will pause above a patch of heavy brush for several seconds before removing the brush. A qualified RPF or biologist will explain this process to contractors and will observe mechanical treatments on the first day of work to ensure that the methods are understood and implemented properly; this could be combined with other pre-activity survey or contractor awareness training requirements. Contractors will watch for ringtail as they masticate in heavy brush. If a ringtail is observed, the contractor will direct treatment activities to halt, and the ringtail will be allowed to leave the area unharmed before treatment begins. If a ringtail is observed outside of maternity season, the qualified RPF or biologist will be contacted and will perform a sweep of the treatment area before work resumes. If the qualified RPF or biologist observes a resting ringtail or active non-maternity den, treatment activities will not occur within that day's treatment area until the ringtail leaves the area on its own. If the qualified RPF or biologist observes a ringtail or confirms the contractor's observation (i.e., based on contractor description or photograph), the occurrence will be reported to CDFW at Sandra.Jacks@wildlife.ca.gov and Kelsey.Vella@wildlife.ca.gov.
    - **Den Surveys.** Within seven days prior to the start of manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments or prescribed burning during the ringtail maternity season, a qualified RPF or biologist will conduct a den search in the treatment area to be treated the next week. The qualified RPF or biologist will search for large trees (i.e., greater than 12 inches diameter at breast height [dbh]) with appropriate cavities (i.e., holes larger than 3 inches in

diameter, cavities extending approximately 12 inches down from the cavity hole). If found, the qualified RPF or biologist will inspect the cavity using a cell phone with a flash, or other tools (e.g., borescopes) to determine whether ringtails are present. Areas (e.g., large trees) with appropriate den habitat, occupied or not, will be marked (i.e., with flagging, spray paint), for inspection during future sweeps (as described below). The qualified RPF or biologist will also search for dens in dense brush habitat and will note any sightings of fleeing adult ringtails.

- **Active Dens.** If active ringtail dens are discovered during a den survey or daily sweep, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and mechanical treatments will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. The 0.25-mile buffer will incorporate the den and an area greater than the typical ringtail home range in northern California (Wyatt, pers. comm., 2021). If an active den is discovered, CDFW (Sandra.Jacks@wildlife.ca.gov and Kelsey.Vella@wildlife.ca.gov) will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer.
- **Daily Sweeps, Training, and Monitoring.** If active ringtail dens are not discovered, the following measures will be implemented to avoid inadvertent destruction of active dens that eluded detection during the den search as well as take of adult ringtails and kits.
- **Daily Sweeps.** On the first morning of work for manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments or prescribed burning, a qualified RPF or biologist will conduct a sweep of the area to be treated that and will search all habitat suitable for ringtails where mastication will occur that day (i.e., larger trees, heavy brush, rock piles) for active dens or adults, including the trees with cavities previously marked by the qualified RPF or biologist. On following days, a trained contractor will search all areas previously marked by the qualified RPF or biologist for active dens (see training requirements below under “Training and Monitoring”). If an active den is discovered during a daily sweep, the qualified RPF or biologist will be notified, all work will stop, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and the requirements described above under “Active Dens” will be followed.
- **Training and Monitoring.** On the first morning of work for manual treatments that use hand-operated power tools (e.g., chainsaws), mechanical treatments or prescribed burning, the qualified RPF or biologist will provide biological resource training (as required under CalVTP PEIR SPR BIO-2) for all contractors. In addition to standard biological resource training, the qualified RPF or biologist will provide additional training specific to ringtail that will include the following elements:
  - Description of ringtail appearance (i.e., physical features, typical size);
  - Description of typical ringtail behavior;
  - Description of denning habitat suitable for ringtail, particularly in that week’s treatment area. The approximate location of large trees with cavities that were previously marked will be noted;
  - Measures required during operation, including daily sweeps of habitat suitable for ringtail where mastication will occur that day (i.e., heavy brush habitat, previously marked tree cavities), year-round take avoidance measures, and required increased vigilance when operating in heavy brush;

- Measures required if a ringtail is spotted (i.e., all work halts until a qualified RPF or biologist can conduct a den search and sweep; if the qualified RPF or biologist observes a ringtail or confirms the contractor’s observation, the occurrence will be reported to CDFW at Sandra.Jacks@wildlife.ca.gov and Kelsey.Vella@wildlife.ca.gov);
- Measures required if a ringtail den is found (i.e., 0.25-mile no-disturbance buffer and requirements described above under “Active Dens” will be followed);
- Definition of and legal consequences for take of ringtail (i.e., \$10,000 fine for each take and/or 1 year in jail); and
- Requirements for contacting CDFW (Sandra.Jacks@wildlife.ca.gov and Kelsey.Vella@wildlife.ca.gov), which include the following circumstances:
  - ringtails observed during treatment activities (notify within 3 business days);
  - active ringtail den discovered (notify within 24 hours); and
  - take of ringtail occurs (notify within 24 hours).
- Wolverine
  - If an active natal den or rendezvous site is identified by a qualified RPF or biologist during focused surveys or any time during project implementation, then CDFW will be contacted immediately, and a no-disturbance buffer of at least 0.5 mile will be established around the natal den or rendezvous within which no treatment activities would occur. No-disturbance buffers may be larger and irregularly shaped, based on topography and concerns for revealing the exact site location.
  - No activities that create loud and continuous noise will occur within the no-disturbance buffer January 1 through June 30 pursuant to discussion and coordination with CDFW, which may result in modified distances or more flexible dates.

<p><b>MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities).</b> 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.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status 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. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required.</p>	Yes	TTAD Prior-During	CAL FIRE
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Mitigation Measure BIO-2b (see Attachment A) will be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetative cover, nesting trees, host plants) for other special-status wildlife species, or species which are not listed under CESA or ESA, and are not California fully protected. This includes monarch butterfly, Southern long-toed salamander, Northern goshawk, yellow warbler,

Lahontan mountain sucker, mountain whitefish, Sierra Nevada mountain beaver, Sierra Nevada snowshoe hare, Western white-tailed jackrabbit, and fisher.

Mitigation Measure BIO-2b requires a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries), determined at a size and location appropriate for the species. 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 are outlined in the full text of Mitigation Measure BIO-2b, outlined in Attachment B. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the area is cleared for work. 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.

All treatment activities will be designed to maintain the habitat function by implementing habitat protection features outlined in Mitigation Measure BIO-2b (Attachment B).

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.

In addition, the following project-specific implementation has been added to Mitigation Measure BIO-2b for the Waddle Ranch Vegetation Treatment Project in consultation with USFWS and CDFW:

- If other (i.e., non-listed) special-status wildlife species are observed during 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.
  - If southern long-toed salamanders are detected during focused surveys, the project proponent will require flagging areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of this species.
  - If nesting California spotted owls are identified during protocol-level surveys, a no disturbance buffer of 0.25 mile will be established around active California spotted owl nests and no treatment activities will occur within this buffer.

- If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of at least 0.25 mile for northern goshawk nests, and at least 100 feet around yellow warbler nests or the nests of other special-status birds will be established, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist.
- If active Sierra Nevada mountain beaver dens are detected during focused surveys, a no-disturbance buffer of at least 250 feet will be established around the burrow, and no treatment activities will occur within this buffer.
- If it is determined that Sierra Nevada snowshoe hare or western white-tailed jackrabbit are present in the project area and work occurs during the species' limited operating period, a RPF or biologist will conduct a focused survey for nests prior to treatment in habitat suitable for these species. If a nest is detected during focused surveys, a no-disturbance buffer of at least 100 feet will be established around the nest, and no treatment activities will occur within this buffer until the nest is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.
- If an active fisher den is detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around the den, and no treatment activities will occur within this buffer until the den is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.

<p><b>MM BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)</b> 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.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.</p>	No	N/A	<u>N/A</u>
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This mitigation measure does not apply to the project. As required, Mitigation Measures BIO-2a, BIO-2b, BIO-2e, and BIO-2g will be implemented to reduce impacts to species. Compensatory mitigation is not warranted to mitigate residual impacts to habitat function.

<p><b>MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)</b></p>	No	N/A	<u>N/A</u>
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This mitigation measure does not apply to the project because the project area is outside of the range of Valley elderberry longhorn beetle.

<p><b>MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)</b> The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. If it is</p>	Yes	TTAD Prior-During	<u>CAL FIRE</u>
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determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.			
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Monarch host plants may be present and breeding may occur within the project area. Treatments within forests and grasslands may result in the loss of host plants if present. If monarch butterflies or host plants are detected or assumed to occur in suitable habitat, treatment of suitable habitat will be designed to avoid milkweed when feasible and to maintain habitat function for the species. Mitigation measure BIO-2e will be implemented to avoid impacts to and maintain habitat for monarch butterfly host plants.

<b>MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)</b>	No	N/A	<u>N/A</u>
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This mitigation measure does not apply because no special-status beetles, flies, grasshoppers, or snails have the potential to occur within the project area.

<b>MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities).</b> 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 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. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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Habitat is present for western bumble bee and the species has potential to occur in the project area, therefore, mitigation measures BIO-2g will be implemented to avoid or minimize impacts and to maintain habitat function (e.g., retain floral resources) for western bumble bee. Mitigation Measure BIO-2g requires that prescribed burning within occupied or suitable habitat for special-status bumble bees occurs between October through February to avoid the bumble bee flight season, as feasible. In addition, treatment will be divided into a sufficient number of treatment units and conducted in a patchy pattern so that the entirety of the species' floral resources are not treated in a single year. The following project-specific implementation has also been added to Mitigation Measure BIO-2g for the Waddle Ranch Vegetation Treatment Project to provide additional detail and further protect western bumble bee individuals and their habitat function:

- Prescribed burning and biomass disposal will be designed to avoid overwintering bumble bees and bumble bee floral resources:
  - Chips will not be placed on or within 5 feet of habitat that is likely suitable for a bumble bee nest (e.g., existing burrows, cavities).
  - Broadcast burning in habitat suitable for sensitive bumble bees that contains floral resources will be restricted to October 1 – February 28.
- Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year. The scale will be determined by a qualified biologist or RPF. The objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area.

<b>MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)</b>	No	N/A	<u>N/A</u>
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The project does not include prescribed herbivory treatments; therefore, this mitigation measure does not apply.

<p><b>MM BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands.</b> The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3:</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.</p>	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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The project area potentially contains eight sensitive natural communities as defined by CDFW and no oak woodland types (Attachment B). The project area may support the following sensitive natural communities: green leaf manzanita - pinemat manzanita chaparral, bush chinquapin chaparral, silver sagebrush wet shrubland, Rothrock's sagebrush, needle spike-rush stand, aspen groves, water birch thicket, and black cottonwood forest and woodland. Under Mitigation Measure BIO-3a, a qualified RPF or biologist will determine the natural fire regime, condition class, and FRI for each sensitive natural community type. Initial and maintenance treatment activities in sensitive natural communities will be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function.

<b>MM BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands.</b> If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects.	No	N/A	<u>N/A</u>
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This mitigation measure does not apply to the project. The implementing entities will implement Mitigation Measure BIO-3a to avoid impacts to sensitive natural communities and oak woodlands; therefore, no compensatory mitigation will be required.

<b>MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat.</b> Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.	No	N/A	<u>N/A</u>
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This mitigation measure does not apply to the project because WLPZs and ELZs will be established adjacent to all Class I, Class II, and Class III streams within the project area, and protections applied in all WLPZs and ELZs will avoid the loss or degradation of riparian habitat functions. Therefore, compensatory mitigation is not required.

<b>MM BIO-4: Avoid State and Federally Protected Wetlands</b>	Yes	<u>TTAD</u>	<u>CAL FIRE</u>
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		Prior-During	
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There are several seasonal freshwater emergent wetlands and seasonal freshwater wetland forested/shrub areas within the project area. Because WLPZs established would not apply to seasonal wetland habitat, a qualified RPF or biologist will delineate the boundaries of these seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance will be prohibited within this buffer.

<b>MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites</b>	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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If wildlife nursery habitat is identified during SPR BIO-10 surveys, treatment activities could result in disturbance of nursery behavior causing loss of young or result in direct removal of nursery habitat and this mitigation measure will apply.

The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10:

- Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment.
- Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.



**Table EC-5-1 Special-status plant and wildlife species that are known to occur or could occur in the project area.**

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<b>Special-Status Plants</b>								
<i>Boechea rigidissima</i> (Synonym: <i>Arabis rigidissima</i> var. <i>demota</i> ) Galena Creek Rockcress	Perennial herb	1B.2	–	–	Broadleaved upland forest, upper montane coniferous forest.	Well-drained, stony soil underlain by basic volcanic rock	Could Occur	MM Bio-1b
<i>Botrychium ascendens</i> upswept moonwort	Perennial rhizomatous herb	2B.3	–	–	Lower montane coniferous forest, meadows and seeps.	Grassy fields, coniferous woods near springs and creeks	Could Occur	MM Bio-1b
<i>Botrychium crenulatum</i> Scalloped moonwort	Perennial rhizomatous herb	2B.2	–	–	Bogs and fens, meadows and seeps, upper montane coniferous forest, lower montane coniferous forest, marshes and swamps.	Moist meadows, freshwater marsh, and near creeks	Could Occur	MM Bio-1b
<i>Botrychium neolunaria</i> (Synonym: <i>Botrychium lunaria</i> ) North American moonwort	Perennial rhizomatous herb	2B.3	–	–	Meadows and seeps	Mesic, rocky (sometimes)	Could Occur	MM Bio-1b
<i>Carex davyi</i> Davy's sedge	Perennial herb	1B.3	–	–	Subalpine coniferous forest, upper montane coniferous forest	–	Could Occur	MM Bio-1b
<i>Carex lasiocarpa</i> woolly-fruited sedge	Perennial rhizomatous herb	2B.3	–	–	Bogs and fens, marshes and swamps	Sphagnum bogs, freshwater marsh, lake margins	Could Occur	MM Bio-1b

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<i>Carex limosa</i> Mud sedge	Perennial rhizomatous herb	2B.2	–	–	Bogs and fens, lower montane coniferous forest, meadows and seeps, marshes and swamps, upper montane coniferous forest.	In floating bogs and soggy meadows and edges of lakes	Could Occur	MM Bio-1b
<i>Drosera anglica</i> English sundew	Perennial herb	2B.3	–	–	Bogs and fens, meadows and seeps	–	Could Occur	MM Bio-1b
<i>Eriogonum umbellatum</i> var. <i>torreyanum</i> Donner Pass buckwheat	Perennial herb	1B.2	–	–	Upper montane coniferous forest, meadows and seeps	Steep slopes and ridgetops; rocky, volcanic soils; usually in bare or sparsely vegetated areas	Could Occur	MM Bio-1b
<i>Eurybia merita</i> Subalpine aster	Perennial herb	2B.3	–	–	Upper montane coniferous forest	–	Could Occur	MM Bio-1b
<i>Glyceria grandis</i> American manna grass	Perennial rhizomatous herb	2B.3	–	–	Bogs and fens, meadows and seeps, marshes and swamps	Wet meadows, ditches, streams, and ponds, in valleys and lower elevations in the mountains	Could Occur	MM Bio-1b
<i>Ivesia sericoleuca</i> Plumas ivesia	Perennial herb	1B.2	–	–	Great Basin scrub, lower montane coniferous forest, meadows and seeps, vernal pools	Vernally mesic areas; usually volcanic substrates	Known to Occur	MM Bio-1b
<i>Juncus luciensis</i> Santa Lucia dwarf rush	Annual herb	1B.2	–	–	Vernal pools, meadows and seeps, lower montane coniferous forest, chaparral, Great Basin scrub	Vernal pools, ephemeral drainages, wet meadow habitats and streamsides	Could Occur	MM Bio-1b

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<i>Lomatium grayi</i> Gray's lomatium	Perennial herb	2B.3	—	—	Great Basin scrub, pinyon and juniper woodland.	—	Could Occur	MM Bio-1b
<i>Meesia uliginosa</i> broad-nerved hump moss	Moss	2B.2	—	—	Meadows and seeps, bogs and fens, upper montane coniferous forest, subalpine coniferous forest	Moss on damp soil. Often found on the edge of fens or raised above the fen on hummocks/shrub bases	Could Occur	MM Bio-1b
<i>Potamogeton epihydrus</i> Nuttall's ribbon-leaved pondweed	Perennial rhizomatous herb (aquatic)	2B.2	—	—	Marshes and swamps	Shallow water, ponds, lakes, streams, irrigation ditches	Could Occur	MM Bio-1b
<i>Potamogeton robbinsii</i> Robbins' pondweed	Perennial rhizomatous herb (aquatic)	2B.3	—	—	Marshes and swamps	Deep water, lakes	Could Occur	MM Bio-1b
<i>Rhamnus alnifolia</i> Alder buckthorn	Perennial deciduous shrub	2B.2	—	—	Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest, riparian scrub	Mesic sites	Could Occur	MM Bio-1b
<i>Scutellaria galericulata</i> Marsh skullcap	Perennial rhizomatous herb	2B.2	—	—	Marshes and swamps, lower montane coniferous forest, meadows and seeps	Swamps and wet places	Could Occur	MM Bio-1b
<i>Sidalcea multifida</i> cut-leaf checkerbloom	Perennial herb	2B.3	—	—	Lower montane coniferous forest, meadows and seeps, Great Basin scrub, pinyon and juniper woodland	—	Could Occur	MM Bio-1b

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence <sup>2</sup>	Mitigation Measures if Found
<i>Stachys pilosa</i> hairy marsh hedge-nettle	Perennial rhizomatous herb	2B.3	–	–	Great Basin scrub, meadows and seeps	Mesic sites	Could Occur	MM Bio-1b
<i>Stuckenia filiformis ssp. alpina</i> northern slender pondweed	Perennial rhizomatous herb (aquatic)	2B.2	–	–	Marshes and swamps	Shallow, clear water of lakes and drainage channels	Could Occur	MM Bio-1b
<b>Special-Status Reptiles and Amphibians</b>								
<i>Ambystoma macrodictylum sigillatum</i> southern long-toed salamander	Amphibian	SSC	–	–	High elevation meadows and lakes in the Sierra Nevada, Cascade, and Klamath mountains	Aquatic larvae occur in ponds and lakes. Outside of breeding season adults are terrestrial and associated with underground burrows of mammals and moist areas under logs and rocks	Could Occur	MM Bio-2b
<i>Rana sierrae</i> Sierra Nevada yellow- legged frog	Amphibian	–	ST	FE	Often encountered within a few feet of water; however, suitable habitat is defined as permanent waters, intermittent waters associated with permanent waters that contain permanent pools, and uplands within 82-feet of aquatic habitat	–	Could Occur	MM Bio-2a

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<b>Special-Status Birds</b>								
<i>Accipiter gentilis</i> Northern goshawk	Bird	SSC	–	–	Within, and in vicinity of, coniferous forest. Uses old nests, and maintains alternate sites	Usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees	Could Occur	MM Bio-2b
<i>Empidonax traillii</i> Willow flycatcher	Bird	–	SE	–	Inhabits extensive thickets of low, dense willows on edge of wet meadows, ponds, or backwaters	Requires dense willow thickets for nesting/roosting. Low, exposed branches are used for singing posts/hunting perches	Could Occur	MM Bio-2a
<i>Haliaeetus leucocephalus</i> Bald eagle	Bird	–	SE FP	–	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water	Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter	Could Occur	MM Bio-2a
<i>Setophaga petechia</i> Yellow warbler	Bird	SSC	–	–	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada	Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders	Could Occur	MM Bio-2b
<i>Strix occidentalis occidentalis</i> California spotted owl	Bird	SSC	–	FPT	Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Canopy closure >40%	Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water	Could Occur	MM Bio-2b

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<b>Special-Status Fish</b>								
<i>Catostomus lahontan</i> Lahontan mountain sucker	Fish	SSC	–	–	Occur in the Walker, Carson, Truckee and Susan river drainages of the Lahontan basin in the eastern Sierra Nevada, but not in the Eagle Lake basin. Also found in the North Fork Feather River drainage, mainly in Red Clover Creek	Found in shallow (< 2 m), clear, low-gradient streams; associated with diverse substrates, from sand to boulders, in areas with dense cover. Have been found in streams at elevations up to 2800 m and at temperatures of 1-25C	Could Occur	MM Bio-2b
<i>Oncorhynchus clarkii</i> <i>Henshawi</i> Lahontan cutthroat trout	Fish	–	–	FT	Historically in all accessible cold waters of the Lahontan Basin in a wide variety of water temps and conditions	Cannot tolerate presence of other salmonids. Requires gravel riffles in streams for spawning	Could Occur	MM Bio-2a
<i>Prosopium williamsoni</i> Mountain whitefish	Fish	SSC	–	–	Mountain whitefish historically occupied similar habitats to Lahontan cutthroat trout on both the California and Nevada sides of the Sierra Nevada	–	Could Occur	MM Bio-2b
<b>Special-Status Invertebrates</b>								
<i>Bombus occidentalis</i> Western Bumble bee	Bumble bee	–	SC	–	Once common and widespread, species has declined precipitously from central CA to southern B.C., perhaps from disease.	–	Could Occur	MM Bio-2a and MM Bio-2g

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<i>Danaus plexippus</i> Monarch butterfly	Butterfly	–	–	FC	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Monarch require their host plant, milkweed, for breeding and foraging, and they may forage on other common flowering plants	Along migration routes and within summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds ( <i>Asclepias</i> spp.) upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies	Could Occur	MM Bio-2b and MM BIO-2e
<b>Special-Status Mammals</b>								
<i>Aplodontia rufa californica</i> Sierra Nevada mountain beaver	Mammal/ rodentia	SSC	–	–	Dense growth of small deciduous trees and shrubs, wet soil, and abundance of forbs in the Sierra Nevada and east slope	Needs dense understory for food and cover. Burrows into soft soil. Needs abundant supply of water	Could Occur	MM Bio-2b
<i>Bassariscus astutus</i> Ringtail	Mammal/ carnivora	–	FP	–	Exploit a variety of habitats such as dry, rocky, brush-covered hillsides or riparian areas, typically not far from an open water source	Dens most often in rock crevices, boulder piles, or talus, but also tree hollows, root cavities, and rural buildings. Rarely use same den for more than a few days. Females with litters change dens within 10 days of birth and almost daily after 20 days	Could Occur	MM Bio-2a

Species	Lifeform	CRPR/ Other Rank <sup>1</sup>	State Listing Status <sup>1</sup>	Federal Listing Status <sup>1</sup>	Habitat	Micro Habitat	Potential for Occurrence? <sup>2</sup>	Mitigation Measures if Found
<i>Gulo gulo</i> Wolverine	Mammal/ carnivora	–	ST FP	FT	Found in the north coast mountains and the Sierra Nevada. Found in a wide variety of high elevation habitats.	Needs water source. Uses caves, logs, burrows for cover and den area. Hunts in more open areas. Can travel long distances.	Could Occur	MM Bio-2a
<i>Lepus americanus</i> <i>tahoensis</i> Sierra Nevada snowshoe hare	Mammal/ lagomorpha	SSC	–	–	Boreal riparian areas in the Sierra Nevada.	Thickets of deciduous trees in riparian areas and thickets of young conifers.	Could Occur	MM Bio-2b
<i>Lepus townsendii</i> <i>townsendii</i> Western white-tailed jackrabbit	Mammal/ lagomorpha	SSC	–	–	Sagebrush, subalpine conifer, juniper, alpine dwarf shrub and perennial grassland.	Open areas with scattered shrubs and exposed flat-topped hills with open stands of trees, brush and herbaceous understory.	Could Occur	MM Bio-2b
<i>Pekania Pennanti</i> Fisher	Mammal/ carnivora	SSC	–	–	Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure	Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest.	Could Occur	MM Bio-2b

Note: CNDDDB = California Natural Diversity Database; DPS= Distinct Population Segment; CRPR = California Rare Plant Rank

<sup>1</sup> Legal Status Definitions

**Federal:**

FE Endangered (legally protected)  
 FT Threatened (legally protected)  
 FPT Proposed for listing as Threatened under ESA  
 FC Candidate for Listing under ESA

**State:**

SE Endangered (legally protected)  
 ST Threatened (legally protected)  
 SC Candidate for Listing under CESA (legally protected)  
 FP Fully protected (legally protected)  
 SSC Species of special concern (no formal protection other than CEQA consideration)

**California Rare Plant Ranks:**

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

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

**Threat Ranks**

0.1-Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)



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

0.3-Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known)

<sup>2</sup> Potential for Occurrence Definitions

**Could occur:** Suitable habitat is available at the project site; however, there are little to no other indicators that the species might be present.

**Known to occur:** The species, or evidence of its presence, was observed at the project site during reconnaissance surveys, or was reported by others.

## EC-6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil</b>	Impact Geo-1, 3.7	LTS	<u>SPR GEO-1, 2, 3, 4, 5, 6, 7, 8,</u> <u>SPR HYD-3</u> <u>SPR AQ-3</u> <u>SPR HYD-4</u>	Yes	LTS	<input checked="" type="checkbox"/>

The table below includes a summary of the six dominant soil types that may be present in the project area. Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity. Values of K range from 0.02 to 0.69. Other factors being equal, the higher the K value, the more susceptible the soil is to sheet and rill erosion by water (NRCS 2023).

**Table 1 Summary of the Six Dominant Soil Types That may be Present in the Project Area**

Soil Type	Erosion Factor K	Erosion Potential
Trojan-Sattley-Kyburz complex, 2 to 30 percent slopes	0.17	Low
Trojan-Sattley-Kyburz complex, 30 to 50 percent slopes	0.20	Moderate
Kyburz-Trojan complex, 9 to 30 percent slopes	0.20	Moderate
Aldi-Kyburz complex, 2 to 30 percent slopes	0.20	Moderate
Aquolls and Cryolls, 0 to 5 percent slopes	NA	NA
Inville-Riverwash-Aquolls complex, 2 to 5 percent slopes	0.17	Moderate

Soil types in the project area have moderate to low potential for erosion (Table 1). Initial treatment and maintenance treatments would include mechanical treatment and prescribed burning (broadcast and pile burning). Although the soil erosion potential is moderate to low, prescribed burning and mechanical operations may result in erosion and potential loss of topsoil. Prescribed burning can remove litter and surface fuels, which may expose mineral soil to rain splash and overland flow. However, prescribed burning treatment will typically retain 70 percent of the vegetation, which would minimize erosion. Additionally, TTAD would minimize erosion by installing erosion control measures such as water bars in bare linear treatment areas capable of generating storm runoff pursuant to SPR GEO-5. Mechanical vegetation removal may also result in compaction from physical disturbance of the tires or grappling equipment, which can result in loss of soil cover or breakdown of soil structure. To address this risk, SPR GEO-1 requires that mechanical soil disturbance is suspended during moderate to high precipitation events (see Attachment A for details). Additionally, SPR GEO-2 would limit high ground pressure vehicle disturbance, and SPR GEO-5 would require mechanically disturbed soil areas to be stabilized post-treatment.

The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the soil characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact GEO-2: Increase Risk of Landslide</b>	Impact Geo-2, 3.7	LTS	SPR GEO-3, 4, 7, 8, SPR AQ-3 SPR AD-3	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include vegetation removal in areas with sloping terrain. Slopes vary from 0.10 percent to 57.65 percent, and much of the project area is on hillsides, however no known landslide zones are within or adjacent to the project area (DOC and CGS 2023, USGS 2023a). Much of the soil in the project area has low to moderate erosion potential (see table under Impact GEO-1). All mechanized equipment would operate on slopes less than 35 percent, except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent. Manual treatment may occur on slopes steeper than 35 percent. The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is not substantially greater than described in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Geology, Soils, Paleontology, and Mineral Resources:</b> Would the project result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.7.1, “Environmental Setting,” and Section 3.7.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR GEO-1 Suspend Disturbance during Heavy Precipitation:</b> 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. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>

Mechanical treatment activities would be suspended if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours, as described in SPR GEO-1 (Attachment A) to minimize the risk of soil compaction and disturbance. The project does not propose prescribed herbivory or herbicide treatment activities.

<b>SPR GEO-2 Limit High Ground Pressure Vehicles:</b> 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. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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TTAD will avoid driving heavy equipment and other high ground pressure vehicles on saturated soils to minimize the risk of soil compaction and disturbance.

<b>SPR GEO-3 Stabilize Disturbed Soil Areas:</b> 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. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types.	Yes	<u>TTAD</u> During-Post	<u>CAL FIRE</u>
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TTAD will stabilize soils following mechanical treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the project area. This project includes chipping materials and scattering the chips within the treated areas, which will reduce the amount of exposed bare soil following treatments. The project does not propose prescribed herbivory.

<b>SPR GEO-4 Erosion Monitoring:</b> The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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After the first storm event where 1.5 inches of rain or more falls within a 24-hour period, the project area will be inspected to determine if erosion control measures functioned properly. If any area is identified where erosion could result in substantial sediment discharge, the area will be stabilized within 48 hours of the rainfall event.

<p><b>SPR GEO-5 Drain Stormwater via Water Breaks:</b> 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. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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Stormwater runoff will be drained via water breaks to minimize the risk of erosion occurring within the project area or on road infrastructure following mechanical and manual treatments that may compact or disturb soils.

<p><b>SPR GEO-6 Minimize Burn Pile Size:</b> 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. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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Pile burning activities would be implemented by TTAD in close coordination with CAL FIRE. Burn piles would not exceed 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the Program EIR (CalVTP Final Program EIR Volume II Section 2.7.6, 47).

<p><b>SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads.</b> This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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The use of heavy equipment (i.e., bulldozers, masticators, and chippers) would not occur on slopes over 35 percent except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent.

<p><b>SPR GEO-8 Steep Slopes:</b> The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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The use of heavy equipment (i.e., bulldozers, masticators, and chippers) for mechanical treatment activities will not occur on slopes over 50 percent. For other treatment activities, an RPF or licensed geologist would evaluate project areas with slopes greater than 50 percent for any unstable areas and unstable soils. If these areas are unavoidable, additional measures would be implemented to ensure that substantial erosion or loss of topsoil would not occur.

## EC-7 GREENHOUSE GAS EMISSIONS

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact GHG-1:</b> Conflict with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs	Impact GHG-1, 3.8	LTS	<u>SPR GHG-1</u>	Yes	LTS	<input checked="" type="checkbox"/>

The use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from prescribed burning and equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce the occurrence and intensity of wildfire, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, duration of prescribed burning, and resultant GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact GHG-2:</b> Generate Greenhouse Gas Emissions through Treatment Activities	Impact GHG-2, 3.8	SU	<u>SPR AQ-3</u> <u>MM GHG-2</u>	Yes	SU	<input checked="" type="checkbox"/>
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The use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. Accordingly, TTAD is proposing the use of air curtain burners. The essential function of this technology is to reduce smoke and resultant GHG emissions compared to pile burning by consuming biomass quickly and efficiently. According to a 2020 study of biomass, air curtain burners emit 54 percent less CO<sub>2</sub> emissions compared to pile burning (Puettmann et. al. 2020 as cited in Ascent 2022). Additionally, the production of biochar and subsequent application as a soil amendment provides long-term carbon sequestration benefits that are not available from pile burning.

The GHG emissions produced from this proposed treatment project are within the scope of the impacts evaluated in the Program EIR because the proposed activities, equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions associated with wildfire are consistent with those analyzed in the Program EIR. Although use of air curtain burners would substantially

reduce GHG emissions, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain potentially significant and unavoidable, consistent with, and for the same reasons described in, the Program EIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. Although use of an air curtain burner would substantially reduce GHG emissions, this impact would remain potentially significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a substantially more severe significant impact.

<b>Other Impacts to related to Greenhouse Gases:</b> Would the project result in other impacts related to greenhouse gases that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.8.1, “Regulatory Setting,” and Section 3.8.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. No changed circumstances are present, and the proposed treatments and 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process:</b> The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types.	No	N/A	N/A

SPR GHG-1 is not applicable because this project is not a registered offset project.

<b>MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns.</b> 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.	Yes	TTAD Prior-During	CAL FIRE
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A Burn Plan pursuant to SPR AQ-3 will be prepared by TTAD prior to pile and broadcast burn treatments. Feasible methods for GHG emission reduction will be implemented during prescribed burns, and these would be documented in the burn plan. Feasible methods may include retention of large fuels unburned, reduction of the total burned area through mosaic burning, burning when fuels have higher fuel

moisture content, reduce fuel loading prior to ignition with other methods, or scheduling burns prior to the development of new fuels (Attachment A). Additionally, the use of an air curtain burner is proposed, pursuant to MM GHG-2, to reduce GHG emissions from pile burning. Use of an air curtain burner would substantially reduce smoke and associated GHG emissions (i.e., CO<sub>2</sub>) compared to pile burning, as explained above. When an air curtain burner is utilized, it will be documented as a technique to reduce GHG emissions pursuant to MM GHG-2.



## EC-8 ENERGY

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy</b>	Impact ENG-1, 3.9	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

The 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 Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, existing energy consumption is essentially the same within and outside the treatable landscape; thus, the increase in the use of vehicles and mechanical equipment, and related energy use, would not be substantially greater than that analyzed in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<b>Other Impacts to Energy Resources:</b> Would the project result in other impacts to energy resources that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.9.1, “Regulatory Setting,” and Section 3.9.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

## EC-9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact HAZ-1:</b> Create a Significant Health Hazard from the Use of Hazardous Materials	Impact HAZ-1, 3.10	LTS	<u>SPR HYD-4</u> <u>SPR HAZ-1, 2, 3, 4</u>	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would include mechanical treatments, manual treatments, and prescribed burning (broadcast and pile burning). These treatment activities would require the transportation, use, and storage of fuels, lubricants, oils, and related accelerants, which are hazardous materials that pose significant health hazards. SPR HAZ-1 requires that the project proponent minimize leaks and the risk of resultant contaminants entering the environment, and that all diesel- and gasoline-powered equipment is maintained to the manufacturer's specification. Accelerants would be used to implement prescribed burns; however, fire ignition (including use of accelerants) would not occur in the protection zones for watercourses (SPR HYD-4); therefore, hazardous materials would be excluded from watercourses and significant health hazards related to water quality would be avoided.

The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazard material impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact HAZ-2:</b> Create a Significant Health Hazard from the Use of Herbicides	Impact HAZ-2, 3.10	LTS	<u>SPR HAZ-5, 6, 7, 8, 9</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because herbicides would not be used within the project area.

<b>Impact HAZ-3:</b> Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	Impact HAZ-3, 3.10	PS	<u>MM HAZ-3</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The project area is accessible to the public because the Waddle Ranch preserve is managed for recreation purposes and contains hiking trails and campsites. Other recreation sites are adjacent to the project area. Initial and maintenance treatments would include soil disturbance and prescribed burning, 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 Program EIR. This impact was identified as potentially significant in the Program EIR 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 project area (DTSC 2023; CalEPA 2023; SWRCB 2023). Therefore, this impact would be less than significant. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Hazardous Materials, Public Health and Safety:</b> Would the project result in other impacts to hazardous materials, public health and safety that are not evaluated in the CalVTP Program EIR?				No	N/A	☑
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.10.1, “Environmental Setting,” and Section 3.10.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR HAZ-1 Maintain All Equipment:</b> 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. This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>

Mechanical and manual treatment crews and pile burn crews would maintain all equipment, check for leaks, and remove leaking equipment from the site to minimize the risk of impacts resulting from leaks.

<b>SPR HAZ-2 Require Spark Arrestors:</b> This SPR applies only to manual treatment activities and all treatment types	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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All mechanized hand tools would have federal- or state-approved spark arrestors.

<b>SPR HAZ-3 Require Fire Extinguishers:</b> 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.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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Manual treatment crews will carry one fire extinguisher per chainsaw and vehicles will be equipped with one long-handled shovel and one axe or Pulaski.

<b>SPR HAZ-4 Prohibit Smoking in Vegetated Areas.</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>TTAD</u> During	<u>CAL FIRE</u>
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Crews will not be permitted to smoke in vegetated areas prior to or during treatment activities.

<b>SPR HAZ-5 Spill Prevention and Response Plan:</b> 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. This SPR applies only to herbicide treatment activities and all treatment types.	No	N/A	<u>N/A</u>
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SPR-HAZ-5 does not apply to the proposed project because herbicides would not be used within the project area.

<b>SPR HAZ-6 Comply with Herbicide Application Regulations.</b> This SPR applies only to herbicide treatment activities and all treatment types.	No	N/A	<u>N/A</u>
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SPR-HAZ-6 does not apply to the proposed project because herbicides would not be used within the project area.

<b>SPR HAZ-7 Triple Rinse Herbicide Containers.</b> This SPR applies only to herbicide treatment activities and all treatment types.	No	N/A	<u>N/A</u>
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SPR-HAZ-7 does not apply to the proposed project because herbicides would not be used within the project area.

<b>SPR HAZ-8 Minimize Herbicide Drift to Public Areas.</b> This SPR applies only to herbicide treatment activities and all treatment types.	No	N/A	<u>N/A</u>
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SPR-HAZ-8 does not apply to the proposed project because herbicides would not be used within the project area.

<b>SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas.</b> This SPR applies only to herbicide treatment activities and all treatment types.	No	N/A	<u>N/A</u>
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SPR-HAZ-9 does not apply to the proposed project because herbicides would not be used within the project area.

<p><b>MM HAZ-3: Identify and Avoid Known Hazardous Waste Sites</b>  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.</p>	Yes	<u>TTAD</u> Prior	<u>CAL FIRE</u>
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As discussed above, 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 project area (DTSC 2023; CalEPA 2023; SWRCB 2023).

## EC-10 HYDROLOGY AND WATER QUALITY

	Program EIR specific			Project - specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact HYD-1:</b> Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	Impact HYD-1, 3.11	LTS	<u>SPR HYD- 4</u> <u>SPR AQ-3</u> <u>SPR BIO-4, 5</u> <u>SPR GEO-4, 6</u> <u>MM BIO-3b</u>	Yes	LTS	<input checked="" type="checkbox"/>

The project area is within the North Lahontan hydrologic region and is under the jurisdiction of the Lahontan Regional Water Quality Control Board. The project area falls within the Truckee River watershed. There are several water courses within the project area: East Martis Creek located in the southern portion off the project area and Dry Lake which is a small reservoir in the northeast portion of the project area (Figure 2, USGS 2023b). Less than 1,000 feet west of the project area is Martis Creek and Martis Creek Lake which flow into the Truckee River. Unnamed tributaries to Martis Creek and East Martis Creek are also present. Initial and maintenance treatments would include prescribed burning. Per SPR HYD-4, WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within the project area. The patchwork of low and moderate intensity fire in a prescribed burn would preserve vegetated islands to capture runoff and sediment and riparian vegetation would be preserved to act as buffers around watercourses and wet areas. This, and with implementation of relevant SPRs and mitigation measures would prevent sediment, ash, and other post-burn debris from the project area that may contain nutrients, metals, or organic pollutants from being washed by runoff into adjacent drainages and streams. The project will not result in discharges into water resources, any violations of the LRWQCB Basin Plan, or other substantial degradation of surface or groundwater quality. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR (USGS 2023b).

<b>Impact HYD-2:</b> Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	Impact HYD-2, 3.11	LTS	<u>SPR HYD-1, 4, 5</u> <u>SPR BIO-1</u> <u>SPR GEO-1, 2, 3, 4, 5, 7, 8</u> <u>SPR HAZ-1, 5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include mechanical treatment and manual treatments. Per SPR HYD-4, WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within the project area. This would prevent water quality degradation from mechanical equipment or manual vegetation removal activities occurring close enough to streams to cause runoff of project-related debris into adjacent drainages and streams. Therefore, the project will not result in discharges into water resources, any violations of the LRWQCB Basin Plan, or other substantial degradation of surface or groundwater quality. The potential for mechanical or manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR 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 Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact HYD-3:</b> Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	Impact HYD-3, 3.11	LTS	<u>SPR HYD- 3</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

<b>Impact HYD-4:</b> Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	Impact HYD-4, 3.11	LTS	<u>SPR HYD-5</u> <u>SPR BIO-4</u> <u>SPR HAZ-5, 7</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because application of herbicides is not a proposed treatment activity.

<b>Impact HYD-5:</b> Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	Impact HYD-5, 3.11	LTS	<u>SPR HYD-2,</u> 4, 6 <u>SPR GEO-5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments could cause ground disturbance that could directly or indirectly modify existing drainage patterns, however, would have only minor effects on site drainage with the implementation of the applicable SPRs. The potential for treatment activities to substantially alter the existing drainage pattern of a project area was examined in the Program EIR. This impact to site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Hydrology and Water Quality:</b> Would the project result in other impacts to hydrology and water quality that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.11.1, “Environmental Setting,” and Section 3.11.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR HYD-1 Comply with Water Quality Regulations:</b> 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. This SPR applies to all treatment activities and treatment types.	Yes	TTAD Prior-During	CAL FIRE

The State Water Resources Control Board is requiring all projects utilizing the CalVTP Program EIR to follow the requirements of their Vegetation Treatment General Order (ORDER WQ 2021-0026-DWQ), 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 Program EIR. In addition, the General Order requires compliance with any applicable Basin Plan prohibitions.

<b>SPR HYD-2 Avoid Construction of New Roads:</b> 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.	Yes	TTAD During	CAL FIRE
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No new roads would be constructed under the proposed project.

<b>SPR HYD-3 Water Quality Protections for Prescribed Herbivory:</b> This SPR applies to prescribed herbivory treatment activities and all treatment types.	No	N/A	N/A
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SPR-HYD-3 does not apply to the proposed project because prescribed herbivory would not be used within the project area.



<p><b>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones:</b> The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916.5 of the California Forest Practice Rules on either side of watercourses. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior-During</p>	<p><u>CAL FIRE</u></p>
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WLPZs would be established for watercourses within the project area based on the widths and protective measures established for each water and slope class defined in Table I of 14 California Code of Regulations Section 916.5 (CalVTP Final Program EIR Section 3.7-24). East Martis Creek is a Class II Watercourse which is a tributary to Martis Creek and Martis Creek Lake just outside the project area. East Martis Creek flows east to west through the southern portion of the project area. Dry Lake is a small reservoir in the northeast portion of the project area, and it flows downstream toward the Martis Creek Lake. A qualified RPF or biologist will determine each waterway size class and appropriate WLPZs prior to initiation of treatment activities.

<p><b>SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides:</b> This SPR applies to herbicide treatment activities and all treatment types.</p>	<p>No</p>	<p>N/A</p>	<p><u>N/A</u></p>
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SPR-HYD-5 does not apply to the proposed project because herbicides would not be used within the project area.

<p><b>SPR HYD-6 Protect Existing Drainage Systems:</b> This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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All stormwater drainage infrastructure will be flagged prior to treatment activities to prevent disturbance or modification. If stormwater drainage infrastructure is inadvertently disturbed or modified, TTAD would repair any damage and restore pre-project drainage conditions.

## EC-11 LAND USE AND PLANNING, POPULATION AND HOUSING

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation</b>	Impact LU-1, 3.12	LTS	<u>SPR AD-3, 9</u>	Yes	LTS	<input checked="" type="checkbox"/>

The project area is owned by TTAD and is open to the public. Facilities are managed by Tahoe-Donner Land Trust through a conservation easement. Treatment activities on lands owned or managed by private owners and conducted by local government agencies (e.g., TTAD) are generally required to comply with applicable city and county general plans and other local policies and ordinances. As noted in Section EC-12, "Noise," below, treatment activities would occur during daytime hours, which would be consistent with the Nevada County and Placer County General Plan Noise Ordinances (Nevada County 2014; Placer County 2013). No conflict with any plan, policy, or regulation would occur. 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 Program EIR. This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the Program EIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. Treatment types would be consistent with those described in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<b>Impact LU-2: Induce Substantial Unplanned Population Growth</b>	Impact LU-2, 3.12	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>
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The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the Program EIR. The Program EIR assumed that treatment activities would have an average crew size of 20 workers for mechanical treatments, 45 workers for prescribed burns, and 20 to 40 workers for manual treatments. The proposed project assumes crew sizes of 2 to 20 workers for mechanical treatments, 5 to 50 workers for prescribed burns, and 5 to 40 workers for manual treatments, which are within the ranges of the crew sizes assumed in the Program EIR. In addition, the proposed project would not require the hiring of new permanent employees. Because of the temporary nature of the increase in demand for workers, the proposed treatments would not cause a need for new housing, roads, or infrastructure. Therefore, impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<p><b>Other Impacts related to Land Use and Planning, Population and Housing:</b> Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the CalVTP Program EIR?</p>				No	N/A	<input checked="" type="checkbox"/>
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The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.12.1, “Environmental Setting,” and Section 3.12.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

## EC-12 NOISE

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact NOI-1:</b> Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	Impact NOI-1, 3.13	LTS	SPR NOI-1, 2, 3, 4, 5, 6 SPR AD-3	Yes	LTS	<input checked="" type="checkbox"/>

The initial and maintenance treatments would include the use of mechanical treatment that requires heavy-duty, noise-generating equipment (i.e., masticators). The potential for substantial short-term increase in ambient noise levels was analyzed in the Program EIR. The short-term increase in noise from the use of heavy equipment is within the scope of the activities and impacts addressed in the Program EIR because the types and number of equipment proposed, and the duration of use of the equipment are consistent with those analyzed in the Program EIR. The closest nearby residences are located approximately 500 feet away from the northern edge of the project area, in Nevada County. The closest residence in Placer County is approximately 1,800 feet south of the project boundary. When treatment activities occur along the boundary of the Waddle Ranch Preserve, private residences may be within audible distance of equipment noise. However, treatment activities would occur during daytime hours, between 7:00 a.m. and 5:00 p.m., which is consistent with the Placer and Nevada County noise ordinances. The Placer County noise ordinance has exceptions to its ordinance with noise allowances for construction projects. The proposed vegetation treatment activities are considered analogous to construction projects because mechanized equipment would be used. The Placer County noise ordinance limits construction noise hours, and limits noise-generating construction activities within 1,000 feet of noise-sensitive users (Placer County 2013: 3.8-3 and 3.8-7). The Nevada County noise ordinance states that projects in designated rural areas shall have limited hours of noise production (Nevada County 2014: 9-9). Both the Nevada County and the Placer County ordinances would be met because treatments would be limited to daytime hours, thereby avoiding the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. In addition, treatments would be dispersed throughout the 1,465-acre project area, and sensitive receptors are uncommon within 1,000 feet of the boundary of the project area; therefore, noise disturbance to any nearby residences would be temporary and limited. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact NOI-2:</b> Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	Impact NOI-2, 3.13	LTS	SPR NOI-1	Yes	LTS	<input checked="" type="checkbox"/>
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The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the project area. These work trucks would pass near residential receptors, which could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was evaluated in the Program EIR. Short-term increases in noise from the use of heavy equipment during project implementation is within the scope of the treatment activities and impacts addressed in the Program EIR because the number and types of

equipment proposed are consistent with those analyzed in the Program EIR. All truck trips and use of heavy equipment would be limited to daytime hours to avoid sleep disturbance of nearby residents. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts Related to Noise:</b> Would the project result in other impacts related to noise that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities discussed in the Program EIR. CAL FIRE has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.13.1, “Environmental Setting,” and Section 3.13.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. No changed circumstances would lead to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to noise would occur that is not analyzed in the Program EIR.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours:</b> 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.	Yes	TTAD During	CAL FIRE

Noise-generating vegetation treatment activities would be limited to Monday – Saturday between 7:00 am and 5:00 pm.

<b>SPR NOI-2 Equipment Maintenance:</b> 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.	Yes	TTAD During	CAL FIRE
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All diesel- and gasoline-powered treatment equipment would be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations.

<b>SPR NOI-3 Engine Shroud Closure:</b> 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.	Yes	TTAD During	CAL FIRE
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TTAD would ensure that engine shrouds are closed during equipment operation.

<p><b>SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses.</b> This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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Equipment would be staged within the property boundaries and not within 1,000 feet of any sensitive receptors.

<p><b>SPR NOI-5 Restrict Equipment Idle Time:</b> 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.</p>	<p>Yes</p>	<p><u>TTAD</u> During</p>	<p><u>CAL FIRE</u></p>
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TTAD would ensure that equipment is shut down when not in use and idling of equipment and haul trucks will be limited to 5 minutes.

<p><b>SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors:</b> 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. This SPR applies only to mechanical treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior</p>	<p><u>CAL FIRE</u></p>
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Proposed treatment activities using heavy equipment would occur within 1,500 feet of residential noise-sensitive receptors. Several rural residences are present within 1,500 feet of treatment activities. No schools, hospitals, or places of worship are present within 1,500 feet of the project area. All noise-sensitive receptors will be notified prior to treatments.

## EC-13 RECREATION

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas</b>	Impact REC-1, 3.14	LTS	SPR REC-1	Yes	LTS	<input checked="" type="checkbox"/>

Vegetation treatment activities have the potential to disrupt recreational activities within the project area through temporary trail closures during active treatments and by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased traffic during project implementation. TTAD maintains trails and access points for the public to use the project area for hiking and outdoor recreational opportunities, and these recreational areas will continue to be maintained during implementation of the PSA. During treatment activities in or near recreational areas, TTAD would apply SPR REC-1, which would notify users of temporary closures during treatment. If the temporary closure of a recreation area or facility is required, TTAD will post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. This impact is within the scope of the Program EIR because the availability of recreational resources and the treatment activities and intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the availability of recreation resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact to recreation is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<b>Other Impacts to Recreation:</b> Would the project result in other impacts to recreation that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.14.1, “Environmental Setting,” and Section 3.14.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<p><b>SPR REC-1 Notify Recreational Users of Temporary Closures.</b> 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 approximately 2 weeks prior to the commencement of the treatment activities. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p>TTAD Prior-During</p>	<p><u>CAL FIRE</u></p>

TTAD would work with the Truckee-Donner Land Trust if a temporary closure of a recreation area or facility is required during treatment by posting notifications and closures approximately two weeks prior to the commencement of treatment activities.



## EC-14 TRANSPORTATION

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact TRAN-1:</b> Result in temporary traffic operations impacts by conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures	Impact TRAN-1, 3.15	LTS	<u>SPR TRAN-1</u> <u>SPR AD-3</u>	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would temporarily increase vehicular traffic on SR 267, Martis Dam Road, and private roadways in the project area (e.g., Fox Draw, The Strand, and Walden Drive). 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 Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR 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 Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact TRAN-2:</b> Substantially increase hazards due to a design feature or incompatible uses	Impact TRAN-2, 3.15	LTS	<u>SPR TRAN-1</u> <u>SPR AD-3</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. SPR TRAN-1 requires implementation of traffic control as needed to avoid creating any traffic hazard during treatment activities. In addition, to address air quality issues, a smoke management plan would be prepared, which would prohibit burning from occurring when smoke could blow toward highways. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact TRAN-3:</b> Result in a net increase in VMT for the proposed CalVTP	Impact TRAN-3, 3.15	SU	<u>MM AQ-1</u>	Yes	SU	<input checked="" type="checkbox"/>
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Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the project area is in a remote location and would require vehicle trips to access the project area. The potential for treatment activities to increase VMT was evaluated in the Program EIR. As noted under Impact TRAN-3 in the Program EIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate fewer than 110 trips per day, which would cause a less-than-significant transportation impact for specific later activities, as described in the Technical Advisory on Evaluating Transportation Impacts, published by the Governor's Office of Planning and Research (OPR 2018). Specifically, the Program EIR assumed that individual vegetation treatment projects would accommodate up to 50 vehicles bringing crews and equipment to a treatment site in a day (i.e., 100 trips commuting to and from a treatment site each day, plus a few additional incidental trips during the day). Although the Program EIR determined that individual vegetation treatments would likely be less than significant, the overall impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT. The proposed treatments are expected to require between five and 40 crew members for manual treatments, between two and 20 crew members for mechanical treatments, and between five and 50 crew members for prescribed burning operations. The proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. It is expected that the proposed project would generate fewer than 110 trips. Because the project would generate VMT during project implementation, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact for areas outside the CalVTP treatable landscape is also significant and unavoidable, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Other Impacts to Transportation:</b> Would the project result in other impacts to transportation that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<p><b>SPR TRAN-1 Implement Traffic Control during Treatments:</b> 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. This SPR applies to all treatment activities and treatment types.</p>	Yes	<p style="text-align: center;"><u>TTAD</u> Prior</p>	<p style="text-align: center;"><u>CAL FIRE</u></p>

The proposed project would not result in a permanent increase in traffic beyond existing conditions for the local area. During treatment activities, vehicles would access the project area from SR 267, Martis Dam Road, and private roadways in the project area (e.g., Fox Draw, The Strand, and Walden Drive). TTAD will coordinate with the California Department of Transportation, Placer County, Nevada County, or other applicable agencies with jurisdiction to determine if traffic control is needed at any affected roadway segment within or surrounding the project area. At a minimum, signs will be placed along all affected roadways to advise motorists of slow vehicles entering and exiting these roadways. Additionally, signs will be placed along affected roadways to advise of smoke conditions during prescribed burning operations.

## EC-15 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact UTIL-1:</b> Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	Impact UTL-1, 3.16	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

Treatment activities requiring the provision of water include prescribed burning (pile and broadcast). An on-site water supply (water trucks) would be available as a safety precaution during prescribed burning. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR 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 Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

<b>Impact UTIL-2:</b> Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	Impact UTL-2, 3.16	SU	SPR UTIL-1	No	N/A	<input checked="" type="checkbox"/>
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The initial and maintenance treatments would generate biomass as a result of vegetation removal within the project area. Biomass generated would be chipped and scattered on-site or consumed with pile burning or an air curtain burner. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure, and this impact does not apply to the proposed project.

<b>Impact UTIL-3:</b> Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	Impact UTL-3, 3.16	LTS	SPR UTIL-1	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because all biomass generated from the proposed treatments would be disposed of on site.

<p><b>Other Impacts to Public Services, Utilities, and Service Systems:</b>                  Would the project result in other impacts to public services, utilities, and service systems that are not evaluated in the CalVTP Program EIR?</p>				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the Program EIR, and the project is consistent with the regulatory and environmental conditions presented in the Program EIR (refer to Section 3.16.1, “Environmental Setting,” and Section 3.16.2, “Regulatory Setting,” in Volume II of the Final Program EIR). However, within the boundary of the project area, the existing environmental conditions pertinent to public services, utilities, and service systems 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 Program EIR. No changed circumstances would lead to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the Program EIR.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<p><b>SPR UTIL-1: Solid Organic Waste Disposition Plan.</b> 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. This SPR applies only to mechanical and manual treatment activities and all treatment types.</p>	No	N/A	<u>N/A</u>

This SPR does not apply to this project because no biomass will be hauled off site.

## EC-16 WILDFIRE

	Program EIR specific			Project-specific		
	Identify location of impact Analysis in the Program EIR	Identify impact Significance in the Program EIR	SPRs & MMs applicable to the impact analysis in Program EIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire</b>	Impact WIL-1, 3-17	LTS	<u>SPR HAZ-2, 3, 4</u>	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would include prescribed burning and mechanical treatments using heavy equipment, both of which could pose a risk of wildfire ignition or risk of a prescribed fire escaping its control lines. The project is mapped within high and very high fire severity zone areas (CAL FIRE 2023), which are at particularly high risk of a high-severity fire. The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with prescribed burning and use of heavy equipment in vegetated areas are within the scope of the Program EIR because the types of equipment and treatment duration of the proposed project are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. Additionally, given the extensive preparation and planning prior to a prescribed burn (e.g., preparation of a SMP and Burn Plan), active monitoring and maintenance during a prescribed burn, and implementation of stringent safety protocols, prescribed burning would not substantially exacerbate fire risk that could result in the uncontrolled spread of wildfire. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<b>Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides</b>	Impact WIL-2, 3-17	LTS	<u>SPR AQ-3</u> <u>SPR GEO-3, 4, 5, 8</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include prescribed burning, and steep slopes are present within the project area. The potential for post-fire landslides to occur was examined in the Program EIR. The project area has not experienced a landslide in recent years or historically (DOC and CGS 2023, USGS 2023a). This is likely because of the relatively low-moderate erodibility factor of the soil as detailed in GEO-1, relatively mild slopes, and limited fire damage in the Martis Valley which has allowed the area to maintain vegetation cover and soil infiltration capabilities to limit the erodibility of the soil. However, the project is in a high severity fire risk area and could be at risk of landslides if a wildfire were to occur in or near the project area (CAL FIRE 2023). Prescribed broadcast burning under the CalVTP would be low severity and typically retain approximately 70 percent of vegetation, including root systems. Therefore, areas would remain stable after prescribed broadcast burning, and no major changes to drainage or runoff would occur. Furthermore, to the extent the treatments reduce wildfire risk, they would decrease the risk of landslides and flooding in areas that could otherwise burn in a high severity wildfire without treatment. The potential risk of exposure of people or structures to post-fire landslides is within the scope of the Program EIR because the severity and duration of the proposed prescribed burn are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR.

However, within the boundary of the project area, the post-fire landslide risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

<b>Other Impacts related to Wildfire:</b> Would the project result in other impacts related to wildfire that are not evaluated in the CalVTP Program EIR?				No	N/A	<input checked="" type="checkbox"/>
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CAL FIRE has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.17.1, “Regulatory Setting,” and Section 3.17.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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.

## EC-17 ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR AD-1 Project Proponent Coordination:</b> For treatments coordinated with CAL FIRE, CAL FIRE would meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.	No	N/A	<u>N/A</u>

CAL FIRE is the project proponent and will be engaged in project implementation.

<b>SPR AD-2 Delineate Protected Resources:</b> 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.	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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Prior to beginning any treatment activities, TTAD will clearly define the boundaries of the treatment area and protected resources on maps for the project area and with highly-visible flagging or clear, existing landscape demarcations.

<b>SPR AD-3 Consistency with Local Plans, Policies, and Ordinances:</b> The project proponent would design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types.	Yes	<u>CAL FIRE</u> Prior-During	<u>CAL FIRE</u>
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As noted in section EC-11, "Land Use, Planning, Population and Housing," the proposed project would not conflict with any local plans, policies, or ordinances.

<b>SPR AD-4 Public Notifications for Prescribed Burning:</b> At least three days prior to the commencement of prescribed burning operations, the project proponent would: 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 would 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	Yes	<u>TTAD</u> Prior-During	<u>CAL FIRE</u>
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<p>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.</p>			
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At least 3 days prior to the commencement of prescribed burning, TTAD will post signs along recreational access points to the project area describing the activity and timing and publish a public interest notification in a local newspapers or other widely distributed media. Additionally, TTAD will 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. ``.

<p><b>SPR AD-5 Maintain Site Cleanliness:</b> 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.</p>	<p>Yes</p>	<p><u>TTAD</u> During-Post</p>	<p><u>CAL FIRE</u></p>
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Trash receptacles will not be required on-site. TTAD staff will be instructed to remove all trash generated daily. Following completion of treatment activities, all flagging, trash, debris, and barriers will be removed from the project area.

<p><b>SPR AD-6 Public Notifications for Treatment Projects.</b> One to three days prior to the commencement of a treatment activity, the project proponent would post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p>	<p>Yes</p>	<p><u>TTAD</u> Prior</p>	<p><u>CAL FIRE</u></p>
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One to three days prior to the commencement of a treatment activity, TTAD will post signs in a conspicuous location near the project area describing the activity and timing and requesting persons in the area to contact a designated TTAD or CAL FIRE representative.

<p><b>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects.</b> For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>CAL FIRE</u> Prior-During-Post</p>	<p><u>CAL FIRE</u></p>
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Information on the proposed treatment project has been submitted to the Board. Once the project is approved and completed, respectively, updated information will be submitted to the Board for online posting on the CalVTP Project Viewer.

<p><b>SPR AD-8 Request Access for Post-Treatment Assessment.</b> For CAL FIRE projects, during contract development, CAL FIRE would include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>CAL FIRE</u> Post</p>	<p><u>CAL FIRE</u></p>
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As funding is available, TTAD contracts with Tahoe-Donner Land Trust would allow for post-treatment assessments.

<p><b>SPR AD-9. Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required.</b> When planning a treatment project within the Coastal Zone, the project proponent would contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. This SPR applies to all treatment activities and all treatment types.</p>	<p>No</p>	<p>N/A</p>	<p><u>N/A</u></p>
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The project is not within the Coastal Zone and this SPR does not apply to the proposed treatments.

## EC-18 MANDATORY FINDINGS OF SIGNIFICANCE

	New Impact that is Significant or Potentially Significant	New Impact that is Less Than Significant with Mitigation Incorporated	New Impact that is Less Than Significant Impact	No New Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

***No additional comments.***

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