PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CALVTP PROGRAM EIR

Bear/North Complex Reforestation Forest Health Project

Prepared for:

CAL FIRE

September 2024

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Prepared for:

California Department of Forestry and Fire Protection
Climate & Energy Program
715 P Street
Sacramento, CA 95814

Contact:

Raymond Gutteriez
Senior Prescribed Fire & Environmental Protection Scientist
916.268.1476

Prepared by:

Ascent
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Contact:

Stephanie Rassmussen
Senior Project Manager
916.842.3173

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Acronyms and Abbreviations

AQMD	Air Quality Management District
ASR	Archaeological Survey Report
project	Bear/North Complex Reforestation Forest Health Project
BMP	Best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNPS	California Native Plant Society
CNDDB	California Natural Diversity Database
CalVTP	California Vegetation Treatment Program
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Federal Endangered Species Act
FHG	Forest Health Grant
GHG	generate greenhouse gas
GWSA	Global Warming Solutions Act
IAP	Incident Action Plan
MMRP	mitigation monitoring and reporting program
NWI	National Wetlands Inventory
NAHC	Native American Heritage Commission
NWL	Natural and Working Lands
NOA	naturally occurring asbestos
PCA	Pest Control Advisor
PSA	Project-specific Analysis
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
RPF	Registered Professional Forester
Siller	Siller Brothers, Inc.
SENL	single event noise levels
SPRP	Spill Prevention and Response Plan
SPR	Standard Project Requirements
SWRCB	State Water Resource Control Board’s
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
WDR	Waste Discharge Requirements
WLPZ	Watercourse and Lake Protection Zones

THE CALIFORNIA VEGETATION TREATMENT PROGRAM ENVIRONMENTAL CHECKLIST

PROJECT-SPECIFIC ANALYSIS/ADDENDUM TO THE PROGRAM ENVIRONMENTAL IMPACT REPORT

1 INTRODUCTION

Siller Brothers, Inc. (Siller) received a Forest Health Grant (FHG) from the California Department of Forestry and Fire Protection (CAL FIRE) with a goal of improving forest health on their properties in Butte and Plumas counties. The proposed Bear/North Complex Reforestation Forest Health Project (project) would consist of ecological restoration treatments using mechanical, manual, prescribed burning, and herbicide treatment activities consistent with the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (EIR). The project would restore ecosystem processes, conditions, and resilience through reforestation of up to 3,157 acres and would reduce competition from encroaching shrub species on 633 acres, including areas that have been reforested since the Bear/North Complex Fire. The project would treat up to 3,157 acres. The need for ecological restoration is a result of the 2020 Bear/North Complex Fire, which was a lightning strike and wind-driven wildfire that devastated more than 319,000 acres in Butte and Plumas counties. Without post-wildfire treatments, the ecological succession patterns are expected to revert to early successional stages with grasses and shrubs dominating as primary colonizers.

AGENCY ROLES

This Project-specific Analysis (PSA)/Addendum to the CalVTP Program EIR (Program EIR) addresses and provides California Environmental Quality Act (CEQA) compliance for implementation of treatments (including maintenance treatments) throughout 3,157 acres owned by Siller that require a discretionary action by a state or local agency. The CEQA lead agency is CAL FIRE; its discretionary approval is the issuance of FHG funding to implement initial treatments within the project area. In this PSA/Addendum, Siller is referred to as the "implementing entity" reflecting its role as the lead implementer of treatments. As defined in the Program EIR, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. The Program EIR contemplated that the primary discretionary approval of the public agency project proponent would be implementing the treatments and associated standard project requirements (SPRs) and mitigation measures. However, this PSA/Addendum may be relied upon for CEQA compliance in the future by other agencies, acting in a lead or responsible agency role, with a discretionary approval pertaining to the activities and area covered herein, including for public funding through other sources or future grants. For this proposed project, CAL FIRE's discretionary approval is to provide grant funding and Siller, as the landowner would be implementing treatments and associated SPRs and mitigation measures. Therefore, as used in this PSA/Addendum, unless otherwise noted, Siller Brothers is the project proponent.

PURPOSE OF THIS PROJECT-SPECIFIC ANALYSIS AND ADDENDUM

This document serves as a PSA and Addendum to evaluate if the proposed treatments are within the scope of the Program EIR. The proposed 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 Program EIR is whether it is within the CalVTP treatable landscape (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 Program EIR. In total, these areas outside the treatable landscape encompass approximately 959 acres of the 3,157-acre project area; they are dispersed in small sections throughout the project area. The scattered array of acres outside of the treatable landscape is due to the method by which the treatable landscape was digitally developed and the resultant degree of 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 disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed project outside of the 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.

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 revisions or changes in the project, compared to the Program EIR, are the inclusion of areas outside of the treatable landscape. The checklist below includes the criteria to support an Addendum to the Program EIR for the inclusion of proposed treatment areas outside the treatable landscape.

This PSA/Addendum and attachments together support the finding that the proposed project is within the scope of the Program EIR. Each resource topic below includes a discussion of impacts related to that resource area followed by discussions of SPRs and mitigation measures that are applicable for avoiding, minimizing, and mitigating impacts for that resource area. Supplemental 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 Program EIR (see impact discussions under Sections EC-1 through EC-16 below)
- Evidence the project impact is addressed by the Program EIR (see impact discussions under Sections EC-1 through EC-16 below and Attachment B)
- Identification of CalVTP SPRs and mitigation measures applicable to the proposed project (see SPR and mitigation measure discussions under Sections EC-1 through EC-16 below and Attachment A)
- Conclusion regarding consistency with the Program EIR (see impact discussions under Sections EC-1 through EC-16 below)

Siller manages its property for the harvest and commercialization of timber, which is subject to compliance with the Forest Practice Act. Non-commercial treatments, including the proposed ecological restoration treatments analyzed in this PSA/Addendum, are subject to CEQA when there is a related discretionary action by a public agency, as described above. Because the discretionary action here does not involve the commercialization of timber, and pursuant to CEQA, this PSA/Addendum does not address commercial timber sales or chip sales to biomass facilities.

MITIGATION MONITORING AND REPORTING PROGRAM

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 adopts all feasible mitigation measures. 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 section below 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 area. 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 party responsible for implementing the measure and time frame in which the SPR or mitigation measure will 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.

This MMRP will be adopted by CAL FIRE with regard to its discretionary approval of the issuance of FHG funding to implement treatments within the project area. As this PSA/Addendum is used for CEQA compliance of future discretionary approvals by other state and local agencies related to treatments in the project area, those agencies will adopt separate MMRPs that specify the SPRs and mitigation measures relevant to their approval and within their jurisdiction. Unless otherwise specified herein, Siller (the implementing entity) is responsible for implementing the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. As the CEQA lead agency, CAL FIRE will be responsible for ensuring that implementation of mitigation measures and SPRs related to its discretionary approval (i.e., for portions of the proposed project that are seeking funding from CAL FIRE) occurs in accordance with the MMRP. Pursuant to State CEQA Guidelines Section 15097(a), for activities that would be seeking grant funding from CAL FIRE, CAL FIRE has delegated monitoring and reporting responsibilities to Siller, who accepted this delegation. As the implementing entity and reflecting delegation by CAL FIRE, the “project proponent” as identified in the PSA/Addendum and this MMRP, including the SPRs and mitigation measures in Attachment A, refers to the Siller. In coordination with the lead or responsible agency (CAL FIRE for the purposes of this FHG), Siller will 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.

2 PROJECT INFORMATION

1. Project Title: Bear/North Complex Reforestation Forest Health Project

2. CAL FIRE Project Number 8GG21609

3. CalVTP I.D. Number 2023-03

4. CEQA Lead Agency Contact and Address: Andrea Williams
CAL FIRE, Climate & Energy Program
715 P Street Sacramento, CA 95814
Andrea.Williams@fire.ca.gov; (916) 202-5744

5. Implementing Agency Contact and Address: Nicholas Knipe, Project Manager
Siller Brothers, Inc.
1255 Smith Road
Yuba City, CA 95991
nick@sillerhelicopters.com, (530) 624-9970

6. Project Location: The project area is located in southeastern Butte County and southwestern Plumas County, within the southern portion of the burn footprint of the 2020 Bear/North Complex Wildfire. The project area covers 13 separate parcels: three in the vicinity of the community of Berry Creek, two near Forbestown, seven within the South Fork of the Feather River drainage and its main tributary, Lost Creek, and one within the South Branch of the Middle Fork of the Feather River. The project area is mostly located in rural areas and is surrounded by dense to moderately open forested land shown in Figure 1. In burn areas, previously forested land is mostly open due to the severity of wildfire in the project area.

7. Total Area to be Treated (acres): 3,157

8. Description of Project:

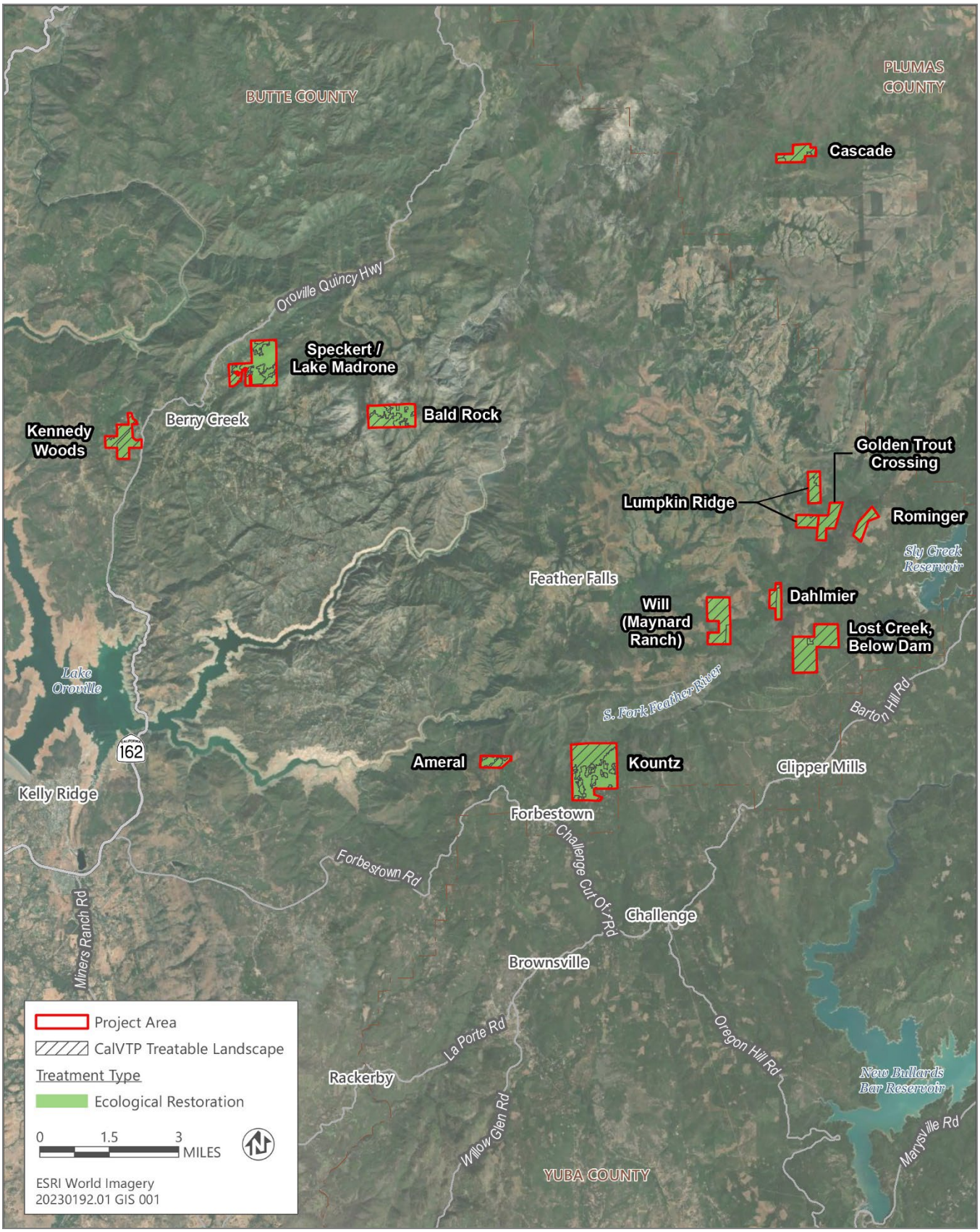
The CalVTP treatment type that would be implemented is ecological restoration. Proposed treatment activities that would be used to implement this treatment type are mechanical, manual, herbicide treatments, and prescribed burning (i.e., pile burning, broadcast burning). The proposed CalVTP treatment activities are shown in Figure 1 and are summarized in Table 1, by type, below.

Table 1 Proposed CalVTP Treatment Types and Activities

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activities	Equipment Used for Treatments	Typical Duration of Treatments[1]	Acres of Treatment
Ecological Restoration	Habitat improvement/fire resiliency treatments	Mechanical, manual, herbicide, & prescribed burning	3 tractors/skidders, 6 masticators, 3 chippers, 10 chainsaws or hand saws, 10 brush cutters, hoedads	Year-round	3,157

[1] Siller would only implement prescribed burning during the burn window (typically fall through spring) when environmental conditions (windspeed, weather forecast, fuel moisture) are conducive.

Source: Data and information provided by Siller in 2023.



Sources: adapted by Ascent in 2023.

Figure 1 Project Area

PROPOSED TREATMENTS

The lands within the proposed treatment area were severely burned during the Bear/North Complex Wildfire. Siller would manage burned forest lands with post-wildfire treatments so that ecological succession patterns do not revert to early successional stages with grasses and shrubs dominating as primary colonizers. When these species colonize an area, they can easily outcompete any seedling development from seed dispersion by residual or neighboring overstory trees and often more aggressive shrub species such as buckbrush or manzanita will begin to dominate, reducing species diversity over time. This may prevent the re-establishment of trees and thus the regeneration of forests in the short term. Dense stands of shrubs are also susceptible to high intensity wildfires and may contribute to the spread and intensity of future wildfires in the region. Furthermore, due to the limited growth in shrubs, corresponding carbon sequestration rates will eventually level out.

In contrast, reforestation and subsequent shrub control would accelerate successional dynamics, allowing for trees to immediately establish within the burned areas that would have a positive effect on sequestration rates. Controlling the competing shrubs would allow for seedling growth rates to continue to increase due to the lack of competition from neighboring shrubs. This would allow for quicker reforestation of the area and greater increases in carbon sequestration. A forested landscape will also contribute to the stabilization of soil resources and benefit water quality, by providing more shade from the now exposed watercourses. Ecological restoration treatments would focus on removing dead and dying vegetation, thinning small diameter live trees (i.e., less than 12 inches diameter at breast height [DBH]), and understory vegetation providing ideal conditions for planting conifer seedlings and ultimately supporting native species regeneration to restore habitat conditions.

Furthermore, the entire treatment area is located within Low Income Priority Population Census Tracts and many of the adjacent, private landowners do not have the means to reforest their properties. By reestablishing forest in proximity to these parcels there is a greater chance of seed dispersion and subsequent forest establishment on these adjacent parcels.

The proposed project would use pile burning, chipping, and herbicide application to prepare the sites for reforestation and increase the chances of seedling survivability.

The intended effects of this project comply with the climate goals outlined in the California Forest Carbon Plan, California's Natural and Working Lands Implementation Plan, and the Global Warming Solutions Act (GWSA) of 2006. The California Forest Carbon Plan outlines the need for reforestation from wildfire disturbed landscapes indicating that it "secures a variety of important natural and social ecosystem services for the public" and can "prevent conversion of forest ecosystems to shrub or grassland ecosystems, and advance carbon storage capacity in the landscape". This project would reestablish commercial timberland, which under the Forest Practice Rules will be managed for the continued growth of high-quality timber products and forest health once the grant cycle has ended. The Forest Carbon Plan explains that using this sustainable management regime, will both maximize forest health goals and create revenue opportunities to fund additional forest treatments, not to mention provide an economic return for both local and statewide resources. By creating these benefits, Siller would also meet the Natural and Working Lands (NWL) and GWSA objectives. The NWL outlines plans to conserve, restore, and manage natural and working lands throughout the state. It further illustrates the need to reduce greenhouse gases in the atmosphere both by reducing emissions from and increasing sequestration within these lands. This is also the backbone of the GWSA. A major point made throughout these documents and legislation regarding forested landscapes is to use these lands as a major source of carbon sequestration via sound forest management. These documents also outline the need to restore the structure and composition of forested ecosystems after disturbances such as wildfire. The lands within this proposed treatment area were severely burned during the Bear/North Complex wildfire. Restoring these once forested tracts by removing excess standing dead timber and the newly encroaching shrub component and replanting with a mixture of tree species typical for this region is paramount for increasing carbon sequestration rates. In addition, this project would result in a positive impact on water quality, biodiversity, wildlife habitat, and overall ecosystem health.

By retaining larger living trees, removing dead, dying, and irreversibly diseased trees, and thinning trees less than 12 inches in DBH, overall forest health is expected to increase with growth and carbon storage capacity in the residual stand. Implementation of initial treatments would require approximately 20 crew members along with their associated vehicles to travel to and from the treatment areas. Up to four crews could be conducting treatments simultaneously throughout the project area. Treatment activities would generally occur during the daytime, typically between 7:00 a.m. and 7:00 p.m. in areas in proximity to sensitive receptors. The project is expected to begin in 2024 and be implemented over several months.

MECHANICAL TREATMENTS

Initial mechanical treatments are proposed within approximately 1,500 acres of the project area. Mechanical treatments may also be used over the remaining project area. Mechanical treatments would occur in areas outside of the Watercourse and Lake Protection Zones (WLPZ), and where slopes are less than 50 percent. Mechanical treatments may cut, uproot, crush/compact, or chop existing vegetation using masticators and other methods of application such as mowing and piling. Mechanical treatments would additionally include:

- Remove dead, dying, and diseased trees and select live trees less than or equal to 12 inches DBH; healthy trees to be retained less than 12 inches DBH should achieve a 10-20 foot spacing where feasible;
- Where there are only stands made up of trees less than 12 inches DBH in the project area, these stands of smaller trees would be spaced approximately 10-20 feet apart;
- Cut and masticate vegetation in shrub-dominated plant communities (chaparral habitats) to create a mosaic of habitat. A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities within shrub-dominated areas;
- Chip and masticate dead and downed trees less than 12 inches DBH. Where downed woody debris is greater than 12 inches DBH it may be repositioned to reduce wildland fuel connectivity or have a path cut through them to access other parts of the treatment unit to create a mosaic of habitat;
- Remove trees greater than 12 inches DBH if they are a public safety hazard, dead or dying, irreversibly diseased, substantially damaged, or an invasive species;
- Cut and masticate vegetation outside of the drip line of retained trees and shrubs leaving live root systems intact for resprouting to achieve a horizontal crown separation of approximately 50-100 feet, with approximately 10 percent retention per acre, and dependent on slope or proximity to key infrastructure assets;
- Mechanical equipment would remain outside of Equipment Limitation Zones (ELZs) and WLPZs or on road and skid trail crossings when treating vegetation within ELZs and WLPZs. Masticators and cutting equipment may conduct treatments within ELZ and WLPZ buffers by reaching from skid trails, roads, and the outside edge of the ELZ and WLPZ as long as ELZ and WLPZ vegetation retention standards are maintained. Material cut for piling or for biomass would be manually moved out of the ELZs and WLPZs and set in a location that would not adversely affect the ELZs or WLPZs;
- Mastication limited to the cutting or chopping of above-ground vegetation with the intent of keeping masticating heads out of duff layers and minimizing direct disturbance to subsurface soil layers, allowing intact root systems to resprout, where feasible; spreading of residual masticated material uniformly and not exceeding a depth of 6 inches with an average of approximately 3 inches; and cutting stumps, no higher than 6 inches above the ground and maintaining a smooth, flat appearance.

To maintain habitat function for special-status wildlife, the following features would be retained within all treatment areas:

- Healthy hardwoods greater than 12 inches DBH;
- Healthy conifers greater than 12 inches DBH;
- Downed woody debris in strategic locations to maintain forest floor complexity while reducing fuel connectivity;
- California buckeye (Aesculus californica), California Big leaf-maple (*Acer macrophyllum*), western sycamore (*Platanus racemosa*), box elder (*Acer negundo var. californicum*), and all hydrophytic plant species (e.g., sedges [*Carex* spp.], rushes [*Juncus* spp.], and ferns [*Pteridophyta*]);
- Micro stands of untreated oak trees with a cluster radius of approximately 25 feet (50-foot diameter);

- Micro stands of oaks should be spaced approximately 75-100 feet apart depending on the steepness of slope related to where they could exacerbate fire behavior, or proximity to key infrastructure and assets; and
- Chaparral vegetation at approximately 35 percent in any mature chaparral-dominated area within a treatment polygon.

MANUAL TREATMENTS

Initial manual treatments are proposed on approximately 1,500 acres of the project area. Manual treatments may also be used over the remaining project area**.** Manual treatments would consist of the use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species and plant conifer seedlings to restore habitat conditions and encourage reforestation in previously forested areas. Manual activities would generally include similar treatment specifications as mechanical treatments but completed with hand crews and include:

- Thinning trees with chainsaws, loppers, or pruners;
- Cutting undesired competing shrub species above ground level to favor desired species and spacing;
- Planting conifer species native to the project area within areas burned during the Bear/North Complex Wildfire in stands previously dominated by conifers; and
- Pulling or digging out root systems of undesired plants to prevent sprouting and regrowth.

Manual treatments would be implemented predominantly in Class III Equipment Exclusion Zones (EEZ) and where slopes are greater than 35 percent. Manual treatments within Class I and II WLPZs would follow canopy retention requirements of the Program EIR. Ground disturbance during manual treatments is typically less than that of mechanical treatments, allowing for treatments to be carried out where mechanical treatments are not feasible or appropriate.

HERBICIDE TREATMENTS

Herbicide treatments are proposed to occur on approximately 2,000 acres of the project area to help control invasive species and increase seedling survivability. Two herbicides are proposed for use and are within the scope of the Program EIR: Triclopyr (Garlon 3 or 4) and Glyphosate (Round Up). Under the CalVTP, herbicide treatments would be limited to ground-level application and must comply with all Environmental Protection Agency (EPA) label directions. During herbicide treatments, all federal and state regulations governing the use and application of herbicides will be followed and applications will be conducted by certified applicators.

Herbicides would be used to prevent the spread and the re-sprouting of invasive species in the treatment areas. Herbicides would be used primarily in previously burned areas to control the vigorous growth of invasives. During the initial treatments, herbicide use would be used to control invasive vegetation. Herbicides would only be applied directly by hand via cut stump, spot, or foliar spray. Use of herbicides would be excluded from areas with open water bodies.

BIOMASS PROCESSING

Vegetation removed during treatments would primarily be masticated or chipped on-site within the treated areas during dry periods of the year to dispose of accumulated biomass. The biomass generated from vegetation treatments could also be disposed by the following measures:

- lopping and scattering within treatment boundaries;
- shipping chips to a biomass processing facility;
- use of pile or broadcast burning; or
- chips blown onto the ground as mulch.

Broadcast burning would be implemented during the time of year with conditions conducive to safe and effective low-intensity burning, such as high humidity and high fuel moisture content (typically October to February). Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments (e.g., construction of dozer lines, mowing, using hand tools).

Broadcast burning would require one crew consisting of 10 to 20 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 to 3 days. Equipment would include water trucks, skidgines, fire engines, and bulldozers. 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, pursuant to regulatory requirements. The 2020 North Complex Fire perimeter encompassed most of the chaparral habitats in the project area. Therefore, prescribed burn treatments will not occur in these areas for a minimum of 10 to 30 years depending on the chaparral vegetation type because the normal fire return interval for these species is a minimum of 10 to 30 years.

9. **Treatment Types**

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

10. Treatment Activities

- ☒ Prescribed (Broadcast) Burning, 1,500 Acres
- ☒ Prescribed (Pile) Burning, 1,000 Acres
- ☒ Mechanical Treatment, 1,500 Acres
- ☒ Manual Treatment, 1,500 Acres
- ☐ Prescribed Herbivory, ___ Acres
- ☒ Herbicide Application, 2,000 Acres

11. **Fuel Type**

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

12. **Geographic Scope**

- ☐ The treatment site is entirely within the treatable landscape
- ☒ The treatment site is NOT entirely within the treatable landscape

13. Surrounding Land Uses and Setting:

The project area is situated in hilly to mountainous terrain in previously burned or dense forest in Butte and Plumas counties east of Lake Oroville. Surrounding land uses include public and private timberland, residential development, Lake Oroville, recreation areas, grazing and agricultural lands, and open space.

In dense forested areas, tree species present include ponderosa pine, sugar pine, incense cedar, white fir, Douglas fir, California black oak, tanoak, madrone, and gray pine at lower elevations. Shrubs include manzanita, ceanothus (buckbrush), and buckwheat.

14. Other public agencies whose approval is required:

Butte County Agricultural Commissioner – Pesticide Application Permit

Butte County Air Quality Management District (AQMD) and/or Northern Sierra AQMD – smoke management plan(s) and burn permits

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.?

Note: For treatment projects that are within the scope of this Program EIR, AB 52 consultation has been completed. The Board of Forestry and Fire Protection and CAL FIRE completed consultation pursuant to Public Resources Code section 21080.3.1 in preparation of the Program EIR.

The Board of Forestry and Fire Protection completed consultation pursuant to Public Resources Code Section 21080.3.1 during preparation of the Program EIR; however, CalVTP SPR CUL-2 includes a requirement for further tribal coordination during PSA/Addendum preparation. Pursuant to CalVTP SPR CUL-2, 10 Native American tribes in Butte and Plumas counties were contacted on August 29, 2022. The Mooretown Rancheria responded on August 29, 2022. Siller followed up with Mooretown Rancheria on October 12, 2022, and confirmed that the tribe did not have concerns about the project, but requested notification of any inadvertent discovery of human remains. No other responses were received.

16. Use of PSA/Addendum for Treatment Maintenance:

Prior to retreating any area within the project area, the project proponent will verify that site conditions described in the PSA/Addendum are still relevant. Maintenance treatments would ideally occur every 3 to 5 years to emulate the natural historic fire return interval of this area but may occur at greater intervals if funds are not available, or the fuel loading does not require treatment maintenance at the planned time of treatment maintenance. Treatment maintenance would occur as needed, and when feasible, over the lifetime of the PSA/Addendum. Following initial treatment, site conditions are expected to resemble a mosaic habitat with an open understory that would promote a healthier, more vigorous forest. Open understories would create a mosaic of fuel continuity that would support wildlife habitats and the regeneration of native species. Maintenance intervals would be dependent on the re-establishment rate of the understory species and would be triggered by dense, continuous understory and ladder fuels. Maintenance treatments would involve the same treatment types and treatment activities used in the initial treatments described above and may also include limited use of broadcast burning.

Broadcast burning would be implemented during the time of year with conditions conducive to safe and effective low-intensity burning, such as high humidity and high fuel moisture content (typically October to February). Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments (e.g., construction of dozer lines, mowing, using hand tools).

Broadcast burning would require one crew consisting of 10 to 20 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 to 3 days. Equipment would include water trucks, skidgines, fire engines, and bulldozers. 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, pursuant to regulatory requirements. The 2020 North Complex Fire perimeter encompassed most of the chaparral habitats in the project area. Therefore, prescribed burn treatments will not occur in these areas for a minimum of 10 to 30 years depending on the chaparral vegetation type because the normal fire return interval for these species is a minimum of 10 to 30 years.

Planning, outreach, and education are not the primary objectives of this project but given the proximity to private landowners there are opportunities to engage with neighbors to describe the management goals and objectives of this project and how they benefit the neighboring parcels and help make the landscape more resilient while increasing biodiversity. As these stands regenerate and reach cone bearing age, seed dispersion onto neighboring parcels is likely to increase. The interactions the RPF may have with the neighbors would provide an opportunity to describe how to ensure seedling survival and the benefits of such actions on the landscape.

17. Standard Project Requirements and Mitigation Measures

☒ All applicable SPRs and Mitigation Measures are feasible and will be implemented

☒ There is NO new information which would render mitigation measures previously considered infeasible or not considered in the 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*)

Explanation: NA

DETERMINATION (To be completed by the CEQA lead agency)

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 Program EIR, (b) have been avoided or mitigated pursuant to the Program EIR, and (c) all applicable mitigation measures and Standard Project Requirements identified in the Program EIR will be implemented. The proposed project is therefore **WITHIN THE SCOPE** of the Program EIR. NO ADDITIONAL CEQA DOCUMENTATION is required.

☒ I find that proposed project areas outside the 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 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, an **ADDENDUM** is adopted to address the project areas outside the geographic extent presented in the Program EIR.

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

☐ I find that the proposed project will have effects that were not examined in the Program EIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the 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 Program EIR. Because these effects are or may be significant and cannot be clearly mitigated, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature: DocuSigned by: John Melvin 6569EF653A04422... Date: 9/23/2024

Printed Name: John Melvin Title: Assistant Deputy Director

CALIFORNIA DEPARTMENT OF
FORESTRY AND FIRE PROTECTION (CAL FIRE)
Agency

EC-1:AESTHETICS AND VISUAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	Impact AES-1, 3.2	LTS	SPR AES-2 SPR AQ-2, 3 SPR REC-1	Yes	LTS	☒

The project area is on privately-owned lands in Butte and Plumas counties. The project area would not be visible from any eligible or officially designated state scenic highways (Caltrans 2022). Public viewpoints of the project area include public lands and area roadways. The project area is not visible from any scenic vistas. Views of the project area include mostly open forest in previously burned areas; damage to the landscape caused by the wildfire has degraded the visual character of that area. There are also foreground views of dense, unburned forest. Some portions of private access roads throughout the project area provide views of steeper slopes with seasonal creeks. Middle ground views include views of distant mountains and forest, bisected by rural roadways.

Varying degrees of temporary degradation of neighboring views would result during active implementation of vegetation treatments under the proposed project. Equipment and vehicles associated with manual and mechanical treatments and the absence of vegetation immediately following treatments could be visible to the public from limited vantage points, along area roadways. However, activities would be temporary and only last from a week to several months and, because the project is not within any scenic vista or visible from any scenic highways, these views would not be degraded. The potential for the proposed treatments 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 and types of visual effects are consistent with those analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	Impact AES-2, 3.2	LTS	SPR AES-1 SPR AES-3 SPR AD-4 SPR REC-1	Yes	LTS	☒

The proposed initial and maintenance treatment type is ecological restoration. The project is located on private lands and is not within a scenic vista or visible from a scenic highway (Caltrans 2022). Portions of the project are visible from public property and public roadways; however, the project area either has degraded visual character related to previous wildfire or forested with steep terrain. The proposed project is intended to treat both previously burned and forested areas for forest health. There would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway. Given the degraded visual character of the previously burned areas, the proposed project treatments in these areas could improve the visual character by removing dead biomass and would not result in long-term degradation of visual character or quality of public views as a result of vegetation removal. Treatments would remove shrubs and trees smaller than 12 inches DBH, leaving overstory vegetation. Therefore, mature vegetation would remain to provide partial

screening of treatment areas. The long-term visual character of the treatment areas after implementation of the project would remain consistent with the current natural, vegetated landscape and would not constitute a noticeable adverse change or degrade the currently visual character of the landscape. The potential for the proposed treatment types 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 type and related visual effects are consistent with those analyzed in the Program EIR. The inclusion of 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 visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same. 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.

Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	Impact AES-3, 3.2	SU	MM AES- 3	No	N/A	☒

This impact does not apply because the proposed project is focused on ecological restoration and would not include non-shaded fuel breaks.

Other Impacts to Aesthetics: Would the project result in other impacts to aesthetics that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities covered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 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
SPR AES-1 Vegetation Thinning and Edge Feathering: This SPR only applies to mechanical and manual treatment activities within all treatment types.	Yes	Siller Prior-During	Siller

The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band as reasonable or appropriate for vegetation conditions.

SPR AES-2 Avoid Staging within Viewsheds: This SPR applies to all treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project area is within private lands and is not visible from scenic vistas. Treatment activities may be visible from public lands and public roadways. The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public lands and roadways to the extent feasible.

SPR AES-3 Provide Vegetation Screening: This SPR applies to all treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public lands and roadways as reasonable or appropriate for vegetation conditions.

MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks	No	N/A	

This mitigation measure does not apply to the proposed project because no non-shaded fuel breaks are proposed as part of this project.

EC-2: AGRICULTURE AND FOREST RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AG-1: 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	☒

The dominant vegetation community in the project area is forest/woodland, and the project area contains lands meeting the definition of forest land as defined in Public Resources Code (PRC) Section 12220(g), which defines “forest land” as land that can support 10 percent native tree cover of any species under natural conditions. In addition, the project area contains timberland pursuant to PRC section 4526. Implementation of proposed treatments would not result in the net loss of timberland because the project objective is to facilitate the reforestation of timberland in which loss of timber has occurred due to wildfire. The potential for these treatment types 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. Consistent with the Program EIR, the vegetation remaining after treatments in forested 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 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 potential for the project to result in the loss or conversion of forest land is within the scope of the Program EIR. Therefore, the project would not constitute a substantially more severe significant impact than was analyzed in the Program EIR.

Other Impacts to Agriculture and Forest Resources: Would the project result in other impacts to agriculture and forest resources that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities covered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 agricultural and forestry resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to agricultural and forestry resources would occur.

EC-3: AIR QUALITY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	Impact AQ-1, 3.4	PSU	SPR AD- 4 SPR AQ-1,2,3,4,5,6 MM AQ- 1	Yes	SU	☒

Use of vehicles, mechanical equipment, and prescribed burning during treatments 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 is within the jurisdiction of the Butte County Air Quality Management District (AQMD) and/or Northern Sierra AQMD. 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 was found to be 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 would contribute to the significance of the impact analyzed in the Program EIR, and therefore is also considered significant and unavoidable. This impact is within the scope of the Program EIR because the size of treatment crews, the types of equipment, and the duration of equipment use would be consistent with those analyzed in the Program EIR. The inclusion of 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 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. This impact would remain unavoidable and potentially significant for the same reasons explained in the Program EIR, but would not constitute a substantially more severe significant impact.

Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	Impact AQ-2, 3.4	LTS	SPR AQ-1 SPR HAZ-1 SPR NOI-4 SPR NOI-5	Yes	LTS	☒

The use of vehicles and equipment during initial and maintenance vegetation treatments could expose people to diesel particulate matter emissions if present in, or immediately adjacent to the project area. The proposed treatments would occur over a short duration and would not occur near the same people for an extended period. The potential to expose people to diesel particulate matter emissions during vegetation treatments was examined in the Program EIR. Diesel particulate matter emissions from the proposed treatments would be within the scope of the Program EIR because 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 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. 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.

Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	Impact AQ-3, 3.4	LTS	SPR AQ-1,4, 5	Yes	LTS	☒

Vegetation treatments would involve mechanical treatment activities and vegetation removal that may result in ground disturbance that could expose people to fugitive dust emissions containing naturally occurring asbestos (NOA) if present in soils and people are present within or immediately adjacent to active treatments. Soils with NOA have the potential to occur in the project area (NRCS 2014). The potential to expose people to fugitive dust emissions containing NOA was examined in the Program EIR. The potential for the project to result in the exposure of people to NOA is within the scope of the Program EIR because the proposed treatment activities and amount of soil disturbance are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed 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 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. 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.

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	Impact AQ-4, 3.4	PSU	SPR AD-4 SPR AQ-1,2, 6	Yes	SU	☒

The project area is within the Sacramento Valley and Mountain Counties Air Basins. Prescribed burning during treatments could expose people to toxic air contaminants, which was examined in the Program EIR. This impact was identified as potentially significant and unavoidable in the Program EIR after the application of all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of toxic air contaminants and associated levels of acute health risk with a Hazard Index greater than 1.0. Emissions of toxic air contaminants related to the proposed treatment would contribute to the significance of the impact analyzed in the Program EIR, and therefore is also considered significant and unavoidable. This impact is within the scope of the Program EIR because the duration and parameters of the pile and broadcast burns would be consistent with those covered in the Program EIR. The inclusion of 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 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. This impact would remain significant and unavoidable as explained in the Program EIR, but would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	Impact AQ-5, 3.4	LTS	SPR AQ-1 SPR HAZ-1 SPR NOI-4, 5	Yes	LTS	☒

Use of diesel-powered equipment during treatments could expose people to objectionable odors from diesel exhaust if present near active treatment activities. The potential to expose people to objectionable odors from diesel exhaust was examined in the Program EIR. Consistent with the Program EIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. This impact is within the scope of the Program EIR because the equipment that would be used and the duration of use are consistent with what was analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	Impact AQ-6, 3.4	PSU	SPR AD-4 SPR AQ-1,2, 6	Yes	SU	☒

Prescribed burning during treatments could expose people to objectionable odors from smoke. The potential to expose people to objectionable odors from prescribed burning was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. Exposure of people to objectionable odors related to smoke from prescribed burning would contribute to the significance of the impact analyzed in the Program EIR, and therefore is also considered significant and unavoidable. The duration and parameters of the prescribed burning, and the exposure potential are consistent with the with the scope of the activities addressed in the Program EIR. The inclusion of 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 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. This impact would remain significant and unavoidable as explained in the Program EIR, but would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Other Impacts to Air Quality: Would the project result in other impacts to air quality that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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. For this reason, the impacts are the same and 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 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
SPR AQ-1 Comply with Air Quality Regulations: This SPR applies to all treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project proponent will comply with the applicable air quality requirements of Butte County AQMD and/or Northern Sierra AQMD. A Smoke Management Plan will be submitted to Butte County AQMD and/or Northern Sierra AQMD as applicable, and a permit will be acquired from the applicable AQMD.

SPR AQ-2 Submit Smoke Management Plan: This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project proponent will submit a Smoke Management Plan to the Butte County AQMD and/or Northern Sierra AQMD for all prescribed burns, in accordance with 17 CCR Section 80160 prior to prescribed burning treatments. Pursuant to this regulation a Smoke Management Plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable AQMD having jurisdiction over the treatment area.

SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types**.**	Yes	Siller Prior-During	Siller

The project proponent will create a burn plan using the CAL FIRE burn plan template prior to implementing any prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss.

SPR AQ-4 Minimize Dust: This SPR applies to all treatment activities and treatment types.	Yes	Siller During	Siller

All listed measures within SPR AQ-4 will be implemented to minimize dust during treatments (see Attachment A, “List of Standard Project Requirements (SPRs) and Mitigations Measures (MMs)”).

SPR AQ-5 Avoid Naturally Occurring Asbestos: This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain NOA per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (when required by 17 CCR Section 93105) is prepared and approved by the AQMD with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable AQMD will be followed.

SPR AQ-6: Prescribed Burn Safety Procedures: Prescribed burns will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP).	Yes	Siller Prior-During	Siller

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

MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques: Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment.	Yes	Siller Prior-During	Siller

The components of Mitigation Measure AQ-1 that have been determined by the project proponent to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment and encouraging carpooling to the project area. However, crew may be from widespread locations throughout the two counties. Therefore, carpooling may not be feasible to implement in all cases. Because the treatments would be implemented by a private company with limited funding, it may be cost prohibitive for all equipment used to meet the latest efficiency standards, including meeting the US EPA’s Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. However, equipment meeting Tier 4 emission standards, Best Available Control Technology for emission reductions of NO_X and PM on equipment, and the use of renewable fuel would be implemented when feasible.

EC-4: ARCHEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	Impact CUL-1, 3.5	LTS	SPR AD-3 SPR CUL-1, 7, 8	Yes	LTS	☒

Proposed treatment activities are mechanical treatments, manual treatments, prescribed burning, and herbicides. Use of targeted herbicides and manual treatments would generally not damage historical resources because such resources can be avoided. In addition, mechanical treatments can be designed to avoid known historical resources. However, prescribed burning has the potential to damage historical resources and mechanical treatments have the potential to damage built-environment structures that have not yet been recorded or evaluated for historical significance. Two cultural record searches were performed for different portions of the project area. The first cultural records search (IC File # K22-84B) identified one built environment feature, the Oroville Division of the State Water Project; the second record search (IC File # NE23-543) did not identify any built environment features. However, the potential exists for built-environment structures that have not yet been identified or evaluated for historical significance to occur in the project area. The potential for treatment activities to result in disturbance to, damage to, or destruction of built-environment structures, including those 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 project are consistent with those analyzed in the Program EIR. The inclusion of 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 potential to encounter built-environment structures that have not yet been recorded or evaluated for historical significance in areas outside the treatable landscape is essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same. 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.

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	Impact CUL-2, 3.5	SU	SPR AD-3 SPR CUL-2, 3, 4, 5, 8 MM CUL- 2	Yes	SU	☒

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 may result in damage to known or previously unknown archaeological resources. Results of the Northeast Information Center records searches show archaeological resources occur within a sixteenth-mile radius of the project area. Consistent with the evaluation included in the Program EIR, proposed vegetation treatment activities may result in inadvertent soil disturbance, including churning or compaction, as a result of vehicle and equipment movement and tree removal. Soil disturbance has the potential to result in damage to subsurface archaeological resources located within the treatment units. Measures detailed in the Archaeological Survey Report (ASR), consistent with SPR CUL-4 and 5, will be implemented to ensure avoidance and protection of archaeological resources present within the proposed units. The Program EIR also includes SPRs and mitigation measures to reduce the potential for proposed vegetation treatments to damage known and/or unknown buried archaeological resources.

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. The project requires identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse

change in the significance of any unique archaeological resources or subsurface historical resources. However, because the project could result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources, 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, as explained in the Program EIR. 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 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 is also the same. The proposed project will not constitute a substantially more severe significant impact than what was evaluated in the Program EIR.

Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	Impact CUL-3, 3.5	LTS	SPR CUL-1, 2, 3, 4,5, 6, 8 SPR AD-3	Yes	LTS	☒

Native American contacts in Butte and Plumas Counties, as identified on CAL FIRE's Native American Contact List, were contacted on August 23, 2022. Mooretown Rancheria requested additional information regarding the project. Siller had a follow-up phone conversation with Mooretown Rancheria to provide additional details on the project and the tribal representative confirmed that they did not have any concerns with the proposed treatments, but requested notification of any inadvertent discovery of human remains. No other responses were received from any Native American tribes. 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 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. 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.

Impact CUL-4: Disturb Human Remains	Impact CUL-4, 3.5	LTS	SPR AD-3	Yes	LTS	☒

No cemeteries are present within the project area. Vegetation treatment activities would include treatments using heavy equipment; these treatments may use masticators, excavators, and chippers, which could uncover human remains. This impact is within the scope of the Program EIR because the intensity of ground disturbance under the proposed project is consistent with what was analyzed in the Program EIR. In addition, consistent with the Program EIR, the proposed project would comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097 in the event of a discovery. The inclusion of 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 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. 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.

Other Impacts to Archeological, Historical, and Tribal Cultural Resources: Would the project result in other impacts to archeological, historical, or tribal cultural resources that are not evaluated in the Program EIR?				No	N/A	☒

Proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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, and tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to archaeological, historical, and tribal cultural resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR CUL-1 Conduct Record Search: 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	Siller Prior	Siller

Consistent with SPR CUL-1, archaeological and historical resource record searches were conducted on September 12, 2022 (IC File # K22-84B), and December 13, 2023 (IC File # NE23-543).

The project proponent has complied with SPR CUL-1 through the following:

- Conducted archaeological and historical resource record searches with the Northeast Information Center. The resources will be flagged and avoided and are documented and mapped within the confidential CAL FIRE ASR.
- Reviewed previous archaeology survey reports and previous investigations and reference materials for the local area.
- Consulted with CAL FIRE Senior State Archaeologist Stephanie Velasquez.

SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List, which may be obtained from the CAL FIRE website, as appropriate. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior	Siller

Native American Contact letters were sent on August 23, 2022, to 10 tribes identified from the CAL FIRE Native American Contact list (revised July 1) 2022, Butte and Plumas County. These letters identified the project location with associated maps, proposed treatment types, the purpose of the project and requested any information concerning the location of any cultural resources that may exist within the project area. Mooretown Rancheria requested additional information regarding the project. Siller had a follow-up phone conversation with Mooretown Rancheria to provide additional details on the project and the tribal representative confirmed that they did not have any concerns with the proposed treatments, but requested notification of any inadvertent discovery of human remains. No other responses were received from any Native American tribes. As required by SPR CUL-2, a search of NAHC's sacred land file database was requested; a positive result was returned on January 9, 2024.

SPR-CUL-3 Pre-field Research: 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	Siller Prior	Siller

Pre-field research included:

- Query of the Northeast Information Center records. Results show historic and prehistoric resources occur within a sixteenth-mile radius of the project area. The majority of these resources occur more than 100 feet outside of the project area and will not be affected by the proposed project. Precontact sites and historic-era archaeological sites were identified within the project area. The resources will be flagged and avoided and are documented and mapped within the confidential CAL FIRE ASR.
- Review of previous archaeology survey reports and previous investigations and reference materials for the local area.
- Consultation with CAL FIRE Senior State Archaeologist Stephanie Velasquez.
- Conversations with landowner forest management staff.

SPR CUL-4 Archaeological Surveys: 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	Siller Prior	Siller

A Confidential ASR was prepared by Siller and reviewed by Sonoma State.

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

Identified resources will be avoided.

SPR CUL-6 Treatment of Tribal Cultural Resources: 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	Siller Prior-During	Siller

Identified resources will be avoided.

SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The record search identified one built environment feature; all resources will be avoided. If additional built environment historical resources are identified within the project area, they will be avoided during project implementation.

SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The project proponent 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.

MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources: If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find.	Yes	Siller Prior-During	Siller

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 CAL FIRE Archaeologist and Forester to be contacted. Work will not resume until direction is provided by the Archaeologist.

EC-5: BIOLOGICAL RESOURCES

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

Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments [other than tree planting], herbicide, and prescribed burning) could adversely affect special-status plant species (see Attachment B for detailed information). 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 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. 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.

Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	Impact BIO-2, 3.6	LTSM/ PSU (all wildlife species except bumble bees: LTSM) (bumble bees: PSU)	SPR AD-1 SPR BIO-1, 2, 3, 4, 5, 8, 10, 11 SPR HYD-1, 3, 4, 5 SPR HAZ-5, 6 MM BIO-2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 3a, 3b, 3c, 4	Yes	LTSM	☒

Vegetation treatments and follow-up maintenance treatments could result in direct or indirect adverse effects on special-status wildlife species and habitat suitable for these species within a treatment area. Potential impacts resulting from maintenance activities would generally be the same as those resulting from initial vegetation treatments because the same treatment activities would occur. A biological resources reconnaissance survey was completed by Davey Resources Group on August 8, 2022. Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, herbicide

application, prescribed burning) could disturb, cause injury or mortality to, or degrade or remove habitat for some special-status wildlife species (see Attachment B for detailed information). The potential for treatment activities to adversely affect special-status wildlife was examined in the Program EIR.

The Program EIR concluded that impacts on special-status wildlife were less than significant after implementation of mitigation measures, but that impacts on special-status bumble bees would be potentially significant and unavoidable, because it addressed the entirety of the treatable landscape across the state and significant impacts could not be ruled out. Addressing this potential effect at a project-specific level may result in a different significance conclusion, if supported by evidence. Siller provided CDFW the proposed methods to avoid take and maintain habitat function for Crotch bumble bee and western bumble bee on July 2, 2024. CDFW responded on July 25, 2024 and concurred that the proposed standard project requirements and Mitigation Measure BIO-2g would reduce impacts to less than significant.

Treatment activities within the limited habitat suitable for Crotch bumble bee (i.e., Cascade and Kennedy Woods parcels) and western bumble bee (i.e., Cascade parcel) may result in the removal of floral resources; however, habitat function of habitat suitable for Crotch bumble bee and western bumble bee would be maintained. If Crotch bumble bees or western bumble bees are detected during pre-treatment surveys, or if presence of these species is assumed, treatment of habitat suitable for these species will be designed to maintain floral resources during any year of treatment. Information on bumble bees in general, and Crotch bumble bee and western bumble bee specifically, is gradually becoming more available. However, there is limited information on the abundance of Crotch bumble bee and western bumble bee in California or colony size (CDFW 2019), and a current lack of published information on the potential magnitude of effects from the loss of individual Crotch bumble bee or western bumble bee overwintering queens or nests on populations of the species. Since the Program EIR was certified, CDFW released new survey guidance in June 2023, which highlights that overwintering habitat for the majority of bumble bee species in North America is poorly understood (CDFW 2023). Due to this lack of understanding, CDFW is not recommending surveys for the overwintering period (CDFW 2023). However, implementation of project-specific measures (*See* Attachment A) would reduce impacts on Crotch bumble bees and western bumble bees by designing prescribed burning and biomass disposal activities to avoid overwintering bumble bees and bumble bee floral resources, implementing prescribed burning outside of the bumble bee flight season, and conducting treatments in a patchy pattern such that bumble bee habitat is retained. For these reasons, it is unlikely that populations of Crotch bumble bee or western bumble bee would be reduced below self-sustaining levels as a result of implementation of the proposed project or that treatment activities would substantially reduce the number or restrict the range of this species. Therefore, this impact would be less than significant with mitigation. As described above, CDFW concurred that habitat function would be maintained for Crotch bumble bee and western bumble bee; although these determinations were made by the wildlife agencies pursuant to CESA, respectively, they support the determination that this impact would be less than significant under CEQA, and less severe than considered at the statewide level in the Program EIR.

The proposed project's impact on special-status wildlife 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. Inclusion of land in the project area that is outside of the 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 of the treatable landscape; therefore, the potential impact related to special-status wildlife species is also the same. 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.

Impact BIO-3: 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	LTSM	SPR AD-1 SPR BIO-1, 2, 3, 4, 5, 6, 8, 9 SPR HYD-4, 5 MM BIO-3a, 3b, 3c	Yes	LTSM	☒

Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, herbicide, and prescribed burning) could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat, sensitive natural communities, wetlands, oak woodlands, and chaparral habitat (see Attachment B for detailed information). The potential for treatment activities, including maintenance treatments, to result in adverse effects on

sensitive habitats was examined in the Program EIR. This impact on sensitive habitats 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 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. 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.

Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	Impact BIO-4, 3.6	LTSM	SPR AD-1 SPR BIO-1 SPR HYD-1, 3, 4, MM BIO-4	Yes	LTSM	☒

Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, herbicide, and prescribed burning) could result in direct or indirect adverse effects on state or federally protected wetlands. An aquatic resource delineation has not been conducted in the project area; however, wetlands are mapped in the treatment area at a coarse scale by the National Wetlands Inventory (NWI) (USFWS 2023) using aerial imagery. Additional wetlands may be present throughout the project area that have not been identified or mapped in the NWI, including seasonal wetlands, springs, seeps, and other aquatic resources. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR. Based on review of project-specific biological resources, the project area contains streams and forested/shrub wetland features. 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 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. 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.

Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	Impact BIO-5, 3.6	LTSM	SPR AD-1 SPR BIO-1, 4, 5, 10, 11 SPR HYD-1, 4 MM BIO-5	Yes	LTSM	☒

Initial and maintenance treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in direct or indirect adverse effects on wildlife movement corridors and nursery sites. The potential for initial and maintenance treatment activities to result in adverse effects on wildlife movement corridors and nursery sites was examined in the Program EIR.

While the project is not located in an identified Essential Connectivity Area (CNDDB 2023), the area has been identified as a winter migration area for mule deer (Butte County 2023). However, given the discontinuous nature of the treatment units, the project as a whole would not create any landscape level barrier to wildlife movement. Furthermore, habitat connectivity for some terrestrial wildlife species may have been altered by the fire, which reduced canopy and understory cover within the treatment units. In addition, SPR HYD-4 places limits on removal of riparian vegetation along the South Fork of the Feather River, Lost Creek, and other perennial streams that may provide local and landscape level movement for terrestrial wildlife. Therefore, although natural habitats within treatment units may be used for movement and cover for common wildlife species, and treatment activities may temporarily disrupt wildlife movement patterns, the project would not result in a substantial change in wildlife movement from the existing conditions with the project area.

No known wildlife nursery sites or indications of nursery sites, such as deer fawning habitat or potential rookery trees were identified within the treatment units during the SPR BIO-1 survey; however, common bat roosts may occur within the project area, where suitable roosting trees are present. If common bat roosts are present within a treatment area they may be disturbed or removed by mechanical treatments, manual treatments, or prescribed burning, which could result in substantial loss of these nursery sites.

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 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 treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, the potential impact on wildlife movement corridors is also the same and would be less than significant. 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.

Impact BIO-6: 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	☒

Initial and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for these species is present in locations throughout the project area. Although the majority of the project area was burned during the North Complex Fire, several species of common wildlife are anticipated to use portions of the project area that provide enough canopy foliage to support cover and breeding. Cavity nesting birds may use the existing standing dead trees within the treatment units, and habitat is also currently present for ground and shrub nesting species in some areas where burn intensity was low. Treatment activities, including prescribed burning, mechanical treatments, manual treatments, and herbicide application conducted during the nesting bird season could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on habitat or abundance of common wildlife was examined in the Program EIR.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the Program EIR because the treatment activities and extent of expected disturbance as a result of implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape the potential impact on common wildlife, including nesting birds is also the same. 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.

Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	Impact BIO-7, 3.6	No Impact	SPR AD-1, 3	Yes	N/A	☒

The proposed project does not occur within any areas subject to special provisions of the Butte County or Plumas County Codes of Ordinances. Furthermore, the project would not conflict with Butte County General Plan goals and polices related to biological resources or timber resources (Butte County 2023), or the Plumas County General Plan goals and polices related to preservation of natural resource or forestry resources (Plumas County 2013). The potential for the proposed treatments to conflict with local policies is within the scope of the Program EIR. In addition, all projects implemented under the CalVTP would be required to comply with applicable local policies, plans, and ordinances. The inclusion of land in the proposed 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 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 a local policy or ordinance protecting biological resources is also the same. 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.

Impact BIO-8: 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	SPR AD-1	No	N/A	☒

The project area is not within the boundary of any adopted Habitat Conservation Plans or Natural Community Conservation Plans, therefore; this impact does not apply to the project.

Other Impacts to Biological Resources: Would the project result in other impacts to biological resources that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to biological resources would occur.

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

A list of special-status plant and wildlife species with potential to occur in the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the U.S. Geological Survey (USGS) quadrangles containing and surrounding the project area (CNDDB 2023; CNPS 2023); and Appendix BIO-3 (Table 5a, Table 5b, Table 18a, Table 18b, and Table 19) in the Program EIR (Volume II) for special-status plants and wildlife that could occur in the Sierra Nevada foothills and Sierra Nevada ecoregions. A list of sensitive natural communities with potential to occur in the project area was compiled by completing a CNDDB search of the USGS quadrangles containing and surrounding the project area (CNDDB 2023) and reviewing Table 3.6-11 (pages 3.6-47 – 3.6-49) and Table 3.6-31 (pages 3.6-110 – 3.6-111) in the Program EIR (Volume II) for sensitive natural communities that could occur in the Sierra Nevada foothills and Sierra Nevada ecoregions in the habitat types mapped in the project area.

A biological resources reconnaissance survey was completed by Davey Resources Group on August 8, 2022, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities, special status-plants) and to assess the suitability of habitat in the project area for special-status plant and wildlife species.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys, a complete list of all species with potential to occur in the vicinity of the proposed project was assembled (Attachment B; Table B-2).

Based on the results of the data review and reconnaissance-level survey, it was determined that habitat suitable for some special-status wildlife is present but adverse effects can be clearly avoided (Attachment B). However, for special-status plants, sensitive natural communities, wetlands, sensitive habitats, and other special-status wildlife species, habitat is present and adverse effects cannot be clearly avoided for treatments other than manual tree planting (Attachment B). For these biological resources, where habitat is present and adverse effects cannot be clearly avoided, further review and surveys will be conducted.

SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).

SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

Based on implementation of SPR BIO-1, it was determined that sensitive natural communities or other sensitive habitats may be present in the project area. While adverse effects on some of these resources would be avoided through project design or implementation of SPRs, adverse effects on all of these sensitive habitats cannot be avoided by treatments other than manual tree planting. A qualified RPF or botanist 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 other than manual tree planting (CDFW 2018). Sensitive natural communities and other sensitive habitats, including oak woodlands and riparian habitat, within the project area will be mapped by a qualified RPF or botanist during this survey.

SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

Class I, II, and III watercourses occur throughout the project area. Watercourse and Lake Protection Zones (WLPZs) and Equipment Limitation Zones (ELZs) will be established adjacent to all Class I, Class II, and Class II streams within the project area. 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 any treatments in riparian habitat, CDFW will be notified pursuant to California Fish and Game Code 1602, when required.

SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. These SPR requirements apply to all treatment activities and all treatment types. Additional measures will be applied to ecological restoration treatment types	Yes	Siller Prior-During	Siller

The project area contains mixed chaparral habitats (see additional detail in Attachment B). Treatments implemented in chaparral habitats will be designed to avoid type conversion of and to maintain the function of these habitats. This will include designing treatments based on current fire return interval departure and condition class of the chaparral vegetation onsite, maintaining a minimum percent cover of mature native shrubs, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Refer to the discussion of chaparral in Attachment B for details regarding treatment design parameters that would maintain chaparral habitat function in the project area. Treatments in all sensitive habitats in the project area will be designed to maintain the membership rules of the affected vegetation alliance, maintain ecological function, and improve wildfire resilience.

SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

Best management practices (BMPs) listed under SPR BIO-6 in Attachment A will be implemented, which include cleaning and sanitizing vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site.

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

Habitat potentially suitable for 34 special-status plant species is present in the project area. Of the 34 plants with potential to occur within the project area, there are 17 perennial species and 17 geophytic or herbaceous annual species (see Attachment B). Protocol-level surveys for the special-status plant species identified in Attachment B will be conducted in suitable habitat areas prior to implementation of treatments. Seasonal avoidance measures can be implemented without conducting surveys when annual and geophytic species may be present (see Attachment B).

SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs. This SPR applies to all treatment activities and only the ecosystem restoration treatment type.	No	N/A	

This project is outside of the Coastal Zone; therefore, this SPR does not apply.

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The project proponent will implement the BMPs listed under SPR BIO-9 in Attachment A to prevent the spread of invasive species.

SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) 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	Siller Prior-During	Siller

If implementation of treatment activities outside of identified avoidance buffers or limited operating periods during sensitive seasons is determined to be infeasible, surveys will be required prior to implementation of treatment activities in habitat suitable for western pond turtle, bald eagle, black swift, California spotted-owl, golden eagle, northern goshawk, monarch butterfly, fisher, pallid bat, Townsend's big-eared bat, western mastiff bat, western red bat, and wildlife nursery sites. Surveys would be required or presence may be assumed for California red-legged frog, foothill yellow-legged frog, southern long-toed salamander, Sierra Nevada yellow-legged frog, Crotch bumble bee, western bumble bee, and ringtail.

SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). This SPR applies only to prescribed herbivory and all treatment types.	No	N/A	

The project does not propose prescribed herbivory treatments; therefore, this SPR does not apply.

SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the 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	Siller Prior-During	Siller

The project proponent will schedule treatment activities, other than manual tree planting 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. The active nesting season will be defined by the qualified RPF or biologist.

If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors, 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 regardless of nest occupancy status.

MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA 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).	Yes	Siller Prior-During	Siller

Special-status plant species listed under ESA or CESA have the potential to occur in the project area. SPR BIO-7 directs protocol-level surveys to be completed for those species if they have the potential to be affected by project activities. If any special-status plants that are listed under ESA or CESA are found during surveys, avoidance strategies will be implemented per MM BIO-1a. See Attachment B for the species list, habitat requirements, potential for species to be affected by the proposed project, and avoidance strategies.

MM BIO-1b: Avoid Loss of 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 measures to avoid loss of individuals and maintain habitat function of occupied habitat.	Yes	Siller Prior-During	Siller

Special-status plant species not listed under ESA or CESA have the potential to occur in the project area. Impacts to non-listed special-status plants will be avoided by physically avoiding the location of special-status plants using avoidance buffers, designing projects to maintain the function of special-status plant habitat, and prohibiting fire ignition within the special-status plant buffer (see Attachment B for additional detail).

MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants 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. 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.	No	N/A	

The project proponent will avoid significant impacts to special-status plants; therefore, compensatory mitigation will not be required.

MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)	Yes	Siller Prior-During	Siller

The measures listed in Attachment A will be implemented to avoid impacts on and maintain habitat function (e.g., suitable vegetative cover, nesting trees) for California red-legged frog, foothill yellow-legged frog, Sierra Nevada yellow-legged frog, bald eagle, golden eagle, and ringtail. In addition, the project proponent consulted with CDFW and USFWS as necessary in conformance with the requirements of MM BIO-2a.

MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species. 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.	Yes	Siller Prior-During	Siller

The measures listed in Attachment A will be implemented to avoid impacts on and maintain habitat function (e.g., suitable vegetative cover, nesting trees, host plants) for southern long-toed salamander, western pond turtle, black swift, California spotted owl, northern goshawk, fisher, pallid bat, Townsend's big-eared bat, western mastiff bat, and western red bat.

MM BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. 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.	No	N/A	

Mitigation Measure BIO-2a, Mitigation Measure BIO-2b, Mitigation Measure BIO-2e, and Mitigation Measure BIO-2g would reduce impact to less than significant; therefore, this mitigation measure does not apply.

MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)	No	N/A	Siller

The project is outside of the range of valley elderberry longhorn beetle; therefore, this mitigation measure does not apply.

MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) 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 determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.	Yes	Siller Prior-During	Siller

One special-status butterfly species, monarch butterfly, was identified during SPR BIO-1 desktop analysis and was also detected during SPR BIO-1 surveys. MM BIO-2e will be implemented as described in Attachment A to prevent significant impacts to the species and host plants.

MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)	No	N/A	N/A

No special-status beetles, flies, grasshoppers, or snails have potential to occur in the project area; therefore, this mitigation measure does not apply.

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

Limited habitat for Crotch bumble bee and western bumble bee was identified during SPR BIO-1 desktop analysis (Attachment B). Measures listed in Attachment A will be implemented to avoid or minimize impacts on and maintain habitat function (e.g., floral resources) for Crotch bumble bee and western bumble bee. In addition, the project proponent consulted with CDFW as necessary in conformance with the requirements of Mitigation Measure BIO-2g.

MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)	No	N/A	N/A

Prescribed herbivory is not proposed for this project; therefore, this mitigation measure does not apply.

MM BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3. 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.	Yes	Siller Prior-During	Siller

The project area potentially contains 19 sensitive natural communities as defined by CDFW and coastal oak woodland habitat (see detail in Attachment B). Under Mitigation Measure BIO-3a, a qualified RPF or biologist will determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type determined to be present in the project area. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands 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.

MM BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands. 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	NA

This mitigation measure does not apply to the project. Mitigation Measure BIO-3a will be implemented to avoid significant impacts on sensitive natural communities and oak woodlands; therefore, no compensatory mitigation will be required.

MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat 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	N/A

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 are anticipated to avoid the loss or degradation of riparian habitat functions. For riparian habitat present beyond WLPZs and ELZs, which are primarily intended to protect water quality, SPRs BIO-3 and BIO-4 will be implemented to avoid significant impacts on riparian habitat. Therefore, no compensatory mitigation will be required, and this mitigation measure does not apply to the project.

MM BIO-4: Avoid State and Federally Protected Wetlands	Yes	Siller Prior-During	Siller

Freshwater forested/shrub wetlands and riverine habitats are mapped in the project area (USFWS 2023). Because WLPZs would not apply to wetland habitat, a qualified RPF or biologist will delineate the boundaries of these and any other potential 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.

MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites	Yes	Siller Prior-During	Siller

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. A qualified RPF or biologist will establish buffers around active deer fawning sites, heron or egret rookeries, or significant common bat roosts of the appropriate size prior to implementation of treatment activities. The appropriate size and shape of the buffer will be based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors.

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

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	Impact Geo-1, 3.7	LTS	SPR AD-3 SPR GEO-1, 2, 3, 4, 5, 6, 7, 8, SPR HYD-3 SPR HYD-4 SPR AQ-3, 4	Yes	LTS	☒

The dominant soil types present in the project area are surnuf gravelly loam (3 to 8 percent slopes), holland-wapi families complex (0 to 30 percent slopes), toadtown-powellton (15 to 30 percent slopes), mudwash-timberisland-lavatop (2 to 30 percent slopes), chaix-wapi families complex (30 to 50 percent slopes), and mounthope-hartsmill (15 to 30 percent slopes) (NRCS 2003). Several of these soils have moderate to high runoff potential (NRCS 2023). Manual, mechanical, and prescribed burning treatment activities would result in vegetation removal and soil disturbance, which have the potential to increase rates of erosion and loss of topsoil. Mechanical treatments are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas with steep slopes. The proposed project would implement mechanical treatments of the treatment areas, including areas where steep slopes occur, and where burn scars are present. 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 proposed treatment activities and intensity of vegetation removal and potential associated soil disturbance under the proposed project is consistent with what was analyzed in the Program EIR. The inclusion of land in the project area that is outside the 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. 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.

Impact GEO-2: Increase Risk of Landslide	Impact Geo-2, 3.7	LTS	SPR AD-3 SPR GEO-3, 4, 7, 8 SPR AQ-3	Yes	LTS	☒

Treatments would include vegetation removal in areas with steep slopes, which could decrease the stability of slopes and increase the risk of landslides. 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 and methods of vegetation removal on steep slopes and intensity of prescribed burns are consistent with those analyzed in the Program EIR. The inclusion of 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 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 also the same. 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.

Other Impacts to Geology, Soils, Paleontology, And Mineral Resources: Would the project result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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). Including land outside the 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 geological, soils, paleontological and mineral resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to geological, soils, paleontological and mineral resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.	Yes	Siller During	Siller

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

SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use.

SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types.	Yes	Siller During-Post	Siller

The project proponent will stabilize soil disturbed during mechanical and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface.

SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types.	Yes	Siller During-Post	Siller

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

SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6I of the California Forest Practice Rules. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss.

SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area.

SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads. This SPR applies to all treatment activities and all treatment types.	Yes	Siller During	Siller

The use of heavy equipment (i.e., bulldozers, masticators, and chippers) will not occur on slopes over 65 percent or slopes steeper than 50 percent where the erosion hazard rating is high or extreme.

SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types.	Yes	Siller Prior-During	Siller

The project proponent will require a RPF or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issues related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur.

EC-7: GREENHOUSE GAS EMISSIONS

	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact GHG-1: 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	SPR AD-3 SPR GHG-1	Yes	LTS	☒

Use of vehicles and equipment during vegetation treatments and biomass disposal and prescribed burning would generate greenhouse gas (GHG) emissions. However, as discussed in Section 2, “Project Information,” above, the intended effects of this project comply with the climate goals outlined in the California Forest Carbon Plan, California’s Natural and Working Lands Implementation Plan, and the GWSA of 2006. This project would reestablish commercial timberland, which under the Forest Practice Rules will be managed for the continued growth of high-quality timber products and forest health once the grant cycle has ended. The lands within this proposed treatment area were severely burned during the North Complex wildfire and restoring these once forested tracts by removing excess standing dead timber and the newly encroaching shrub component and replanting with a mixture of tree species typical for this region is paramount for increasing carbon sequestration rates. By doing this not only would carbon be sequestered at greater rates but there would also be a positive impact on GHG emissions, water quality, biodiversity, wildlife habitat, and overall ecosystem health.

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 equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk and increase forest health and post-wildfire resilience, 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 treatment activities, associated equipment, duration of use, and resultant GHG emissions, as well as the project purpose, are consistent with those analyzed in the Program EIR. The inclusion of 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 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. This impact is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact GHG-2: Generate Greenhouse Gas Emissions through Treatment Activities	Impact GHG-2, 3.8	PSU	SPR AD-3 SPR AQ-3 MM GHG-2	Yes	SU	☒

Use of vehicles and equipment during initial and maintenance vegetation treatments and biomass disposal and prescribed burning would generate GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR and found to be 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 the parameters and objectives of prescribed burning. Consistent with the Program EIR, treatment activities implemented under the proposed project would result in GHG emissions directly generated by off-road equipment, on-road vehicles, worker commute trips, and hauling of equipment and materials associated with mechanical treatment activities. As listed in the Program EIR Table 3.8-3, mechanical treatments are estimated to produce between 0.92 and 0.07 MTCO2e/acre (depending on vegetation type), manual treatments are estimated to produce between 0.69 and <0.01 MTCO2e/acre (depending on vegetation type), and prescribed burning treatments are estimated to produce between 63.15 and 7.90 MTCO2e/acre (depending on vegetation type). The estimated calculations derived from the values in the Program EIR Table 3.8-3 do not include the GHG emissions from vehicle transport, including the transportation of equipment and contractors. This impact is within the scope of 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. In addition, the goal of the proposed vegetation treatments is to increase the health and vigor of retained vegetation and reduce wildfire risk, which would reduce GHG

emissions resulting from wildfire and sequester carbon as vegetation matures. The project would also increase carbon sequestration of the project area over time with reforestation because forested areas have higher sequestration rates than the grasses and shrubs that would otherwise colonize the area.

The inclusion of 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 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. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Other Impacts to related to Greenhouse Gases: Would the project result in other impacts related to greenhouse gases that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 GHG emissions that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to GHG emissions would occur.

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

SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board’s Assembly Bill 1504 Carbon Inventory Process.

MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns. 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	Siller Prior-During	Siller

A Burn Plan pursuant to SPR AQ-3 will be prepared by Siller prior to pile and broadcast burn treatments.

EC-8: ENERGY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	Impact ENG-1, 3.9	LTS	N/A	Yes	LTS	☒

The use of vehicles and equipment during treatments as well as biomass disposal by chipping and mastication 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. Consistent with the Program EIR, and in consideration of the project's purpose to reduce wildfire occurrence and severity, implementation of the proposed treatment types is reasonably expected to reduce the intensity of response to wildfire, specifically the resources needed for fire suppression (e.g., equipment and vehicles). The consumption of energy during implementation of the proposed treatment project from the use of equipment and vehicles 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 treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is also the same. Therefore, 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.

Other Impacts to Energy Resources: Would the project result in other impacts to energy resources that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 energy resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to energy resources would occur.

EC-9: HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	Impact HAZ-1, 3.10	LTS	SPR HAZ- 1 SPR HYD-4 SPR AD-3	Yes	LTS	☒

Proposed treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to create a significant health hazard from the use of hazardous materials was evaluated in the Program EIR. The potential impacts related to the use of common hazardous materials during treatment activities are within the scope of the Program EIR because the treatment types, equipment, and types of hazardous materials to be used are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the 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. 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.

Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	Impact HAZ-2, 3.10	LTS	SPR AD-3 SPR HAZ-5, 6, 7, 8, 9	Yes	LTS	☒

Proposed treatments require the transport, storage, and disposal of various herbicides. The potential for the use of herbicides to create a significant health hazard was analyzed in the Program EIR. This impact is within the scope of the Program EIR because the specific herbicides (i.e., Triclopyr (Garlon 3 or 4) and Glyphosate (Round Up)) that would be used and methods of application (i.e., applied directly by hand via cut stump, spot, or foliar spray) are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the 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 potential to cause a significant health hazard from the use of herbicides is not substantially greater than described in the Program EIR. This impact is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	Impact HAZ-3, 3.10	PS	SPR AD-3 MM HAZ- 3	Yes	LTSM	☒

Vegetation treatments would include soil disturbance through mechanical treatment activities 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 treatment activities to encounter contamination that could expose workers 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 throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance in a hazardous materials site was uncertain. As directed by MM HAZ-3, a database search and review of the Cortese List via the State Water Resource Control Board's (SWRCB) GeoTracker database was conducted for hazardous materials sites. There are two mine sites within or adjacent to the project area near Forbestown that are under evaluation for contamination (60003148 and 60003371) (DTSC 2023; CalEPA 2016; SWRCB 2023) (Attachment C). Therefore, consistent with the Program EIR, any potential areas of contamination will be marked and no prescribed burning or soil

disturbing treatment activities will occur within 100 feet of the site boundaries. The inclusion of 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 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 and this area was included in the database searches; therefore, the hazardous materials impact is also the same. 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.

Other Impacts to Hazardous Materials, Public Health and Safety: Would the project result in other impacts to hazardous materials, public health and safety that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to hazardous materials would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer’s specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

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

SPR HAZ-2 Require Spark Arrestors: This SPR applies only to manual treatment activities and all treatment types	Yes	Siller Prior-During	Siller

The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors.

SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

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.

SPR HAZ-4 Prohibit Smoking in Vegetated Areas. This SPR applies to all treatment activities and treatment types.	Yes	Siller During	Siller

The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4).

SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project proponent or licensed PCA will prepare a 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.

SPR HAZ-6 Comply with Herbicide Application Regulations. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application.

SPR HAZ-7 Triple Rinse Herbicide Containers. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	Siller Post	Siller

All herbicides and adjuvant containers will be triple rinsed with clean water at an approved site and rinsate will be disposed of in a batching tank (3 CCR Section 6684).

SPR HAZ-8 Minimize Herbicide Drift to Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas:

- application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative);
- spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift;
- low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and
- spray nozzles will be kept within 24 inches of vegetation during spraying.

SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	Siller Prior	Siller

For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases.

MM HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials.	Yes	Siller Prior	Siller

As discussed above, database searches for hazardous materials sites within the project area have been conducted, and there are two mine sites within or adjacent to the project area near Forbestown that is under evaluation for contamination (60003148 and 60003371) (DTSC 2023; CalEPA 2016; SWRCB 2023) (Attachment C). Therefore, consistent with the Program EIR, any potential areas of contamination will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries.

EC-10: HYDROLOGY AND WATER QUALITY

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

The project area is in the Feather River watershed and is under the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). Treatments would include prescribed burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. The potential for prescribed burning 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 duration and intensity of the proposed prescribed burns would be consistent with those analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	Impact HYD-2, 3.11	LTS	SPR AD-3 SPR HYD-1, 4, 5 SPR BIO-1 SPR GEO-1, 2, 3, 4, 5 7, 8 SPR HAZ-1, 5	Yes	LTS	☒

Treatments and maintenance activities would include manual and mechanical mastication and chipping, would disturb soils, and require the use of fuels, which have the potential to enter waterways and degrade water quality. The potential for 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 types of treatment activities and use of heavy equipment to remove and process vegetation are consistent with those analyzed in the Program EIR. All projects using the Program EIR follow the requirements of the SWRCB Vegetation Treatment General Order. The inclusion of 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 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. 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.

Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	Impact HYD-3, 3.11	LTS	SPR AD-3 SPR HYD- 3	No	N/A	☒

This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	Impact HYD-4, 3.11	LTS	SPR AD-3 SPR HYD-5 SPR BIO-4 SPR HAZ-5, 7	Yes	LTS	☒

Treatment activities would include ground application of herbicides that could affect water quality through runoff, leaching, drifting, and misapplication or spills. The potential for herbicide treatment activities to violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan was evaluated in the Program EIR. The potential impacts are within the scope of the Program EIR because the types of herbicides that would be used, the methods of herbicide application, and the transportation, storage, and disposal of herbicides are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed 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, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from use of herbicides is also the same. This impact is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	Impact HYD-5, 3.11	LTS	SPR AD-3 SPR HYD-1, 2, 3, 4, 6 SPR GEO-5	Yes	LTS	☒

Use of mechanical equipment and off-road vehicles during treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a treatment area was examined in the Program EIR. This impact 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 treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, drainage 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. 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.

Other Impacts to Hydrology and Water Quality: Would the project result in other impacts to hydrology and water quality that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to hydrology and water quality would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

Initial and maintenance treatments will be implemented in conformance with applicable regulatory requirements of the WDRs and/or related Waivers and the water quality control plans for the Sacramento River Basin and San Joaquin River Basin, pursuant to the standards adopted by the Central Valley RWQCB (Region 5). This project is automatically enrolled in the Vegetation Treatment General Order (ORDER WQ 2021-0026-DWQ).

SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

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).

SPR HYD-3 Water Quality Protections for Prescribed Herbivory: This SPR applies to prescribed herbivory treatment activities and all treatment types.	No	N/A	N/A

SPR HYD-3 does not apply to the proposed project because prescribed herbivory would not be used within the project area.

SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: 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.	Yes	Siller Prior-During	Siller

WLPZs will 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).

SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: This SPR applies to herbicide treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

Herbicides will be mixed in an area devoid of vegetation or outside of areas that can contaminate waterways. All herbicide application will comply with all EPA label directions and adhere to operational restrictions in place to minimize drift. Herbicide will not be applied in established WLPZs. Herbicide will be directly applied to freshly cut stumps so the herbicide will not be sprayed adjacent to species that may be special status.

SPR HYD-6 Protect Existing Drainage Systems: This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions.

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

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	Impact LU-1, 3.12	LTS	SPR AD-3, 9	Yes	LTS	☒

Vegetation treatments would occur within several privately-owned parcels in Butte and Plumas counties. As noted in EC-5, "Biological Resources," the project area is not within the areas subject to special provisions of the Butte County or Plumas County Code of Ordinances. As noted in Section EC-12, "Noise," below, treatment activities would occur during daytime hours, typically between 7:00 a.m. and 7:00 p.m. for treatments in proximity to sensitive receptors, which is consistent with the Butte and Plumas County Noise Ordinances. The potential for vegetation treatments to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the Program EIR. This impact is within the scope of the Program EIR because the treatment types and activities associated with the project are consistent with those analyzed in the Program EIR. The inclusion of land in the project area that is outside the 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. 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.

Impact LU-2: Induce Substantial Unplanned Population Growth	Impact LU-2, 3.12	LTS	N/A	Yes	LTS	☒

Proposed treatments would involve manual and mechanical treatment activities, prescribed burning, and herbicide application, which would require up to four crews at a given time. Impacts associated with short-term increases in demand for employees during the implementation of the proposed project are within the scope of the Program EIR because the number of workers required for implementation of the treatments is consistent with the crew size analyzed in the Program EIR for the types of treatment activities proposed (i.e., up to four crews of five or 20 total workers)) and because of the temporary nature of the increase in demand for workers, the proposed treatments would not result in substantial unplanned population growth or cause a need for new housing or other infrastructure. The inclusion of land in the project area that is outside the 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. 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.

Other Impacts related to Land Use and Planning, Population and Housing: Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 land use and planning that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to land use and planning would occur.

EC-12: NOISE

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact NOI-1: 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	☒

Treatments would require the use of noise-generating equipment during manual and mechanical treatment activities. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the Program EIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the Program EIR. All treatments would be limited to daytime hours, typically between 7:00 a.m. and 7:00 p.m. for treatments in proximity to sensitive receptors, which is consistent with the Plumas and Butte County Noise Ordinances. This would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. Equipment use would be intermittent and move throughout the treatment areas so noise increases at any one sensitive receptor would be limited. This impact is within the scope of the Program EIR because the number and types of equipment proposed, and the duration of equipment use are consistent with those analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact NOI-2: 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	☒

Treatments would involve large trucks hauling heavy equipment to the treatment area. These haul truck trips could pass by residential receptors, and the event of each truck passing by could increase single event noise levels (SENLs). The potential for a substantial short-term increase in SENLs was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. The haul trips associated with the proposed treatments would occur during daytime hours, which avoids the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. The inclusion of 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 exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same. 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.

Other Impacts Related to Noise: Would the project result in other impacts related to noise that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to noise would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: 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	Siller During	Siller

Per SPR NOI-1, noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays.

SPR NOI-2 Equipment Maintenance: 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	Siller Prior-During	Siller

The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.

SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will require that engine shrouds be closed during equipment operation.

SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure.

SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types.	Yes	Siller During	Siller

The project proponent will require that all mechanical equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.

SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	Siller Prior	Siller

For treatment activities using heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification.

EC-13: RECREATION

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	Impact REC-1, 3.14	LTS	SPR REC-1	No	N/A	☒

The proposed project would occur entirely within privately-owned parcels; the project area is not within a publicly accessible recreation area. Recreational activities do not occur within the project area; therefore, there would be no impact and this impact does not apply to the project.

Other Impacts to Recreation: Would the project result in other impacts to recreation that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to recreation would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR REC-1 Notify Recreational Users of Temporary Closures. 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.	No	N/A	Siller

SPR REC-1 does not apply because there are no publicly accessible recreation areas or facilities within the project area that would need to be closed during project treatments.

EC-14: TRANSPORTATION

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact TRAN-1: Result in temporary traffic operations impacts by conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures	Impact TRAN-1, 3.15	LTS	SPR TRAN-1 SPR AD-3	Yes	LTS	☒

Vegetation treatments would temporarily increase vehicular traffic along several roads providing access to the project area, primarily Oroville Quincy Highway, Black Bear Road, Bloomer Hill Road, Galen Ridge Road, Bald Rock Road, Mooreville Ridge Road, and Golden Trout Crossing. 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 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, increases in vehicle trips associated with the treatments would be dispersed on multiple roadways throughout the project area. The inclusion of 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 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. 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.

Impact TRAN-2: Substantially increase hazards due to a design feature or incompatible uses	Impact TRAN-2, 3.15	LTS	SPR TRAN-1 SPR AD-3 SPR HYD-2	Yes	LTS	☒

Vegetation treatments would not require the construction or alteration of any roadways. However, the proposed treatments would require the transportation of heavy equipment along small and mountainous roadways, which could create increased transportation hazards due to incompatible uses. Proposed initial and maintenance treatments would also include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for the hauling of equipment to remote treatment areas and the potential for smoke to affect visibility along roadways during implementation of treatment projects were examined in the Program EIR. This impact is within the scope of the Program EIR because the quantity and types of equipment proposed for use that would require transport to treatment areas are similar those analyzed in the Program EIR and the burn duration is consistent with that analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact TRAN-3: Result in a net increase in VMT for the proposed CalVTP	Impact TRAN-3, 3.15	PSU	MM AQ-1	Yes	SU	☒

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the project area. This 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. Treatment activities under the proposed project would typically require up to 20 crew members. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the Program EIR. A temporary increase in VMT is within the scope of the activities and impacts addressed in the Program EIR because the number and duration of increased vehicle trips, the size and number of crews, and treatment activities are consistent with that analyzed in the Program EIR. The increase in vehicle trips would be temporary and dispersed over multiple roadways. While carpooling would be encouraged under Mitigation Measure AQ-1, crew sizes would be small and may not all be employed with the same company. Therefore, carpooling may not be feasible to implement for most of the workers. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. For these reasons, and as explained in the Program EIR, this impact would remain significant and unavoidable. The inclusion of land in the proposed 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 transportation-related conditions 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.

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.

Other Impacts to Transportation: Would the project result in other impacts to transportation that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to transportation would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior-During	Siller

The proposed project would not result in a permanent increase in traffic beyond existing conditions for the local area. During treatment activities, vehicles could access the project area from Oroville Quincy Highway, Black Bear Road, Bloomer Hill Road, Galen Ridge Road, Bald Rock Road, Mooreville Ridge Road, and Golden Trout Crossing. The project proponent will coordinate with the California Department of Transportation, and Butte and Plumas Counties 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

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	Impact UTL-1, 3.16	LTS	SPR AD-3	Yes	LTS	☒

Treatments would include mechanical and manual treatment activities, prescribed burning, and herbicide application. An on-site water supply (i.e., 5,000 gallon trailer with a pump) would be required during implementation of the proposed project as a safety measure for fire suppression and to minimize dust if excessive dust while traveling on unpaved roads or to remove visible dirt or mud that gets tracked out onto public paved roadways. The potential increase in water demand as a result of treatment activities was examined in the Program EIR. The most water-intensive activities described in the Program EIR include the provision of onsite water for prescribed burning. This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those included in the Program EIR and the water source type and amount of water required during project implementation is consistent with, although less than, what is analyzed in the Program EIR. The inclusion of 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 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. 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.

Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	Impact UTL-2, 3.16	SU	SPR AD-3 SPR UTIL- 1	Yes	SU	☒

Vegetation treatments would generate biomass as a result of vegetation removal within the project area. Biomass would primarily be masticated or chipped on-site within the treated areas during dry periods of the year to dispose of accumulated biomass. The biomass generated from vegetation treatments may also be disposed by lopping and scattering; shipping chips to a biomass processing facility; pile or broadcast burning; or blowing chips onto the ground as mulch. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled offsite could exceed the capacity of existing infrastructure for handling biomass. This impact is within the scope of the activities and impacts addressed in the Program EIR because the type of treatments and biomass disposal methods 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, conditions related to biomass in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same. There are multiple methods to dispose of biomass. Therefore, solid waste generation would not be 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.

Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	Impact UTL-3, 3.16	LTS	SPR AD-3 SPR UTIL- 1	Yes	LTS	☒

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be primarily be masticated or chipped on-site within the treated areas during dry periods of the year to dispose of accumulated biomass. The biomass generated from vegetation treatments may also be disposed by lopping and scattering; shipping chips to a biomass processing facility; pile or broadcast burning; or blowing chips onto the ground as mulch. The project proponent would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same. 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.

Other Impacts to Public Services, Utilities, and Service Systems: Would the project result in other impacts to public services, utilities, and service systems that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the characteristics of the proposed treatment project and determined they are consistent with the applicable 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). Including land outside the 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 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. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to public services, utilities, or service systems would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. This SPR applies only to mechanical and manual treatment activities and all treatment types.	Yes	Siller Prior-During	Siller

If biomass is hauled off-site, a Solid Organic Waste Disposition Plan will be prepared that identifies the amount of solid organic waste to be transported offsite and confirms that the receiving facility has the capacity to accept the biomass.

EC-16: WILDFIRE

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	Impact WIL-1, 3-17	LTS	SPR AD-3 SPR HAZ-2, 3, 4	Yes	LTS	☒

Treatments would include mechanical treatments using heavy equipment and manual treatments using mechanized hand tools that could exacerbate fire risk if accidental ignition occurred from heat or sparks contacting vegetation. Proposed treatments also include prescribed burning, which could exacerbate fire risk if accidental ignition occurred from prescribed burn escaping its control lines. The potential exacerbation of wildfire risk and increase in exposure to wildfire as a result of vegetation treatments was evaluated in the Program EIR. Increased wildfire risk associated with the use of equipment for mechanical and manual treatments and prescribed burning in vegetated areas is within the scope of the Program EIR because the types of equipment, proposed treatment activities, and treatment duration are consistent with those analyzed in the Program EIR. The inclusion of 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 wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same. 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.

Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	Impact WIL-2, 3-17	LTS	SPR AD-3 SPR AQ-3 SPR GEO-3, 4, 5, 8	Yes	LTS	☒

Treatments would include prescribed burning, and steep slopes are present within the project area. The potential for post-fire landslides was examined in the Program EIR. Potential exposure of people or structures to post-fire landslides are within the Program EIR because the post-fire landslide risk of the project area and the low severity and short duration of the proposed prescribed burns are consistent with those analyzed in the Program EIR. The inclusion of 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 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. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

Other Impacts related to Wildfire: Would the project result in other impacts related to wildfire that are not evaluated in the Program EIR?				No	N/A	☒

The proposed treatments are consistent with the treatment types and activities considered in the Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the 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 outside the 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 wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. For this reason, the impacts are the same and 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 treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to wildfire would occur.

EC-17: ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
SPR AD-1 Project Proponent Coordination: 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.	Yes	Siller Prior-During	Siller

For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the IAP.

SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. “Protected Resources” refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types.	Yes	Siller Prior	Siller

Prior to beginning treatment activities, 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.

SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: 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	Siller Prior-During	Siller

As noted in EC-5, “Biological Resources,” the project area is not within the areas subject to special provisions of the Butte County or Plumas County Code of Ordinances. As noted in Section EC-12, “Noise,” treatment activities would take place during daytime hours consistent with the Butte and Plumas County Noise Ordinances.

SPR AD-4 Public Notifications for Prescribed Burning: 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 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.	Yes	Siller Prior	Siller

At least 3 days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area; 2) publish a public interest notification in a local newspaper or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape.

SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types.	Yes	Siller During	Siller

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.

SPR AD-6 Public Notifications for Treatment Projects. 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.	Yes	Siller Prior	Siller

One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns.

SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the 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.	Yes	Siller Prior-During-Post	Siller

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.

SPR AD-8 Request Access for Post-Treatment Assessment. 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.	No	N/A	N/A

The project's initial treatments would be funded in part by CAL FIRE but would not be implemented by CAL FIRE; therefore, a contract is not necessary for implementation of treatments. This SPR does not apply to the project. However, as landowner, land manager and implementing entity, Siller will access areas post-treatment to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance.

SPR AD-9. Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent 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.	No	N/A	N/A

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?	☐	☐	☐	☒
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.)	☐	☐	☐	☒
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Discussion

Because there are no new impacts, additional analysis is not warranted.

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