PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CALVTP PROGRAM EIR
CALVTP PROJECT ID: 2023-14

Collins Pine Vegetation Treatment Project

Prepared for:

Resource Conservation District of Tehama County
and Collins Pine Company

July 2023

Collins Pine Vegetation Treatment Project

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LIST OF ABBREVIATIONS

AMM	Avoidance and Minimization Measure
Board	California Board of Forestry and Fire Protection
CAAQS	California Ambient Air Quality Standard
CalEPA	California Environmental Protection Agency
CalVTP	California Vegetation Treatment Program
CARI	California Aquatic Resources Inventory
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
Collins	Collins Pine Company
CRHR	California Register of Historical Resources
CWHR	California Wildlife Habitat and Relationships
dbh	diameter at breast height
DPR	California Department of Pesticide Regulation
DPS	distinct population segment
EPA	US Environmental Protection Agency
ESA	federal Endangered Species Act
ESU	Evolutionarily Significant Unit
EVEG	Existing Vegetation
GHG	greenhouse gas
HCP	habitat conservation plans
MMRP	mitigation monitoring and reporting program
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission

NCCP	natural community conservation plans
NEIC	Northeast Information Center
NWI	National Wetlands Inventory
Program EIR	Program Environmental Impact Report
PSA	project-specific analysis
PSA/Addendum	project-specific analysis and addendum to the Program EIR
RCDTC	Resource Conservation District of Tehama County
RPF	registered professional forester
SPI	Sierra Pacific Industries
SPR	standard project requirement
SR	State Route
SRA	State Responsibility Area
TAC	toxic air contaminant
TCAPCD	Tehama County Air Pollution Control District
USFS	US Forest Service
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
VMT	vehicle miles traveled
WLPZ	watercourse and lake protection zone

1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

The California Board of Forestry and Fire Protection (Board) certified the Program Environmental Impact Report (Program EIR) for the California Vegetation Treatment Program (CalVTP) in December 2019. The Program EIR evaluates the potential environmental effects of implementing vegetation treatments throughout the State Responsibility Area (SRA) in California. This document is a project-specific analysis (PSA) and addendum to the Program EIR (PSA/Addendum). The PSA process was designed during Program EIR preparation for use by many state, special district, and local agencies to help increase the pace and scale of vegetation treatments by employing California Environmental Quality Act (CEQA) streamlining tools, i.e., a within-the-scope finding based on the PSA. An Addendum to the Program EIR is another CEQA streamlining tool designed to address those project components that are not within the scope of the Program EIR. This PSA/Addendum comprises the joint implementation of these CEQA streamlining tools in a single document.

Pursuant to State directives to provide training on use of the CalVTP to increase the pace and scale of vegetation treatment by streamlining CEQA review (i.e., Objective 1.38 in California's Wildfire and Forest Resilience Action Plan [Forest Management Task Force 2021] and Goal 4 in California's Strategic Plan for Expanding the Use of Beneficial Fire [California Wildfire and Forest Resilience Task Force 2022]), the Board is supporting the preparation of PSA documents to create a library of example projects that help guide state and local agencies in preparing their own PSAs under the CalVTP Program EIR, as well as to achieve CEQA compliance for the proposed project. The Board selected Collins Pine Company's proposed vegetation treatment project to be one of the PSAs that provides CEQA compliance for project approval and implementation and serves as an example PSA for other agencies seeking to use the CalVTP Program EIR to accelerate approval of their own vegetation treatment projects.

1.1.1 Proposed Project

The proposed project entails implementation of vegetation treatments on up to 10,376 acres of land managed by Collins Pine Company (Collins) (Collins Pine Vegetation Treatment Project or proposed project) in Tehama County (Figure 1-1). According to data from the California Wildlife Habitat and Relationships (CWHR) habitat classification, the project area contains approximately 4,500 acres of mature forest habitat, some of which is located in areas that are difficult to access (e.g., steep slopes), and as a result, have not been logged or managed recently. In some areas this has created overstocked conditions resulting in an increased risk of wildfire. In addition, the project area and vicinity have experienced recent wildfire; the project area borders the 2021 Dixie Fire burn area, with a few small sections in the northern portion of the project area within the burn footprint. The southeastern portion of the project area burned in the Cub and Onion Lightening Complex Fires in 2008 (CAL FIRE 2023). The southwestern portion of the project area has been burned multiple times in recent years including the Panther Fire in 2013, Mill Fire in 2012, Gun II in 1999, and Barkley in 1994 (CAL FIRE 2023). Additionally, the Camp Fire (2018) and the North Complex Fire (2020) both occurred south of the project area (CAL FIRE 2023). Although the project area has experienced recent wildfires, due to successful suppression efforts, these fires did not burn a substantial part of the project area, leaving a majority of the project area unburned for over 120 years (CAL FIRE 2023).

The project area is owned by Collins Pine Company and its subsidiaries (i.e., Collins Pine Company, Collins California Trust, Collins Timber Properties, and CC&H Lands, LLC). The proposed treatment types (i.e., shaded and non-shaded fuel breaks and ecological restoration) and the treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

1.1.2 Agency Roles

This document is being prepared to comply with CEQA for the implementation of vegetation treatments that require a discretionary action by a state or local agency. The Resource Conservation District of Tehama County (RCDTC) is the CEQA lead agency.

The RCDTC will enter into a partnership with Collins to implement the proposed treatments. The RCDTC's Board will approve a resolution establishing the partnership. The partnership may entail the provision of resources to Collins, including funding for treatments through grants, staffing, and technical input. In this PSA/Addendum, Collins is referred to as the "implementing entity," reflecting its role as the lead implementer of treatments and landowner of the project area. As the CEQA lead agency, RCDTC has delegated responsibility to Collins for the implementation of CalVTP standard project requirements (SPRs) and mitigation measures, and to confirm that implementation occurs in accordance with the mitigation monitoring and reporting program (MMRP), pursuant to Section 15097(a) of the State CEQA Guidelines.

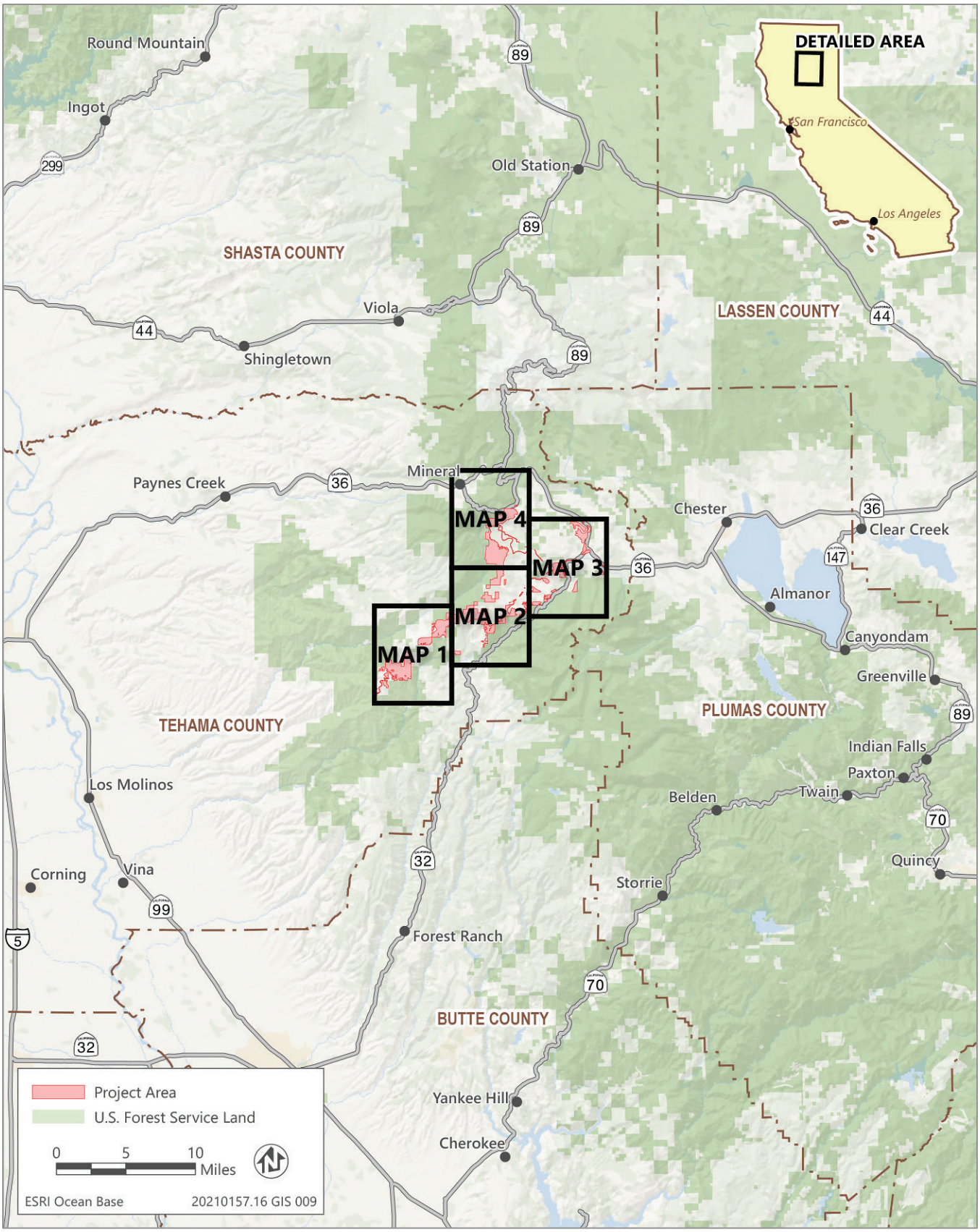


Figure 1-1 Regional Location

1.1.3 Purpose of This PSA/Addendum

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

Portions of the project area extend outside of the treatable landscape described in the CalVTP Program EIR. In total, these areas outside the treatable landscape encompass approximately 1,393 acres of the 10,376-acre project area; they are small sections dispersed throughout the project area (refer to Chapter 2, "Treatment Description"). The scattered array of acres outside of the mapped CalVTP treatable landscape is due to the digital expression of the CalVTP treatable landscape that resulted in a pixelated mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., 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 areas surrounded by the mapped treatable landscape. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the Program EIR would be applicable to the adjacent areas.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the Program EIR, is the inclusion of areas outside of and adjacent to the CalVTP treatable landscape. The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the addendum to the Program EIR.

This document serves as both a PSA and an Addendum to the CalVTP Program EIR for RCDTC review and analysis under CEQA regarding the proposed Collins Pine Vegetation Treatment Project within and outside the treatable landscape covered by the Program EIR. It provides environmental information supported by substantial evidence to RCDTC in its consideration of approving grant funding allocations and implementation of the work by Collins or its contractor(s). The project-specific MMRP, which identifies the CalVTP SPRs and mitigation measures applicable to the proposed project is presented in Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

1.1.4 Proposed Project Revisions

PROPOSED REVISIONS TO CalVTP SPRs

While the proposed treatment types and treatment activities are consistent with the CalVTP, RCDTC and Collins have deemed that certain requirements of three CalVTP SPRs are infeasible, are not warranted to maintain the impact significance conclusions in the Program EIR due to site-specific circumstances, and, if implemented as presented in the Program EIR, would prevent RCDTC and Collins from meeting treatment objectives. Because SPRs are part of the

CalVTP and are incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP Program EIR's description of later project activities.

RCDTC and Collins' proposed revisions to three SPRs are described below. These proposed revisions would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the Program EIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as described below.

SPR AQ-4 Minimize Dust

SPR AQ-4, as presented in the Program EIR, includes measures that the project proponent must implement to minimize dust. One of the measures limits vehicles and equipment traveling on unpaved areas to 15 miles per hour; and another requires that visible dust, silt, or mud tracked-out onto public paved roadways must be removed where sufficient water supplies exist, and that dust, silt, or mud on treatment vehicles be removed at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.

Collins' established speed guideline for vehicles and equipment traveling on unpaved roadways is 25 miles per hour. Collins proposes to limit vehicle and equipment speeds to 25 miles per hour on unpaved roadways consistent with current practice, which has been demonstrated based on Collins' experience to limit fugitive dust on project area roadways. However, if fugitive dust is visibly occurring, Collins would further limit vehicle and equipment speeds to 15 miles per hour. This would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR AQ-4 to avoid the creation of fugitive dust as a result of unpaved roadway travel.

Collins also proposes to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. This revision better aligns the measure with the requirements of Vehicle Code Section 23113 and is consistent with the purpose of SPR AQ-4 to avoid the creation of dust through treatment vehicles tracking out dust, silt, or mud.

Potential impacts resulting from revisions to SPR AQ-4 are discussed below under Section 4.3 "Air Quality," Section 4.5 "Biological Resources" and Section 4.6 "Geology, Soils, Paleontology and Mineral Resources." As explained in these sections, the proposed revisions to SPR AQ-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR AQ-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR AQ-4 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR GEO-1 Suspend Disturbance during Heavy Precipitation

SPR GEO-1, as presented in the Program EIR, requires that the project proponent suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated.

Collins proposes to suspend mechanical, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Potential impacts resulting from revisions to SPR GEO-1 are discussed below under Section 4.5 "Biological Resources," Section 4.6 "Geology, Soils, Paleontology, and Mineral Resources," and Section 4.10 "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR GEO-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR GEO-1 is not required to reduce environmental effects to any other

resources from implementation of the project. The proposed revisions to SPR GEO-1 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR HAZ-1 Maintain All Equipment

SPR HAZ-1, as presented in the Program EIR, requires that the project proponent inspect all equipment for leaks prior to the start of treatment activities and everyday thereafter until equipment is removed from the site, and any equipment found leaking be promptly removed from the treatment area.

Collins proposes to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area. This gives Collins the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed. This would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use.

Potential impacts resulting from revisions to SPR HAZ-1 are discussed below under Section 4.3 "Air Quality," Section 4.9 "Hazardous Materials," and Section 4.10 "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR HAZ-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR HAZ-1 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR HAZ-1 are shown in underline and strikethrough in the MMRP (Attachment A).

2 TREATMENT DESCRIPTION

The proposed project consists of vegetation treatments for wildfire risk reduction and forest health improvement on lands owned by Collins in Tehama County. The project area encompasses approximately 10,376 acres. The project area includes some areas that due to site-specific conditions, may not be treated because of unforeseen restrictions, such as operational considerations (e.g., steep slopes, road limitations), economic feasibility, or to avoid sensitive resources, including cultural sites and presence of special-status species or habitat. Existing permanent and temporary seasonal staff would implement project treatments.

The CalVTP treatment types that would be implemented are fuel breaks (shaded and non-shaded) and ecological restoration. The proposed CalVTP treatment activities are mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application. Locations of treatment types are shown in Figure 2-1 through 2-5. Table 2-1 summarizes the proposed treatments.

Table 2-1 Proposed CalVTP Treatments

CalVTP Treatment Type/ Treatment Area Name	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments	Typical Duration of Treatments
Shaded Fuel Break Main Road 1 Fuel Break	Maintenance of an existing shaded fuel break to reduce wildfire risk and aid in fire control	Mechanical Treatments	381	Tracked tree cutting, tracked masticating, wheeled skidding, and wheeled masticating machines	Several days to several months
		Herbicide Application	381	Back-pack spray equipment, and ATV-mounted spray equipment	5-20 acres per crew per day depending on crew size
Shaded Fuel Break Big Bend and Cold Creek Fuel Breaks	Creation of two new shaded fuel breaks to reduce wildfire risk and aid in fire control	Mechanical Treatments	107	Tracked tree cutting, tracked masticating, wheeled skidding, and wheeled masticating machines	Several days to several months
		Manual Treatments	107	Chainsaws, hand saws, and hand lopping tools	3 to 6 months
		Herbicide Application	107	Back-pack spray equipment, and ATV-mounted spray equipment	5-20 acres per crew per day depending on crew size
Non-Shaded Fuel Break Dixie Fuel Break	The existing fire line initially established during the Dixie Fire would be reestablished and interconnected to create a complete fuel break.	Mechanical Treatments	201	Tracked tree cutting, tracked masticating, wheeled skidding, and wheeled masticating machines	Several days to several months
		Manual Treatments	201	Chainsaws, hand saws, and hand lopping tools	3 to 6 months
		Herbicide Application	201	Back-pack spray equipment, and ATV-mounted spray equipment	5-20 acres per crew per day depending on crew size

CalVTP Treatment Type/ Treatment Area Name	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments	Typical Duration of Treatments
Ecological Restoration (9,688 acres)	Promote forest health and resiliency to disturbance through reducing invasive species, reforesting burned areas, reducing the overstocked understory, and increasing the spacing between canopy trees.	Prescribed Burning	4,766	Hand tools, drip torch, tractor, and water tender	1 day to 1 week
		Mechanical Treatments	3,646	Tracked tree cutting, tracked masticating, wheeled skidding, and wheeled masticating machines	Several days to several months
		Manual Treatments	1,764	Chainsaws, hand saws, and hand lopping tools	3 to 6 months
		Herbicide Application	9,688	Back-pack spray equipment, and ATV-mounted spray equipment	5-20 acres per crew per day depending on crew size
Total Acres			**10,376**		

2.1 PROPOSED TREATMENTS

The proposed project involves two treatment types: fuel breaks (shaded and non-shaded) and ecological restoration. The vegetation treatment activities proposed to implement each of these treatment types are mechanical treatments, manual treatments, prescribed burning, and herbicide application. With the exception of prescribed burning, treatment activities would occur Monday through Friday between 2:00 a.m. and 5:30 p.m. or when relative humidity is above 25 percent, to increase fire safety during operation of mechanical equipment. The treatment types and treatment activities are described below.

2.1.1 Treatment Types

Each treatment type (i.e., fuel breaks and ecological restoration) is described in more detail below and is consistent with the treatment types described in the CalVTP. Refer to Figures 2-1 through 2-5 for the location of each treatment type. Table 2-1 provides a summary of the proposed treatment types and associated activities.

FUEL BREAKS

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, which reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They can also provide safe emergency egress during wildfires. Fuel breaks also reduce the likelihood that a severe fire would occur within the treated area by reducing vegetative fuels and managing regrowth.

Four fuel breaks are proposed at strategic locations and would encompass approximately 688 acres of the project area. Two of the fuel breaks would maintain or reestablish previously created fuel breaks and fire lines. Fire lines are constructed during an active wildfire by removing all vegetation in a linear path to remove fuels, with the intention of changing fire behavior and providing firefighter access (Wilson 1988; Pyne et al. 1996). The proposed fuel breaks would vary in size and residual fuel levels. Three of the fuel breaks would be shaded; in these areas after treatment, trees and

shrubs would remain sufficiently spaced apart to disconnect one form of vegetation (fire fuel) from another. One non-shaded fuel break is proposed; most of the existing vegetation would be removed, except for grasses and forbs.

Fuel breaks would be established using varying combinations of manual and mechanical treatments and targeted herbicide application. Understory fuel not removed by manual or mechanical treatments would be treated with herbicides shortly after establishing the fuel break. Fuel breaks require retreatment over time to maintain the desired fuel levels and prevent dense regrowth. To maintain the fuel breaks, targeted herbicide application and prescribed fire would likely be used to prevent and manage shrub and tree regrowth.

Shaded Fuel Breaks

Three shaded fuel breaks are proposed on up to approximately 488 acres of the project area with maximum widths ranging from 150 to 210 feet. The project would maintain the existing shaded fuel breaks established in 2018, 2019, and 2020 along Main Road 1 (MR 1 Fuel Break), which is the main east-west permanent road in the project area (Figure 2-1 through 2-4). The MR 1 Fuel Break would be approximately 381 acres and maintained using mechanical treatments and targeted herbicide application.

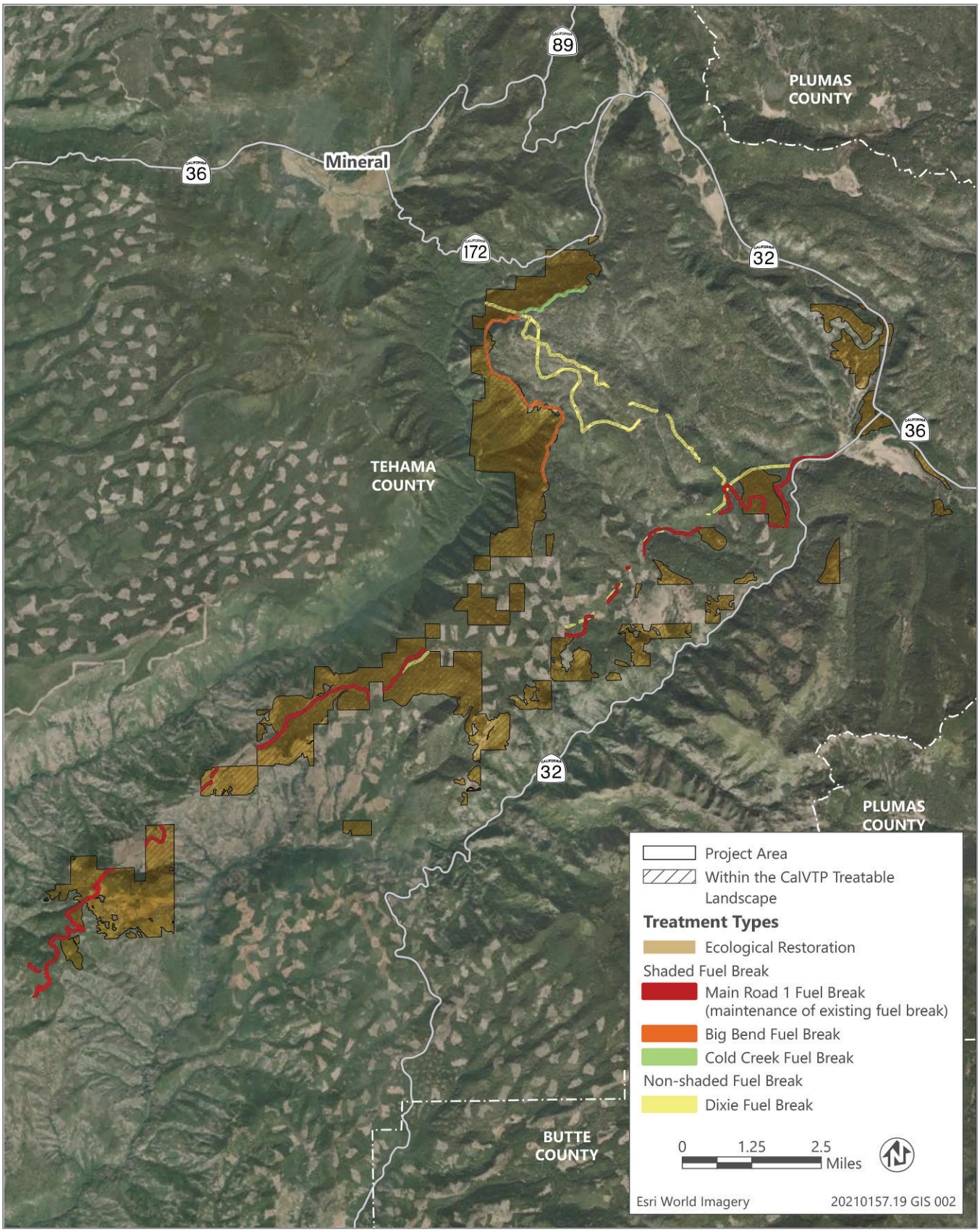
In addition, two new shaded fuel breaks would be established (Cold Creek Fuel Break and Big Bend Fuel Break, Figure 2-1 and 2-5) to connect existing fuel breaks and complete the strategic network required for managing both wildfire and prescribed fire in the general vicinity. Together, they would encompass approximately 107 acres of the project area and be implemented using manual and mechanical treatment, and targeted herbicide application.

In shaded fuel breaks, distances between forms of vegetation would vary, with trees typically spaced 40 feet apart whereas shrubs would typically be separated by 15 to 20 feet. Retaining vegetation to provide shade would reduce growth rates of the understory by blocking sunlight and keeping the microclimate cool and relative humidity high for extended periods of time. Retained trees would also block rain and reduce rain-drop-caused soil displacement.

In forested areas, trees would be thinned and some shrubs would be removed mechanically and/or manually to establish spacing between vegetation both vertically and horizontally. Fire resilient trees would be retained, generally consisting of pine (*Pinus* spp.) and incense cedar (*Calocedrus decurrens*). Mature Jeffrey pines (*Pinus jeffreyi*) are highly resistant to fire due to adaptations such as thick bark and self-pruning branches (Husari 1980; Miller 2000). Sugar pine (*Pinus lambertiana*) is also reported to be very resistant to low to moderate severity fires partially due to thick, fire-resistant bark and an open canopy (Arno and Hammerly 1977; Atzet and Wheeler 1982). Mature incense cedars are protected from low severity surface fires due to their thick bark (Keeley 2018; Skinner and Taylor 2018).

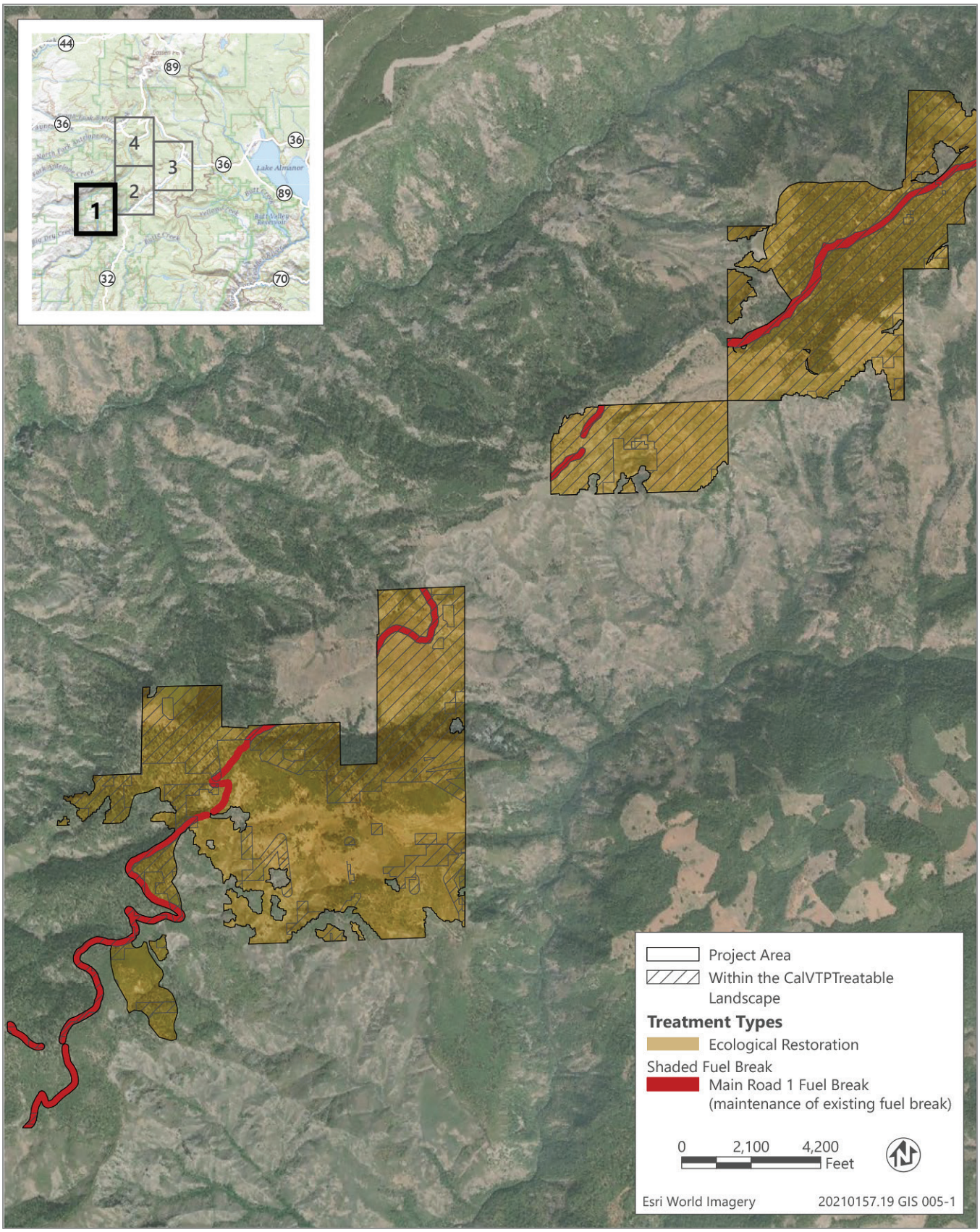
Non-shaded Fuel Breaks

One non-shaded fuel break (i.e., the Dixie Fuel Break) is proposed on up to approximately 201 acres of the project area and would be implemented using manual and mechanical treatments and targeted herbicide application. The Dixie Fuel Break would reestablish the fire line constructed during the Dixie Fire in 2021 and connect any disjointed segments to create a complete fuel break. The fire line created during the Dixie Fire generally occurs along major ridges in a north-to-south orientation. The existing fire line varies in width from 25 to 125 feet; the width of new and/or reestablished segments would vary depending on site specific conditions but would not exceed 125 feet. For the purposes of the analysis in this PSA/Addendum, this fuel break has been mapped with a 125-foot buffer, although it is not and would not be that wide throughout its full extent (Figure 2-3 through 2-5). Although much of the original fire line is a non-shaded fuel break, portions of the proposed Dixie Fuel Break would be shaded so that after implementation, the fuel break would exhibit a mixture of shaded and non-shaded conditions. Due to the unknown nature of the mixture of these two types of fuel breaks, the analysis in this PSA/Addendum assumes that the entire Dixie Fuel Break would be non-shaded.



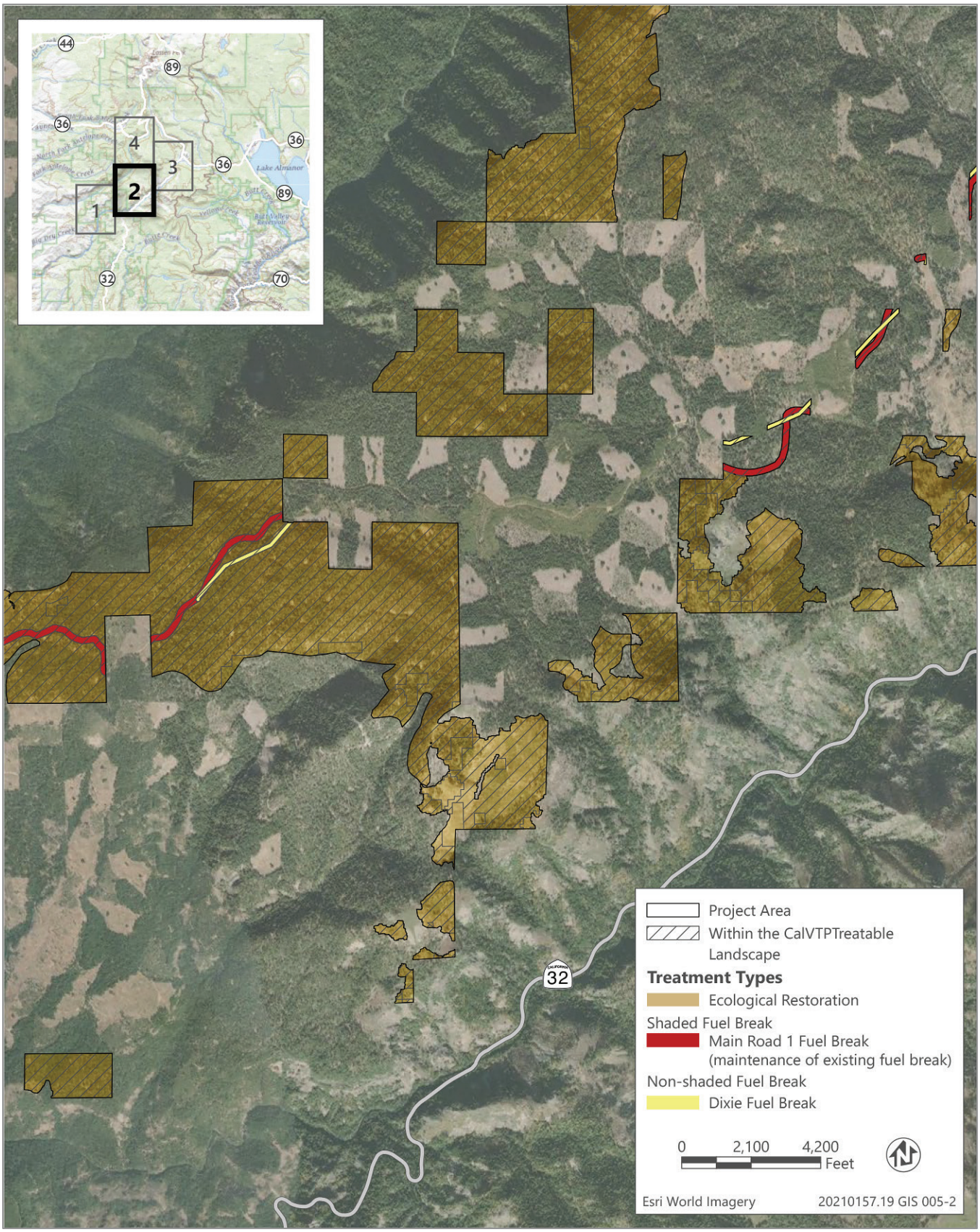
Source: Adapted by Ascent in 2023.

Figure 2-1 Proposed Project Treatments



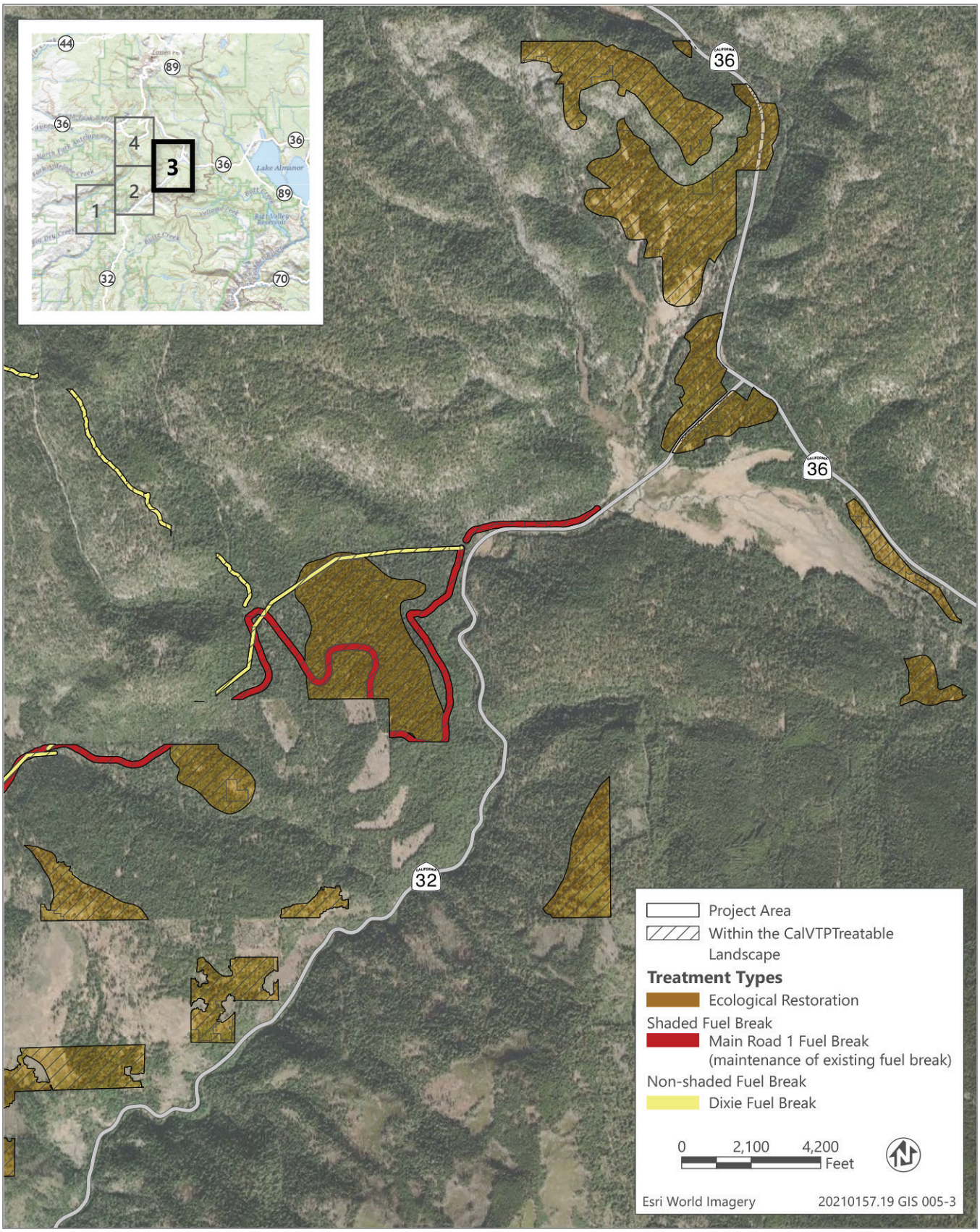
Source: Adapted by Ascent in 2023.

Figure 2-2 Proposed Project Treatments – Southwestern Section



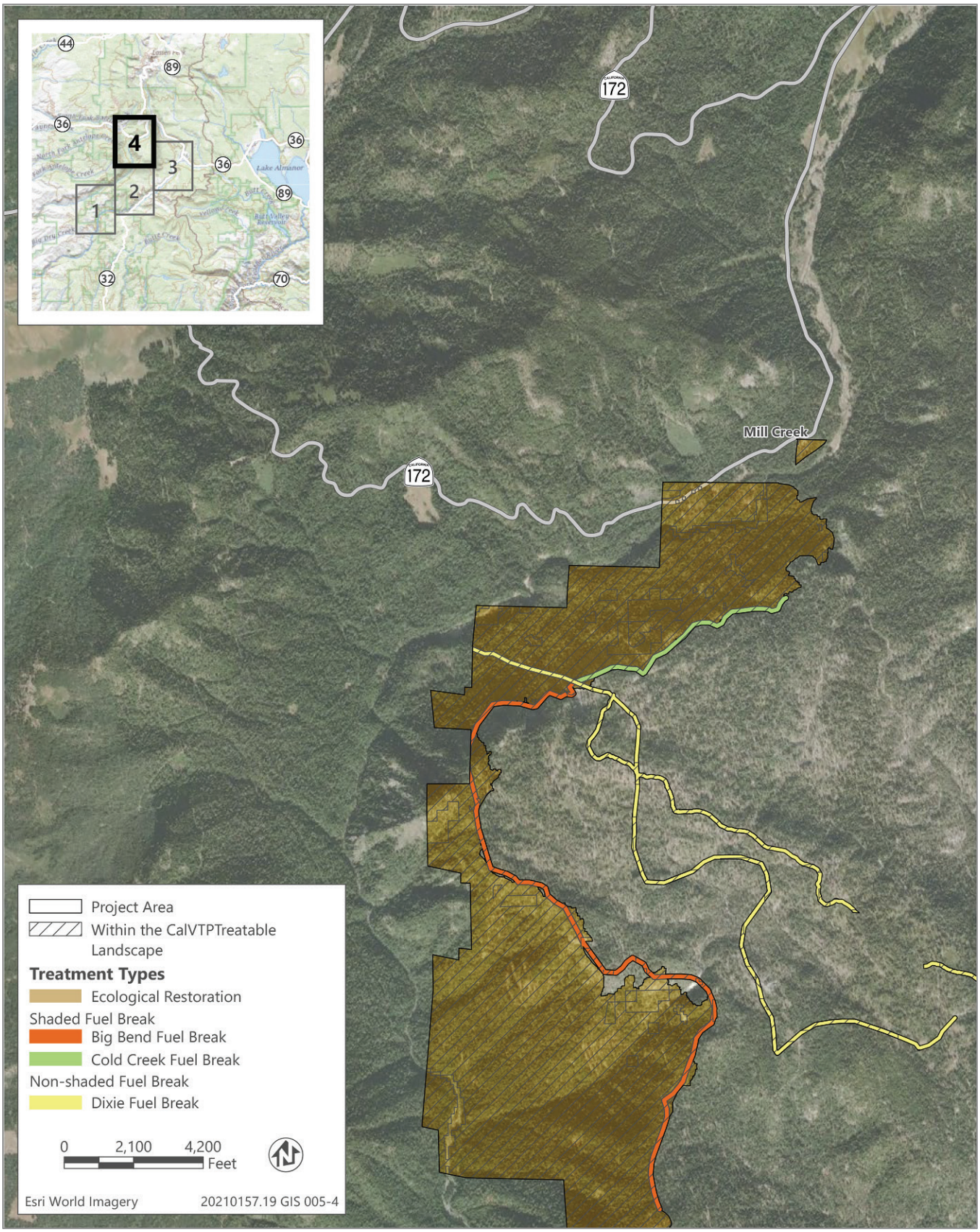
Source: Adapted by Ascent in 2023.

Figure 2-3 Proposed Project Treatments – Central Section



Source: Adapted by Ascent in 2023.

Figure 2-4 Proposed Project Treatments – Northeastern Section



Source: Adapted by Ascent in 2023.

Figure 2-5 Proposed Project Treatments – Northern Section

ECOLOGICAL RESTORATION

Ecological restoration treatments encompass approximately 9,688 acres of the project area. These treatments are proposed for areas between and near fuel break treatment areas, highways, and between other existing fuel breaks in the area, such as those established during previous wildfires (Figure 2-1 through 2-5). The CalVTP seeks to improve overall forest, woodland, and grassland health and provide watershed benefits by supporting native habitat structure that is resilient to future natural disturbances and climate scenarios. A healthy, functioning natural landscape would help reduce the impacts of climate change by sequestering carbon, protecting aquatic resources, and providing important habitat for native wildlife. A healthy natural landscape also can reduce the wildfire risk to surrounding human communities and protect the rich cultural landscape. The project area contains approximately 4,500 acres of mature forest habitat, some of which is located in areas that are difficult to access (e.g., steep slopes), and as a result, have not been logged or managed recently. In some areas this has created overstocked conditions resulting in an increased risk of wildfire. The objective of this treatment type is to prepare the landscape for greater fire resilience, protect and restore native ecological function, including returning fire to a more historical and natural role on the landscape to improve native habitats, and recreate healthy forest and woodland conditions.

In areas that are within their fire return interval, but vegetative regrowth is determined to be increasing fire risk or detrimental to ecological processes, treatment activities may occur, except within sensitive natural communities and chaparral vegetation (refer to SPR BIO-5 and Mitigation Measure BIO-3a for requirements regarding treatment within sensitive natural communities and chaparral within the fire return interval). Under the desired outcome, wildlife habitat function would be maintained. Additionally, forest species diversity would be more heterogenous to better reflect historic conditions of Sierran mixed conifer forests and other vegetation communities present in the project area, promoting fire resilience, which would be achieved partially by managing invasive plants. Soil and watershed processes would improve by reducing fuel buildup at the soil level because excess ground-level fuels can lead to excessive adverse heat-related soil impacts when fire occurs under those conditions.

Ecological restoration treatments would occur in several vegetation types including Sierra mixed conifer, ponderosa pine, perennial grassland, ponderosa pine–Douglas fire alliance, mixed chaparral, and California black oak. Species preference (i.e., tree species that would be retained) would vary, but in general, would include sugar pine (*Pinus lambertiana*), ponderosa pine (*Pinus ponderosa*), incense cedar (*Calocedrus decurrens*), California black oak (*Quercus kelloggii*), and madrone (*Arbutus menziesii)*. Within riparian areas there would be retention of at least 75 percent of the overstory including alders (*Alnus* spp.) and big leaf maple (*Acer macrophyllum*) and 50 percent of the understory canopy of native riparian vegetation.

Specific restoration objectives include promoting forest health and resiliency to disturbance (e.g., fire). Treatments would reduce invasive species (e.g., bromes [*Bromus* spp.]) that occupy treatment areas, particularly following wildfire; reforest burned areas with ecologically appropriate species; reduce vegetation in the overstocked understory; increase the average height of vegetation to the bottom of live crowns; and increase the spacing between canopy trees.

Treatments would vary slightly depending on the vegetation type being treated and specific prescriptions would be developed by a qualified registered professional forester (RPF) to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

To maintain habitat function for special-status wildlife, ecological restoration treatments would retain the following:

- Hardwoods greater than 10 inches diameter at breast height (dbh) (e.g., black oak, madrone, big-leaf maple);
- hardwoods greater than 12 inches dbh with basal hollows or other complex structural features;
- conifers greater than 12 inches dbh;
- snags greater than 12 inches dbh and up to four snags per acre;
- fifty percent of understory (i.e., shrubs, herbs) in watercourse and lake protection zones (WLPZs) would be retained for habitat;
- downed woody debris larger than 18 inches diameter and 12 feet long;

- a minimum of 35 percent relative cover of chaparral will be retained, or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent);
- ten percent of shrub understory habitat would be retained to create shrub patches;
- canopy cover within forest habitats occupied or potentially occupied by California spotted owl would be maintained at 60 percent or greater; and
- forested habitats currently mapped as 4D, 4M, 5D, or 5M, which currently encompass approximately 4,497 acres of the project area and are associated with mature forest habitats preferred by California spotted owl, would be maintained at a mosaic of 40 to 50 percent.
- In the case that California spotted owl is listed as threatened under ESA, Collins would submit this project for review by USFWS. Under USFWS' proposed rule, exceptions for take prohibition include forest and fuels management that would reduce the risk of catastrophic wildfire and that would result in conservation benefits to California spotted owls..

2.1.2 Treatment Activities

The proposed vegetation treatment activities are mechanical treatments, manual treatments, prescribed burning, and herbicide application (see Table 2-1). Each of these treatment activities is described in more detail below and is consistent with the treatment activities described in the CalVTP. Treatment activities could occur during any time of year, although the nesting bird season (February 1 – August 31 or extended limited operating period for raptors as determined by qualified RPF or biologist) would be avoided when feasible. Although there is the potential for prescribed burning to occur during nighttime and weekend hours, all other treatment activities equipment would occur Monday through Friday between 2:00am and 5:30pm or when relative humidity is above 25 percent, to increase fire safety during treatments..

PRESCRIBED BURNING

Prescribed burning is proposed on up to 4,766 acres of the project area. Prescribed burning consists of two general types: pile burning and broadcast burning. Both types of prescribed burning would be used to implement the project.

Broadcast burning would use low-intensity, ground-level fire across a specific area to manage vegetation and would occur on up to 4,766 acres of the project area. It would be used to promote forest health and native flora and reduce biomass and fuel loading in grassland, woodland, and forest vegetation in areas that have not burned recently. It would also promote a more natural, sustainable, and wildfire-resilient native landscape. Pretreatment of vegetation using mechanical and manual activities or targeted herbicide application would occur in areas proposed for broadcast burning. Collins would implement broadcast burning of understory using patterned lighting techniques during appropriate conditions and under the supervision of a qualified burn boss. Generally, appropriate conditions are those that occur during periods of high humidity and high fuel moisture content and/or in advance of an incoming wet weather event. The goal of broadcast burning is to consume targeted ground level vegetation and forest litter fuels. Prescribed broadcast burning would also thin dense vegetation that, because of steep and rocky slopes, cannot be treated by mechanical methods. Generally, not all fuel is consumed during broadcast burns and significant portions of the groundcover and understory typically remain in a mosaic pattern.

Broadcast burning requires the construction of control lines using manual or mechanical methods. Control lines are linear lengths of bare soil that help stop the horizontal progression of a fire. Dense patches of vegetation may be trimmed or removed manually or mechanically in advance of burning. Vegetation could also be pretreated with herbicides to kill the aboveground plant parts and cause them to dry out so they would be better consumed by fire. Prescribed broadcast burning would require between 10 and 50 crew members, depending on the size and site characteristics of the burn unit, water trucks, and excavators or dozers to clear control lines. Typically, each burn would last 1 day to 1 week.

Pile burning would occur on up to 1,556 acres of the project area but would likely be much less. Pile burning consists of igniting biomass piles constructed either manually or mechanically. Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) or hand crews and burned appropriately. If mechanical equipment is used, bulldozers equipped with a brush rake would be used to reduce soil displacement and create dirt-free piles for burning. Pile burning requires fewer crew members than broadcast burning, between 2 to 10, and a nearby water source. A hand-held drip torch would be used to ignite burn piles. Pile burning would take place under the overstory or in areas with little to no live overstory, including areas that have experienced previous wildfire.

All burning would occur in fall, winter, or spring and 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.

MECHANICAL VEGETATION TREATMENT

Mechanical vegetation treatments are proposed on up to 4,335 acres of the project area. Mechanical treatments may include mechanical tree removal (i.e., felling and skidding), mowing, masticating, and piling. Depending on conditions, up to four crews may operate at the same time across the project area. Typically, one hand crew (i.e., 20 workers) would use feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators to implement treatments. Typically, treatments would require several days to several months to complete. Equipment would be operated on or within 100 feet of existing roads or skid trails in fuel break treatment areas on flat to moderate slopes.

Mechanical treatment activities would include three categories: heavy, moderate, and light.

- Heavy mechanical: targets dense hardwoods and/or conifers up to 10 inches dbh.
- Moderate mechanical includes treating shrubs, small hardwoods, and small conifers (i.e., up to 6 inches dbh).
- Light mechanical: typically occur in previously treated areas and the vegetation that would be removed would include small diameter trees (i.e., less than 3 inches dbh), grasses, and shrubs.

The overall vegetation retention standards provided under "Ecological Restoration" above would apply to mechanical and manual treatment activities. Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. In some areas, removed vegetation would be piled for later pile burning or it would be hauled off-site. To reduce soil impacts and erosion, brush rakes would be used to pile residual surface fuels, shrubs, overstocked understory hardwoods and conifers, as appropriate.

MANUAL VEGETATION TREATMENT

Manual vegetation treatments are proposed on up to 2,072 acres of the project area. Manual treatments would be implemented with hand crews of approximately eight to 20 members using hand tools and hand-operated power tools, including chainsaws, hand saws, brush cutters, and loppers, to cut, clear, and prune trees, herbaceous vegetation, and woody shrubs and increase space between trees. Typically, treatments would require 3 to 6 months to complete, depending on the treatment size, steepness of terrain, and type and density of vegetation. Manual treatment activities may occur within 100 feet of Class II or III streams to improve habitat and reduce undesirable wildfire hazards. Manual treatment within 100 feet of Class II or III streams would occur outside of bird nesting season, if feasible.

Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. In some areas, removed vegetation would be piled for later pile burning, broadcast burning, or it would be hauled off-site. The same general guidelines for tree and vegetation removal and retention would be followed as described above for ecological restoration.

Proposed manual treatment activities are:

- Thinning trees with chainsaws, loppers, or pruners;
- cutting shrubs to restore characteristic densities for the vegetation community present; and
- planting ecologically appropriate species by hand (hand planting).

HERBICIDE APPLICATION

Targeted herbicide application may occur over the entire 10,376-acre project area. Actual treated acres would be highly dependent on crew size, ground conditions, and topography. Herbicide application operations would comply with all US Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation (DPR) label standards. All herbicide application would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations. Only targeted, ground-level application would occur; there would be no aerial spraying of herbicides. Several herbicide application methods would be used, including paint-on stems, backpack hand-applicator, or hack and squirt.

Herbicide treatments would typically require a multiple-person crew(s) ranging from three to 16 people, a batch truck, a passenger vehicle to transport crew, backpack sprayers, and all-terrain vehicles to move materials to treatment sites. All-terrain vehicles would only be driven on established roads and skid trails. Ground-based application would occur in late summer or fall, approximately 9 to 15 months following vegetation cutting. However, hack and squirt application may occur at least 3 months prior to cutting of hardwoods, and stump treatment immediately following cutting of hardwoods may also be implemented.

The application method chosen for a specific site would depend on the written recommendations of an independent Pest Control Advisor licensed by DPR. The application of herbicides is widely and effectively used in the project area to help maintain a manageable understory for fuel breaks and to reduce fuel connectivity.

To restore characteristic herbaceous species composition for the vegetation community, pre-emergent herbicides may also be used. Herbicides would also be used to reduce the spread of invasive species such as bromes. Herbicides may also be utilized to restore characteristic shrub densities for the vegetation community.

Herbicides that may be applied include those listed below, which are consistent with those considered for use in the CalVTP Program EIR:

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Velpar (hexazinone);
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E); and
- Cleantraxx (penoxsulam & oxyfluorfen).

BIOMASS DISPOSAL

The vegetative biomass generated by the proposed project would be disposed of by several methods:

- pile burning,
- hauling off-site to a biomass facility as waste product,
- lopping and scattering within treatment boundaries,
- leaving unburned piles for wildlife habitat, or
- chipping and scattering chips onto the ground as mulch, not exceeding 4 inches in depth.

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

2.2 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated under the proposed project would be conducted to control vegetative regrowth and remove invasive species. Maintenance would use the same treatment activities as the initial treatments: mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application. Maintenance treatments would occur as needed and would generally treat smaller acreages and use less equipment than the initial treatments. The interval between initial treatments and subsequent maintenance would be based on site monitoring for the effectiveness of the initial treatment, available funding, and other factors. Maintenance cycles would be dependent on regrowth conditions and would differ by location.

Maintenance prescriptions would be developed with consideration of the location's vegetation type and its natural fire return interval (i.e., time since last burn is greater than the average fire return interval for the habitat type). Retreatment activities would generally occur when the project area is outside of its natural fire return interval. These intervals vary by vegetation type and disturbance intensity. Chaparral vegetation types generally require a minimum of 10 years to recover after fire or fire-replicating treatments, though chaparral vegetation types dominated by obligate seeders generally require a minimum of 15 years to recover (Syphard et al. 2019). Northern California mixed evergreen forest vegetation types require a minimum of 5 years to recover after a surface or low severity fire, 15 years minimum after a mixed severity fire, and 100 years minimum following a stand-replacing event (Tollefson 2008). California montane and subalpine grassland vegetation require zero to 20 years to recover, depending on conditions (USFS 2019).

Manual treatments such as hand pulling of invasive plants or hand thinning could still occur within the natural fire return interval; however, major vegetation disturbance activities which change the composition of the vegetation community and prevent the vegetation community from recovering (i.e., mastication or broadcast burning) would not occur. Long-term maintenance objectives include the return of low-intensity prescribed fire and maintenance of vegetation at a natural fire return interval.

Prior to implementing a maintenance treatment, Collins would verify that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum would be considered by Collins and agencies seeking to use this PSA for later discretionary approvals in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new or substantially more severe impacts may occur, the lead or responsible agency will determine whether a new PSA/Addendum or other environmental analysis is warranted. In addition to verifying that the PSA/Addendum continues to provide relevant CEQA coverage for treatment maintenance, the PSA/Addendum would be updated at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA/Addendum or the latest PSA/Addendum update. For example, a reconnaissance survey may be conducted to verify conditions are substantially similar to those anticipated in the PSA/Addendum. Updated information would be documented.

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3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Collins Pine Vegetation Treatment Project
2. **CalVTP I.D. Number:** 2023-14
3. **Implementing Entity's Name and Address:** Collins Pine Company
   500 Main St.
   Chester, CA 96020
4. **Contact Person Information and Phone Number:** Eric O'Kelley
   530.258.9223
   EOKelley@collinsco.com
5. **Project Proponent Name and Address:** Resource Conservation District of Tehama County
   2 Sutter St. #D
   Red Bluff, CA 96080
6. **Contact Person Information and Phone Number:** Jon Barrett
   530.727.1293
   jbarrett@tehamacountyrcd.org
7. **Project Location:** Tehama County, northwest of State Route (SR) 32, northeast of the City of Chico, southwest of the City of Chester, surrounded by Lassen National Forest lands
8. **Total Area to Be Treated (acres)** Up to 10,376 acres
9. **Description of Project**:

   a. Initial Treatment
   Initial treatments would involve ecological restoration and fuel break treatment types using mechanical treatment, manual treatment, prescribed fire, and targeted herbicide application. See Chapter 2, "Project Description," for additional details.

   Treatment Types

   ☐ Wildland-Urban Interface Fuel Reduction

   ☒ Fuel Break

   ☒ Ecological Restoration

   Treatment Activities

   ☒ Prescribed Burning (Broadcast), 4,766 acres

   ☒ Prescribed Burning (Pile Burning), 1,556 acres

   ☒ Mechanical Treatment, 4,335 acres

   ☒ Manual Treatment, 2,072 acres

   ☐ Prescribed Herbivory, 0 acres

   ☒ Herbicide Application, up to 10,376 acres

Fuel Type *[See description in CalVTP Program EIR Section 2.5.2, check every applicable category, include number of acres subject to each treatment activity, and provide detail in description of initial treatment.]*

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Maintenance treatments would involve the same treatment activities as the initial treatments (i.e., mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application). See Section 2.2, Treatment Maintenance, above for additional details.

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), up to 10,376 acres

☒ Prescribed Burning (Pile Burning), up to 1,556 acres

☒ Mechanical Treatment, up to 10,376 acres

☒ Manual Treatment, up to 10,376acres

☐ Prescribed Herbivory, 0 acres

☒ Herbicide Application, up to 10,376 acres

Fuel Type *[See description in CalVTP Program EIR Section 2.5.2, check every applicable category, include number of acres subject to each treatment activity, and provide detail in description of initial treatment.]*

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

10. Regional Setting and Surrounding Land Uses:

The project area is situated in eastern Tehama County northeast of the City of Chico, southwest of the City of Chester, southeast of Mineral, and surrounded by the Lassen National Forest and private landowners. Surrounding land uses include national forest land, private timberland, recreation areas, grazing, and wilderness.

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

Pesticide application permit from Tehama County Agricultural Commissioner

Smoke management plan for Tehama County Air Pollution Control District

Burn permits from Tehama County Air Pollution Control District

Burn permits from CAL FIRE, when required

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone.

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

- ☐ A coastal development permit has been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable.
- ☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required.

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

Pursuant to SPR CUL-2, Native American tribes in Tehama County were contacted on March 24 and 27, 2023, and included Glenda Nelson, Chairperson, Estom Yumeka Maidu Tribe; Kyle Self, Chairperson, Greenville Rancheria of Maidu; Guy Taylor, Mooretown Rancheria of Maidu; Benjamin Clark, Chairperson, Mooretown Rancheria of Maidu; Andrew Alejandre, Chairperson, Paskenta Band of Nomlaki; Jack Potter, Chairperson, Redding Rancheria; Wade McMaster, Chairperson, Wintu Tribe of Northern California; Beverly Ogle, Tasman Koyom Indian Foundation; and Brandie Cooper, Acting THPO, Natural Resource Director, Susanville Indian Rancheria.

Responses were received from the Paskenta Band of Nomlaki Indians and Mooretown Rancheria. The Paskenta Band of Nomlaki Indians met with Collins and the RCDTC and provided a burial treatment plan and requested additional protection measures for tribal cultural resources. In the letter from Mooretown Rancheria, the Tribe stated they were unaware of any tribal resources in the area but would like to be notified if any human remains were encountered. For additional information regarding Native American consultation, see Section 4.4, "Archaeological, Historical, and Tribal Cultural Resources," below.

DETERMINATION

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

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

☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, 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 covered in the CalVTP Program EIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP Program EIR. A **NEGATIVE DECLARATION** will be prepared.

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

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

Signature

September 7, 2023

Date

Jon Barrett

Printed Name

District Manager

Title

Resource Conservation District of Tehama County

Agency

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AD-4 AES-2 AQ-2 AQ-3	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Wildland-Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-1 AES-3	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Nonshaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	Yes	NA	AES-3	SU	No	Yes

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT AES-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed burning, and targeted ground application of herbicides. The potential for these treatment activities to result in short-term degradation of the visual character of a treatment area was examined in the Program EIR. The nearest eligible state scenic highway to the project area is State Route (SR) 36, which runs adjacent to portions of the project area (Caltrans 2023). The proposed treatments would occur on lands owned by Collins and its affiliates; Collins allows and welcomes public recreation on their lands, except during periods of high fire danger.

Public viewpoints within and near the project area from which treatments would be visible include public trails (e.g., Deer Creek Trail) and recreation areas (e.g., Mill Creek Campground), and SR 32, SR 172, and other public roadways. Although portions of the project area are visible from public viewpoints and an eligible state scenic highway, the project area is densely vegetated with mature trees and varied topography, which would substantially reduce the visibility of treatments from public viewpoints. In addition, prior to treatments in close vicinity to trails and public recreation areas, Collins would post notices informing the public of upcoming treatment activities and any upcoming trail closures at the intersection of SR 32 (Deer Creek Highway) and MR 1 Fuel Break, which is the primary entry point onto Collins lands for recreation. Furthermore, manual and mechanical treatments would remove shrubs and trees smaller than 12 inches dbh, leaving overstory vegetation in much of the project area. Although in the short-term after treatment, the absence of treated vegetation could be noticeable, mature vegetation would remain to provide partial screening of treatment areas. However, equipment, crews, and smoke from prescribed burning could be visible from public viewpoints and an eligible state scenic highway (SR 36) in the short term. However, per SPR AD-4, public notification prior to prescribed burning would occur, and a smoke management plan (SPR AQ-2) and burn plan (SPR AQ-3) would be prepared, which would help to reduce excess smoke by requiring certain conditions be met prior to burning. In addition, Collins would avoid staging vehicles and equipment within the viewshed of public trails, recreation areas, and roadways (SPR AES-2). SPR AD-4 was not included in the Program EIR for this impact (Impact AES-1); however, it is included here to address short-term degradation of public views from prescribed burning.

The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. SPRs applicable to this impact are AD-4, AES-2, AQ-2, AQ-3, and REC-1. 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 AES-2

Initial and maintenance treatments would include ecological restoration, and both shaded and non-shaded fuel break treatment types. The potential for ecological restoration and shaded fuel break treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR. Public viewpoints of the treatment areas include public trails and recreation areas within and adjacent to the project area, SR 36, and other public roadways. Manual and mechanical treatments would remove shrubs and trees smaller than 12 inches dbh, leaving overstory vegetation in much of the project area. Therefore, mature vegetation would remain to provide partial screening of treatment areas. In addition, one of the three shaded fuel breaks proposed would involve maintaining an existing fuel break and thus would not result in a substantial change from past and current conditions. The two new shaded fuel breaks proposed (i.e., Big Bend and Cold Creek) would leave mature vegetation where appropriate. The long-term visual character of the treatment areas after implementation of the proposed ecological restoration and shaded fuel break treatments would remain consistent with the current natural, vegetated landscape and would not constitute a substantial noticeable adverse change or degrade the visual character of the landscape.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AES-1 and AES-3. 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 AES-3

One non-shaded fuel break (i.e., the Dixie Fuel Break) is proposed on up to approximately 201 acres of the project area and would be implemented using manual and mechanical treatments and herbicide application. The Dixie Fuel Break would reestablish the fire line constructed during the Dixie Fire in 2021 and connect disjointed segments to create a complete fuel break. The fire line created during the Dixie Fire generally occurs along major ridges in a north-to-south orientation. The fire line currently and would continue to vary in width from 25 to 125 feet. Due to the unknown nature of the mixture of shaded and non-shaded fuel break treatments, the analysis in this PSA assumes that the entire Dixie Fuel Break would be non-shaded.

The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because it may be infeasible to relocate a non-shaded fuel break to avoid public visibility while achieving treatment objectives. Public viewpoints of the project area include public trails and recreation areas within and near the project area and public roadways. Although SR 36, which is eligible as a state scenic highway, is near eastern portions of the treatment area, the Dixie Fuel Break is proposed in the western portion of the project area (Figure 2-1) and would not be visible from SR 36. However, the Dixie Fuel Break could be visible from other public viewpoints, as described above.

The potential for the Dixie Fuel Break to result in substantial long-term degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment type and activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. No SPRs are applicable to this impact; however, Mitigation Measure AES-3 would apply to this treatment to minimize visual impacts, if feasible, from public trails and recreation areas with views of the Dixie Fuel Break. While implementation of Mitigation Measure AES-3 would substantially reduce the potential for substantial long-term degradation of visual character because the project would implement a non-shaded fuel break that could be visible from public areas, it would contribute to the environmental significance conclusion in the Program EIR. Therefore, the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. This determination is consistent with the Program EIR and would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT AG-1

Vegetation treatment activities implemented within the project area would include mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application to conduct fuel break (shaded and non-shaded) and ecological restoration treatment types. The project area includes forested areas consisting of hardwoods, conifers, and snags, and is currently managed for commercial timber operations.

In areas where shaded fuel breaks are proposed, trees would be thinned, and some shrubs would be removed mechanically and/or manually to establish spacing between vegetation both vertically and horizontally. Fire resilient trees would be retained, generally consisting of pine and incense cedar with larger diameters and thicker bark which protects the trees from heat during a fire. The non-shaded fuel break (i.e., the Dixie Fuel Break) encompasses 201 acres of the project area and would be created by reestablishing a fire line created during the Dixie Fire as well as connect disjointed segments of the fire line. The proposed ecological restoration treatments involve reducing invasive species that occupy treatment areas, particularly following wildfire; reforesting burned areas with ecologically appropriate species; reducing vegetation in the overstocked understory; increasing the average height of vegetation to the bottom of live crowns; and increasing the spacing between canopy trees.

The potential for these treatment types and treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the Program EIR. The treatment types and activities described above would occur in forested lands. Consistent with the Program EIR, the vegetation remaining after treatments would meet the definition of forestland as defined in PRC Section 12220(g), which defines "forest land" as land that can

support 10-percent native tree cover of any species under natural conditions. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact to forest land is also the same, as described above. No SPRs are applicable to this impact. Therefore, the potential for the project to result in the loss or conversion of forestland is within the scope of the Program EIR. 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.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

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

4.3 AIR QUALITY

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

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

Tehama County is in the jurisdiction of the Tehama County Air Pollution Control District (TCAPCD). Pursuant to SPR AQ-1, the implementing entity would comply with the applicable air quality requirements of the TCAPCD. Pursuant to SPR AQ-2, the implementing entity would also prepare a smoke management plan and submit it to TCAPCD prior to implementing any prescribed burning treatment. In addition, the implementing entity would prepare a burn plan as required by SPR AQ-3, which would include fire behavior modeling. Also, SPR AQ-6 requires the implementation of an Incident Action Plan, which identifies burn dates, burn hours, weather limitations, specific burn prescription, communication plan, medical plan, traffic plan, and other special instructions required by TCAPCD for all proposed prescribed burning. Incident Action Plans would also identify the contact personnel with TCAPCD to coordinate on-site briefings, posting notifications, and weather monitoring during burning.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standard (CAAQS) or National Ambient Air Quality Standard (NAAQS) thresholds. The project would be implemented by existing permanent and seasonal staff; therefore, the project would not result in a substantial increase in worker vehicle trips and associated emissions of criteria pollutants. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the Program EIR.

Emissions of criteria air pollutants from the proposed project are within the scope of the Program EIR because the associated equipment and duration of use are consistent with those analyzed in the Program EIR. The emission reduction techniques proposed in Mitigation Measure AQ-1 would be implemented, to the extent feasible. Collins and Collins' contractors primarily use new and efficient forestry equipment (mostly 2016 or later) compliant with current regulatory standards, which helps to reduce the emissions of criteria air pollutants from equipment use. While the project's emissions of criteria pollutants is not expected to exceed CAAQS or NAAQS thresholds, because the project would generate emissions, it would contribute to the environmental significance conclusion in the Program EIR; therefore, the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. The SPRs applicable to this treatment project are AD-4, AQ-1 through AQ-4, and AQ-6.

In addition, Collins proposes to revise SPR AQ-4 to limit vehicle and equipment speeds on unpaved roadways to 25 miles per hour, unless fugitive dust emissions are visibly occurring (then vehicle speeds would be reduced to no more than 15 miles per hour); and to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the Program EIR. These revisions are consistent with the purpose of SPR AQ-4 and would maintain the overall requirements of avoiding and minimizing the creation of fugitive dust through treatment vehicle use of unpaved roadways and vehicles tracking out dust, silt, or mud onto public roadways. In addition, Collins would wet unpaved areas if road use creates excessive fugitive dust, as required by SPR AQ-4. For the reasons described, proposed revisions to SPR AQ-4 would not result in a substantially more severe significant effect related to emissions of criteria air pollutants than what was covered in the Program EIR.

This impact would remain significant and unavoidable. 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 AQ-2

Use of mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists using publicly accessible trails and recreation areas within the Lassen National Forest and Ishi Wilderness, which are adjacent to portions of the project area, to diesel particulate matter emissions. However, treatment activities would not take place near the same people for an extended period such that prolonged exposure would occur. The potential to expose people to diesel particulate matter emissions was examined in the Program EIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5.

In addition, Collins proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does involve any changes to requirements regarding equipment maintenance that could affect diesel particulate emissions. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to emissions of diesel particulate matter than what was covered 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 AQ-3

This impact does not apply to the project because no naturally occurring asbestos is mapped in the project area (DOC 2000; USGS 2011).

IMPACT AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants, which was examined in the Program EIR. The impact in the Program EIR was found to be significant and unavoidable 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 (TACs) and associated levels of acute health risk. The duration and parameters of the proposed prescribed burns are within the scope of the activities addressed in the Program EIR, and within the TCAPCD, air quality conditions are consistent with those analyzed in the Program EIR for Tehama County. Therefore, the potential for exposure to toxic air contaminants is also within the scope the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above.

SPRs applicable to this impact are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the 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 AQ-5

Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the 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 under the proposed project are consistent with what was analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions, and sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5.

In addition, Collins proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does involve any changes to requirements regarding equipment maintenance that could affect diesel exhaust emissions and related odors. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to odors from diesel exhaust than what was covered in the Program EIR.

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

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

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the 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, as described above.

SPRs that are applicable to this impact are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the 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.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The lead agency and implementing entities have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the

boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

Consistent with SPR CUL-1, a records search of the approximately 10,376-acre project area was conducted at the Northeast Information Center (NEIC) on January 26, 2023 (NEIC File No.: NE23-42). The records search revealed one previously recorded precontact archaeological site, eight historic-era archaeological sites, two multicomponent archaeological sites containing both historic and prehistoric elements, and one historic feature. The historic feature has been evaluated as appearing eligible for California Register of Historical Resources (CRHR) listing.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On March 24 and March 27, 2023, letters or emails inviting the tribes to consult were mailed to

the seven tribal representatives indicated by NAHC and two additional tribes known to have cultural affiliations with the project area. A February 14, 2023 search of NAHC's sacred lands database returned negative results.

Responses were received from the Paskenta Band of Nomlaki Indians and Mooretown Rancheria. The Paskenta Band of Nomlaki Indians met with Collins and the RCDTC and provided a burial treatment plan and requested additional protection measures for tribal cultural resources. In the letter from Mooretown Rancheria, the Tribe stated they were unaware of any tribal resources in the area but would like to be notified if any human remains were encountered.

IMPACT CUL-1

Proposed treatment activities include prescribed burning and mechanical treatments, which could damage historical resources. The NEIC records search revealed one built-environment feature (the Mill Creek Recreation Residence Tract) which has been evaluated as appearing eligible for CRHR-listing; therefore, it is a resource under CEQA. Consistent with SPR CUL-7, the Mill Creek Recreation Residence Tract, which consists of residences, bridges, and landscaping, would be avoided by all project activities. Additional structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area, and these structures would be identified and avoided pursuant to SPR CUL-7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR because treatment activities and the intensity of ground disturbance associated with the treatment project are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on historical resources is also the same, as described above. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. 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

Vegetation treatment would include prescribed burning and mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; these activities may result in damage to known or previously unknown archaeological resources. The NEIC records search revealed 11 previously recorded archaeological sites, consisting of precontact sites (lithic scatters, rock tools), historic-era archaeological sites (foundations and structure pads, wells and cisterns, trail segments, communication lines, and trash scatters), and multicomponent sites containing both historic and prehistoric elements. None of these sites have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether the sites are considered resources under CEQA. A survey would be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources would be avoided according to the provisions of SPR CUL-5.

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the Program EIR. This impact was identified as significant and unavoidable in the Program EIR because of the large geographic extent of the treatable landscape and the possibility that there could be some rare instances where inadvertent damage of unknown resources may be extensive. For the proposed treatment project, SPRs and Mitigation Measure CUL-2 would require identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse change in the significance of any unique archaeological resources or subsurface historical resources. However, because the project could result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources, it could contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable.

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 proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the 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 on unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this impact include CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to the proposed project to protect any inadvertent discovery. 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-3

Native American contacts in Tehama County were contacted on March 24 and March 27, 2023, and included Glenda Nelson, Chairperson, Estom Yumeka Maidu Tribe of the Enterprise Rancheria; Kyle Self, Chairperson, Greenville Rancheria of Maidu Indians; Guy Taylor, Mooretown Rancheria of Maidu Indians; Benjamin Clark, Chairperson, Mooretown Rancheria of Maidu Indians; Andrew Alejandre, Chairperson, Paskenta Band of Nomlaki Indians; Jack Potter, Chairperson, Redding Rancheria; Wade McMaster, Chairperson, Wintu Tribe of Northern California; Beverly Ogle, Tasman Koyom Indian Foundation; and Brandie Cooper, Acting THPO, Natural Resource Director, Susanville Indian Rancheria. Responses were received from the Paskenta Band of Nomlaki Indians and Mooretown Rancheria. The Paskenta Band of Nomlaki Indians provided a burial treatment plan and requested revisions to SPRs. In the letter from Mooretown Rancheria, the Tribe stated they were unaware of any tribal resources in the area but would like to be notified if any human remains were encountered.

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 would avoid any substantial adverse change to any tribal cultural resource.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the 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 on tribal cultural resources is also the same, as described above. SPRs applicable to this impact include CUL-1 through CUL-6 and CUL-8. Accordingly, recommendations from the Paskenta Band of Nomlaki Indians have been integrated into SPR CUL-5, SPR CUL-6, and SPR CUL-8. 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-4

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use skid steers, excavators, and dozers, which could uncover human remains. The NEIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the Program EIR. Additionally, consistent with the Program EIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above. No SPRs are applicable to this impact. 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.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

4.5 BIOLOGICAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-5	BIO-1a BIO-1b BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-8 BIO-10 BIO-11 HAZ-5 HAZ-6 HYD-1 HYD-4 HYD-5	BIO-2a BIO-2b BIO-2c BIO-2e BIO-2g BIO-3a BIO-3b BIO-3c BIO-4	LTSM for bumble bee habitat function; TSE for direct harm to bumble bee species; LTSM for other species	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-8 BIO-9 HYD-4 HYD-5	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 HYD-1 HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-3 BIO-4 BIO-5	BIO-5	LTSM	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
				BIO-10 BIO-11 HYD-1 HYD-4				
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	--	--	--	--	--

Notes: LTS = less than significant; LTSM = less than significant with mitigation; NI = no impact; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact; None = there are SPRs and/or MMs identified in the Program EIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

Pursuant to SPR BIO-1, Ascent biologists conducted a data review of project-specific biological resources, including habitat and vegetation types, special-status plants, special-status wildlife, and sensitive habitats (i.e., sensitive natural communities, wetlands) with potential to occur in the project area. The Mill Creek VegCAMP mapping (CDFW 2023a), Northern Sierra Nevada Foothills Vegetation Project mapping (Menke et al. 2011), and US Forest Service (USFS) Existing Vegetation (EVEG) mapping was used to identify the habitat/vegetation types within the project area. The Mill Creek mapping and Northern Sierra Nevada Foothills Vegetation Project mapping are both part of CDFW's VegCAMP mapping project which provides more specific mapping datasets for locations throughout California, but these two maps only cover small portions of the project area (CDFW 2023a; Menke et al. 2011). Mill Creek mapping covers a small portion of the northern section of the project area along the Mill Creek riparian corridor (CDFW 2023a). Northern Sierra Nevada Foothills Vegetation Project mapping covers a small portion of the project area in the southern section that is located in the Sierra Nevada Foothills ecoregion (Menke et al. 2011). In the portions of the project area that were not mapped by the VegCAMP mapping project, USFS EVEG mapping was used to identify habitat/vegetation types.

The project area spans two different ecoregions (from west to east): the Southern Cascades ecoregion and the Sierra Nevada Foothills ecoregion. The project area ranges in elevation from approximately 3,900 feet to 5,800 feet. Habitat types within the project area and total acreage of each type are presented in Table 4.5-1.

Table 4.5-1 Habitat Types in the Project Area

Habitat Type	Fuel Break Acreage	Ecological Restoration Acreage	Total Acreage
Forest/Woodland			
Sierran Mixed Conifer	511.0	7,138.9	7,649.9
Ponderosa Pine	66.9	747.2	814.1
Ponderosa Pine – Douglas Fir Alliance	<0.1	203.5	203.5
California Black Oak Alliance	13.7	122.6	136.2
Montane Hardwood	6.9	121.8	128.7
Montane Hardwood-Conifer	13.0	104.1	117.1
Ponderosa Pine – Incense Cedar Alliance	0.0	91.3	91.3
White Fir	12.9	74.7	87.6
Jeffrey Pine	31.1	53.9	85.0
Lodgepole Pine	0.0	35.9	35.9
Douglas Fir Alliance	0.0	31.5	31.5
Eastside Pine	0.8	10.8	11.6
Canyon Live Oak (Tree) Alliance	0.0	3.7	3.7
Forest/Woodland Total	—	—	*9,396.1*
Shrub/Scrub			
Mixed Chaparral	8.7	128.8	**137.5**
Deer Brush Chaparral Alliance	4.4	93.5	**97.9**
Montane Chaparral	9.3	60.5	**69.8**
Sagebrush	0.0	62.9	**62.9**
Birch Leaf Mountain Mahogany Chaparral Alliance	0.0	35.9	**35.9**
Buck Brush Chaparral Alliance	0.0	16.0	**16.0**
California Yerba Santa Provisional Alliance	0.0	13.8	**13.8**
Whiteleaf Manzanita Chaparral Alliance	0.0	6.0	**6.0**
California & Western Cordilleran Montane Chaparral Macrogroup	0.0	1.0	**1.0**
Shrub/Scrub Total	—	—	*440.8*
Herbaceous			
Perennial Grassland	1.2	327.3	**328.4**
California Annual and Perennial Grassland	0.2	20.4	**20.6**
Annual Grassland	0.0	0.3	**0.3**
Herbaceous Total	—	—	*349.3*
Wetland/Riparian			
Perennial Stream Channel	0.0	10.8	**10.8**
River & Lacustrine Flats & Streambeds	0.0	8.7	**8.7**
Mountain Alder Alliance	0.0	7.9	**7.9**
White Alder Alliance	0.0	7.7	**7.7**
Montane Riparian	0.0	1.3	**1.3**
Wet Meadow	1.1	0.2	**1.3**

Habitat Type	Fuel Break Acreage	Ecological Restoration Acreage	Total Acreage
Western Cordilleran montane – Boreal summer-drying wet meadow Group	0.0	0.9	**0.9**
Wetland/Riparian Total	—	—	***37.3***
Developed/Disturbed/Barren[1]			
Barren	1.7	101.2	**102.9**
Sierra Nevada Cliff and Canyon	0.0	1.3	**1.3**
Undefined areas with little or no vegetation (Human Disturbance)	0.0	0.7	**0.7**
Cliffs and Rock Outcroppings	0.0	0.3	**0.3**
Developed/Disturbed/Barren Total	—	—	***105.4***
Agriculture			
Conifer Plantation	41.4	5.6	**46.9**
Agriculture Total	—	—	***46.9***
All Habitat Types Total	—	—	**10,376.0**

[1] Most urban and barren habitats would not be targeted for treatment; however, due to the scale of the habitat mapping, some areas mapped as urban or barren may contain habitats that would be treated (e.g., forested areas close to urban development).

Source: CDFW 2023a; Menke et al. 2011; USFS EVEG vegetation data, compiled by Ascent Environmental in 2023.

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 US Geological Survey (USGS) quadrangles containing and surrounding the project area (19 quadrangles total; CNDDB 2023; CNPS 2023a); the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (USFWS 2023); and Appendix BIO-3 (Table 14a, Table 14b, 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 Southern Cascades 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 3.6-4 (pages 3.6-88 – 3.6-90) 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 Southern Cascades and Sierra Nevada Foothills ecoregions in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys on July 10 and 11, 2023, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible and incidental wildlife observations were recorded.

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). Forty of the special-status plants and 29 of the special-status wildlife from the complete list of species were determined to potentially occur in the project area (Attachment B). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

IMPACT BIO-1

As described above, review of the CNDDB and CNPS Inventory of Rare and Endangered Plants of California database was conducted, per SPR BIO-1, to identify potential special-status plant species in the project area. Of the 41 special-status plant species identified with suitable habitat in the project area, 25 species – vanilla-grass (*Anthoxanthum nitens* ssp. *nitens*), dwarf resin birch (*Betula glandulosa*), scalloped moonwort (*Botrychium crenulatum*), mingan moonwort (*Botrychium minganense*), western goblin (*Botrychium montanum*), northwestern moonwort (*Botrychium pinnatum*), watershield (*Brasenia schreberi*), woolly-fruited sedge (*Carex lasiocarpa*), mud sedge (*Carex limosa*), Lassen

paintbrush (*Castilleja lassenensis*), silky cryptantha (*Cryptantha crinita*), English sundew (*Drosera anglica*), marsh willowherb (*Epilobium palustre*), tufted loosestrife (*Lysimachia thyrsiflora*), broad-nerved hump moss (*Meesia uliginosa*), tall alpine-aster (*Oreostemma elatum*), rayless mountain ragwort (*Packera indecora*), white-stemmed pondweed (*Potamogeton praelongus*), Robbins' pondweed (*Potamogeton robbinsii*), white beaked-rush (*Rhynchospora alba*), American scheuchzeria (*Scheuchzeria palustris*), slender bulrush (*Schoenoplectus heterochaetus*), water bulrush (*Schoenoplectus subterminalis*), long-leaved starwort (*Stellaria longifolia*), and flat-leaved bladderwort (*Utricularia intermedia*) – are typically associated with wet areas (e.g., wetlands, wet meadows, seeps, riparian habitat, mesic areas in forest or grassland) (Attachment B). There are three special-status plant species – upswept moonwort (*Botrychium ascendens*), snow fleabane daisy (*Erigeron nivalis*), and cylindrical trichodon (*Trichodon cylindricus*) – that may be associated with both wet and upland areas. The remaining 13 special-status plant species – cut-leaf anemone (*Anemone multifida* var. *multifida*), northern spleenwort (*Asplenium septentrionale*), Suksdorf's milk-vetch (*Astragalus pulsiferae* var. *suksdorfii*), Callahan's mariposa-lily (*Calochortus syntrophus*), Davy's sedge (*Carex davyi*), white-stemmed clarkia (*Clarkia gracilis* ssp. *albicaulis*), pyrola-leaved buckwheat (*Eriogonum pyrolifolium* var. *pyrolifolium*), blushing wild buckwheat (*Eriogonum ursinum* var. *erubescens*), little hulsea (*Hulsea nana*), squarestem phlox (*Phlox muscoides*), Hall's rupertia (*Rupertia hallii*), Siskiyou jellyskin lichen (*Scytinium siskiyouense*), and long-stiped campion (*Silene occidentalis* ssp. *longistipitata*) – are associated with upland habitats that are present in the project area.

During the biological reconnaissance survey on July 10, 2023, Hall's rupertia was observed in the project area. Additionally, Collins Pine biologists conducted botanical surveys of the project area in 2013 and 2014. Three special-status species, dwarf resin birch, Callahan's mariposa-lily, and Hall's rupertia were detected in the project area. In addition, western campion (*Silene occidentalis)* was also documented in the project area by Collins Pine biologists during the 2013 and 2014 surveys. These occurrences could potentially be the special-status subspecies long-stiped campion. Because the project area has not been analyzed completely and the botanical resource assessment is more than 5 years old, protocol-level botanical surveys would be required prior to implementing treatments, as explained below.

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on the 41 special-status plant species with suitable habitat in the project area, listed in Attachment B, if present within treatment areas. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments, because the same treatment activities would occur, and treatment would mimic the natural fire return interval. However, treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatment that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for some special-status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special-status plants. For example, if retreatment occurs in chaparral communities at frequencies outside the natural fire return interval, special-status plants associated with this community type could be adversely affected through habitat alteration that makes the habitat unsuitable for their growth and reproduction. The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR.

Pursuant to SPR HYD-4, watercourse and lake protection zones (WLPZs) ranging from 50 to 150 feet adjacent to all Class I and Class II streams and lakes (defined under Forest Practice Rules as a permanent natural body of water of any size, or an artificially impounded body of water having a surface area of at least one acre; CAL FIRE 2020) within the project area would be implemented and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) streams for manual, mechanical, herbicide, and pile burning treatments, which would minimize some adverse effects on species associated primarily or frequently with wet areas. Requirements under SPR HYD-4 requires the retention of at least 75 percent of surface cover and undisturbed area within WLPZs. However, the WLPZ is not a no-disturbance buffer as manual treatments within WLPZs are permitted and up to 25 percent of cover may be removed, per SPR HYD-4, which could potentially result in disturbance to wetlands and similar habitats suitable for special-status plants. Therefore, implementation of WLPZ restrictions under SPR HYD-4 would not be sufficient in protecting special-status plants within the WLPZ. Furthermore, there may be additional on-site wetland, spring, and seep habitat suitable for special-status plants outside of a WLPZ as well as ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules). Wetland delineations would be conducted to determine if other aquatic habitats are located within treatment areas; where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet

around them would be established (per Mitigation Measure BIO-4, refer to Impact BIO-4 below). Although these measures would avoid and minimize some adverse effects on special-status plants typically associated with wet areas, habitat potentially suitable for the three facultative special-status plant species (i.e., associated with both wet and upland areas) and all habitat potentially suitable for the 13 upland-associated special-status plant species would not be avoided under SPR HYD-4 and Mitigation Measure BIO-4. As a result, SPR BIO-7 would be required, which would include surveying for special-status plants before implementing treatments in any habitat potentially suitable for special-status plants. If special-status plant species are observed during SPR BIO-7 surveys, Mitigation Measure BIO-1a and Mitigation Measure BIO-1b would be required, establishing no disturbance buffers around plants listed under the California Endangered Species Act (CESA) and/or federal Endangered Species Act (ESA) and other special-status plants, which would include special-status plants in both wetland and upland habitat.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and would require protocol-level surveys for special-status plants to be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a, or current version). The surveys would occur prior to implementing mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application in any habitat potentially suitable for special-status plants, which would include upland habitat that could potentially contain facultative species that are growing outside of wetlands. Pursuant to SPR BIO-7, surveys would not be required for those special-status plants not listed under ESA or CESA if the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species. Additionally, the specific treatments may be carried out during the dormant season for herbaceous annual, stump-sprouting, or geophyte species or when the species has completed its annual life cycle, provided the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants. However, this would require that treatments in habitat potentially suitable for these special-status plants be restricted to the dormant season for these species and require that treatments that do not disturb below the soil surface (i.e., manual treatments, herbicide application, and prescribed burning) without prior knowledge of their presence, which may unnecessarily or infeasibly constrain treatment implementation. In this case, surveys could be conducted to determine presence or absence and, depending on the results, may provide greater flexibility in terms of the timing and types of treatments that may be implemented.

Twenty one of the 41 special-status plant species that are known to or may occur within the project area are herbaceous annual species or geophytes, as indicated in Attachment B. Impacts on these species would be avoided by implementing non-ground-disturbing treatment activities (i.e., manual treatment, herbicide application, and prescribed burning) and carrying out these treatments only during the dormant season (i.e., when the plant has no aboveground living parts), which would typically occur after seed set and before germination. Typically, germination occurs after the first significant rainfall (approximately 0.5 inch) and cold snap, which generally occurs between October–December (Levine et al. 2008). Control lines for prescribed burning would have to be created outside of potential habitat for special-status plants or the proposed control line areas would need to be surveyed for special-status plants, including annual species, stump-sprouting species, or geophyte species, prior to installing any control lines. Treatment activities that could potentially kill or remove seeds, stumps, and underground root structures (i.e., mechanical treatments) may result in impacts on these plant species even when dormant and would not be conducted in potential habitat for these species without prior implementation of SPR BIO-7. If treatment activities would include activities that could kill or remove vegetation or disturb the soil below the surface (e.g., mechanical treatments), or treatments cannot be completed in the dormant season and would be implemented during the growing period of annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified special-status plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below.

The remaining 20 of the 41 special-status plant species that have potential to occur within the project area are perennial species, which could not be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes; therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify them prior to implementing treatment activities regardless of the timing of treatments.

Where protocol-level surveys are required (pursuant to SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a or BIO-1b, depending on species status, would be implemented to avoid loss of

identified special-status plants. Pursuant to Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which no treatment activities would occur unless a qualified RPF or biologist determines, based on substantial evidence, that a different buffer size should be used or that the species would benefit from the proposed treatment in the occupied habitat area. In the case of plants listed pursuant to ESA or CESA, the determination of beneficial effects would need to be made in consultation with CDFW and/or USFWS, depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants would be carried out by a qualified RPF or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance treatments, maintain habitat function for the special-status plant species present.

In addition, pursuant to SPR HYD-5, nontarget vegetation and special-status species would be protected from herbicides. Only ground-level herbicide application would occur (no aerial spraying). In addition, only herbicides labeled for use in aquatic environments would be used when working in areas where there is a possibility the herbicide could come into direct contact with water. Herbicides would be applied by hand and only during low-flow periods or when seasonal streams are dry. Herbicides, aquatic and terrestrial, would not be utilized within WLPZs or ELZs (established per SPR HYD-5).

As described in Chapter 2, "Treatment Description," Collins does not intend to implement any treatments in wetland habitats. Wetland delineations would be conducted to identify and map the extent of wetland habitats, within treatment areas. Where wetland or other aquatic habitats are delineated, no-disturbance buffers of at least 25 feet would be established (per Mitigation Measure BIO-4, refer to Impact BIO-4 below). Therefore, there would be no impacts to special-status plants associated with wetland habitats.

Collins proposes to revise SPR AQ-4 and SPR GEO-1, both of which are applicable to this impact. SPR AQ-4 would be revised to limit vehicle and equipment speeds on unpaved roadways to 25 miles per hour, unless fugitive dust emissions are visibly occurring (then vehicle speeds would be reduced to no more than 15 miles per hour); and to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the Program EIR. These revisions are consistent with the purpose of SPR AQ-4 and would maintain the overall requirements of avoiding and minimizing the creation of fugitive dust through treatment vehicle use of unpaved roadways and vehicles tracking out dust, silt, or mud onto public roadways. In addition, Collins would wet unpaved areas if road use creates excessive fugitive dust, as required by SPR AQ-4. SPR GEO-1 would be revised to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. For the reasons described, proposed revisions to SPR AQ-4 and SPR GEO-1 would not result in a substantially more severe significant effect related to special-status plants than what was covered in the Program EIR.

Conclusion

The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR. This impact on special-status plants 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 proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status plants is also the same, as described above. SPRs that apply to project impacts under Impact BIO-1 are SPRs AQ-3, AQ-4, BIO-1, BIO-2, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5,

GEO-7, and HYD-5. Biological resource mitigation measures that apply to this impact are Mitigation Measure BIO-1a and Mitigation Measure BIO-1b. 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, Collins would implement Mitigation Measure BIO-1c. 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-2

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

California Red-Legged Frog

California red-legged frog (*Rana draytonii*) (Attachment B) historically occupied portions of the western slope of the Sierra Nevada and southern Cascades from Shasta County south to Tulare County; however, these populations have been fragmented and nearly eliminated (USFWS 2002). There is no critical habitat for California red-legged frog in the project area, or in Tehama County. The nearest documented occurrences of California red-legged frog are approximately 30 miles south of the project area at Hughes Pond, north of Lake Oroville (CNDDB 2023). Visual encounter surveys for amphibians and reptiles have been conducted by Collins Pine in portions of the project area from 2016 to 2020, and no California red-legged frogs were recorded during these surveys (Collins Pine 2023). However, the surveys did not cover the entire project area and were primarily focused on the higher elevations of the project area (Collins Pine 2023).

Glyphosate, triclopyr, and imazapyr are subject to the California Red-Legged Frog Injunction (Center for Biological Diversity v. U.S. EPA [2006] Case No. 02-1580-JSW) and specific application requirements apply in areas subject to the injunction. Pursuant to the Injunction, the application of these herbicides is prohibited within 60 feet of California red-legged frog aquatic breeding habitat or nonbreeding aquatic habitat within critical habitat areas and non-critical habitat areas identified in the injunction. Because there is no critical habitat or non-critical habitat areas for California red-legged frog in the project area, the injunction does not apply to this project.

Because there are no documented occurrences of California red-legged frogs in the project area and because the population of this species in the southern Cascades and Sierra Nevada Foothill region is known to be small and fragmented, it is unlikely that the project area supports a large population of California red-legged frogs, and the species may not be present in the project area at all. However, while California red-legged frogs have not been documented in the project area, surveys have not been conducted for all areas of suitable habitat in the project area and have not been conducted in the lower elevation portions of the project area, and aquatic habitat, including perennial streams with deep pools (e.g., in Mill Creek), stock ponds, seeps, and wetlands throughout the project area may provide habitat suitable for this species. The potential for initial and maintenance treatments to result in adverse effects on California red-legged frogs was examined in the Program EIR.

Aquatic and Upland Habitat

Studies have demonstrated that California red-legged frogs remain close to breeding ponds during the nonbreeding season and typically do not move more than a few hundred feet into upland habitats (Bulger et al. 2003; Fellers and Kleeman 2007). Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams (e.g., ephemeral drainages, irrigation ditches). Also pursuant to SPR HYD-4, pile burning would be conducted outside of the WLPZs. Wetland delineations would be conducted to determine if other wetland, spring, and seep habitats are present within a treatment area, and where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet would be implemented (refer to Impact BIO-4 below). However, these measures may not avoid impacts on California red-legged frogs if frogs are present outside of established WLPZs or buffers (e.g., greater than 150 feet from aquatic habitat), are present within ponds

smaller than one acre (i.e., not considered a lake under Forest Practice Rules), or if non-mechanical treatment activities implemented within the WLPZ resulted in injury or mortality of frogs.

As noted above, aquatic breeding habitat potentially suitable for California red-legged frog is present in perennial streams (e.g., Mill Creek) with deep pools throughout the project area. Aquatic nonbreeding habitat potentially suitable for California red-legged frog is also potentially present (e.g., streams without deep pools, other wetlands).

California red-legged frogs have not been documented in ponds or streams in the project area and populations have been fragmented and nearly eliminated from the region (USFWS 2002); as a result, injury or mortality of California red-legged frogs is unlikely to occur as a result of treatments near these habitats. Nonetheless, per SPR BIO-1, protective buffers would be implemented surrounding these habitats prior to commencement of treatment activities to further reduce the likelihood of impacts. To avoid injury or mortality of California red-legged frogs in aquatic habitat during the wet season (i.e., starting with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15 and ending on April 15), the following measures would be implemented: 1) a 300-foot no-disturbance buffer would be applied to Class I streams, Class II streams with water, permanent ponds, and wetlands which meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist; 2) a 30-foot no-disturbance buffer would be applied to Class I streams that do not meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist, dry Class II streams, and Class III streams; and 3) no mechanical treatments would occur within 75 feet of Class I streams that do not meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist, and dry Class II streams. During the dry season (i.e., starting April 15 and ending with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15), a 30-foot no-disturbance buffer would be applied to all Class I, Class II and Class III streams, permanent ponds, and wetlands, which meet the definition of aquatic habitat suitable for California red-legged frog as determined by a qualified RPF or biologist. Further, year-round measures would require all trees to be felled away from aquatic habitat suitable for California red-legged frogs, and no pile burning within 300 feet of these aquatic habitats.

If these buffers are determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and protocol-level surveys for California red-legged frog would be conducted by a qualified RPF or biologist pursuant to the *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog* (USFWS 2005) within aquatic habitat potentially suitable for the species. If California red-legged frogs are not detected within the treatment area during protocol-level surveys, then no mitigation for the species would be required and the buffers would not be required. If California red-legged frogs are identified during focused surveys, then a no-disturbance buffer of at least 300 feet would be implemented as described above for occupied habitat. If California red-legged frogs are detected, all treatment activities would pause, and USFWS would be contacted pursuant to Mitigation Measure BIO-2a to provide further guidance regarding avoidance measures.

Dispersal and Migration

While California red-legged frogs generally remain close to breeding ponds during the nonbreeding season, adults and juveniles are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to refugia and foraging habitat, or to disperse to new breeding locations. Movements through upland habitat are typically up to approximately 1.6 kilometers (1 mile) over the course of a wet season (Bulger et al. 2003). During migration, California red-legged frogs may travel long distances from aquatic habitat and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). The distance between the nearest documented California red-legged frog occurrences and the project area are approximately 30 miles, substantially greater than the typical dispersal distance of the species (CNDDB 2023). It is unlikely that California red-legged frogs would migrate into the project area from these documented occurrences.

California red-legged frogs generally make overland movements (i.e., dispersal, migration) during the wet season (i.e., October to May) and these movements are typically made at night (Bulger et al. 2003). Pursuant to SPR GEO-1, mechanical treatments and herbicide application would be suspended if it is raining, soils are saturated, or soils are

wet enough to mobilize herbicides or be compacted by mechanical activities. Further, mechanical treatments may not resume until precipitation stops and soils are no longer saturated or very wet. The low likelihood of California red-legged frogs dispersing through the project area combined with implementation of these measures would avoid adverse effects on dispersing frogs.

Habitat Function

Habitat function for California red-legged frogs would be maintained because implementation of SPRs and mitigation measures would result in retention of habitat features important to the species. Treatment activities and maintenance treatments would not occur within aquatic habitat; WLPZs of 50-150 feet adjacent to all Class I and Class II streams and lakes would be implemented within which treatments would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover); WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., ephemeral drainages, irrigation ditches); pile burning would be conducted outside of the WLPZs; no-disturbance buffers of at least 25 feet would be implemented surrounding other wetland, spring, and seep habitats. Additionally, chipped and masticated biomass would not exceed 4 inches in depth, and 50 percent of understory (i.e., shrubs, herbs) in WLPZs would be retained.

Collins contacted USFWS by email on May 3, 2023 to notify them of their proposed avoidance measures and their determination that habitat function would be maintained for California red-legged frog. No refinements to the proposed measures or habitat retention standards were provided by USFWS regarding California red-legged frog. Consultation with USFWS is complete for California red-legged frog and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Cascades Frog

Aquatic habitat potentially suitable for Cascades frog (*Rana cascadae*) is present within the within Class I and Class II streams, ponds, and wet meadows in the project area (Attachment B). Cascades frog is associated closely with water and is rarely found more than a few feet from aquatic habitat. Cascades frog has documented occurrences in the project area (CNDDB 2023). Surveys for Cascades frog have occurred in portions of the project area from 2016 to 2022, but do not cover the entire project area (Johnson and Reno 2023; Collins Pine 2023). Visual encounter surveys have been conducted by Collins in portions of the project area and Cascades Frog have been documented multiple times over multiple survey years in Round Valley Creek and its tributaries and in Gurnsey Creek (Collins Pine 2023). Additionally, capture-mark-recapture surveys have also been conducted in the project area, focused on Cascades frog in the Round Valley Creek watershed (Johnson and Reno 2023; Collins Pine 2023). Collins has a scientific collection permit and memorandum of understanding for Cascades frog with CDFW.

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented. However, these measures may not result in full avoidance of Cascades frogs if individuals are present within ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules) and adjacent to a treatment area, or if manual activities implemented within the WLPZ resulted in injury or mortality of special-status frogs. The potential for treatment activities, including maintenance treatments, to result in adverse effects on special-status frogs was examined in the Program EIR.

Per SPR BIO-1, to fully avoid aquatic habitat potentially suitable for Cascades frog, a 20-foot no-disturbance buffer would be implemented before commencement of treatment activities by flagging adjacent to all perennial (i.e., Class I and Class II) streams, ponds, and wet meadows. If the 20-foot no-disturbance buffers are determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and focused visual encounter surveys for Cascades frog would be conducted by a qualified RPF or biologist within suitable habitat areas before treatment activities. If Cascades frogs are not detected within the treatment area during focused surveys, then no mitigation for this species would be required. If Cascades frog is identified during focused surveys, then Mitigation Measure BIO-2a would be implemented.

Under Mitigation Measure BIO-2a, areas would be flagged within which no treatment activities would occur, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist

as necessary to avoid injury to or mortality of this species. Collins may consult with CDFW for technical information regarding appropriate measures to avoid and minimize impacts. If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and Collins would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA.

Habitat function for Cascades frog would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4, treatments within stream WLPZs adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Additionally, downed woody debris larger than 18 inches diameter and 12 feet long would be retained. Chipped and masticated biomass would not exceed 4 inches in depth within WLPZs to prevent suppression of seed germination in areas where amphibians may require vegetative cover. Pursuant to Mitigation Measure BIO-2a, on May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to Cascades frog and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The only refinement to measures in the MMRP that resulted from this consultation is an additional requirement to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. Consultation with CDFW is complete for Cascades frog and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Foothill Yellow-Legged Frog

Aquatic habitat potentially suitable for foothill yellow-legged frog (*Rana boylii*) is present within Class I and Class II streams in the project area, including Mill Creek and Round Valley Creek (Attachment B). The foothill yellow-legged frog North Coast DPS has potential to occur in the project area. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away from aquatic habitat (CDFW 2018b). Visual encounter surveys for amphibians and reptiles have been conducted by Collins Pine in portions of the project area and no foothill yellow-legged frog occurrences were documented (Collins Pine 2023). The surveys (between 2016 and 2020) did not cover the entire project area and were mainly focused on the higher elevations of the project area (Collins Pine 2023).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented. However, these measures may not result in full avoidance of foothill yellow-legged frogs if manual activities implemented within the WLPZ resulted in injury or mortality of frogs. The potential for treatment activities, including maintenance treatments, to result in adverse effects on foothill yellow-legged frog was examined in the Program EIR.

Per SPR BIO-1, to fully avoid habitat potentially suitable for foothill yellow-legged frog, a 200-foot no-disturbance buffer would be implemented prior to commencement of treatment activities by flagging along perennial streams (Class I and Class II) within and adjacent to the project area. If the 200-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and focused visual encounter surveys for foothill yellow-legged frog would be conducted by a qualified RPF or biologist within suitable habitat areas prior to treatment activities. If foothill yellow-legged frogs are not detected within the project area during focused surveys, then no mitigation for the species would be required. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2b would be implemented.

Under Mitigation Measure BIO-2b, Collins would require flagging areas for avoidance in which no treatment activities would occur, biological monitoring, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of foothill yellow-legged frog. Collins may consult with CDFW for technical information regarding appropriate measures.

Habitat function for foothill yellow-legged frog would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, treatments within stream WLPZs adjacent to the project area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover) (SPR HYD-4), and operations would be prohibited within 30 feet of a watercourse channel. Additionally, chipped and masticated biomass would not exceed 4 inches in depth, and 50 percent of understory (i.e., shrubs, herbs) in WLPZs would be retained.

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.

Southern Long-Toed Salamander

Southern long-toed salamander (*Ambystoma macrodactylum sigillatum*) has potential to occur in high-elevation (i.e., greater than approximately 3,500 feet) meadows, ponds, and streams in the project area (Attachment B). Adult southern long-toed salamanders can also be found under wood, logs, rocks, bark, or underground in animal burrows within approximately 330 feet (100 meters) of aquatic habitat. Visual encounter surveys for amphibians and reptiles have been conducted by Collins Pine in portions of the project area and a southern long-toed salamander was documented in 2017 in the northeastern section of the project area (Collins Pine 2023). The surveys (between 2016 and 2020) did not cover the entire project area and were mainly focused on the higher elevations of the project area (Collins Pine 2023).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented. However, these measures may not result in full avoidance of southern long-toed salamanders if individuals are present further than 150 feet from streams or lakes, or if manual activities implemented within the WLPZ resulted in injury or mortality of salamanders (e.g., by crushing). The potential for initial treatment activities and maintenance treatments to result in adverse effects on southern long-toed salamander was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on southern long-toed salamanders can be clearly avoided by physically avoiding the habitat suitable for this species, then no mitigation would be required. However, because southern long-toed salamanders may be present relatively large distances (i.e., up to approximately 330 feet) from aquatic habitat in a treatment area, and because this distance is not well-defined, it is unlikely that all habitat potentially suitable for the species can be avoided. As a result, SPR BIO-10 would apply, and focused surveys (i.e., walk and turn surveys) for southern long-toed salamanders would be conducted by a qualified RPF or biologist within habitat suitable for the species before implementation of any treatment activities.

If southern long-toed salamanders are not detected within the treatment area during focused surveys, then no mitigation for the species would be required. If the species is detected during focused surveys, then Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, Collins would require flagging areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of southern long-toed salamanders. Collins may consult with CDFW for technical information regarding appropriate impact avoidance measures.

Habitat function for southern long-toed salamanders would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and treatments within WLPZs adjacent to the treatment area would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Additionally, downed woody debris larger than 18 inches diameter and 12 feet long would be retained. Chipped and masticated biomass would not exceed 4 inches in depth within WLPZs to prevent suppression of seed germination in areas where amphibians may require vegetative cover. 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.

Western Pond Turtle

Aquatic habitat potentially suitable for western pond turtle (*Actinemys marmorata*) is present within ponds and streams in and adjacent to the project area, and this species could use upland habitat within the project area in the vicinity of these features (Attachment B). Western pond turtles may be present within upland habitat up to approximately 1,500 feet from water. Visual encounter surveys for amphibians and reptiles have been conducted by Collins Pine in portions of the project and no western pond turtle occurrences were documented (Collins Pine 2023). The surveys (between 2016 and 2020) did not cover the entire project area and were mainly focused on the higher elevations of the project area (Collins Pine 2023).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be

established adjacent to all Class III and Class IV (e.g., ephemeral drainages, irrigation ditches) streams. However, these measures may not avoid impacts on western pond turtles if turtles are present further than 150 feet from stream or lake habitat, are present within ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), or if manual activities implemented within the WLPZ resulted in injury or mortality of turtles. The potential for treatment activities and maintenance treatments to result in adverse effects on western pond turtle was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on western pond turtles can be clearly avoided by physically avoiding the habitat suitable for these species, then no mitigation would be required. However, because western pond turtles may be present relatively large distances (i.e., up to approximately 1,500 feet) from aquatic habitat in the treatment area, it is unlikely that all habitat potentially suitable for the species can be avoided. As a result, SPR BIO-10 would apply, and focused visual encounter surveys for western pond turtle would be conducted by a qualified RPF or biologist within aquatic and upland habitat areas suitable for the species before treatment activities that could potentially kill or remove vegetation or disturb the soil (i.e., prescribed burning, mechanical treatments, targeted herbicide application). If western pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species would be implemented.

Under Mitigation Measure BIO-2b, Collins would require flagging areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of western pond turtles. Collins may consult with CDFW for technical information regarding appropriate measures.

Habitat function for western pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4 treatments within stream WLPZs adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover). 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.

California Spotted Owl

California spotted owl is associated with mature forest habitats. There is approximately 4,500 acres of mature forest mapped in the project area. For the purposes of this document, mature forest is 4D (canopy cover of 60–100 percent, tree size of 11–23.9 inches dbh), 4M (canopy cover of 40–59.9 percent, tree size of 11–23.9 inches dbh), 5D (canopy cover of 60–100 percent, tree size of 24 inches or greater dbh), or 5M (canopy cover of 40–59.9 percent, tree size of 24 inches or greater dbh) forest habitat. Most of the treatment area does not contain nesting habitat suitable for California spotted owl (*Strix occidentalis occidentalis*) (Attachment B), due to the proximity to roads and existing level of disturbance. California spotted owl is thought to mostly use the Collins Almanor Forest, within which the project area is located, for foraging habitat. Collins Pine biologists have set up call stations for California spotted owl, great gray owl (*Strix nebulosa*), and northern goshawk (*Accipiter gentilis*) throughout and adjacent to the project area (Collins Pine 2023). Surveys focused on high priority areas with California spotted owl as the target species were conducted in 2017, 2018, 2020, and 2021 (Collins Pine 2023). No California spotted owls were detected in or adjacent to the project area (Collins Pine 2023). The species is more likely to forage in the project area and nest on adjoining USFS lands (Collins Pine 2014). However, portions of the treatment area contain dense forest, particularly areas near Mill Creek, which may contain nesting habitat suitable for California spotted owl due to the age and composition of the forest stands.

There are many documented occurrences of nesting California spotted owls in the project area, and a larger number of occurrences, including nesting birds, directly adjacent to the project area (CNDDB 2023). This includes multiple documented California spotted owl nesting occurrences located within 0.25 mile of treatment areas. Up to 0.25 mile is the widely-accepted distance within which the species could be disturbed by noise and human activity (USFS 1993).

Treatment activities are unlikely to result in removal of California spotted owl nesting habitat or direct removal of active nests, because nesting habitat suitable for the species is generally not present within the treatment area. However, treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chain saws) could result in disturbance of nesting California spotted owls in adjacent suitable habitat, if these activities occur during the sensitive nesting season (March 1–August 15). The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for California spotted owl can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further mitigation would not be required. Because California spotted owl nesting occurrences have been documented adjacent to the project area and are widespread throughout the eastern portion of Tehama County, to determine whether a documented California spotted owl nesting occurrence is present within 0.25 mile of the treatment area under SPR BIO-1, a qualified RPF or biologist would review California spotted owl occurrence data in the CNDDB. In addition, Collins would contact USFS biologists from Lassen National Forest to obtain any recent survey and occurrence data for California spotted owl that have not been made publicly available (e.g., in the CNDDB). If present, potential impacts on the nesting occurrence would be avoided by implementing a limited operating period within 0.25 mile of the occurrence during the spotted owl nesting season (March 1–August 15) for mechanical treatments, manual treatments, prescribed burning, and herbicide application.

If the limited operating period is determined to be infeasible, then SPR BIO-10 would apply, and protocol-level surveys for California spotted owl would be conducted by a qualified RPF or biologist within a 0.25-mile buffer surrounding the treatment area in habitat suitable for the species prior to implementation of treatment activities. Surveys for California spotted owl would be conducted pursuant to the *Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation Areas* (USFS 1993). If nesting California spotted owls are not identified during protocol-level surveys, then further mitigation for the species would not be required. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b would be implemented.

Under Mitigation Measure BIO-2b, a no disturbance buffer of 0.25 mile would be established around active California spotted owl nests and no treatment activities would occur within this buffer. A no-disturbance buffer of 0.25 mile has been established for the species and is larger than the general no-disturbance buffer of 100 feet provided in Mitigation Measure BIO-2b to provide adequate protection such that impacts would be maintained at less than significant, consistent with the Program EIR. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. If California spotted owl is listed under ESA, any buffer reduction for a special-status species will require consultation with CDFW. Factors to be considered for determining buffer size will include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. Periodic monitoring of the nest by a qualified biologist during project activities will be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

Habitat function for California spotted owl would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh and up to four snags greater than 12 inches dbh would be retained per acre, which would be the most likely features to be used by this species due to the cover provided by larger trees. For ecological restoration treatments, canopy cover within forest habitats occupied or potentially occupied by California spotted owl would be maintained at 60 percent or greater, and treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function. Due to the California spotted owl Sierra Nevada DPS proposed listing as threatened under the Endangered Species Act Collins contacted USFWS by email on May 3, 2023 to notify them of their proposed avoidance measures for California spotted owl and to seek technical assistance from USFWS on the determination that habitat function would be maintained for California spotted owl. Refinements to measures in the MMRP that resulted from this consultation include requiring Collins to coordinate with Sierra Pacific Industries (SPI) on recent survey and occurrence data for California spotted owl on SPI lands that are within 0.25-mile of the project boundary. Collins already coordinates with SPI and Lassen National Forest to acquire information regarding surveys and territory status on Collins adjacent lands. Consultation with USFWS is complete for California spotted owl and the project-specific measures (see Mitigation Measure BIO-2b in the MMRP for measures; Attachment A) will be implemented by Collins.

Other Special-Status Birds

Nine additional special-status bird species have potential to occur in the project area: American peregrine falcon (*Falco peregrinus anatum*), bald eagle (*Haliaeetus leucocephalus*), great gray owl, greater sandhill crane (*Antigone canadensis tabida*), golden eagle (*Aquila chrysaetos*), northern goshawk, olive-sided flycatcher (*Contopus cooperi*), willow flycatcher (*Empidonax traillii*), and yellow-breasted chat (*Icteria virens*) (Attachment B). During the reconnaissance-level survey, a bald eagle was observed foraging in Deer Creek Meadow, directly adjacent to the project area. As mentioned above, Collins Pine biologists have set up call stations for California spotted owl, great gray owl, and northern goshawk throughout and adjacent to the project area (Collins Pine 2023). Surveys with great gray owl as the target species were conducted in 2017 and 2022 and with northern goshawk as the target species in 2018 (Collins Pine 2023). No great gray owl or northern goshawk were detected in or adjacent to the project area (Collins Pine 2023). Additionally, Collins has a Safe Harbor Agreement for the great gray owl with CDFW on lands that include the project area. Surveying and mitigation and avoidance measures for great gray owl would follow the Safe Harbor Agreement.

Treatment activities involving prescribed burning, mechanical treatments, and manual treatments conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests if trees or shrubs containing nests or ground nests are removed or burned. For nests within vegetation that would not be removed, treatment activities including mechanical treatments, manual treatments, prescribed burning, and herbicide application, could result in disturbance to active nests from auditory and visual stimuli (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 special-status birds was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special-status birds can be clearly avoided by physically avoiding habitat suitable the species or conducting treatments outside of a season of sensitivity (e.g., nesting bird season), then no mitigation would be required. Adverse effects on nesting special-status birds would be clearly avoided for treatments that would occur outside of the nesting bird season (February 1–August 31).

If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 would apply, and focused nesting bird surveys for American peregrine falcon, bald eagle, greater sandhill crane, golden eagle, northern goshawk, olive-sided flycatcher, willow flycatcher, and yellow-breasted chat would be conducted by a qualified RPF or biologist before implementation of treatment activities. Established survey protocols would be followed for certain species including but not limited to northern goshawk (USFS 2006) and willow flycatcher (Bombay et al. 2003). Like California spotted owl, northern goshawk is associated with mature forest habitats that are most likely to be present within US Forest Service land adjacent to the project area. Prior to implementing SPR BIO-10 for this species, Collins would contact USFS biologists from Lassen National Forest to obtain any recent survey and occurrence data for northern goshawk that have not been made publicly available (e.g., in the CNDDB).

If no active bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for American peregrine falcon, bald eagle, greater sandhill crane, golden eagle, and willow flycatcher) and BIO-2b (for northern goshawk, olive-sided flycatcher, and yellow-breasted chat) would be implemented.

Under Mitigation Measures BIO-2a or BIO-2b, a no-disturbance buffer of at least 0.5 mile would be established around active golden eagle nests; 0.25 mile for American peregrine falcon, bald eagle, northern goshawk, and sandhill crane nests; and at least 100 feet around the nests of other special-status birds. No treatment activities would occur within these buffers until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle and golden eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

For the great gray owl, the avoidance and minimization measures and monitoring and reporting requirements in the Safe Harbor Agreement would be followed. These include Avoidance and Minimization Measure (AMM) 1, which requires Collins to conduct call-back surveys the year prior to project activities occurring in Nesting Zones, following a modified version of the Beck and Winter (2000) survey protocol. Nesting Zones are defined in the Safe Harbor Agreement as the area of forest in or near the project area that is within 984 feet of a meadow of 10 acres or larger, at slopes less than 15 degrees. The Safe Harbor Agreement also requires, per AMM 5, that CDFW be consulted before project activities occur within the Nesting Zones during the great gray owl's breeding season. Additionally, if a great gray owl is identified during

project activities or surveys, project activities will immediately stop within a 0.25-mile and Collins will contact CDFW to consult. Collins would implement all measures agreed upon during consultation, per AMM 6.

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees. Additionally, up to four snags greater than 12 inches dbh would be retained per acre in ecological restoration treatment areas, habitat favored by the great gray owl. Further, treatments within riparian habitat (which may provide nesting habitat for special-status bird species, including willow flycatcher) that is included within a WLPZ would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Nesting habitat that may occur in the project area includes cliffs for American peregrine falcon. Treatment activities would not occur in these habitats; thus, this nesting habitat would not be removed or modified. On May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to American peregrine falcon, bald eagle, great gray owl, greater sandhill crane, golden eagle, and willow flycatcher and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The only refinement to measures in the MMRP that resulted from this consultation include requiring Collins to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. Consultation with CDFW is complete for American peregrine falcon, bald eagle, great gray owl, greater sandhill crane, golden eagle, and willow flycatcher and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Special-Status Fish

Two special-status fish species are known to occur within the treatment area: Chinook salmon (*Oncorhynchus tshawytscha*) – Central Valley spring-run Evolutionarily Significant Unit (ESU) and steelhead (*Oncorhynchus mykiss irideus*) – Central Valley DPS (Attachment B). The potential for initial treatment activities and maintenance treatments to result in adverse effects on special-status fish examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on special-status fish can be clearly avoided by physically avoiding habitat for these species, then mitigation would not be required. Accordingly, and pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented. Therefore, adverse effects on special-status fish would be clearly avoided through implementation of these SPRs and further mitigation would not be required.

Habitat function for special-status fish would be maintained because initial treatment activities and maintenance treatments would not occur within aquatic habitat and treatments within WLPZs adjacent to the treatment area would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). 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.

Monarch Butterfly

Monarch (*Danaus plexippus*) (Attachment B) has been observed historically approximately 3 miles north of the project area in Mineral and recently multiple times approximately 9.5 miles east-northeast of the project area in Chester (Xerces et al. 2023). It is likely that there are additional undocumented occurrences of monarchs within or near the project area. The monarch host plant milkweed (*Asclepias* spp.) was observed in the project area during the biological reconnaissance survey on July 10, 2023. The project area is outside of the monarch overwintering range; however, it is within the breeding and foraging range and contains various natural habitats and floral resources that likely provide foraging or breeding habitat suitable for the species. Treatment activities, including mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application could result in temporary removal of floral resources, including monarch host plants (i.e., milkweed), or direct mortality of monarch butterflies. The potential for treatment activities to result in adverse effects on monarch butterflies was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on monarch butterflies can be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then implementation

of additional measures would not be required. However, because monarchs may use habitat in the project area for large portions of the year, implementation of SPR BIO-10 would be required before treatment activities. Under SPR BIO-10, presence of monarch butterflies would be assumed or focused surveys for monarchs would be conducted before implementation of treatment activities.

If focused surveys are conducted and monarchs are not detected, then further mitigation for the species would not be required. If monarchs are detected during focused surveys, or are assumed to be present, then Mitigation Measures BIO-2b and BIO-2e would be implemented. Under Mitigation Measures BIO-2b and BIO-2e, several measures would be implemented to reduce the likelihood of mortality, injury, or disturbance to monarchs and to maintain habitat function. These measures include retention of host plants (i.e., milkweed) where feasible and conducting treatments in a patchy pattern to retain floral resources and provide refuge for butterflies.

Habitat function for monarch would be maintained because initial and maintenance treatments would retain host plants for the species where feasible and because all habitat suitable for monarch in the project area would not be treated at once (i.e., treatments in the project area would occur over the course of several years). 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.

Western Bumble Bee

Western bumble bee (*Bombus occidentalis*) has potential to occur in the project area (Attachment B). This species is a candidate for listing as endangered under CESA. Western bumble bee has seen declines across the historical range of this species (Xerces 2018). Populations of western bumble bee in California are now mainly restricted to high elevation sites in the Sierra Nevada and southern Cascades with a large number of occurrences documented in proximity of Lake Almanor, east of project area (CNDDB 2023; Xerces 2018).

Western Bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens. The project area contains habitat suitable for bumble bee nesting, floral resources, and may contain suitable overwintering habitat (overwintering habitat for Western bumble bee is poorly understood, as discussed in more detail below). Suitable habitat within the project area includes meadows and grasslands for foraging and potentially the surrounding forest edges for overwintering. This species generally nests underground and may use abandoned rodent burrows and similar features within suitable habitat to establish nest colonies. Solitary queens may overwinter under leaf litter or in small cavities a few centimeters into loose soil. The flight season for western bumble bee queens is from February to March, the period where the colony is most active is April through September, and the gyne (i.e., young queens) flight season is October through November. The flight season for workers and males is when the colony is active (i.e., April through September). Western bumble bees are generalist foragers that feed from open flowers with short corollas (Xerces 2018). Treatment activities within suitable habitat, including manual treatments, mechanical treatments, prescribed burning, and herbicide application could result in temporary removal of floral resources, as well as injury and mortality through inadvertent destruction of bumble bee nests or overwintering sites through trampling (if present), crushing, or removal of nesting or overwintering substrate (e.g., downed woody debris). Treatments in meadows and grasslands are anticipated to be minimal but may occur depending on site conditions in the future. The potential for treatment activities to result in adverse effects on special-status bumble bees was examined in the Program EIR.

Because there are current (i.e., 2003-2017) documented occurrences of western bumble bee in the vicinity of Lake Almanor, approximately 8 miles east of the project area (Xerces 2018), there is potential for western bumble bee to occur in the project area. As a result, SPR BIO-1 and SPR BIO-10 would apply.

In the Program EIR, Mitigation Measure BIO-2g was proposed as a feasible set of actions to reduce potentially significant impacts on special-status bumble bees by requiring avoidance of prescribed burning and targeted ground application of herbicide treatment during the flight/nesting season and retention of suitable habitat in the range of these species, or compensation for unavoidable loss of special-status bumble bees or habitat function. Recognizing the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts, very limited information about nesting and overwintering behaviors, and the statewide scope of potential

effects analyzed, for purposes of good faith and full disclosure under CEQA, this impact was designated in the Program EIR as potentially significant and unavoidable. However, addressing this potential effect at a project-specific level may result in a different significance conclusion if evidence supports it.

Per SPR BIO-1, if it is determined that adverse effects on western bumble bees can be clearly avoided by conducting treatments outside of a season of sensitivity (e.g., colony flight season; April through September) or physically avoiding habitat for these species, then mitigation would not be required. However, because western bumble bees may use habitat in the project area year-round, implementation of SPR BIO-10 would be required before treatment activities. Under SPR BIO-10, focused surveys for western bumble bees would be conducted following the recommendations within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023b), in coordination with the CDFW, or in lieu of conducting surveys (e.g., if conducting a valid survey is not feasible), the potential presence of western bumble bee in the project area would be assumed. This survey guidance does not provide survey methods for determining the presence of overwintering bumble bees because overwintering habitat is not well understood (CDFW 2023b).

If no western bumble bees are found during pretreatment surveys, no further measures would be required. If western bumble bees are detected during the focused survey, or presence within suitable habitat is assumed, Mitigation Measure BIO-2g would apply, and treatment within suitable habitat would be designed to maintain floral resources during any year of treatment. Mitigation Measure BIO-2g also includes limiting herbicide use and prescribed burning during the flight season where project objectives would still be met and conducting treatments in a patchy pattern to retain floral resources and refuge for bumble bees. Additionally, impacts to habitat for western bumble bee would be avoided or minimized through implementation of Mitigation Measure BIO-3a (see Impact BIO-3). Because survey methods and mitigation approaches for bumble bees are currently evolving, appropriate avoidance measures shall be implemented in coordination with CDFW. Avoidance measures may include, but not be limited to, protective buffers around nesting colonies until these sites are no longer active.

Pursuant to Mitigation Measure BIO-2g, and because this species is a candidate for listing under CESA and is likely to be present year-round in the treatment area (i.e., habitat cannot be avoided), Collins consulted with CDFW about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained. Habitat function for western bumble bee would be maintained because treatment activities and maintenance treatments would be implemented in a patchy pattern in occupied or suitable habitat, such that the entirety of the habitat would not be burned or removed and untreated portions of occupied or suitable habitat are retained so floral resources are available during project implementation. Further, SPR BIO-9 would be implemented, which would prevent the spread of invasive plants and noxious weeds through application of best management practices before, during, and after treatments. For the reasons summarized in the above discussion, habitat function for western bumble bee would be maintained after implementation of treatments and CDFW was contacted for technical input on this determination, as required.

On May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to western bumble bee and to maintain habitat function in compliance with Mitigation Measure BIO-2g. This coordination concluded that for CESA compliance purposes, the mitigation actions for the species are appropriate measures to maintain suitable refuge and habitat function of floral resources for western bumble bee. Refinements to measures in the MMRP that resulted from this consultation include requiring Collins to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. For these reasons, it is unlikely that populations of these species 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. Consultation with CDFW is complete for western bumble bee and the project-specific measures (see Mitigation Measure BIO-2g in the MMRP for measures; Attachment A) will be implemented by Collins.

There is limited published information on the abundance of western bumble bee in California or on colony size of the species (Xerces Society 2018) and a current lack of published information on the potential magnitude of effects from the loss of individual western bumble bee, including 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 2023b).

Due to this lack of understanding, CDFW is not recommending surveys for the overwintering period (CDFW 2023b). Therefore, assessing the impact on the species under CEQA due to the potential loss of individuals and populations (including overwintering queens and nesting bees) from this project would be too speculative to evaluate, because, for the reasons listed above, the analysis herein would need to speculate potential for presence, possibility of impacts, and severity of possible population effects, if impacts were assumed to occur. Information about this species is evolving and the project will implement the best available measures to protect the species (as described above) that are currently available; however, the current state of knowledge is not sufficient to evaluate the significance of the CEQA impact. Therefore, further analysis of this issue is not included in accordance with CEQA Guidelines Section 15145. CEQA Guidelines indicate that after thorough investigation, if an impact is too speculative for meaningful evaluation, this finding should be noted, and further discussion can be concluded (CEQA Guidelines Section 15145).

American Badger

Habitat potentially suitable for American badger (*Taxidea taxus*) is present within grassland and open woodland in the project area (Attachment B). Treatment activities, including prescribed burning and mechanical treatments could result in direct loss of active dens and potential loss of young, if present in treatment areas. Manual treatments and herbicide application treatments would likely not result in adverse effects on American badger dens, because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. The potential for treatment activities to result in adverse effects on American badger was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on American badger can be clearly avoided by conducting treatments outside of a season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. However, because American badgers may use a den year-round (i.e., there is no season of sensitivity), and because focused surveys for American badgers have not been conducted, implementation of SPR BIO-10 would be required before mechanical treatments and prescribed burning. Under SPR BIO-10, focused surveys would be conducted for American badger dens within habitat suitable for the species (i.e., grasslands, open woodland) by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities. If American badger dens are not detected during focused surveys, then further mitigation for the species would not be required. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

Habitat function for American badger would be maintained because habitat suitable for the species (i.e., grasslands, open woodlands) would be maintained and additional open woodland habitat would likely be restored through thinning and removal of ladder fuels. 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.

Fisher

The historic range of fisher (*Pekania pennanti*) (Attachment B) used to include the project area, but the range has been significantly reduced due to historic trapping, development, and habitat conversion (Center for Biological Diversity 2008). However, from 2011 to 2017, 40 fishers were reintroduced to the Stirling Management Area owned by Sierra Pacific Industries in Plumas, Butte, and Tehama counties (Green et al. 2022). There are documented occurrences of fisher associated with this reintroduction effort within approximately 1 mile of the project area (CNDDB 2023). Additionally, two observations from camera traps occurred directly adjacent to the project area (Collins Pine 2020). Habitat suitable for fisher includes stands with high canopy closure, large trees and snags, large woody debris, large hardwoods, and multiple canopy layers. Most of the project area does not contain habitat suitable for fisher due to habitat characteristics (e.g., small trees, low degree of canopy cover, lack of old growth forest habitat) and existing level of disturbance due to timber harvest in and around the project area. However, portions of the project area contain or are adjacent to forest habitat that may provide habitat suitable or marginally suitable for fisher due to the age and composition of the forest stands, particularly near Mill Creek.

Fisher den habitat includes cavities within live trees or snags, rock piles, or woody debris pile, and fishers typically choose the largest feature within an area for denning. Most habitat features that provide den sites suitable for fisher would be avoided, as most live trees (i.e., hardwoods, conifers) and snags larger than 12 inches dbh would not be removed during initial or maintenance treatments and because rocky areas would not be targeted for vegetation treatment. Although some downed woody debris would be targeted for treatment and these features would not be avoided through implementation of other measures, any downed woody debris larger than 18 inches diameter and 12 feet long would be retained for wildlife habitat. The potential for treatment activities, including maintenance treatments, to result in adverse effects on fisher was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on fisher can be clearly avoided by conducting treatments outside of a season of sensitivity (e.g., maternity season), then mitigation would not be required. Outside of the breeding season, fishers would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments and herbicide application treatments would not result in adverse effects on fisher dens, because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. However, prescribed burning and mechanical treatments conducted during the fisher maternity season (i.e., the period during which young would be present in a den, approximately March 1–June 30) and within forest habitats suitable for fisher, could result in destruction of active dens in downed woody debris piles or snags, or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Adverse effects on fishers would be clearly avoided for prescribed burning and mechanical treatments that would occur outside of the fisher maternity season (March 1–June 30) under SPR BIO-1. If pile burning is conducted manually, it can occur during the maternity season.

If conducting some prescribed burning and mechanical treatments outside of the fisher maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and presence of fishers would be assumed, or focused surveys for fishers would be conducted within areas in the treatment area determined to contain habitat suitable for the species by a qualified RPF or biologist before implementation of prescribed burning and mechanical treatments. Surveys for fisher would include the use of trail cameras, track plates, or other non-invasive survey methods to determine whether fishers are present within the treatment area and would be conducted by a qualified RPF or biologist. If baited trail cameras are used, the qualified RPF or biologist should obtain any valid CDFW Scientific Collecting Permits that are required. If focused surveys are conducted and fishers are not detected, then further mitigation for the species would not be required. If fishers are detected during focused surveys, then additional surveys would be required to determine whether an active fisher den is present within the treatment area. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den, the size of which would be determined through consultation with CDFW. No treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

If the presence of fisher within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2b before and during implementation of mechanical treatments, prescribed burning, and pile burning conducted mechanically between March 1 and June 30. Avoidance and minimization measures would include but not be limited to pre-treatment den surveys, daily sweeps of the treatment area, and biological monitoring.

Habitat function for fisher would be maintained because treatment activities and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh, and would retain up to four snags greater than 12 inches dbh per acre, which would be the most likely features to be used by this species due to the cover provided by larger trees. For ecological restoration treatments, canopy cover within forest habitats occupied or potentially occupied by California spotted owl (which share many habitat requirements with fisher) would be maintained at 60 percent or greater, and treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function. Additionally, rocky areas would not be targeted for vegetation treatment. 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.

Gray Wolf

Since the 2011 dispersal of Oregon wolf OR-7, one breeding pack and several dispersed gray wolves (*Canis lupus*) (Attachment B) are currently known to be in California. Contemporary sightings of gray wolves in California have included a pack in western Lassen and northern Plumas Counties (i.e., the Lassen Pack) (CDFW 2022a; CDFW 2022b). An update from CDFW (2022b) in April 2022 reported the Lassen Pack had produced five litters between 2017 and 2022. A female gray wolf was spotted in Tehama County after she was collared in 2017 and another single gray wolf was observed in Tehama County in 2013 (CDFW 2022b). The Lassen Pack's current known range spans from southeast of Lake Almanor in Plumas County to northeast of Lake Almanor and northeast of Susanville (CDFW 2022b). Habitat suitable for natal dens or rendezvous sites may be present in the project area, although this species has not been observed in Collins Pine (2020) camera trap data in the project area. However, the home ranges of uncollared wolves that may not have been detected may include a portion or all of the project area. Additionally, potential home range expansion over the life of the project may occur.

Gray wolf breeding season typically lasts from January until late March, and pups are typically born in April or May; however, this season can vary depending on multiple factors, including geographic location. Wolf pups are born in a natal den, which is typically a hole in the ground, a rock crevice, a hollow log, bases of hollow trees, an overturned stump, or other quiet locations (American Society of Mammologists 1974; Wisconsin Department of Natural Resources 2016). Gray wolf pups are born altricial (i.e., blind, helpless) and do not open their eyes for approximately two weeks. After approximately 8 weeks, the pups are moved to a different location called a "rendezvous site." Rendezvous sites, which are usually within 1 mile of a den site, are typically open areas of grass or sedge adjacent to wetlands, and can be characterized by extensive matted vegetation, numerous trails, and beds usually at the forest edge (Wisconsin Department of Natural Resources 2016). Rendezvous sites are typically used from mid-May to mid-October, and wolf packs may use multiple rendezvous sites within their home ranges (Wisconsin Department of Natural Resources 2016).

Treatment activities, including mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application could result in loss or disturbance of active natal dens and potential loss of helpless young if present in treatment areas. While manual treatments and herbicide application treatments would be less impactful than mechanical treatments because heavy equipment would not be used, these activities would include the use of loud hand-operated power tools (e.g., chainsaws) and presence of personnel or vehicles, which could result in disturbance to nearby natal dens or rendezvous sites, and potential abandonment of these sites. The potential for treatment activities to result in adverse effects on gray wolf was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on gray wolf can be clearly avoided by conducting treatments outside of a season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. However, there is no reliable season during which all impacts on this species could be avoided and avoidance of habitat is not feasible due to the species' large home range. Thus, implementation of SPR BIO-10 would be required before all treatment activities.

As part of SPR BIO-10, and because gray wolf detections are generally not made public, a qualified RPF or biologist would contact CDFW before implementation of treatment activities to obtain general information about documented gray wolf activity within or in the vicinity of a treatment area. If information provided by CDFW indicates that there is current or prior gray wolf activity within a treatment area, then Mitigation Measure BIO-2a would be implemented. If gray wolf activity has not been documented in a treatment area, pursuant to information provided by CDFW, and the treatment area does not overlap the home range of a documented gray wolf or gray wolf pack, and CDFW concurs that the species is unlikely to occur in the treatment area, then the project would proceed without surveys. If gray wolf occurrences have not been documented in a treatment area and the treatment area does not overlap the home range of a documented gray wolf or gray wolf pack, but presence of gray wolves cannot be ruled out by CDFW, then focused surveys for gray wolf activity would be conducted within the treatment area and within 1 mile of the treatment area before implementation of treatment activities. Surveys for gray wolves would include the use of trail cameras, track plates, or other non-invasive survey methods to determine whether wolves are present within the treatment area and would be conducted by a qualified RPF or biologist. If gray wolves are not detected during focused surveys, then further mitigation for the species would not be required. If gray wolves are detected during focused surveys, Collins would contact CDFW immediately and treatment activities would not be initiated in the

treatment area until CDFW provides further guidance. Additional surveys may be required to determine whether an active gray wolf natal den or rendezvous site is present within the treatment area, in consultation with CDFW. If an active den or rendezvous site is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would apply, and a no-disturbance buffer of at least 1 mile would be established around the natal den or rendezvous site, in consultation with CDFW, and no treatment activities would occur within this buffer. No activities that create loud and continuous noise would occur within the no-disturbance buffer through June 30 for a natal den site or through August 31 for a rendezvous site.

Habitat function for gray wolf would be maintained because initial and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh and would retain up to four large snags greater than 12 inches dbh per acre. Preferred gray wolf habitat would include large basal hollows. Additionally, downed woody debris larger than 18 inches diameter and 12 feet long would be retained. Therefore, some features typically used by gray wolves as natal den habitat would be retained. Other features sometimes used as natal den habitat, including large burrows or rock crevices, would not be targeted for treatment and therefore would be retained in the project area. Gray wolves have large home ranges and use many habitat types at a landscape scale. At this scale, habitat function for gray wolves would be maintained because treatments would not result in type conversion (i.e., forest to shrub, shrub to herbaceous) through implementation of tree retention parameters and SPRs. While treatment activities could result in temporary disruption of wolf movement or movement of prey species (e.g., mule deer, elk) in the vicinity of a treatment area, these effects would be limited to the period during which equipment and personnel were actively conducting treatments. No barriers to wolf or deer movement would remain post-treatment, and in treatment areas with dense understory conditions, post-treatment conditions may improve for wildlife movement.

Collins contacted USFWS by email on May 3, 2023, to notify them of their proposed avoidance measures and their determination that habitat function would be maintained for gray wolf. On May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to gray wolf and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The only refinement to measures in the MMRP that resulted from this consultation include requiring Collins to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. Consultation with USFWS and CDFW is complete for gray wolf and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Special-Status Bats

Habitat potentially suitable for three special-status bat species—pallid bat (*Antrozous pallidus*), spotted bat (*Euderma maculatum*), and Townsend's big-eared bat (*Corynorhinus townsendii*)—is present within forest habitat, rocky areas, and human-made structures (e.g., culverts) in the treatment area (Attachment B). Per SPR BIO-1, if it is determined that adverse effects on special-status bats can be clearly avoided by conducting mechanical treatments, manual treatments, and prescribed burning outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special-status bat maternity roosts would be clearly avoided by conducting initial and maintenance treatments outside of the bat maternity season (April 1–August 31; Caltrans 2004).

Mechanical treatments, manual treatments, and prescribed burning conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chain saws, vehicles, personnel) or smoke (e.g., prescribed burning) potentially resulting in abandonment of the roost and loss of young. Herbicide treatments would be limited to ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems and would be conducted by crews of 3-16 people; thus, these treatments would not result in substantial disturbance to special-status bat roosts, because although passenger vehicles and all-terrain vehicles would be utilized to transport crews to treatment areas these vehicles would be limited to existing roads where special-status bat roosts would be less likely to occur. The potential for treatment activities to result in adverse effects on special-status bats was examined in the Program EIR.

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

Under Mitigation Measure BIO-2b, a no-disturbance buffer of 250 feet would be established around active pallid bat, spotted bat, Townsend's big-eared bat roosts and mechanical treatments, manual treatments, and prescribed burning would not occur within this buffer until the roost is no longer occupied as determined by the qualified RPF or biologist.

Habitat function for special-status bats would be maintained because initial and maintenance treatments would not result in removal of living trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh and up to four snags greater than 12 inches dbh per acre, which would be the most likely features to be used by this species due to the cover provided by larger trees. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Ringtail

Ringtail (*Bassariscus astutus*) is primarily nocturnal, and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats (Attachment B). Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and shrubs. Some of these habitats would be avoided, as live trees (i.e., conifers, hardwoods with basal hollows or other complex structural features) larger than 12 inches dbh would not be removed during initial or maintenance treatments and because rocky areas would not be targeted for vegetation treatment. However, hardwoods with no basal holes or complex structural features and shrub habitat would be targeted for treatment and would not be avoided through implementation of other measures. The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on ringtail can be clearly avoided by conducting treatments outside of a season of sensitivity (i.e., maternity season), then mitigation would not be required. Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments and herbicide application would not result in adverse effects on ringtail dens because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. However, prescribed burning and mechanical treatments conducted within habitat suitable for ringtail during the ringtail maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30) could result in destruction of active dens within shrub habitat or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Adverse effects on ringtail would be clearly avoided for prescribed burning and mechanical treatments in habitat suitable for ringtail that would occur outside of the ringtail maternity season (April 15–June 30) under SPR BIO-1. If pile burning is conducted manually, it can occur during the maternity season.

If conducting some prescribed burning and mechanical treatments within habitat suitable for ringtail outside of the ringtail maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and presence of ringtail would be assumed, or focused surveys for ringtail would be conducted within suitable habitats in the treatment area before implementation of mechanical treatments or prescribed burning. Surveys for ringtail would include the use of trail cameras, track plates, or other non-invasive survey methods to determine whether ringtails are present within the treatment area and would be conducted by a qualified RPF or biologist. If baited trail cameras are used, the qualified RPF or biologist should obtain any valid CDFW Scientific Collecting Permits that are required. If focused surveys are conducted, and ringtails are not detected, then further mitigation for the species would not be required. If ringtails are detected during focused surveys, then additional surveys would be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, a no-disturbance buffer would be established around the den, the size of which would be determined through consultation with CDFW. No treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

If the presence of ringtail within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a before and during implementation of broadcast burning and mechanical treatments in habitats suitable for ringtail between April 15 and June 30. Avoidance and minimization measures would include but not be limited to pre-treatment den surveys, daily sweeps of the treatment area, and biological monitoring.

Habitat function for ringtail would be maintained because initial and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh, and would retain up to four large snags per acre, which would be the most likely features to be used by this species due to the cover provided by larger trees. Additionally, rocky areas would not be targeted for vegetation treatment. On May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to ringtail and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The only refinement to measures in the MMRP that resulted from this consultation include requiring Collins to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. Consultation with CDFW is complete for ringtail and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Sierra Nevada Mountain Beaver

Habitat potentially suitable for Sierra Nevada mountain beaver (*Aplodontia rufa californica*) may be present adjacent to perennial streams with dense, shrubby habitat (Attachment B). Many streams within the project area do not provide habitat suitable for this species. Sierra Nevada mountain beavers are strongly associated with aquatic habitat and are not found far from water.

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., ephemeral drainages, irrigation ditches) streams. Mechanical treatments would not occur within WLPZs. However, these measures may not avoid impacts on Sierra Nevada mountain beaver if manual activities implemented within the WLPZ resulted in injury or mortality of mountain beavers. The potential for treatment activities and maintenance treatments to result in adverse effects on Sierra Nevada mountain beaver was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on Sierra Nevada mountain beaver can be clearly avoided by conducting treatments outside of a season of sensitivity, then mitigation would not be required. However, because Sierra Nevada mountain beavers may use a den year-round, and because individuals may retreat to burrows in response to the presence of vehicles, equipment, or personnel, implementation of SPR BIO-10 would be required before treatments within habitat suitable for the species (e.g., dense riparian habitat adjacent to perennial streams). Under SPR BIO-10, focused surveys (i.e., burrow searches) for Sierra Nevada mountain beavers would be conducted in areas up to 200 feet from perennial streams within the treatment area before implementation of treatment activities. If focused surveys are conducted and Sierra Nevada mountain beaver burrows are not detected, then further mitigation for the species would not be required. If Sierra Nevada mountain beaver burrows are detected during focused surveys, then additional surveys would be required to determine whether the burrow is active. If an active burrow is identified by a qualified RPF or biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer of at least 250 feet would be established around the burrow, and no treatment activities would occur within this buffer.

Habitat function for Sierra Nevada mountain beaver would be maintained because pursuant to SPR HYD-4, treatments within stream WLPZs adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover) which would result in retention of habitat suitable for this species. 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.

Sierra Nevada Red Fox

Sierra Nevada red fox (*Vulpes vulpes necator*) (Attachment B) within the Lassen population have been documented moving from high-elevation alpine habitats to lower elevation areas during the winter months, possibly due to reduced snow levels at these elevations (USFWS 2015). Winter habitat potentially suitable for Sierra Nevada red fox is present in the project area within coniferous forest, chaparral, and meadow habitats. Den habitat for Sierra Nevada red fox is not well described, but it is thought that the species typically dens in natural cavities within boulder piles and talus slopes. Winter dens at the elevation of the project area would not contain defenseless young. Additionally, denning habitat (e.g., rocky areas) would not be targeted for treatment, though adults could still be disturbed if treatments occur nearby. Sierra Nevada red fox may forage in the project area, though this would likely be rare. If Sierra Nevada red fox adults were foraging in the project area during treatment activities, it is likely they would flee the area.

Per SPR BIO-1, if it is determined that adverse effects on Sierra Nevada red fox can be clearly avoided by conducting treatments outside of the winter season, then mitigation would not be required. However, if it is not feasible to conduct treatments outside of the winter season then SPR BIO-10 would be required before treatments can be conducted within habitat suitable for the species (e.g., coniferous forest, meadows, chaparral). Under SPR BIO-10, focused, noninvasive surveys (i.e., den searches) for Sierra Nevada red fox would be conducted within habitat suitable for denning prior to implementation of mechanical and manual treatments, prescribed burning, or herbicide application to determine whether occupied Sierra Nevada red fox dens are present within the treatment area before implementation of treatment activities. If focused surveys are conducted and Sierra Nevada red fox dens or signs of occupied dens are not detected, then further mitigation for the species would not be required. If Sierra Nevada red fox dens are detected or assumed present during focused surveys, then additional surveys (e.g., camera trapping, track plates) would be required to determine whether the den is active. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, a no-disturbance buffer would be established around the den, the size of which would be determined through consultation with CDFW. No treatment activities would occur within this buffer.

Habitat function for Sierra Nevada red fox would be maintained because initial and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods with basal holes or complex structural features) greater than 12 inches dbh, and would retain up to four snags greater than 12 inches dbh per acre, which would be the most likely features to be used by this species due to the cover provided by larger trees. Additionally, rocky areas would not be targeted for vegetation treatment. On May 3, 2023, Collins sent a memo to Andre Benoist at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to Sierra Nevada red fox and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The only refinement to measures in the MMRP that resulted from this consultation include requiring Collins to conduct review of the CDFW special-status species list annually to see if the status of any species has changed. Consultation with CDFW is complete for Sierra Nevada red fox and the project-specific measures (see Mitigation Measure BIO-2a in the MMRP for measures; Attachment A) will be implemented by Collins. 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.

Sierra Nevada snowshoe hare

Sierra Nevada snowshoe hare (*Lepus americanus tahoensis*) (Attachment B) has historical documented occurrences and a more recent documented occurrence from 2006, all north of the project area near Mineral (CNDDB 2023; NSF et al. 2023). The Sierra Nevada snowshoe hare is found from Mount Lassen south through Yosemite National Park in mid-elevation habitats of the northern and central Sierra Nevada (Collins 1998). Snowshoe hares typically are only observed when flushed and prefer dense vegetation (Collins 1998). Snowshoe hares prefer thickets of deciduous trees in riparian areas, dense shrubs, and thickets of young conifers. They are active year-round, being most active at night and in the early morning (Flux and Angermann 1990). Maternity season is typically from early spring to late summer (Zeiner et al. 1990).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., ephemeral drainages, irrigation ditches) streams. Mechanical treatments would not occur within WLPZs. However, these measures may not avoid impacts on Sierra Nevada

snowshoe hare if nests are present outside of the WLPZ. The potential for treatment activities and maintenance treatments to result in adverse effects on Sierra Nevada snowshoe hare was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on Sierra Nevada snowshoe hare can be clearly avoided by conducting treatments outside of a season of sensitivity (i.e., maternity season), then mitigation would not be required. Outside of the maternity season, resting snowshoe hares would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of injury or mortality. Manual treatments and herbicide application would not result in adverse effects on snowshoe hare nests because personnel would conduct these activities on foot, and the likelihood of a nest being inadvertently crushed or otherwise destroyed would be very low. However, mechanical treatments and prescribed burning conducted during the Sierra Nevada snowshoe hare maternity season (i.e., the period during which young would be present in a den, conservatively to account for uncertainty, approximately April 1–August 31) could result in destruction of active nests within dense riparian woodland, thickets of small conifers, and dense shrub habitat or disturbance to active nests potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Adverse effects on Sierra Nevada snowshoe hare would be clearly avoided for mechanical treatments and prescribed burning that would occur outside of the snowshoe hare maternity season (April 1–August 31) under SPR BIO-1.

If it is not feasible to conduct some mechanical treatments outside of the snowshoe hare maternity season, SPR BIO-10 would be required before mechanical treatment and prescribed burning within habitat suitable for the species (e.g., dense riparian woodland, thickets of small conifers, dense shrubs). Under SPR BIO-10, focused surveys (i.e., nest searches) for Sierra Nevada snowshoe hare would be conducted within habitat suitable for the species (i.e., dense riparian woodland, thickets of small conifers, dense pockets of shrubs) by a qualified RPF or biologist before implementation of treatment activities. If focused surveys are conducted and Sierra Nevada snowshoe hare nests are not detected, then further mitigation for the species would not be required. If Sierra Nevada snowshoe hare nests are detected during focused surveys, then additional surveys would be required to determine whether the nest is active. If an active nest is identified by a qualified RPF or biologist, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den, the size of which would be determined through consultation with CDFW. No treatment activities would occur within this buffer.

Habitat function for Sierra Nevada snowshoe hare would be maintained because pursuant to SPR HYD-4, treatments within stream WLPZs adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover) which would result in retention of riparian habitat suitable for this species. Additionally, 10 percent of shrub habitat would be retained in ecological restoration treatment areas to create shrub patches. 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.

Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities, intensity of disturbance as a result of implementing treatment activities, and potential effects on special-status wildlife are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status wildlife is also the same, as described above. SPRs that apply to project impacts under Impact BIO-2 are SPR BIO-1 through SPR BIO-5, SPR BIO-8, SPR BIO-10, SPR BIO-11, SPR HAZ-5, SPR HAZ-6, SPR HYD-4, and SPR HYD-5. Biological resource mitigation measures that apply to this impact are Mitigation Measure BIO-2a through Mitigation Measure BIO-2h, Mitigation Measure BIO-3a through Mitigation Measure BIO-3c, and Mitigation Measure BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-3

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat and sensitive natural communities as defined by CDFW (CDFW 2023c). Potential

impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed; however, retreatment at too great a frequency could result in additional adverse effects. The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the Program EIR.

Based on the results of the reconnaissance-level biological surveys conducted pursuant to SPR BIO-1, as well as local vegetation mapping, aerial photos, species ranges, and occurrence data, 17 sensitive habitats (i.e., natural communities with a rarity rank of S1, S2, or S3) may be present within the treatment area. The sensitive natural communities, the associated rarity rank, and the habitat type within which the communities may occur are presented in Table 4.5-2. In addition, several oak woodland and forest types (I.e., interior live oak, canyon live oak, California black oak, and mixed oak forest) may be present in the project area. During the reconnaissance-level survey, black oak (*Quercus kelloggii*) was observed in the project area. Some black oaks were notably large, including some individuals in areas that previously burned at high severity during the Panther Fire in 2013. These areas were subsequently planted with ponderosa pine (*Pinus ponderosa*), among other species. As such, black oak is no longer present in these areas at densities that the vegetation meets the membership rules for the black oak woodland alliance. Therefore, although these high-severity burn areas may have black oak individuals, black oak woodlands are not present. However, black oak woodland may be present in other areas of the project area, especially in the lower elevation areas of the project area where black oak was observed. These habitats are considered sensitive habitats pursuant to the Oak Woodlands Conservation Act and PRC Section 21083.4.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, several species associated with these sensitive natural communities were observed, including incense cedar (*Calocedrus decurrens*) and Fremont cottonwood (*Populus fremontii*). Additionally, several genera associated with these sensitive natural communities were observed, including alder, rush (*Juncus* spp.), and manzanita (*Arctostaphylos* spp.). Not all parts of project area were observed during the reconnaissance survey, and the survey intensity was not sufficient to identify vegetation to alliance level; therefore, additional sensitive natural communities may be present (including those identified in Table 4.5-2). Implementation of SPR BIO-3 is required to map sensitive natural communities prior to treatment.

Table 4.5-2 Sensitive Natural Communities Documented or with Potential to Occur in the Project Area

Sensitive Natural Community[1]	Rarity Rank[2]	Habitat Type
Incense Cedar Forest and Woodland	S3	Sierran Mixed Conifer
Tanoak Forest	S3.2	Montane Hardwood
California Buckeye Groves	S3	Montane Hardwood
Bigleaf Maple Forest and Woodland	S3	Montane Hardwood, Montane Hardwood-Conifer
Hoary, Common, and Stanford Manzanita Chaparral	S3	Mixed Chaparral
Oregon Ash Grove	S3.2	Montane Riparian
Fremont Cottonwood Forest and Woodland	S3.2	Montane Riparian
Wild Grape Shrubland	S3	Montane Riparian
Mountain Alder Thicket	S3	Montane Riparian
Rocky Mountain Maple Thickets	S3?	Montane Riparian
Torrent Sedge Patches	S3	Montane Riparian
Resin Birch Thickets	S2?	Montane Riparian
Black Cottonwood Forest and Woodland	S3	Montane Riparian
Needle Spike Rush Stands	S2	Annual Grassland
Deer Grass Beds	S2?	Perennial Grassland
Small-fruited Sedge Meadows	S2?	Perennial Grassland
Water Foxtail Meadows	S3?	Perennial Grassland

[1] These are designated sensitive natural communities with a state rarity rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable)

[2] Older ranks, which need to be updated by CDFW, may still contain a decimal "threat" rank of .1, .2, or .3, where .1 indicates very threatened status, .2 indicates moderate threat, and .3 indicates few or no current known threats. A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this rank.

Source: CDFW 2023a; CNPS 2023b; Menke et al. 2011; USFS EVEG vegetation data. Compiled by Ascent Environmental in 2023.

Maintenance treatments would be developed with consideration for the location's vegetation type (as determined by a RPF or Biologist) and its natural fire return interval (i.e., time since last burn is greater than the average fire return interval for the habitat type). These intervals vary by vegetation type. For example, chaparral vegetation types generally require a minimum of 10 years to recover after fire or fire-replicating treatments.

Impacts on sensitive natural communities and oak woodlands would be avoided by not conducting treatment in these communities. However, if avoiding treatment activities within identified sensitive natural communities or oak woodlands would preclude achieving overall treatment objectives, then Mitigation Measure BIO-3a would apply in these areas to ensure that the characteristics that qualify the communities as sensitive (e.g., dominant canopy species, canopy relative percentage of dominant species, species composition) are retained post-treatment to the extent feasible. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. If habitat function of sensitive natural communities or oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, then Mitigation Measure BIO-3b would apply and unavoidable losses of these resources would be compensated through restoration or preservation of these vegetation types within or outside of the project area.

As described in the project description, Collins does not intend to implement any treatments in wetland habitats. Wetland delineations would be conducted to identify and map the extent of wetland habitats within treatment areas. Where wetland or other aquatic habitats are delineated, no-disturbance buffers of at least 25 feet would be established (per Mitigation Measure BIO-4, refer to Impact BIO-4 below). Therefore, there would be no impacts to sensitive natural communities associated with wetland habitats.

Riparian habitats are also present in the project area. Riparian vegetation observed in the project area during the reconnaissance-level survey included willow (*Salix* spp.) and cottonwoods (*Populus* spp.) Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented for all treatment activities, which would avoid treatment within riparian habitat. While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the treatment area has not been mapped and riparian habitat may be present outside of the areas encompassed within WLPZs. As a result, before implementation of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat within a treatment area. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Only manual treatments are proposed within the riparian habitat, and pursuant to SPR HYD-4, driving heavy equipment, equipment fueling, placement of burn piles, and fire ignition would be prohibited within the WLPZ. Herbicides, aquatic and terrestrial, would not be utilized within WLPZs or ELZs (established per SPR HYD-5). In addition, before conducting any treatments in riparian habitat, Collins would notify CDFW pursuant to California Fish and Game Code 1602, when required. After implementation of SPR BIO-4, if impacts to riparian habitat remain significant under CEQA, then Mitigation Measures BIO-3c would apply and unavoidable losses of these resources would be compensated through restoration or preservation of these vegetation types within or outside of the project area.

As described above, montane chaparral habitat may be present within the project area. As required by SPR BIO-5, treatments implemented in chaparral would be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function. This would include identifying the chaparral vegetation types to the alliance level, determining appropriate treatment prescriptions based on current fire return interval departure and condition class of the chaparral vegetation alliances on-site, retaining at least 35 percent relative final density of mature chaparral vegetation in ecological treatments, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Collins would

demonstrate with substantial evidence that the habitat function of the specific chaparral vegetation types (i.e., alliances) present would be maintained or enhanced by the treatments applied. Ecological restoration treatments would not be implemented in stands of chaparral vegetation that are within their natural fire return interval unless Collins demonstrates with substantial evidence that the habitat function of the chaparral vegetation alliances would be improved.

Conclusion

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, 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 from 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 CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape in the project area are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on sensitive habitats is also the same. SPRs that apply to project impacts under Impact BIO-3 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-5, SPR BIO-6, SPR BIO-8, SPR BIO-9, SPR HYD-4, and SPR HYD-5. The mitigation measures that apply to this impact are Mitigation Measure BIO-3a, Mitigation Measure BIO-3b, and Mitigation Measure BIO-3c. 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

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR.

Aquatic habitats that have been mapped in the project area by the National Wetlands Inventory (NWI) consist of freshwater emergent wetlands (15.64 acres), freshwater forested/shrub wetlands (61.91 acres), and riverine features (83.26 acres). The California Aquatic Resources Inventory (CARI) classifies the project area as having approximately 66.24 acres of palustrine and riverine wetlands and 21.43 acres of fluvial drainage features. Resources mapped in these databases are identified primarily through aerial imagery and are not ground verified. Additionally, VegCAMP and Fire and Resource Assessment Program mapping includes 1.3 acres of wet meadow habitat and 0.9 acres of dry meadow habitat. Wetland vegetation communities found in the project area during the reconnaissance survey included freshwater emergent and freshwater forested/shrub wetlands containing species including Douglas' meadowsweet (*Spiraea douglasii*), California false hellebore (*Veratrum californicum*), leopard lily (*Lilium pardalinum*), alder, willow, and cottonwoods. During the reconnaissance-level survey, some of these features contained standing water and others had saturated soil. Riverine features were also observed in the project area during the reconnaissance-level survey including Mill Creek and other unnamed streams. Lining the banks of some of the riverine features were freshwater emergent and freshwater forested/shrub wetlands. Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, and seeps. Pursuant to Mitigation Measure BIO-4, aquatic resources delineations would be conducted to accurately identify and map the extent of state and federally protected wetlands and waters in the treatment areas and delineate wetland and upland boundaries in wet and dry meadow habitats.

Pursuant to SPR HYD-4, a WLPZ of 50 to 100 feet adjacent to Class II waters and 75 to 150 feet adjacent to Class I waters within the treatment area would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV waters within treatment areas for all treatment activities. Establishment of WLPZs would result in avoidance of all stream and pond habitat during treatments.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, and

seeps. Mitigation Measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of wetland features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, seeps, and other wetlands; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). A larger buffer may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., dwarf resin birch, Cascades frog; see Impact BIO-1 and Impact BIO-2). Containment lines for prescribed burns would be installed or created outside of springs, seeps, streams, or other aquatic habitats identified through NWI mapping, CARI mapping, and during Mitigation Measure BIO-4 surveys.

Conclusion

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the Program EIR. This impact on wetlands is within the scope of the Program EIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape in the project area are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wetlands is also the same, as described above. SPRs that apply to this impact are SPR BIO-1, SPR HYD-1, and SPR HYD-4. The biological resource mitigation measure that applies to project impacts under Impact BIO-4 is Mitigation Measure BIO-4. 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-5

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

Based on review and reconnaissance level-survey of project-specific biological resources (SPR BIO-1), mapped essential connectivity areas are located throughout the project area including two riparian connections associated with Mill Creek and Deer Creek (CDFW 2023d). The project area is located between two natural landscape blocks which are largely associated with forested habitat in Lassen National Forest (CDFW 2023d). A small portion of the project area is not included in essential connectivity areas or natural landscape blocks but contains natural habitat and is likely used as a wildlife movement corridor to some degree. Additionally, the Tehama State Wildlife Area is located west of the project area.

Existing roads are located within and in the vicinity of the project area. The size and traffic levels of the roads and level of development are consistent throughout the project area and are subject to ongoing disturbances (e.g., vehicle traffic, human activity), and some level of wildlife habitat fragmentation due to historic land uses (e.g., timber harvest) in the project area. While habitat directly adjacent to roads would not be optimal habitat, wildlife may move through these areas, or use some habitats for cover or as nursery sites, especially in relatively undeveloped areas.

Treatment types would include shaded fuel breaks that would retain some forest canopy, non-shaded fuel breaks to provide a complete fuel break, and ecological restoration treatments designed to support native habitat structures and build forest resilience. Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes within the project area would be implemented. This would limit the extent of treatment activities within riparian habitat (e.g., no mechanical treatment, retention of at least 75 percent surface cover) that may function as a wildlife movement corridor. SPR HYD-1 requires compliance with water quality regulations, which would protect aquatic and riparian habitat by avoiding erosion and associated sedimentation that could degrade aquatic nursery sites or sensitive riparian habitat. Most live trees (i.e., conifers, hardwoods with basal holes or complex structural features) and snags greater than 12 inches dbh would be retained. Pursuant to SPR BIO-3, SPR BIO-4, and SPR BIO-5, treatments in sensitive

natural communities, riparian habitat, and chaparral habitat, respectively, would be designed to maintain habitat function of these communities. Additionally, implementation of proposed treatments would not result in any conversion of land cover or create new barriers to wildlife movements within (locally) or across (regionally) the project area. With implementation of SPRs, habitat function within the project area would be maintained and there would not be a substantial change in the existing conditions that facilitate wildlife movement in the project area.

If during surveys conducted pursuant to SPR BIO-10 wildlife nursery sites (e.g., heron rookeries, deer fawning areas, common bat roosts) are detected, Mitigation Measure BIO-5 would apply to all treatment activities and a no-disturbance buffer would be established around these features, the size of which would be determined by a qualified biologist or RPF.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape in the project area are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wildlife movement corridors is also the same, as described above. SPRs that apply to project impacts under Impact BIO-5 are SPR BIO-1, SPR BIO-3, SPR BIO-4, SPR BIO-5, SPR BIO-10, SPR BIO-11, SPR HYD-1, and SPR HYD-4. The biological resource mitigation measure that applies to this impact is Mitigation Measure BIO-5. 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-6

Initial treatment and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds. Nesting habitat suitable for birds is present throughout the project area. All of the proposed treatment activities conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli (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 the reduction of habitat or abundance of common wildlife, including nesting birds, was examined in the Program EIR.

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

The potential for 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 CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions and habitat characteristics present in areas outside the treatable landscape in the project area are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on common wildlife, including nesting birds, is also the same, as described above. SPRs that apply to project impacts under Impact BIO-6 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-5, and SPR BIO-12. 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

The applicable local policy or ordinance relevant to biological resources is the Tehama County Code of Ordinances. The Tehama County Fire Hazard Abatement Ordinance (Chapter 9.05) contains modified firebreak requirements (Chapter 9.05, Article 2, Section 9.05.060) that may be established by the enforcing officing (i.e., the executive officer of the fire protection agency having jurisdiction, any person designated by the aforementioned executive officer, and any person employed by the County of Tehama and appointed to the position of code enforcement officer, as established by Tehama County Resolution Number 125-1991) to mitigate erosion potential on steep slopes; prevent destruction of unique wildlife habitat, endangered species, vernal pools, or watercourses; or for other environmental factors. The SPRs included throughout this PSA/Addendum that would be implemented by Collins are consistent with the requirements of the Tehama County Fire Hazard Abatement Ordinance. With implementation of SPRs and mitigation measures described in Impacts BIO-1 through BIO-6 above, project implementation would not conflict with local ordinances.

The potential for treatment activities to conflict with local policies or ordinances was examined in the Program EIR. The potential for the treatment project to conflict is within the scope of the Program EIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. 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. The SPR that applies to this impact is SPR AD-3. 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-8

Implementation of the proposed vegetation treatments and maintenance treatments would not result in a conflict with adopted habitat conservation plans (HCP) or natural community conservation plans (NCCP), because the project area is not within the plan area of any adopted HCP or NCCP.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR).Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR and revisions to SPRs constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revisions to SPRs and mitigation measures would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

The project area is located within the southernmost extension of the Cascade Range, where the Tuscan formation of the Pliocene age, comprised primarily of mudflows, influences the area's geology. This formation dips gently and thins toward the southwestern portions of the watersheds. Geologic diversity is supplied by several other influences. These include andesitic plugs that intrude the Tuscan formation along two linear trends, relatively minor exposures of marine sedimentary rocks in the area's watersheds, and at lower elevations, quaternary sediments of the Sacramento Valley (USGS 1976). Timber harvest and grazing have impacted many of the watersheds' tributary streams. Though similar in general description, the extent and distribution of different landforms within the three watersheds causes them to display vastly different characteristics. The project area has more rhyolitic soils compared to other neighboring watersheds, which has resulted in increased surface erosion rates relative to other soils (USGS 1976).

Soils generated from these parent materials are generally productive, erosion rates range from low to moderate on the andesitic soils, and from high to very high on the rhyolitic soils. Surface erosion, especially on the rhyolitic soils, is the other major source of sediment. The watershed's area is relatively long and narrow, with moderate to steep slopes (USGS 1976). Extended low gradient channel types are uncommon on the mainstems, restricted to Deer Creek Meadows and reaches the Valley floor. Steep slopes adjacent to the main channels served as historic barriers to activity, and recent land use allocations have protected these areas such that the main stem near stream environments are essentially undisturbed (USGS 1976).

IMPACT GEO-1

Vegetation treatments would include ecological restoration and fuel breaks through use of pile burning, broadcast burning, mechanical treatment, manual treatment, and targeted ground application of herbicides. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the Program EIR because the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. SPRs applicable to this impact are GEO-1 through GEO-8, AQ-3, AQ-4, and HYD-4.

In addition, Collins proposes to revise SPR AQ-4 and SPR GEO-1, both of which are applicable to this impact. SPR AQ-4 would be revised to limit vehicle and equipment speeds on unpaved roadways to 25 miles per hour, unless fugitive dust emissions are visibly occurring (then vehicle speeds would be reduced to no more than 15 miles per hour); and to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the Program EIR. These revisions are consistent with the purpose of SPR AQ-4 and would maintain the overall requirements of avoiding and minimizing the creation of fugitive dust through treatment vehicle use of unpaved roadways and vehicles tracking out dust, silt, or mud onto public roadways. In addition, Collins would wet unpaved areas if road use creates excessive fugitive dust, as required by SPR AQ-4. SPR GEO-1 would be revised to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. For the reasons described, proposed revisions to SPR AQ-4 and SPR GEO-1 would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the Program EIR.

As explained above, impacts related to soil erosion resulting from the proposed project would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GEO-2

Treatment activities would include mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application. No areas with known landslide activity are identified within the project area (USGS 2023). However, given the variable topography in some of the treatment areas, the remoteness of the area, steep terrain, and wet winter conditions, there is the potential for landslides in the project area. The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape; therefore, the potential impact related to landslide risk is also the same, as described above. SPRs applicable to this impact are GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, and AQ-3.

In addition, Collins proposes to revise SPR GEO-1 to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance

during heavy precipitation to minimize the risk of soil compaction and soil disturbance. For the reasons described, proposed revisions to SPR GEO-1 would not result in a substantially more severe significant effect related to landslide risk than what was covered in the Program EIR.

As explained above, impacts related to landslide risk resulting from the proposed project would not constitute new or substantially more severe significant impact than what was covered in the Program EIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final Program EIR). Within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

4.7 GREENHOUSE GAS EMISSIONS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	None	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	SU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	SU	No	Yes

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the Program EIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with prescribed burning. However, emissions generated by the proposed treatments would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the Program EIR. SPR AQ-3 is also applicable to this treatment and would document in a Burn Plan which methods for reducing GHG emissions can feasibly be integrated into the treatment design. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. 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.

NEW IMPACTS RELATED TO GHG EMISSIONS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

4.8 ENERGY RESOURCES

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT ENG-1

Use of vehicles, mechanical equipment, and some manual equipment (e.g., chainsaws) during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that Is outside the CalVTP 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, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land outside the treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to energy resources would occur.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

Notes: LTS = less than significant; LTSM = less than significant with mitigation; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT HAZ-1

Initial and maintenance treatments would include mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. SPR HAZ-1 is applicable to this treatment.

In addition, Collins proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the original purpose and intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use and would allow Collins' to stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. For the reason described, the proposed revision to SPR HAZ-1

would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials than what was covered 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 HAZ-2

Initial and maintenance treatments would include herbicide application to target plant species using cut-stump and basal-bark application methods. No aerial spraying of herbicides would occur. The potential for treatment activities to cause a significant health hazard from use of herbicides was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of herbicides (e.g., glyphosate, triclopyr, imazapyr) and application methods that would be used, which are limited to ground-based applications, are consistent with those analyzed in the Program EIR. In addition, herbicides would be applied by licensed applicators in compliance with all laws, regulations, and herbicide label instructions, consistent with herbicide use described in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. SPRs HAZ-5 through HAZ-9 are applicable to this treatment. 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 HAZ-3

Initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the 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 soil disturbance or burning in those areas could expose people or the environment to hazards. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. No hazardous materials sites are located within 0.25 mile of any of the treatment areas (DTSC 2023; CalEPA 2023; SWRCB 2023) (Attachment C). Therefore, this impact is less than significant with mitigation.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. No SPRs are applicable to this impact, and no additional mitigation is required. 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.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed 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; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 HYDROLOGY AND WATER QUALITY

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

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

The project area is within the Deer Creek watershed, which drains in a southwesterly direction from its mountainous headwaters in eastern Tehama County to its confluence with the Sacramento River near the town of Vina. The main hydrologic features in the project vicinity include Deer Creek, Mill Creek, Round Valley Creek, Gurnsey Creek, and the Sacramento River. As is common with neighboring watersheds, the upper watershed is flatter with significant alluvial valleys, connected to lowland agricultural lands via a steep and deeply incised middle section (USFS 1998). The upper watershed also has large acreage of private commercial timberland; mid- and lower-elevation lands are dominated by large working ranches. On the valley floor near the Sacramento River, irrigated agricultural land is mostly in pasture and orchard crops. Except for three small diversions, the watershed is undammed and provides critical habitat for salmon and steelhead, in particular spring-run Chinook salmon (USFS 1998). Land ownership is divided equally between public (upper watershed) and private (middle and lower watersheds) landowners.

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

IMPACT HYD-1

Initial and maintenance treatments would include prescribed burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for Class I and Class II streams that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this impact are HYD-1, HYD-4, BIO-4, BIO-5, GEO-4 through GEO-6, and AQ-3. SPRs HYD-1 and GEO-5 were not included in the Program EIR for this impact (Impact HYD-1); however, they are included here to address potential impacts to water quality from prescribed burning. 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

Initial treatment would include mechanical and manual treatments. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. SPRs applicable to this impact are HYD-1, HYD-4, GEO-1 through GEO-5, GEO-7, GEO-8, BIO-1, and HAZ-1.

In addition, Collins proposes to revise SPR GEO-1 and SPR HAZ-1, both of which are applicable to this impact. SPR GEO-1 would be revised to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. SPR HAZ-1 would be revised such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the original purpose and intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use and would allow Collins' to stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. For the reasons described, proposed revisions to SPR GEO-1 and SPR HAZ-1 would not result in a substantially more severe significant effect related to degradation of water quality from manual and mechanical treatment activities than what was covered 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 HYD-3

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

IMPACT HYD-4

Initial and maintenance treatments would include the use of herbicides to reduce the spread of invasive species, restore characteristic shrub densities for the vegetation community, manage resprouting tree species, maintain a manageable understory for fuel breaks, and to reduce fuel connectivity. Herbicide application would be limited to ground-based methods, such as painting herbicide onto cut stems, a backpack hand-applicator, or hack and squirt. All herbicide application would comply with EPA and California Department of Pesticide Regulation label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of herbicides to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR. The

inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, 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, as described above. SPRs applicable to this impact are HYD-1, HYD-5, BIO-4, and HAZ-5 through HAZ-7. SPRs HYD-1 and HAZ-6 were not included in the Program EIR for this impact (Impact HYD-4); however, they are included here to address potential impacts to water quality from herbicide application. 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-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project treatment site was examined in the Program EIR. This impact to site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. SPRs applicable to this impact are HYD-4, HYD-6, and GEO-5. 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.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

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

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT LU-1

Initial and maintenance treatment activities would occur within Tehama County on land owned by Collins. The majority of the project area is zoned Timber Production, with some small portions zoned Government (Tehama County 2023a). As noted in Section 4.12, "Noise," below, the treatment project is exempt from the Tehama County Noise Ordinance. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those analyzed in the Program EIR. Collins would adhere to SPR AD-3 and no conflicts with County ordinances or any other land use plan, policy, or regulation would occur. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the Program EIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

IMPACT LU-2

The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the Program EIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR

because the overall number of workers required for implementation of the treatments is consistent with (less than) the crew size analyzed in the Program EIR for the types of treatments proposed (i.e., 10–50 workers for prescribed burns, eight to 20 crew members and up to four crews for mechanical and manual treatments, and up to 16 workers for herbicide treatments). In addition, the proposed project would not require the hiring of new employees.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the 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 population and housing impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to land use and planning would occur that is not covered in the Program EIR.

4.12 NOISE

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT NOI-1

Initial and maintenance treatments would require the use of heavy, noise-generating equipment. Manual, mechanical, and prescribed burning treatment activities as well as chipping/mastication and pile burning occurring adjacent to sensitive land uses could temporarily expose those receptors to noise levels that exceed local standards. The potential for a substantial short-term increase in ambient noise levels from the use of heavy equipment was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed, and equipment use being temporary and sporadic, are consistent with the assumptions analyzed in the Program EIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment, and therefore the most severe noise impact, evaluated in the Program EIR.

Tehama County's Noise Ordinance (Code of Ordinances, Section 17.77.040) notes that noise sources associated with agricultural and timber management operations in zones permitting agricultural and timber management uses are exempt from the Tehama County's Noise Ordinance (Tehama County 2023b). Because the project area is zoned for timber production, the project is exempt from the County's Noise Ordinance.

As discussed in the Program EIR, noise levels generated by individual equipment range from 75 to 87.9 dB at 50 feet from the noise source (75 to 85 dB at 50 feet from the noise source for projects without the use of helicopters), with the loudest type of equipment being a chainsaw. Though multiple pieces of equipment would be operated simultaneously to implement a treatment, they would typically be spread out (i.e., usually more than 100 feet apart)

rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment such as masticators and chippers. Treatments would also be dispersed throughout the 10,376-acre project area, distributed across distinct treatment areas, so that short-term noise increases at any one sensitive receptor would be limited.

SPRs AD-3 and NOI-1 through NOI-5 are applicable to this treatment. With implementation of SPR AD-3, noise levels associated with vegetation treatment activities under the CalVTP would not exceed local land use/noise compatibility standards, and noise exposure attributed to vegetation treatment activities under the CalVTP would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of local standards. For any sensitive receptors (e.g., residential land uses, schools, places of worship) that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. The project is in a very rural area with primarily recreational uses in the immediate vicinity (i.e., within 1,500 feet of proposed treatments). Per SPR NOI-6, established recreational areas within 1,500 feet of the project would be notified prior to mechanical treatments.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area including, but not limited to SR 32, SR 36, SR 172, and fire roads located off of Lassen Trail. Vehicle traffic on area highways is not expected to generate a noticeable increase in traffic-related noise because it would be dispersed, infrequent, and not a substantial increase over existing conditions.

Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the Single-Event Noise Level. The potential for a substantial short-term increase in Single-Event Noise Level 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 inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. SPR NOI-1 is applicable to the project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to noise would occur.

4.13 RECREATION

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

The project area is located within Tehama County, which has many recreational resources (Tehama County 2009). Mill Creek Resort and Mill Creek Campground are located immediately north of the project area, off SR 172. Trails and several other small campgrounds are located in the immediate vicinity of the project area, including Potato Patch Campground and Elam Campground. Approximately 8 miles north of the project area are recreation areas and trails within Lassen Volcanic National Park. Lassen Volcanic National Park provides an abundance of recreational opportunities, including 150 miles of hiking trails (including 17 miles of the Pacific Crest Trail), camping, mountaineering, rock climbing, winter snow sports, sightseeing, wildlife viewing and interpretive resources (Tehama County 2009).

IMPACT REC-1

Vegetation treatment activities have the potential to disrupt recreational activities within the project area through temporary trail closures during active treatments and by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased haul truck trips. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. Recreational users would be notified of temporary closures of any area in advance of treatment activities per SPR REC-1, which Collins already does as a best practice during operations. Nuisance impacts related to noise, air quality, aesthetics, and transportation would be avoided or minimized as explained in the discussion for those respective resource areas throughout this PSA/Addendum.

This impact is within the scope of the Program EIR because the availability of recreational resources and the treatment activities and intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the availability of recreational resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact on recreation is also the same, as described above. The SPR applicable to this treatment is REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW RECREATION IMPACTS

The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the 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 pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

4.14 TRANSPORTATION

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

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including SR 32, SR 36, SR 172, and various other public and private roadways. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. The SPRs applicable to

this treatment are AD-3 and TRAN-1. 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 TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. SPRs applicable to this treatment are AD-3, HYD-2, and TRAN-1. 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 TRAN-3

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. The project would be implemented by existing permanent and seasonal staff; therefore, the project would not result in a substantial increase in worker vehicle trips. 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.

Manual and mechanical treatments and prescribed burning under the proposed treatment project would typically require between eight and 50 crew members depending on the treatment. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips over existing conditions would be small, temporary, and dispersed over multiple roadways. 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 attributable to the project are consistent with those analyzed in the Program EIR. 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 CalVTP 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, as described above. No SPRs are applicable to this project. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to transportation would occur.

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT UTIL-1

Initial and maintenance treatment would include mechanical treatment, manual treatment, prescribed burning, and targeted ground application of herbicides. Prescribed burning would require an on-site water supply (i.e., water trucks) to be available as a safety precaution. If needed to extinguish a burn, water would be supplied from water trucks. The

potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size of the area proposed for prescribed burning treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. No SPRs are applicable to this impact. 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-2

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would primarily be disposed of by pile burning. However, chipped or lopped and scattered debris may be left on-site, removed to a biomass facility, or piled for wildlife habitat. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site in some parts of the treatable landscape could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, some plant biomass could be hauled off-site to an appropriate waste collection facility. While the amount of biomass generated is not expected to exceed the capacity of existing local infrastructure in Tehama County, because the project would generate biomass that could be hauled off-site for disposal, it would contribute to the environmental significance conclusion in the Program EIR; therefore, the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the 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, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the project area, which would be disposed of primarily through pile burning. However, there is the potential for a small amount to be disposed of off-site at an appropriate waste collection facility. The implementing entity 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 types 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 project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the 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, as described above. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. 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.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP 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 in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the Program EIR.

4.16 WILDFIRE

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT WIL-1

Proposed vegetation treatments would include fuel breaks (shaded and non-shaded) and ecological restoration through use of mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application. Vegetation treatment involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final Program EIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water trucks and safety equipment would be staged on-site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and during prescribed burns is within the scope of the Program EIR because the types of equipment and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same,

as described above. SPRs applicable to this treatment are AD-3, AQ-3, HAZ-2, HAZ-3, and HAZ-4. 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

Vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration, and methods of prescribed burn implementation are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads or skid trails or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. 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.

NEW IMPACTS ON WILDFIRE

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed 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; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances would give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to wildfire would occur that is not covered in the Program EIR.

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