Marin Wildfire Prevention Authority

Greater Ross Valley Shaded Fuel Break Project CalVTP Phase II Reporting Period from February 9, 2023 through November 3, 2023

Project ID: 2022-05

January 2024

MARIN WILDFIRE PREVENTION AUTHORITY

PANORAMA ENVIRONMENTAL, INC.

Marin Wildfire Prevention Authority

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CalVTP Phase II Reporting Period from February 9, 2023 through November 3, 2023

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Prepared for:

Marin Wildfire Prevention Authority

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MARIN WILDFIRE PREVENTION AUTHORITY

PANORAMA ENVIRONMENTAL, INC.

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1 Introduction

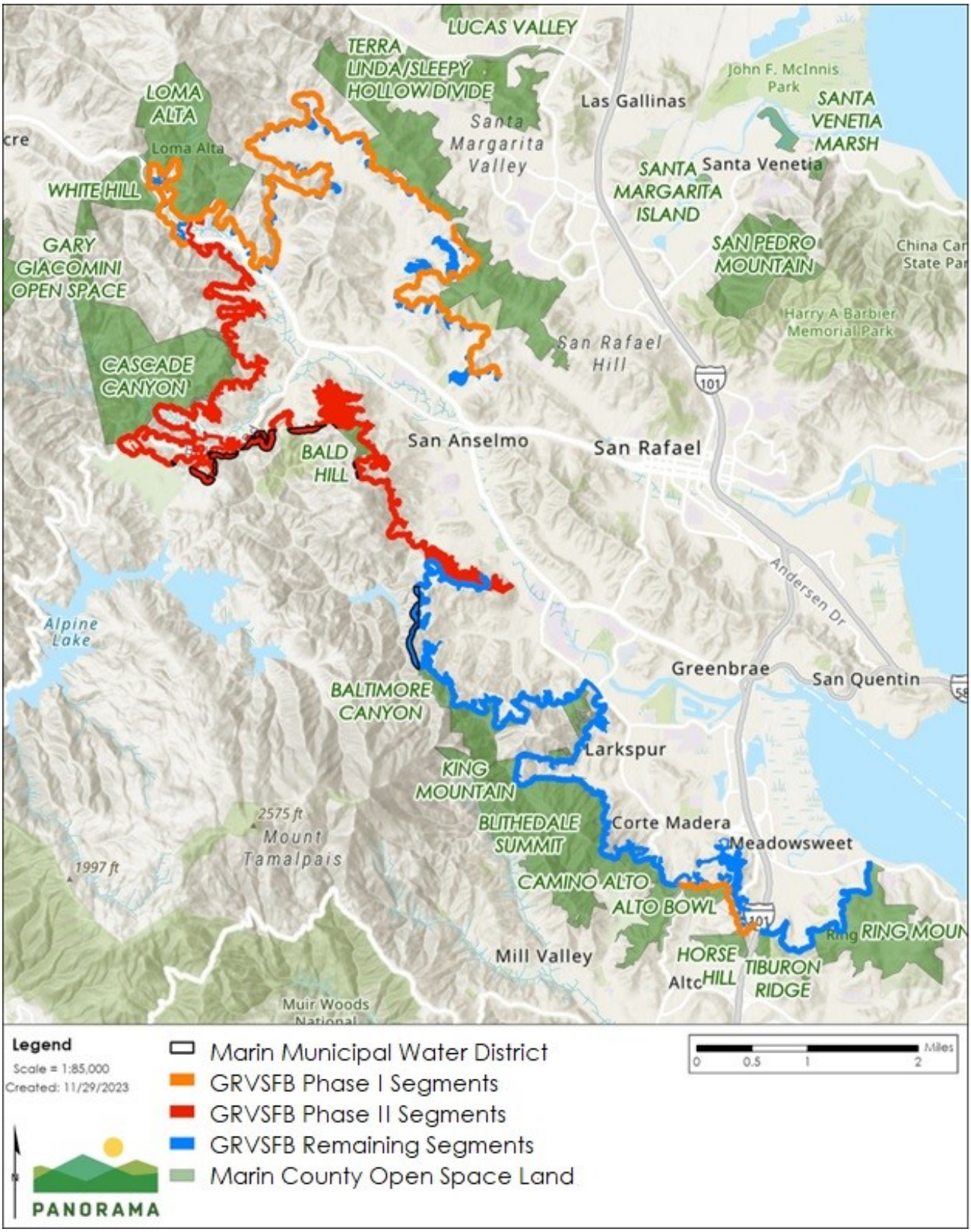
1.1 Overview

The Central Marin Fire Department (Central Marin Fire) has collaborated with the Ross Valley Fire Department, Kentfield Fire Protection District, Marin County Fire Department, Marin County Open Space District (MCOSD), and Marin Wildfire Prevention Authority (MWPA), for the Greater Ross Valley Shaded Fuel Break (GRVSFB) project. The following report describes the GRVSFB project's compliance with the California Vegetation Treatment Program (CalVTP) Environmental Impact Report (EIR) during project implementation. On May 30, 2022, the Project Specific Analysis (PSA) and Addendum was approved for the Project authorizing vegetation maintenance activities to create a 38-mile-long continuous shaded fuel break within a 1,379-acre shaded fuelbreak area and treat up to 497 acres of Wildland Urban Interface (WUI) areas. Phase I treatments for the GRVSFB project were completed between August 2, 2022 and February 8, 2023. Central Marin Fire identified segments 3, 5, and 9 of the GRVSFB project as the second phase (Phase II) where treatments activities would occur. Figure 1-1 shows the segments that constitute Phases I and II as well as the remaining GRVSFB areas. Treatments addressed in this report began on February 9, 2023 and ended on November 3, 2023, which mostly focused on Phase II segments, with some initial and re-treatments of Phase II and Phase I segments.

1.2 CalVTP Reporting Requirements

To comply with the CalVTP EIR and Standard Project Requirement (SPR) 7, a Completion Report is required for each completed phase of post-project implementation.

Figure 1-1 GRVSFB Phases



The Completion Report must include:

- Size of treated area (typically acres);
- Treatment types and activities;
- Dates of work;
- A list of the SPRs and mitigation measures that were implemented; and
- Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12, explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). In addition to the SPRs and mitigation measures, MWPA has developed specific Project Design and Implementation Features (PDIFs)[1] adapted from several source documents that will be incorporated as applicable into the project design and implementation for each of its projects.

1.3 Purpose

The purpose of this report is to provide details on treatment activities conducted during February 9, 2023 through November 3, 2023; the compliance activities required by the CalVTP EIR and implemented by MWPA in coordination with Central Marin Fire, County Fire, and MCOSD with support from other Central Marin Zone fire agencies, as well as to disclose that the project remained in overall compliance with the CalVTP EIR.

2 Pre-Treatment and Ongoing Compliance Activities

2.1 Compliance Personnel

Prior to initiation of treatment activities, the environmental compliance team was assembled. Table 2-1 lists the compliance inspection and monitoring personnel relevant to this report. Compliance inspection and monitoring occurred as required from February 9, 2023 to November 3, 2023.

[1] The PDIFs that meet an SPR are shown as replacing the SPR. Where an SPR is identified as more stringent than the PDIFs, this is noted next to the SPR. The PDIFs that do not have a corresponding SPR are also shown in the MMRP for ease of implementation and monitoring. These PDIFs are not needed to address any new impacts but are a standard part of MWPA Core Projects.

Table 2-1 MWPA Compliance Personnel

Firm	Name	Role
MWPA	Anne Crealock	Planning and Program Manager
MWPA/Panorama Environmental, Inc	Mike St. John	Vegetation Management Specialist and Field Manager
MWPA/Panorama Environmental, Inc	Brian McCarthy	Field Manager
Panorama Environmental, Inc	Caitlin Gilleran	Program Manager
Panorama Environmental, Inc	Emily Capello	Project Manager
Sequoia Ecological	Julie Woodruff	Senior Biologist
Sequoia Ecological	Andrew Ford	Senior Biologist
Sequoia Ecological	Tanya Baxter	Botanist
Sequoia Ecological	Amanda Smith	Botanist
Sequoia Ecological	Dechen Santapau	Biologist
Sequoia Ecological	Mimi Dietderich	Biologist
Sequoia Ecological	Elliott Steele	Biologist
Far Western Anthropological Research Group, Inc	Cassidy Baker	Senior Cultural Resource Specialist
Far Western Anthropological Research Group, Inc	Montse Osterlye	Cultural Resource Specialist
Miller Pacific	Zoe Stephens	Geologic Specialist

2.2 Worker Environmental Awareness Training

Worker environmental awareness training for all contractor crews and the field managers was already completed prior to the initiation of Phase I treatments. The environmental compliance team prepared project-specific worker environmental awareness pamphlets and a training program for the GRVSFB project. During the Phase II reporting period, rare plant pamphlets targeting those species that were observed during the Phase II botanical surveys were prepared and distributed to the field managers and work crew leads. During the weekly meetings, refreshers were provided regarding allowable activities and avoidance areas due to presence of resources including but not limited to potential to encounter additional rare plant species, nesting birds, and risk of destabilization.

2.3 Cultural Resources Surveys

Cultural surveys were conducted in areas of high sensitivity based on the records search and buried sensitivity analysis conducted for the GRVSFB project (in accordance with SPR CUL-4, refer to Table 4-1 for full text of measure). The pedestrian survey areas were conducted on April

7, 2023 prior to any ground disturbing (e.g., broom pulling) activities in these areas. The surveys were conducted in transects spaced no farther than 15 meters apart using geographic features, property boundaries, printed maps, and a submeter Global Positioning System (GPS) unit to determine survey boundaries. All exposed areas, rodent holes, drainages, and cutbanks were carefully examined for the presence of cultural materials. The surveys were documented using digital photographs and a handheld submeter GPS unit. One precontact/Native American archaeological resource was identified during the pedestrian surveys, but was avoided by project activities (Far Western Anthropological Research Group, Inc 2023). A Department of Parks and Recreation (DPR) 523 form for the resource was submitted to the California Historic Information System Northwest Information Center. The MWPA notified the Federated Indians of Graton Rancheria via email on May 4, 2023 regarding the discovery of the resource. No cultural resources were encountered by crews.

2.4 Botanical Surveys

Botanical surveys were conducted to identify sensitive plant species and habitats prior to activities that could result in damage or loss of special-status plant species (in accordance with SPR BIO-7, refer to Table 4-1 for full text of measure). The extent of the survey area is presented in Figure 2-1. Surveys were performed and data reported following the 2018 California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Special-status plant surveys performed on the GRVSFB project were conducted on March 28, 29, 30 and 31, 2023; May 10, 11, and 12, 2023, and June 12, 13, and 14, 2023. Surveys were conducted during the appropriate flowering period for special-status plants known to occur in the region of the GRVSFB project, and in accordance with CDFW (2018), CNPS (2001), and USFWS (1996), published survey guidelines stating that special-status plant surveys should be conducted at the proper time of year when special-status plants would be identifiable if present. Surveys were conducted by walking meandering transects through the survey area. Due to safety and access concerns, areas with steep slopes, private property, or dense, impenetrable vegetation were not surveyed on foot. Additionally, not all private properties or backyards that overlapped the Phase II treatment segments were surveyed. In these areas, the botanists scanned the properties with binoculars, where feasible. The botanists performed surveys on a priority basis. Priority areas were those areas that were designated as high probability of wildfire risk, and those areas that were designated as CDFW designated sensitive habitats. All plant species observed during the surveys were documented and identified to the level necessary to determine rarity status.

As discussed in the Focused Special-Status Plant Survey Report for Phase II (2023), seven special-status plant species were detected during surveys. Special-status plants within the treatment areas were found along Oak Avenue, Redwood Road, and north of Cascade Drive. Special-status plants found outside of the treatment areas were found within the MCOSD Cascade Canyon Preserve and on Marin Municipal Water District lands. The seven special-status plant species included Mount Tamalpais jewelflower, Tiburon buckwheat, serpentine reed grass, Tamalpais lessingia, Napa false indigo, Mount Tamalpais manzanita, and harlequin

lotus. Additionally, the lead field manager identified a Napa false indigo within the treatment area. The Napa false indigo was avoided by treatment activities. All special-status plant species were avoided by project activities.

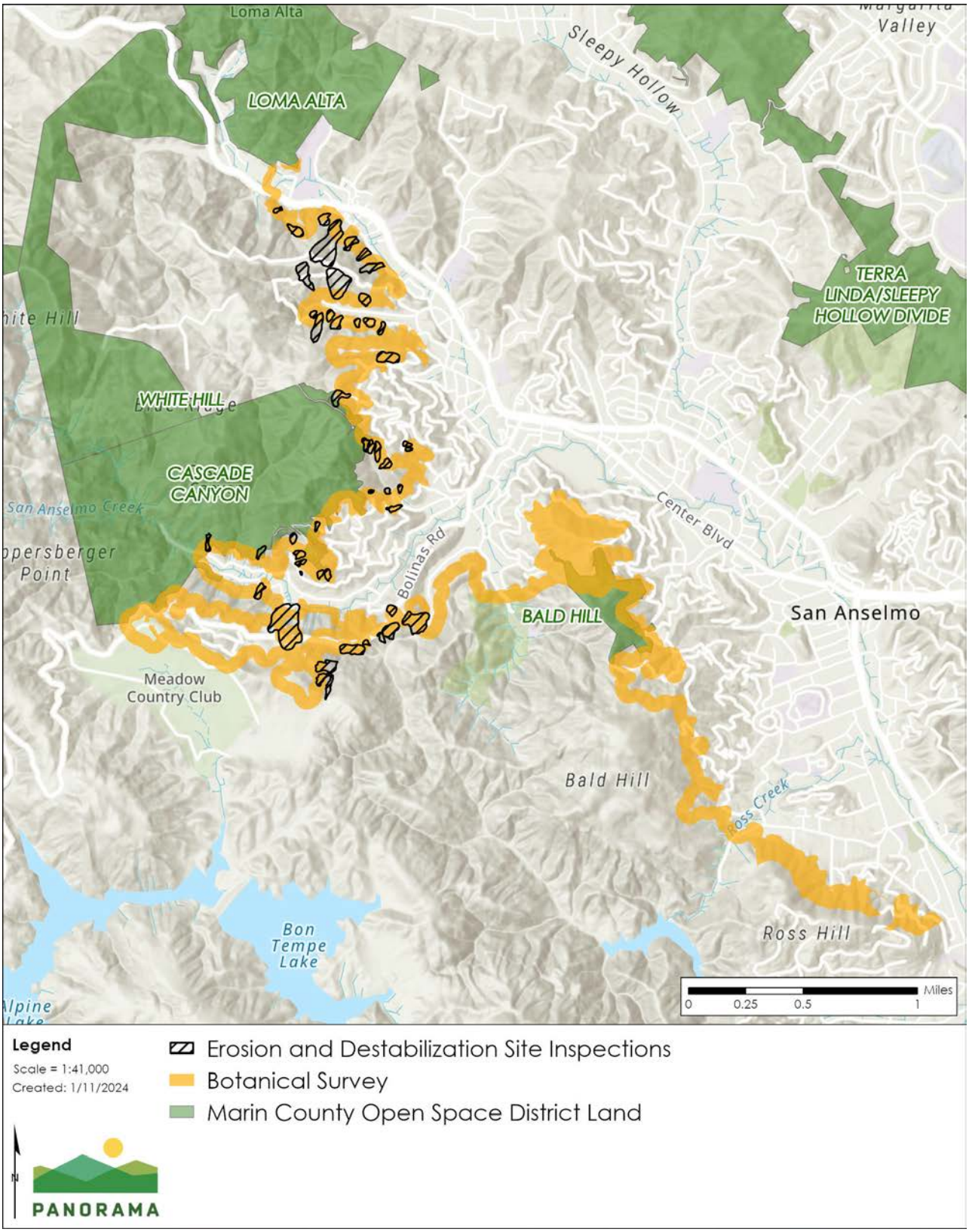
2.5 Northern Spotted Owl Surveys

Northern spotted owl (NSO) pre-treatment surveys were performed in targeted locations pursuant to MWPA PDIF NSO-2 to determine whether the previously documented activity centers were active. On May 8, 2023, biologists conducted surveys to identify nesting northern spotted owls within 0.25-mile of the project footprint and within suitable spotted owl nesting habitat. The biologists searched one known NSO territory within 0.25-mile of the treatment area for NSO nesting. One NSO male was detected during the survey, but no active nests were observed. The biologists concluded that the NSO male was likely a part of a pair. Treatment activities did not occur within 330 feet of any active nests. Noise-generating treatment activities (e.g., chipping) were prohibited within 0.25-mile of active nests.

2.6 Erosion and Destabilization Site Inspections

Site inspections of previously treated areas were conducted generally from early April 2023 and June, 2023 to inspect ”high priority” areas, based on a desktop analysis of geologic and landslide mapping and GIS assessment of slope inclinations (in accordance with SPR GEO-8, refer to Table 4-1 for full text of measure). The site reconnaissance was performed over several days to map landslide hazard areas. The locations of these site inspections are identified in Figure 2-1. A geotechnical report was prepared for treatments that occurred within the Phase II reporting period with recommendations to reduce impacts from treatment on areas of “marginal stability,” based on the desktop analysis, field reconnaissance, and previous work near the treatment areas (Miller Pacific Engineering Group 2023). The remainder of the Phase II segments will be assessed for potential erosion and destabilization in 2024.

Figure 2-1 GRVSFB Phase II Survey Areas



3 Treatment Types and Methods

Approximately 186.4 acres of land were treated within the segments included in Phase II and Phase I of the GRVSFB project during this reporting period. Treatments were conducted using funds from MWPA's Measure C, MCOSD's Measure A, and the California Department of Forestry and Fire Protection California Climate Investments Wildfire Prevention Grant Program. Approximately 32.2 acres of land were retreated during Phase II. Within the treatment areas, 44.8 acres were treated on MCOSD lands. Of the 44.8 acres treated on MCOSD lands, approximately 8.3 acres were treated by the MWPA-managed implementation team in the Phase II segments and approximately 36.5 acres were treated by the MCOSD-managed implementation team mostly in the Phase I segments (Panorama Environmental, Inc 2023).[2] Prior to treatment on MCOSD lands the on-the-ground MWPA field managers conducted site walks with MCOSD staff to discuss the types and extent of treatments recommended at each location.

Treatments during the Phase II reporting period were typically conducted within a 100 to 150-foot-wide swath within the overall fuelbreak analysis area. Tree limbing, shrub thinning, and other typical defensible space treatments were focused in the 100 to 150-foot-wide treatment area (refer to Chapter 2 of the PSA and Addendum for further details on treatments). In some discrete areas treatments were conducted within a 200-foot-wide to, very rarely, a 300-foot-wide fuel break, which was determined by the on-the-ground field managers based on the vegetation present, topography, and proximity to roads and residences. Most of the locations with wider treatment areas was due to the presence of dense broom. The majority of the treatment areas required broom pulling and sometimes cutting, depending upon the age and condition of the broom, or the site conditions (e.g., areas of instability). Figure 3-1 through Figure 3-10 shows the locations where vegetation treatments occurred. Some areas within Phase II were inspected by the on-the-ground field managers and determined that treatment was not necessary as the condition of the vegetation was already meeting project objectives. Other areas are already under treatment through other projects, such as the one shown on Figure 3-5. Not all of the segments that were designated as Phase II were treated. Treatments are anticipated to resume in the remainder of the Phase II segments in 2024.

[2] Botanical surveys conducted during Phase I and Phase II implementation cover a majority of the treatments conducted by the MCOSD-managed implementation team. MCOSD areas treated outside of the botanical survey areas, adhered to the protocols outlined in the Marin County Parks and MCOSD Vegetation and Biodiversity Management Plan (May & Associates, Inc 2015).

Figure 3-1 MWPA-Managed Treatment Area (1 of 4)

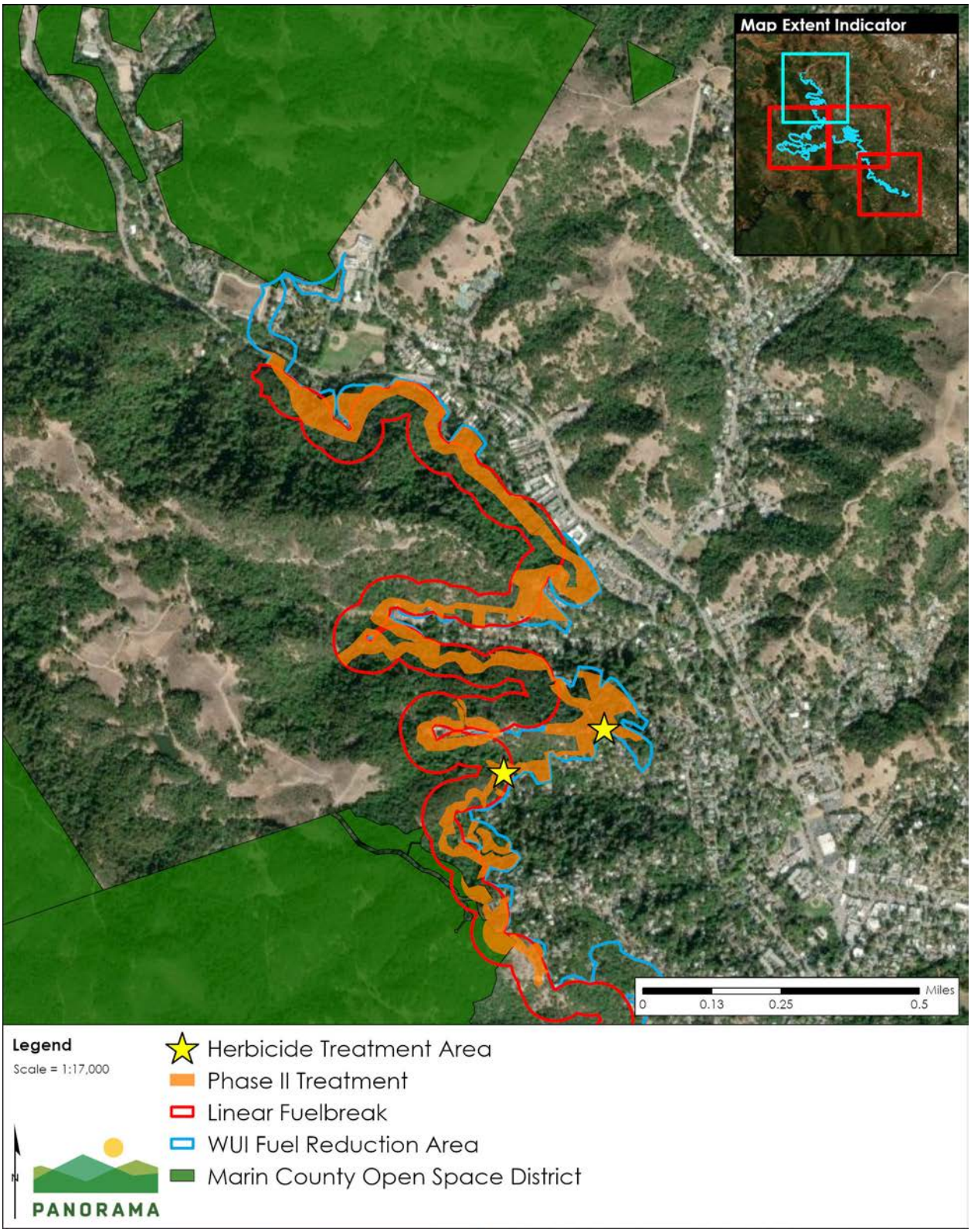


Figure 3-2 MWPA-Managed Treatment Area (2 of 4)

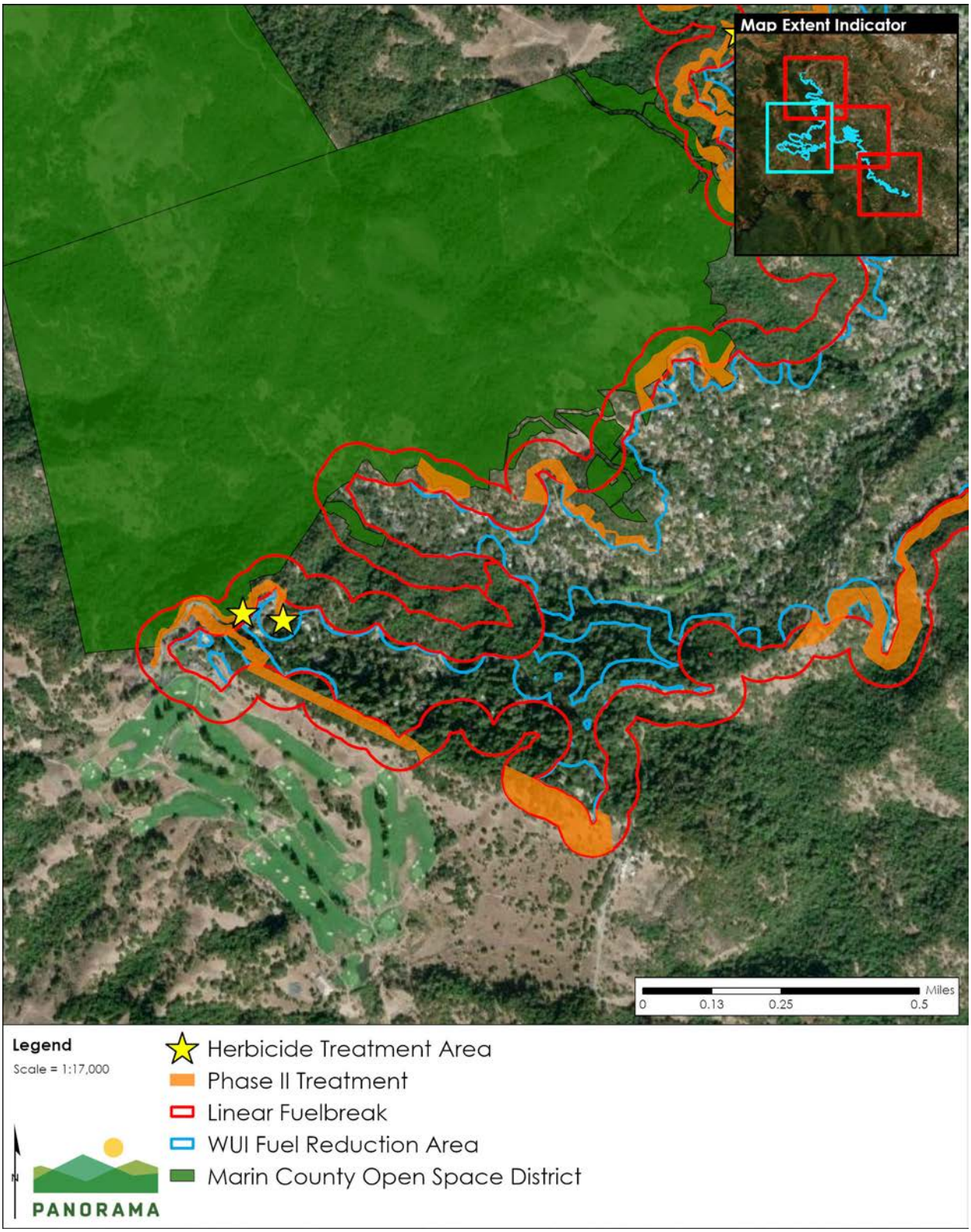


Figure 3-3 MWPA-Managed Treatment Area (3 of 4)

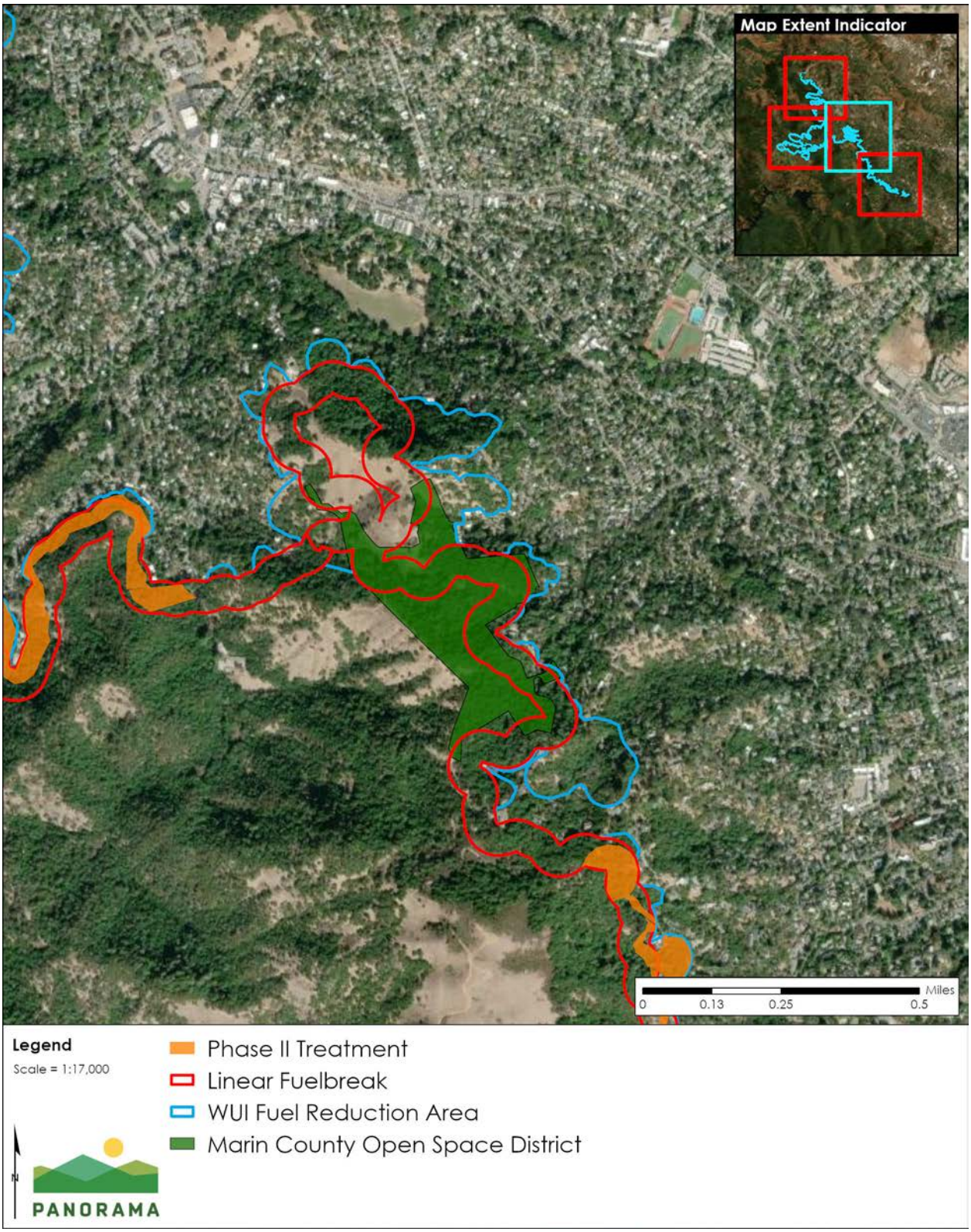


Figure 3-4 MWPA-Managed Treatment Area (4 of 4)

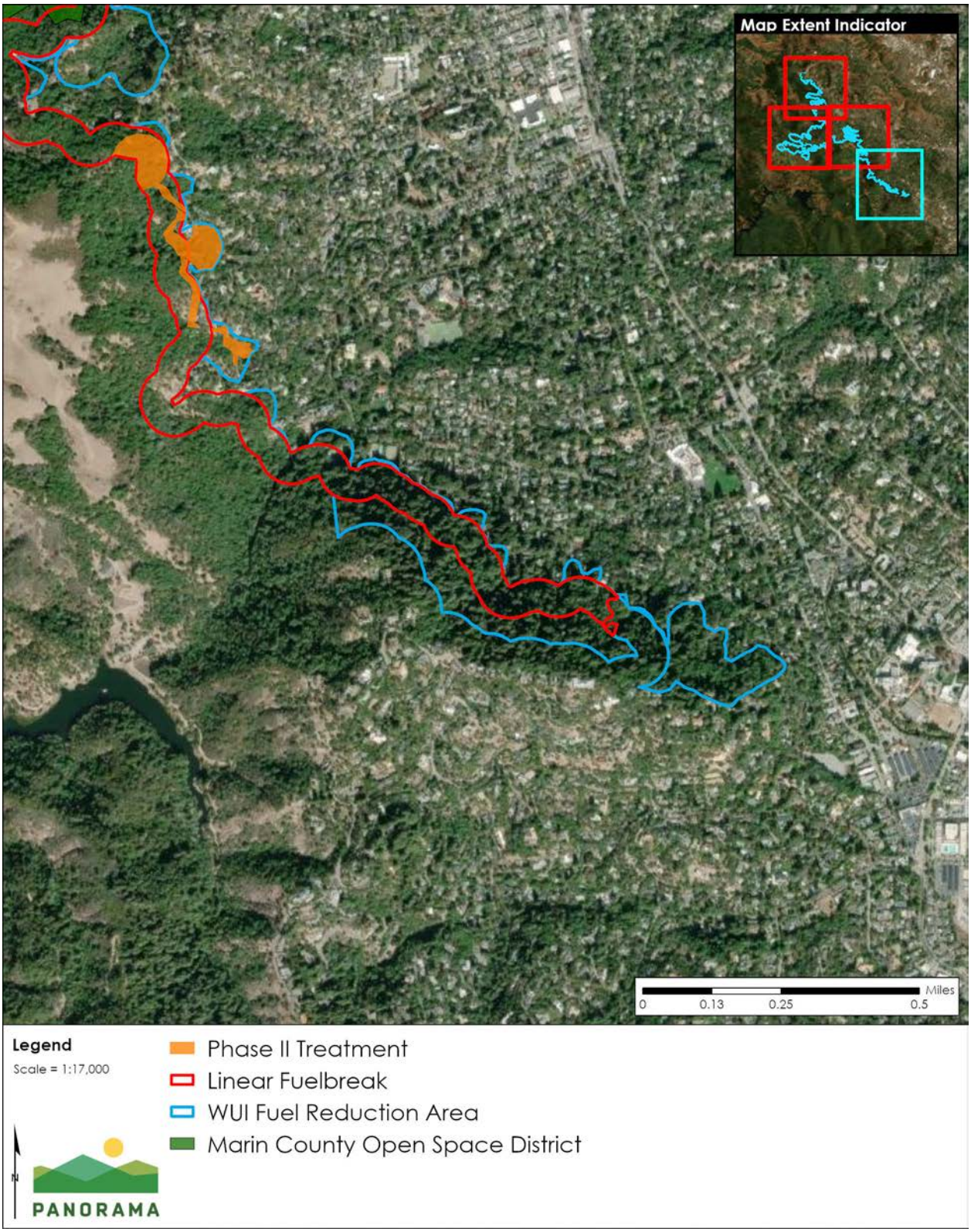


Figure 3-5 MCOSD-Managed Treatment Areas (1 of 2)

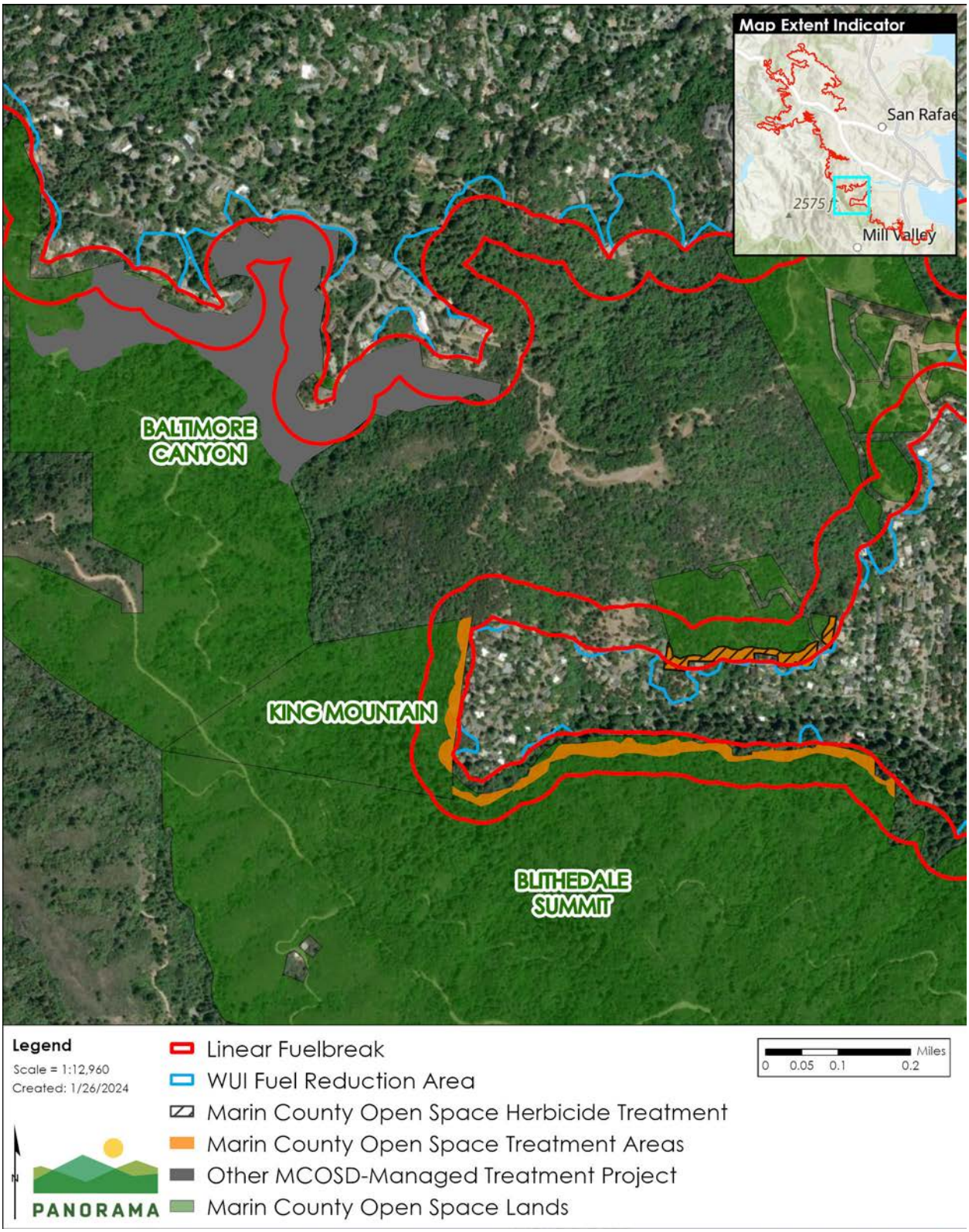


Figure 3-6 MCOSD-Managed Treatment Areas (2 of 2)

The following project treatments and methods occurred (refer to Chapter 2 of the PSA and Addendum for further information on treatment methods), consistent with the CalVTP EIR and SPRs:

- **Manual hand treatment.** Crews conducted manual hand thinning using hand tools (e.g., hand saws) to cut, clear, or prune herbaceous woody species and remove dead woody vegetation and low-lying shrubs. Vegetation was primarily treated through weeding, broom pulling, and lopping vegetation.
- **Handheld mechanical treatment.** Handheld mechanical treatment (i.e., chainsaws, pole saws, broom pullers, string trimmer) was conducted to remove broom, limb up trees, remove small diameter, fire-hazardous trees, non-native trees, downed dead vegetation, and dead or dying trees. No ground-based mechanical treatment occurred during the Phase II reporting period.
- **Chipping**. A towable chipper and truck were used to process cut vegetative materials. Approximately 400 to 450 cubic yards of vegetative debris was hauled off for composting, the rest of the debris was chipped and broadcast on site.
- **Pile burning**. A total of 213 piles were burned during the Phase II reporting period. Approximately 54 piles of vegetative debris that were piled by the MWPA-managed implementation team during Phase I, were burned, as shown in Figure 3-7. Additionally, approximately 159 piles of vegetative debris on MCOSD lands were burned by the MCOSD-managed implementation team, as shown in Figure 3-8 through Figure 3-10. Pile diameters were typically 4 feet wide by 4 feet tall.
- **Herbicide**. During the reporting period, herbicide (135.5 ounces of Garlon 4 Ultra herbicide) was applied by the MWPA-managed implementation team to broom sprouts on approximately 2 acres of private land. Approximately 1.9 acres of the total acres treated during this reporting period was applied as retreatment within Phase I treatment segments. Approximately 103[3] ounces of Triclopyr/Triclopyr choline were applied by the MCOSD-managed implementation team on 2.5 acres of MCOSD land of the fuel break as shown in Figure 3-5 and Figure 3-6. Herbicide treatments were applied in accordance with all applicable local ordinances. Field managers coordinated with the appropriate local jurisdiction prior to treatment. In all instances, notices of herbicide application were sent to residences adjacent to the treatment area, as appropriate, and posted in the area.

[3] The herbicide quantity is the estimated amount MCOSD used within the GRVSFB Phase II treatment area under the GRVSFB Project, based on the proportion of the herbicide application area that overlapped according to spatial data.

Figure 3-7 MWPA-Managed Burn Piles

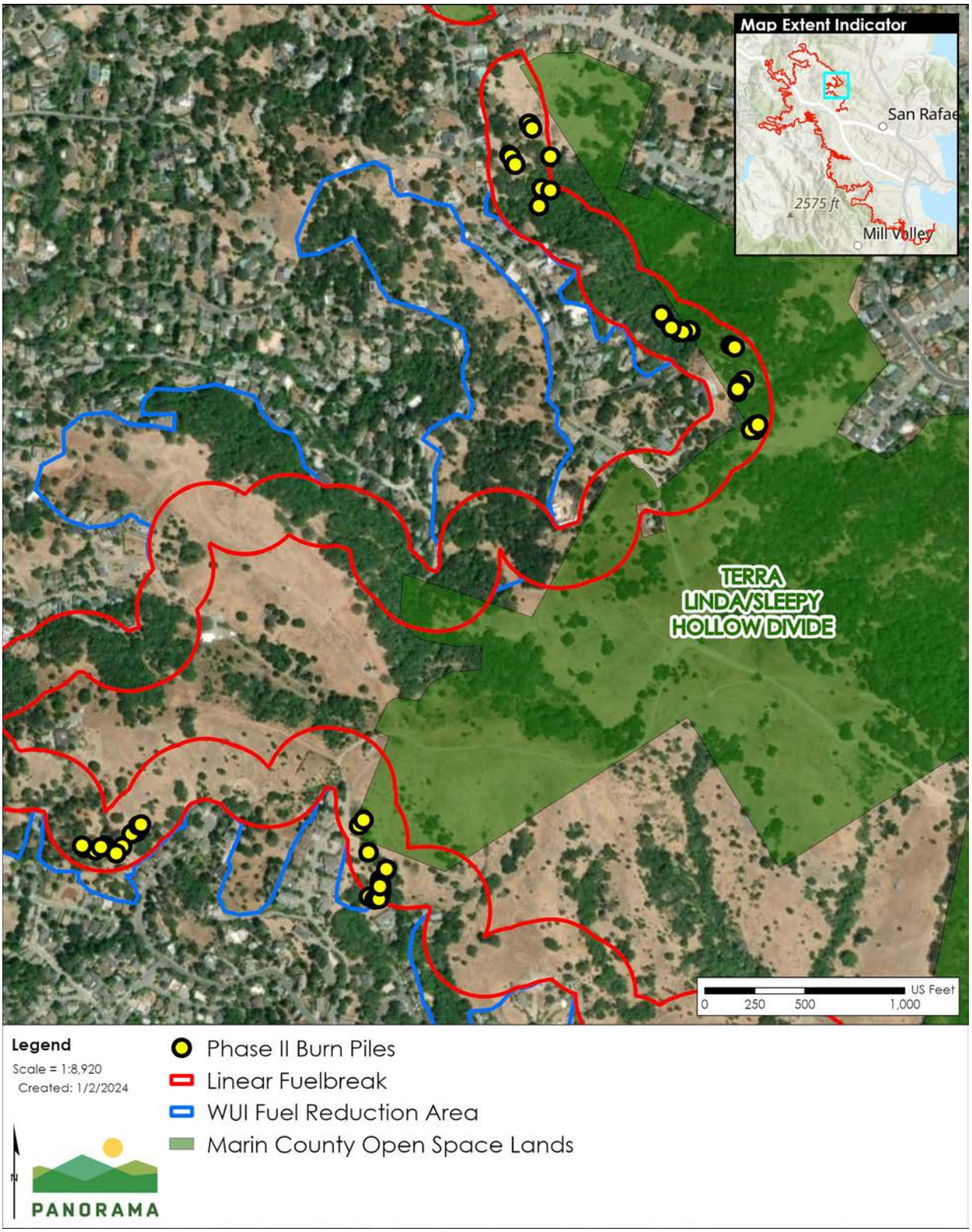


Figure 3-8 MCOSD-Managed Burn Piles (1 of 3)

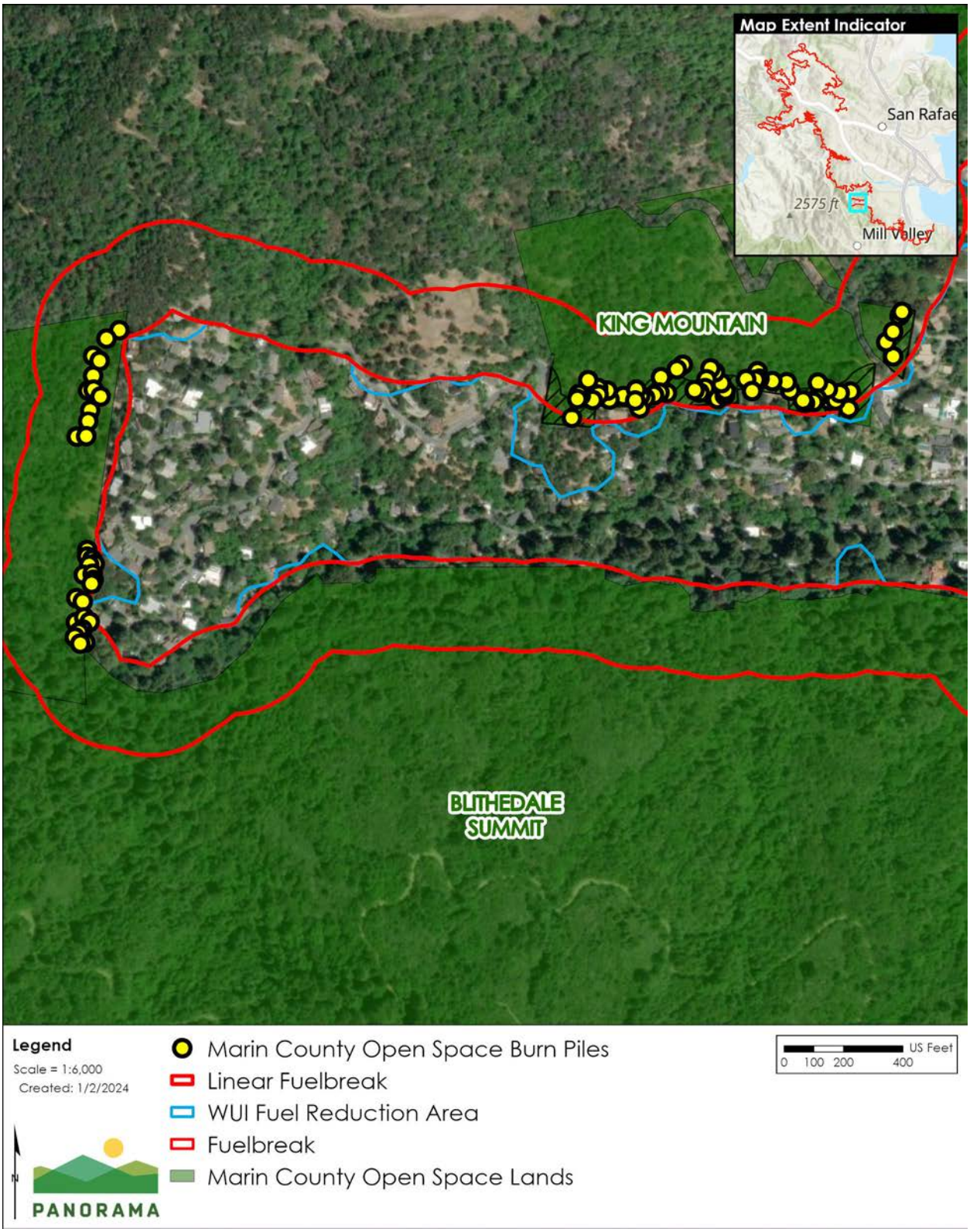


Figure 3-9 MCOSD-Managed Burn Piles (2 of 3)

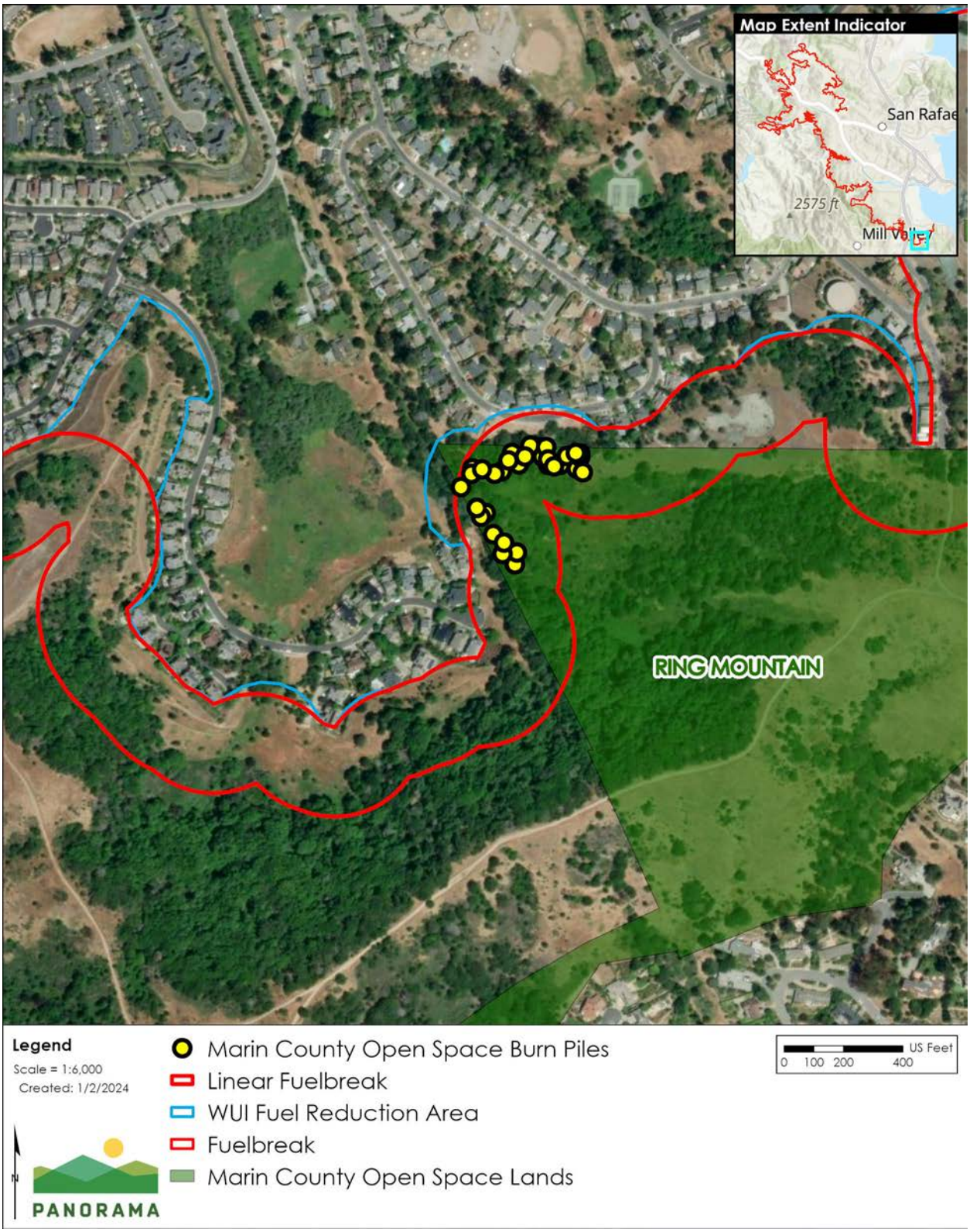


Figure 3-10 MCOSD-Managed Burn Piles (3 of 3)

4 CalVTP Compliance

4.1 SPRs and Mitigation Measures

Table 4-1 presents the SPRs, PDIFs, and mitigation measures identified as relevant to the GRVSFB project and describes how each were implemented during this reporting period or if the measure was not relevant.

4.2 Compliance Conclusion

All vegetation management activities during this reporting period complied with the CalVTP EIR SPRs or comparable MWPA PDIFs and mitigation measures. Biological and cultural resource surveys were conducted prior to this reporting period. Special-status plant species identified during surveys were avoided during project activities. One precontact archaeological resource was identified during cultural resource surveys and was avoided during project implementation. Work crews were adequately trained on sensitive biological and cultural resources, treatment methods and restrictions, wildfire risks, noise ordinances, and all environmental requirements. Crews received pamphlets and the on-the-ground field managers received binders on all project and environmental requirements relevant to the GRVSFB project. The GRVSFB project complied with all applicable ordinances and regulations. No compliance incidents or stop work orders were issued during this reporting period.

Table 4-1 SPRs Implemented during this Reporting Period

Standard Project Requirements/Project Design and Implementation Features	Compliance Summary
Administrative	
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	The project complied with all local plans, policies, and ordinances. Work crews were provided binders of all applicable city and county noise and tree ordinances, herbicide requirements, and all applicable environmental requirements from the CalVTP PSA (e.g., treatment types and methods, SPRs, MMs, and PDIFs).
SPR AD-4 Public Notifications for Prescribed Burning: At least days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Not applicable, broadcast burning was not conducted.
Aesthetic and Visual Resource	
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Not applicable, linear treatments, such as disclines, were not implemented.
SPR AES-2 Avoid Staging within Viewsheds: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and	The project avoided staging within viewsheds to the extent feasible. Treatment occurred in any one area for a short period of time, and any staging within the viewshed was temporary.

Standard Project Requirements/Project Design and Implementation Features	Compliance Summary
roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	This SPR was met and achieved. Treatments conducted did not result in large scale tree and shrub removal and therefore did not result in removal of vegetation that serves to screen views.
Air Quality	
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	The project complied with all Bay Area Air Quality Management District air quality requirements and California ambient air quality standards.
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	A Smoke Management Plan was submitted and approved by the Bay Area Air Quality Management District in accordance with Regulation 5 Open Burning 401.15 for pile burning activities (BAAQMD 2023). The Smoke Management Plan includes a review of burn blocks, smoke management components, and contingency actions that would be taken during the burn to reduce smoke exposure to sensitive receptors.
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Not applicable, broadcast burning was not conducted.
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures:	Off-road travel was minimal and primarily consisted of the occasional chipper or worker truck that parked in unpaved areas to avoid blocking roadways and for access. Speed limits

Standard Project Requirements/Project Design and Implementation Features	Compliance Summary
• Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. • If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. • Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. • Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	were strictly adhered to and track out was not an issue. Land clearing did not occur as part of this project.
SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	An area of serpentine rock was modeled to overlap with a small portion of the segments for Phase II, however substantial ground disturbing treatments (e.g., disclines) that could put workers or the public at risk were not conducted. Rock outcrops, where observed, were avoided as treatment was not required.
SPR AQ-6: Prescribed Burn Safety Procedures: Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special	Not applicable, broadcast burning was not conducted.

Standard Project Requirements/Project Design and Implementation Features	Compliance Summary
instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	
Archaeological, Historical, and Tribal Cultural Resources	
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	A cultural records search was conducted for the overall analysis area for the entire GRVSFB project (Far Western 2022).
SPR CUL-2 Contact Geographically Affiliated Native American Tribes (more stringent than PDIF CUL-4, in combination with SPR CUL-6): The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: • A written description of the treatment location and boundaries. • Brief narrative of the treatment objectives. • A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. • A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. - A request for information regarding potential impacts to cultural resources from the proposed treatment. • A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	The MWPA sent letters to the Federated Indians of Graton Rancheria and Guidiville Indian Rancheria with a description of the project and details of the project location in March 2022. An additional letter was sent to the Federated Indians of Graton Rancheria in June 2022. No responses have been received to date.
PDIF CUL-3 Cultural Resource Investigation (replaces SPR CUL-3 Pre-field Research): Prior to implementation of vegetation management activities that have potential for intensive ground disturbance below the ground surface, significant heat from a burn, or use of heavy equipment off established roads and trails, a qualified archaeologist will conduct a records search and/or site-specific survey of the project areas where such disturbances could occur. Outreach with Graton Rancheria will be conducted as early as feasible to obtain information regarding culturally sensitive areas and/or the location of tribal cultural	Pedestrian cultural surveys were conducted on April 7, 2023. One precontact archaeological resource was identified and avoided by project activities. The discovery of the resource was shared with the Graton Rancheria on May 4, 2023. MWPA staff and Far Western met with the Graton

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resources within the project areas. Any information provided by Graton Rancheria and/or tribal monitor(s) is confidential and exempt from public disclosure in accordance with statutory and regulatory requirements (Gov. Code § 6254(r), 6254.10; PRC § 5097.98(c); Cal. Code Regs. § 15120(d)). Records searches and field survey results will be shared with Graton Rancheria, as appropriate. Resources found during the records search, tribal outreach, and/or survey will be flagged for avoidance with an appropriate buffer identified by the qualified archaeologist, or the qualified archaeologist may identify modifications to the prescriptions using only hand tools or powered hand tools and access by foot with no ground disturbance, provided it would avoid all impacts to the resources. Any resource found during the site survey will be documented on California State Department of Parks and Recreation cultural resource record forms and a survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures.	Rancheria on June 22, 2023, to share information and receive input on the resource discovery. No built historical resources were identified. A survey report was prepared following the cultural resource survey (Far Western Anthropological Research Group, Inc 2023).
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Refer to PDIF CUL-3.
PDIF CUL-2 Unanticipated Discovery (replaces SPR CUL-5 Treatment of Archaeological Resources): In the event that a previously unidentified cultural resource is discovered during implementation of an activity all work within a minimum of 150 feet of the discovery will be halted. The resource will be located, identified, and recorded in the MWPA cultural resources GIS database. The boundaries around the buffered resource will be temporarily marked, such as with fencing or flagging. A qualified archaeologist will inspect the discovery and determine whether further investigation is required. Data regarding archaeological resources will be kept confidential per law. As appropriate, the qualified archaeologist will inform Graton Rancheria's THPO of the discovery. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort will be required. If the project proponent wishes to continue work in the area, only work performed using hand tools or powered hand tools is allowed, work cannot include ground disturbance and the work area can only be accessed on foot as determined acceptable by the qualified cultural resource specialist/archaeologist.	No ground disturbance occurred that unearthed any previously unidentified cultural resources.

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Alternatively, the qualified archaeologist and/or THPO or tribal monitor will evaluate the resource and determine whether it is: • Eligible for the CRHR (and a historical resource for purposes of CEQA), • A unique archaeological resource as defined by CEQA, and/or • A potential tribal cultural resource (all archaeological resources could be a tribal cultural resource). If the resource is determined to be neither a unique archaeological, an historical resource, nor a potential tribal cultural resource, work may commence in the area. If the resource meets the criteria for either a historical resource, unique archaeological resource, and/or tribal cultural resource, work will remain halted in the buffered area around the resource. No work will occur within the buffered area except those methods previously discussed as determined acceptable by the qualified archaeologist and/or THPO or tribal monitor. After work is completed, all cultural resource delineators (e.g., flags or fencing) will be removed in order to avoid potential vandalism, unauthorized excavation(s), etc.	
PDIF CUL-5 Cultural Resources Monitoring (not required by the CalVTP PEIR): Based on the results of CUL-3 and -4, cultural resources monitoring may be conducted in order to avoid impacts to known resources. In addition to flagging the resource for avoidance (as described in CUL-2 or CUL-3) if monitoring is conducted, a qualified archaeologist will be present during ground disturbance work to ensure the known or previously unidentified resources are avoided and protected during project implementation, and if the resource is identified to be pre-contact archaeological and/or a tribal cultural resource, a tribal monitor will be invited to attend during the ground disturbance work.	Not applicable. Cultural resources monitoring was not required.
SPR CUL-6 Treatment of Tribal Cultural Resources (more stringent than PDIF CUL-4, in combination with SPR CUL-2): The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Not applicable. No tribal cultural resources were identified by culturally affiliated tribes.

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SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	No built historic resources were identified during cultural resource surveys.
PDIF CUL-1 Training (replaces SPR CUL-8 Cultural Resource Training): For all activities with the potential for ground disturbance (excluding prescribed herbivory, vegetation and tree trimming, and hand pulling smaller vegetation) all contractors and crew will receive training prepared by and/or conducted by a qualified archaeologist (who meets the U.S. Secretary of Interior's professional standards set forth in 48 FR Parts 44738-44739 and Appendix A to 36 CFR 61) prior to beginning work. The Tribal Heritage Preservation Officer(s) (THPO) from a local tribe (Federated Indians of Graton Rancheria [Graton Rancheria]) will be notified of the opportunity to attend and/or train crews. The training will address the potential for encountering subsurface cultural resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified including reporting the resource to a qualified archaeologist and/or THPO, as appropriate, and understanding all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains.	Cultural resource training was conducted on August 2, 2022. Work crews were provided pamphlets that identified applicable laws and regulations, and provided protocols for discovering previously unidentified cultural resources or human remains.
Biological Resources	
SPR BIO-1: Review and Survey Project-Specific Biological Resources: The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat	Botanical resource surveys were conducted by qualified biologists on March 28, 29, 30, and 31, 2023; May 10, 11, and 12, 2023; and June 12, 13, and 14, 2023 (Ford, Woodruff and Labberton 2023). Based on the data review and reconnaissance surveys, the biologists determined that suitable habitat is present but adverse effects can be avoided through the avoidance of suitable habitat.

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(including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:

a. **1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.** If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment:
    i. a. by physically avoiding the suitable habitat, or
    ii. b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites).

Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist.

b. **2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.** Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey

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requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
PDIF ET-1 Environmental Training for Biological Resources (replaces SPR BIO-2: Require Biological Resource Training for Workers): All crew members and contractors will receive training from a qualified registered professional forester (RPF) or biologist prior to beginning a treatment project where sensitive biological resources could occur in the work areas. The training will describe the appropriate work practices necessary to effectively implement the appropriate project design and implementation features and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of potentially present special-status species with potential to occur; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; best management practices; and reporting requirements. As appropriate, the training will include protocols for work, such as specific trimming methods, where applicable. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist. The qualified RPF or biologist will immediately contact the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS), as appropriate, if any wildlife protected by the CE Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).	Biological resource training was provided on August 2, 2022. Work crews were provided pamphlets that identified special-status plant and wildlife species that could occur within the work areas.
Sensitive Natural Communities and Other Sensitive Habitats	
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats: If SPR BIO-1 determines that sensitive natural communities or sensitive habitat may be present and adverse effects cannot be avoided, the project proponent will: • require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).	Not applicable. Sensitive natural communities (e.g., oak communities, manzanita communities) were observed and known to be present within the Phase II reporting period. However, adverse effects were proposed to be and were avoided due to the scale and type of treatment activities.

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• map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function (more stringent than PDIF SH-1): Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: • Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. • Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. • Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. • Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service).	The project met the requirements of this SPR. On-the-ground field managers and work crews were trained on vegetation treatment requirements and regulations that are relevant to riparian habitats. Substantial alteration of canopy cover and shading did not occur. Vegetation debris and other materials did not enter the bed, channel, or bank of waterways, including dry channels. No vehicles or equipment drove through or near riparian channels. No coordination with or permits from CDFW were required.

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• Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. • Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. • Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. • The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. • In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub (more stringent than PDIF IP-4): The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of	The project met the requirements of the SPR. Work crews were trained on vegetation treatment requirements in chaparral and coastal sage scrub habitat. These habitats were mapped during biological surveys conducted and the locations provided to the on-the-ground field managers. These communities comprised a very small portion of the overall GRVSFB project. Treatments did not

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biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: • Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. • The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: • For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. • Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved.	involve substantial removal of native shrub species.

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• A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area 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). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. • If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.	
SPR BIO-6: Prevent Spread of Plant Pathogens (more stringent than PDIF IP-1). When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of Phytopthora and other plant pathogens (e.g., pitch canker (Fusarium), goldspotted oak borer, shot hole borer, bark beetle): • clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; • include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; • minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment;	The project implemented the best management practices listed in SPR BIO-6. Work crews were trained on how to prevent the spread of plant pathogens in sensitive natural communities, riparian habitats, and oak woodlands. Contractors were required to have appropriate cleaning materials and implement cleanings in accordance with these measures.

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• minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; • clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and • follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
Special-Status Plants	
SPR BIO-7: Survey for Special-Status Plants (more stringent than PDIF ES-1). If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: • If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. • If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will	Botanical resource surveys were conducted by qualified biologists on March 28, 29, 30, and 31, 2023; May 10, 11, and 12, 2023; and June 12, 13, and 14, 2023 (Ford, Woodruff and Labberton 2023). The surveys identified sensitive communities and seven special-status plant species were observed within treatment areas of the GRVSFB project. The special-status species that were observed during the surveys were avoided during this reporting period. Adverse impacts to special-status plant species will not occur and additional surveys were not required.

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not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
Invasive Plants and Wildlife	
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife (more stringent than PDIF IP-2): The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): • clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; • for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; • inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; • stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; • identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; • treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site);	The project implemented the actions listed in SPR BIO-9. Work crews were trained on how to prevent the spread of invasive plants and noxious weeds. Contractors were required to have appropriate cleaning materials and implement cleanings in accordance with these measures. No known invasive wildlife were present that could be spread by the treatment types that were implemented.

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transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and • implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
PDIF IP-3 Treat Invasive Plants Prior to Seeding (not required by the CalVTP PEIR): Schedule activities to maximize the effectiveness of control efforts and minimize introduction and spread of invasive plants as feasible, with consideration for project objectives and location (e.g., install and maintain fuel breaks, disc lines, and other work before non-native plants set seeds).	Broom management was conducted during the Phase II reporting period. Treatment methods varied. Depending upon the age of the broom and density, it can be beneficial to pull younger broom or cut older, dry broom in the dry season and pull in the wet season.
Wildlife	
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites: If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Not applicable. Due to the locations and types of treatments that were conducted, surveys were not needed to avoid adverse impacts to special-status wildlife species with a potential to occur. Refer to the analysis in the PSA and Addendum for details.
PDIF WILD-1 Temporary Fencing (replaces SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory)): If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly recyclable fencing design will be used. The design should consider the following: • Minimize the chance of wildlife entanglement by minimizing barbed wire, loose or broken wires. • If feasible, keep electric netting-type fencing electrified at all times or laid down while not in use. • Charge temporary electric fencing with intermittent pulse energizers.	Not applicable. No prescribed herbivory occurred as part of Phase II treatments.

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• Allow wildlife to jump over easily without injury by installing fencing that can flex as non-target animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it, while keeping grazing animals safely within the fence. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. • Fences should be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers.	
SPR BIO-12. Protect Common Nesting Birds, Including Raptors (more stringent than PDIFs NB-1 through NB-4). The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following:	Workers and supervisors were trained on what to look for to avoid birds that could potentially nest outside of the nesting season. Treatment activities occurred within the nesting season for migratory birds and raptors. Several active nests were found during treatment activities and were flagged for avoidance. Treatment resumed once nesting was confirmed to have completed. Treatment activities that occurred during the nesting season primarily included broom pulling and manual treatment with hand tools or quiet mechanical tools (e.g., electric chainsaw). Any potential nesting birds that began nesting during treatment would have been habituated to the presence of workers and lower noise-generating activities. As such, surveys were not conducted.

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• **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. • **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. • **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: • **Monitor Active Raptor Nest During Treatment**. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other	

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avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. • **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
PDIF NSO-1 Northern Spotted Owl Nesting Season Avoidance (not required by the CalVTP PEIR). Each project will be reviewed by a qualified biologist to determine if northern spotted owls have potential to occur near proposed project activities. Within areas where northern spotted owl have the potential to occur, work, including mowing with heavy equipment, the mechanical removal of vegetation, or prescribed burning, including pile and broadcast burning, will occur outside of the northern spotted owl nesting season to the extent feasible (February 1 to July 31). If work must occur during the northern spotted owl nesting season, either NSO-2 or NSO-3 will apply.	Work occurred within the northern spotted owl nesting season. Maps of known activity centers and nests were consulted prior to treatment activities to ensure that visual and auditory disturbance would not occur using NSO databases and data from PointBlue. Work activities that occurred during the NSO nesting season primarily included broom pulling and manual treatments using hand tools. Treatments did not occur within 330 feet of active nests. No chipping occurred within 0.25-mile of any potential or known active NSO nest.
PDIF NSO-2 Work During Northern Spotted Owl Nesting Season – Surveys (not required by the CalVTP PEIR) Within an area where northern spotted owl has the potential to occur, when work will occur during the northern spotted owl nesting season (February 1 through July 31), and work is not considered low-impact by a qualified biologist the following measure will apply. Low impact type activities include, but are not limited to, goat grazing, hand pulling of weeds, hand trimming of trees and vegetation with non-mechanized equipment, chipping from existing roadways in residential areas, and use of mechanized equipment adjacent to roads or in residential areas that is a typical noise for the environment. In contrast, high-impact activities may include operation of heavy machinery in wildlands with lower baseline environmental noise, or work which produces noise disturbance for a longer duration than is typical in the environment. The biologists will determine if a known breeding pair is found within 0.25 mile of the proposed activity (i.e., from existing surveys that season or historic data) and perform a nest check to confirm presence. If no survey data for the season has been completed for the areas, two surveys will be conducted by a qualified biologist (whose qualifications have been approved by the MWPA or lead public agency) for nesting	NSO surveys were conducted on May 8, 2023. No active nests were observed within 0.25 mile of the treatment areas. However, one NSO male was detected during the survey, and was likely part of a pair.

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northern spotted owls during the months of April and May preceding the commencement of these activities. At a minimum, the survey area will include all suitable nesting habitats within 0.25 mile of any planned activity sites, and then one of the two options listed below will be implemented. If access cannot be secured for surveys, then work should be delayed until after the nesting season, unless it can be shown that noise generation from the activities and the activities proposed would be below noise and visual disturbance levels for northern spotted owls (refer to USFWS Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California) at the nest site, if known. • If it is conclusively determined that there are nesting northern spotted owls, planned activities that generate noise (e.g., mowing, heavy equipment usage, crews with hand tools that generate noise) in areas without regular human disturbances from human residency (e.g., leaf blowers, home construction and remodeling, roadways), that are within 0.25-mile of an identified active nest will not begin prior to September 1 unless the young have fledged, at which time work may begin no earlier than July 10. Prescribed burns may only occur within suitable northern spotted owl habitat (as determined by a qualified biologist) during the nesting season if protocol surveys have determined that northern spotted owl nesting is not occurring in the area of planned activity. If work must occur within 0.25 mile, and work has been determined to have the potential to impact an active northern spotted owl nest, CDFW and USFWS would be consulted to determine if take could occur and whether further permits are required.	
PDIF NSO-3 Northern Spotted Owl Habitat Alteration (not required by the CalVTP PEIR) For projects involving removal of large trees (10-inches DBH or greater) in potential northern spotted owl roosting, or nesting habitat (as identified during the desktop review) in areas without regular human disturbances from human residency, habitat alteration within core use areas (nesting and roosting habitat) will be planned in consultation with a qualified northern spotted owl biologist.	Removal of large trees in potential northern spotted owl roosting or nesting habitat did not occur.
PDIF NSO-4 Retain Dusky-footed Woodrat Nests (not required by the CalVTP the PEIR) Dusky-footed woodrats are important prey for northern spotted owls. Wherever feasible, project activities will leave dusky-footed wood rat nests intact. If possible, maintain a 3-foot buffer of vegetation around dusky-footed woodrat middens.	Several hundred dusky-footed woodrat nests were encountered during project activities and avoided.
PDIF RB-1 Prework Survey (not required by the CalVTP PEIR): If vegetation management activities would (1) occur in trees with potential for roosting bat species, (2) would include removal or trimming of trees where a bat could be roosting, or (3) would involve removal or trimming of a tree with mechanized equipment adjacent to trees or structures that could have roosting bats and (4) the work would commence between	Work occurred within the bat maternity period. Treatment activities included broom pulling and manual treatment using hand tools. As such, prework surveys were not required.

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March 1 and July 31, during the bat maternity period, a pre-activity survey will be conducted for roosting bats within 2 weeks prior to work to ensure that no roosting bats will be disturbed during work. This survey can be conducted concurrent with other surveys for other sensitive species. Trees and shrubs within the work footprint that have been determined to be unoccupied by roosting bats, or that are located outside the avoidance buffer for active roosting sites may be removed. Roosting initiated during work is presumed to be unaffected, and no buffer would be necessary.	
PDIF RB-2 Avoidance of Maternity Roosts and Day Roosts (not required by the CalVTP PEIR): If active maternity roosts or day roosts are found within the project site, or in areas subject to disturbance from work activities, avoidance buffers will be implemented. The buffer size will be determined in consultation with the qualified biologist or RPF.	Not applicable
PDIF RB-3 Bat Roosting Tree Removal – Seasonal Restrictions (not required by the CalVTP PEIR): If it is determined that a colonial maternity roost is potentially present, the roost will be avoided and will not be removed during the breeding season (March 1 through July 31) unless removal is necessary to address an imminent safety hazard. Operation of mechanical equipment producing high noise levels (e.g., chainsaws, heavy equipment) in proximity to buildings/structures supporting or potentially supporting a colonial bat roost will be restricted to periods of seasonal bat activity (as defined above), when possible.	Not applicable
PDIF RB-4 Bat Roosting Tree Removal – Emergency Removals (not required by the CalVTP PEIR): Potential non-colonial roosts that must be removed in order to address a safety hazard, can be removed after consultation with a biologist. Removal will occur on warm days in late morning to afternoon when any bats present are likely to be warm and able to fly. Appropriate methods will be used to minimize the potential of harm to bats during tree removal. Such methods may include using a two-step tree removal process. This method is conducted over two consecutive days, and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on Day 1. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed, to not return to the roost that night. The remainder of the tree is removed on Day 2.	No emergency removals of non-colonial roosts were required
Geology, Soils, and Mineral Resource	
PDIF GEO-3 Soil Saturation and Rain Event Measures (replaces SPR GEO-1 Suspend Disturbance during Heavy Precipitation): The following measures will be implemented to prevent soil loss and erosion during rain events and following rain events:	Work was halted during rain events and for a period afterwards to avoid rutting or disturbing saturated soils. No off-road heavy equipment or

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• Shut down use of off-road heavy equipment, skidding, and truck traffic when soils become saturated (from rain event) and unable to support the machines. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. • Off-road heavy equipment work will be suspended if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours • Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater period≥ 1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. • For activities that involve ground disturbing work and have not been stabilized, inspect for evidence of erosion after the first rain event (i.e., 0.5 inch of rain within a 48-hour or greater period) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours. • For activities that involve ground disturbing work, inspect project areas for the proper implementation of erosion control, as necessary and determined by the qualified personnel (e.g., RPF), prior to the rainy season. If erosion control measures are not properly implemented, the measures will be remediated prior to the first rainfall event.	ground-disturbing work occurred during Phase II treatments.
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Not applicable. No heavy equipment was used during this reporting period.
PDIF GEO-1 Erosion and Soils Loss Stabilization Measures (replaces SPR GEO-3 Stabilize Disturbed Soil Areas): Soils will be stabilized if a vegetation management activity may leave less than 70 percent groundcover or native mulch/organic material.	No erosion control measures were installed during this reporting period. Treatment areas were inspected during and following storm events. Monitoring was conducted by field leads at sites

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For areas between 50 percent and 70 percent ground cover left: • Sow native grasses and other suitable native vegetation on denuded areas where natural colonization or other replanting will not occur rapidly; use slash or chips to prevent erosion on such areas. • Use surface mounds, depressions, logs, rocks, trees and stumps, slash and brush, the litter layer, and native herbaceous vegetation downslope of denuded areas to reduce sedimentation and erosion, as necessary to prevent erosion or slope destabilization. • Install approved, biodegradable erosion-control measures and non-filament-based geotextiles (e.g., coir, jute) when: • Conducting substantial ground-disturbing work (e.g., use of heavy equipment, pulling large vegetation) within 100 feet and upslope of currently flowing or wet wetlands, streams, lakes, and riparian areas; • Causing soil disturbance on moderate to steep (10 percent slope and greater) slopes; and • Removing invasive plants from stream banks to prevent sediment movement into watercourses and to protect bank stability. • Sediment-control devices, if installed, will be certified weed-free, as appropriate. Sediment control devices will be inspected daily during active work to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies. For areas with less than 50 percent ground cover: • Any of the above measures • Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable. • If project activities could result in substantial sediment discharge from soil disturbance, as determined by the qualified personnel (e.g., RPF), organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. • Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. Once work is completed, the areas will be inspected at least annually if accessible, until groundcover exceeds 70 percent or slopes have stabilized, as determined by a qualified professional. At that time, erosion-control and slope-stability devices may be removed.	where erosion control measures were installed during the Phase II reporting period.
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large	Erosion control monitoring was conducted by Brian McCarthy and Mike St. John in areas where erosion control measures were implemented in the Phase II reporting period and during and after

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storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	rainfall events. No erosion or sediment discharge related to project activities was observed to occur.
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Not applicable
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Burn piles were typically 4 feet in diameter in compliance with CAL FIRE burn pile regulations which are more stringent than SPR GEO-6 or the Bay Area Air Quality Management District.

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SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Not applicable. Heavy equipment use and prescribed herbivory did not occur during activities during this reporting period.
PDIF GEO-2 Prescribed Herbivory Erosion and Trail Control Measures (not required by the CalVTP PEIR): Methods will be implemented to reduce the potential creation of prescribed herbivory trails and erosional features, including the following: • Implement methods, which could include rotating or providing multiple feeding areas to minimize excessive congregation of animals in any one location for too long, as determined by a qualified professional. • If prescribed herbivory trails or damaged areas form, the bare area will be remediated by decompacting the soil and discontinuing prescribed herbivory in the area until the trails are revegetated, as determined by a qualified professional. • Manage livestock grazing on steep slopes (generally slopes with more than 35 percent grade) to reduce potential for erosion. Management can include (but is not limited to) reducing or limiting the number of	Not applicable. No prescribed herbivory occurred as part of Phase II reporting period treatments.

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animals or duration on slopes above 35% (using stocking equation) to avoid erosion and avoid placing water and feeding troughs on steep slopes. Grazing will not occur during a storm event or under muddy conditions, when hooves may sink into the ground.	
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Site inspections of previously treated areas were conducted between April 2023 and June 2023 to inspect "high priority" areas, based on a desktop analysis of geologic and landslide mapping and GIS assessment of slope inclinations. . A specialist with appropriate technical knowledge and expertise conducted site inspections over several days and prepared a report that included the findings and recommendations for specific sites (Miller Pacific Engineering Group 2023).
Hazardous Material and Public Health and Safety	
PDIF HAZ-1 Leak Prevention and Spill Cleanup (replaces SPR HAZ-1 Maintain All Equipment): The project proponent will, at a minimum, implement measures that address the following procedures related to the use of hazardous materials during work: • Proper disposal or management of contaminated soils and materials (i.e., clean up materials) • Daily inspection of vehicles and equipment for leaks and spill containment procedures • Emergency response and reporting procedures to address hazardous material releases • Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur • Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases • The absorbent material will be removed promptly and disposed of properly • Use of secondary containment and spill rags when fueling • Discourage "topping-off" fuel tanks • Workers using fuels or other hazardous materials must be knowledgeable of the specific procedures necessary for hazardous materials cleanup and emergency response	Work crews received training on leak prevention and spill cleanup procedures during this reporting period and had appropriate spill containment when filling up equipment. These procedures were implemented during project activities. No leaks or spills were observed throughout this reporting period.

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• All diesel and gasoline powered equipment will be maintained per manufacturer's specification, and in compliance with all state and federal emission requirements	
PDIF HAZ-2 Wildfire Risk Reduction (replaces SPR HAZ-2 Require Spark Arrestors and SPR HAZ-3 Require Fire Extinguishers): The following measures will be implemented during activities that involve the use of equipment that can generate sparks or heat: • Maintain fire suppression equipment (e.g., shovel, extinguisher) in work vehicles and ensure workers are trained in use • Closely monitor for ignited vegetation from equipment and tool use • Train workers to properly handle and store flammable materials to minimize potential ignition sources • Prohibit smoking in vegetated areas • Avoid use of spark- and/or heat-generating equipment during high fire danger days (e.g., Red Flag Days and Fire Weather Watch) • Outfit off-road diesel vehicles and equipment with spark arrestors • Avoid metal string or blade weed trimmers Maintain one fire extinguisher for each chainsaw	Work crews received training on wildfire risk reduction procedures. These procedures were implemented during project activities. No ignitions occurred during this reporting period.
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Work crews were prohibited from smoking in vegetated areas. This measure was met and achieved.
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): • a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; • a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; • procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	A Spill Prevention Plan was adhered to for the GRVSFB project and implemented by herbicide applicator (Forster & Kroeger Landscape Maintenance, Inc. n.d.).

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SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: • Be implemented consistent with recommendations prepared annually by a licensed PCA. • Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. • Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. • Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Herbicide application occurred on 2 acres of private property by the MWPA-managed implementation team within the Phase II treatment areas. Approximately 1.9 acres of the 2-acre herbicide application areas were retreatment within Phase I treatment segments. Herbicide application was applied by the MCOSD-managed implementation team on 31.3 acres of MCOSD land. The herbicide was Garlon 4 Ultra and Triclopyr/Triclopyr choline herbicide, which are allowable types under the CalVTP EIR. Targeted herbicide application was one of the treatment methods that was implemented due to how critical this tool is in treating broom, most notably. As discussed previously, while herbicide application was included as part of the project and has been implemented, the majority of broom has been removed by hand crews. Broom is widespread within the GRVSFB project area. Even so, less than 1 percent of the GRVSFB project area treated to date has included herbicide application for broom control. The primary method employed was dabbing onto cut stumps when mature broom was present in areas of documented instability or was not able to be pulled effectively. In discrete areas, herbicide was applied to foliage in a targeted manner. The project complied with all applicable herbicide regulations, including Section 8.40 of the Town of Fairfax Municipal Code, which requires neighbor notification prior to the use of herbicides on private property. In accordance with the Town of Ross and Town of San Anselmo Integrated Pest Management Policies, the public was notified of

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	herbicide application that occurred on town property. Notices were posted, consistent with requirements of the CalVTP SPRs and MWPA's PDIFs to inform the public and residents in the area. No herbicide was applied along public trails or in areas where the public could come in contact with it. While no herbicides were used on Town of San Anselmo property, the crew leads coordinated directly with the Town of San Anselmo Public Works and Building Director to ensure that the Town had no concerns about the use of herbicide in this area. Herbicides were applied in adherence to all United States Environmental Protection Agency (USEPA) and California Environmental Protection Agency (CalEPA) regulations and in such a way to prevent over drift.
PDIF HAZ-4 Application of Herbicides (replaces SPR HAZ-7 Triple Rinse Herbicide Containers and SPR HAZ-8 Minimize Herbicide Drift to Public Areas) • Projects will comply with all herbicide application regulations and ecologically sound integrated pest management principles. • Herbicide containers will be triple rinsed with clean water at an approved site, and rinsate will be disposed of by placing it in the batch tank for application. • Herbicide drift to public areas or sensitive areas will be minimized through the following measures: - Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative). - No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. - Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift. - Low nozzle pressures will be utilized. - Spray nozzles will be kept within 24 inches of vegetation, if spraying.	This PDIF was met and achieved. As discussed above, herbicide treatments complied with all applicable regulations and IPMPs. Herbicides were primarily applied by dabbing onto cut stumps to minimize drift. In discrete areas, herbicides were applied in a targeted manner. No herbicides were applied during precipitation events. Notices were posted to inform the public and residents of herbicide application. No herbicide was applied along public trails or in areas where the public could come in contact with it. Additionally, Garlon 4 Ultra, which contains triclopyr, is mixed with a vegetable-based oil which reduces evaporation and potential for drift and allows the mixture to stick to leaves and wood for better absorption. Additionally, coloring is added to the mix to ensure precise application to

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• For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, signs will be posted at each end of herbicide application areas and any intersecting trails notifying the public of the use of herbicides at a minimum 1 day before and 1 day after herbicide use.	plants and avoidance of surrounding soil or vegetation.
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Neighboring properties were notified of herbicide use prior to application in accordance with this measure and the Town of San Anselmo, Town of Ross, and Town of Fairfax regulations. The notifications included the information required in the measure indicating that it was a "Notice of Herbicide Application".
PDIF HAZ-3 Pile Burning (not required by the CalVTP PEIR): The following measures will be implemented to reduce hazards associated with pile burning: • Pile burning will only be allowed on days when fire is less likely to spread (e.g., wind speeds are less than 15 mph). • Piles will only be constructed in areas where burning can be safely controlled, for example, on the flattest area possible. Bottoms of steep, vegetated hills will be avoided. • Piles should be constructed with 10 feet of clearance around them. • Piles will be set back from public roads and trails at a distance to minimize risk to the public or cordoned off from the public. • All requirements of CAL FIRE, the local fire department, and/or the BAAQMD will be met, including any permit, notification, burn bans, and reporting requirements. • Have fire suppression crews on-site during the fire season determined by CAL FIRE or the local fire department (typically mid-May to mid-November) during curtain and pile burns. • Pile burning will adhere to BAAQMD criteria pollutant thresholds and Regulation 5 for open burning.	The measures outlined in PDIF HAZ-3 were implemented by County of Marin Fire Department when conducting the pile burning as part of this project. The PDIF was met and achieved.
Hydrology and Water Quality	
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance	Treatments that occurred during the Phase II reporting period were conducted in accordance

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related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	with the requirements outlined in the State Water Resources Control Board (SWRCB) Order WQ 2021-0026-DWQ *General Waste Discharge Requirements for Vegetation Treatment Activities Conducted in Conformance with the California Vegetation Treatment Program*. The MWPA and environmental compliance team conducted site visits with the SWRCB and the Regional Water Quality Control Board (RWQCB) on March 3, 2023. Quarterly status updates were provided to the RWQCB on June 16 and October 6, 2023. Following the October 6, 2023 update, an additional site visit was conducted with the RWQCB.
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Not applicable. No roads were constructed.
PDIF HYD-1 Prescribed Herbivory Treatments (replaces SPR HYD-3 Water Quality Protections for Prescribed Herbivory): The following water quality protections will apply for all prescribed herbivory treatments: • Limit the duration of prescribed herbivory within 50 feet of lakes/reservoirs, creeks, streams, riparian corridors, and wetlands to prevent soil erosion that could affect water quality (see SH-1) • Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. • Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.	Not applicable. No prescribed herbivory occurred during this reporting period.
PDIF SH-2 Grazing and Sensitive Habitats (replaces SPR HYD-3 Water Quality Protections for Prescribed Herbivory): Avoid grazing in sensitive habitats including serpentine-associated communities, chaparral, and across waterways and within a 50 foot buffer if there is a need for protection of riparian vegetation from grazing. Limited grazing may be allowed if it would be beneficial to plant and wetland communities,	Not applicable. No prescribed herbivory occurred during this reporting period.

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including serpentine-associated communities, without causing harm (e.g., removal of invasive species) and would not result in erosion.

SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.

No work occurred within any WLPZs. Stream corridors were identified during Phase II planning and appropriate avoidance was conducted where applicable.

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths

Water Class	Class I	Class II	Class III	Class IV
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ				
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
30-50 % Slope	100	75		
>50 % Slope	150	100		

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

The following WLPZ protections will be applied for all treatments:

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

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• Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	
PDIF HAZ-5 Protect Vegetation and Special-Status Species from Herbicides (replaces SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides) The project proponent will implement their approved integrated pest management (IPM) procedures when utilizing herbicides, or the following measures if no IPM is in place that addresses herbicide use in sensitive areas: • Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. • Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. • No terrestrial or aquatic herbicides will be applied within Watercourse and Lake Protection Zones (WLPZs) of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. • No herbicides will be applied within a 50-foot buffer of federal Endangered Species Act (ESA) or California ESA listed plant species or within 50 feet of dry vernal pools. • For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by California Department of Pesticide Regulation, if warranted) to prevent overspray.	Herbicide application occurred in areas that were comprised of invasive broom. No special-status species were identified during biological resource surveys in the herbicide application area and the potential for occurrence was low. No herbicides were applied in aquatic environments, riparian habitats, or WLPZs.
SPR HYD-6 Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	No ground-disturbing activities occurred that required marking existing stormwater drainage infrastructure. No drainage structure or infiltration system was disturbed or modified during project activities.

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Noise	
PDIF NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors (replaces SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours, SPR NOI-2 Equipment Maintenance, SPR NOI-3 Engine Shroud Closure, SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses, and SPR NOI-5 Restrict Equipment Idle Time): All projects will comply with applicable local noise ordinances. All powered equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Measures to minimize noise disruption to nearby neighbors and sensitive receptors will be implemented as needed. These measures may include but are not limited to: • Using noise control technologies on equipment (e.g., mufflers, ducts, and acoustically attenuating shields) • Locating stationary noise sources (e.g., pumps and generators) away from sensitive receptors • Close engine shrouds during equipment operations • Shut down equipment when not in use. Equipment will not be idled unnecessarily • Operate heavy equipment during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship) • Locate project activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible	The on-the-ground field managers were provided binders with the applicable local noise ordinances. The project complied with all applicable noise ordinances.
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	No heavy equipment was utilized except for a chipper. Chipping complied with all applicable noise ordinance.
Recreation	
SPR REC-1 Notify Recreational Users of Temporary Closures: If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent to will [sic] coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is	No temporary closures of public recreational facilities or trails was required. Treatments occurred along a trail at the end of Holly Road.

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required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Work crews would stop work and allow recreationalists to continue along the trail corridor.
Transportation	
SPR TRAN-1 Implement Traffic Control during Treatments (more stringent than PDIF TR-2): Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities	Temporary lane closures occurred on Bolinas-Fairfax Road, Olema Road, and along several other roadways. Traffic control was implemented during the lane closures and included flaggers and cones. Pile burning was not conducted near roadways.
PDIF TR-1 Emergency Access to Project Areas (not required by the CalVTP PEIR): The following measures will be implemented to maintain emergency access:	Not applicable. Road and lane closures were not required.

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• At least one week prior to temporary lane or full closure of a public road for vegetation management-related work, the appropriate emergency response agency/agencies will be contacted with jurisdiction to ensure that each agency is notified of the closure and any temporary detours in advance and obtain all required encroachment permits • In the event of any emergency, roads blocked or obstructed for maintenance activities will be cleared to allow the vehicles to pass. • During temporary lane or road closures on public roads, flaggers equipped with two-way radios will be utilized where needed to control traffic. During an emergency, flaggers will radio to the crew to cease operations and reopen the public road to emergency vehicles. All authorized vehicles at the treatment site will be parked to not block roads when no operator is present to move the vehicle.	
Public Services and Utilities	
SPR UTIL-1: Solid Organic Waste Disposition Plan: For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	A Solid Organic Waste Disposition Plan was prepared for the project. The plan included all the requirements listed in SPR UTIL-1.

Mitigation Measures

Table 4-2 Mitigation Measures Implemented during this Reporting Periiod

CalVTP PEIR Mitigation Measures	Compliance Summary
Air Quality	
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: • Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. • Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: - meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; - be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; - contain no fatty acids or functionalized fatty acid esters; and - have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. • Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. • Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.	Not applicable. Heavy equipment was not used during this reporting period.

CalVTP PEIR Mitigation Measures	Compliance Summary
Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.	
Archaeological, Historical, and Tribal Cultural Resources	
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Not applicable. No previously undiscovered resources were uncovered by crews during this reporting period.
Biological Resources	
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed	The seven special-status species identified during botanical surveys were avoided by project activities.

CalVTP PEIR Mitigation Measures	Compliance Summary
plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.	
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: • Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will	The seven special-status species identified during botanical surveys were avoided by project activities. Crews were provided rare plant pamphlets to identify special-status plants species during implementation. The lead field manager identified one Napa false indigo during treatment activities. The Napa false indigo was avoided by project activities.

CalVTP PEIR Mitigation Measures	Compliance Summary

depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape.

- Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank.
- Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation.
- No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer.

A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will

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be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.	
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: c. 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR d. 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. - For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. - Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> • The project proponent will design treatment activities to maintain the habitat function, by implementing the following: - While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees	Treatment occurred within the nesting bird and roosting bat season. Nesting birds were avoided for work that occurred during the nesting season. Treatment primarily included broom removal by hand crews that would not significantly disturb nesting birds. Additionally, any observed nests were avoided by treatment activities. No other special-status or sensitive wildlife species had a high potential to occur in the areas that treatments were conducted for this reporting period.

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with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. - If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. • A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.	
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> • The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer	Treatments during this reporting period avoided the potential to adversely impact all special-status wildlife species. Project activities that occurred within the nesting bird and roosting bat period included broom pulling and manual treatment using hand tools. Active nests were identified during project activities and were avoided. Work was avoided within 330 feet of active NSO nests. Chipping was prohibited within 0.25-mile of active NSO nests. As per PDIF NSO-3, large trees that could be

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would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). • No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. • For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> • For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: - While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees	suitable for use by northern spotted owl, were not removed by suitable habitat.

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with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.

- If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained.
- A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function.

A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be

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beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.	
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: • Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. • Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. • To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). • To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). • Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in*	Fuel reduction work within woodland treatment areas included pruning tree branches 8 to 10 feet above ground (not to exceed 1/3 of the tree's height), removal of dead/downed branches and dead standing trees, and the removal of live trees with a diameter of typically less than 10 inches diameter at breast height (dbh), but up to 12 inches dbh, to achieve horizontal spacing. Smaller, mature native trees were retained unless the densities pose a fire hazard risk but may be pruned. The on-the-ground managers received training on vegetation treatment in sensitive natural communities and oak woodlands. Treatments were designed to not result in adverse impacts on sensitive communities and oak woodlands.

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California's Ecosystems (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/).

- Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory.

The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the

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substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.	
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: • The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. • The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). • A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. • A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. • Within this buffer, herbicide application is prohibited. • Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. • Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: - No special-status species are present in the wetland habitat - The wetland habitat function would be maintained. - The prescribed burn is within the normal fire return interval for the wetland vegetation types present - Fire containment lines and pile burning are prohibited within the buffer - No fire ignition (and associated use of accelerants) will occur within the wetland buffer	All wetlands were avoided. The project complied with MM BIO-4.

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Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: • **Retain Known Nursery Sites.** A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. • **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	Not applicable. Nursery sites, aside from suitable nesting bird and maternity roosting bat habitat, were not located within the Phase II treatment areas.
PDIF SH-3 Minimization of Pile Burning Disturbance (not required by the CalVTP PEIR): Pile burning will not be performed in sensitive habitats, such as serpentine-associated communities, wetlands, or riparian areas. If piles are burned on a different day than piled, the piles should be moved prior to burning to ensure wildlife is not present, such as by re-piling by hand, or a qualified biologist will inspect the pile prior to burning to ensure wildlife are not present. If moving or inspection of the piles is not feasible, the pile will be lit from one side and allowed to burn slowly to the other side, in order to allow any wildlife to relocate, rather than lighting the entire pile at once.	Pile burning was not conducted in sensitive habitats or riparian areas. Piles were lit from one side and allowed to slowly burn to the other side.
Greenhouse Gas Emissions	
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): • reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; • reduce the total area burned through mosaic burning; • burn when fuels have a higher fuel moisture content;	Not applicable. Broadcast burning did not occur.

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• reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and • schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	
Hazardous Materials, Public Health and Safety	
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Not applicable. Hazardous waste sites were not located within the Phase II treatment areas and substantial ground disturbing activities that could expose the public or environment to buried hazards did not occur.

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