Girl Scouts of Northern California - Camp Butano Forest Health Project % Project-Specific Analysis %

An Addendum to the CalVTP PEIR

Prepared for:

San Mateo Resource Conservation District %

In Collaboration With:

Girl Scouts of Northern California

AUGUST 2021

CALVTP ID: 2021-12

Girl Scouts of Northern California – Camp Butano Forest Health Project
Project-Specific Analysis

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Project Summary %

Girl Scouts of Northern California – Camp Butano Forest Health Project

Setting

Wildfires have taken a significant toll on many communities across California. A majority of land managers, researchers, and foresters predominantly agree on the factors that have led to many recent large-scale fires: The outlawing of cultural burning since the late 1800s, restricting fire over the last 100 years, a lack of vegetation management, climate change, periods of successive drought, and significant development into the Wildland-urban Interface. The results of these factors are severely overstocked forests and surrounding vegetation types ripe for wildfire ignition that are in desperate need of treatment.

CEQA and Coastal Act Compliance

The California Vegetation Treatment Program (CalVTP) is a Programmatic Environmental Impact Report that was certified in 2019 as a document compliant with the California Environmental Quality Act (CEQA). This Programmatic EIR offers an array of permittable vegetation treatments that allow for ecological restoration, forest health treatments, and other treatments reducing the risk of wildfire with the submittal of a Project Specific Analysis (PSA). The PSA must demonstrate how the project will comply with Standard Project Requirements and Mitigation Measures from the CalVTP Programmatic EIR.

While the CalVTP provides CEQA compliance for an array of forest health and wildfire prevention projects, the San Mateo Resource Conservation District's (RCD) Public Works Program (PWP) is a companion to the CalVTP that provides a streamlined mechanism for Coastal Act compliance. The PWP requests information on a set of Coastal Vegetation Treatment Standards (CVTS) and details additional information on project design standards for projects within the Coastal Zone. This PSA not only addresses all of the critical components of the CalVTP, but also includes information that responds to the CVTS. The CVTS for Camp Butano Creek (CBC) can be found in Attachment H of this PSA.

Girls Scouts of Northern California – Camp Butano Creek

The Girl Scouts of Northern California CBC, like many other properties in the Santa Cruz Mountains, exhibits unhealthy forest characteristics that set the stage for disease and a significant fire event. This forested stand is densely overstocked in many areas with tanoak and redwood trees averaging approximately 300-400 trees per acre, especially in small (1-12 inch in diameter) and some mid-range (12-24 inch in diameter) trees. A healthier, less dense forest stand would be around 200 trees per acre, significantly reducing the number of smaller trees.

The stand with 400 trees per acre has very little room to grow and is strained through competition for sunlight, nutrients, and water among so many trees. This creates weaker forest stand conditions where diseases, like sudden oak death, can more easily kill trees and weather driven wildfire can burn very hot impacting larger, healthy trees. The results of a densely overstocked stand are considered impaired forest conditions that require ecologically restorative treatments to reduce

competition among trees predominantly removing trees ≤8 inches in diameter. The goal is to increase healthy growth of larger trees and allow sunlight to reach the forest floor to increase plant diversity, while also reducing ladder fuels and the associated fire hazard. In addition, the 2020 CZU fire burned a majority of the property with a low burn severity leaving behind significant amounts of unconsumed, small, dead tanoaks and brush increasing the potential for future wildfire ignition (see *Figure 1* and *2*).

Figure 1. CBC- Overstocked <8-inch diameter tanoak

Figure 2. CBC - Overstocked <8-inch diameter redwood

Figure 1 and *Figure 2* show the impaired, overstocked forest conditions on CBC that this effort seeks to address. The proposed treatments focus predominantly on mechanized mastication of dead, dying, and diseased understory vegetation and overstocked areas of trees with some handwork in sensitive areas to remove approximately 70-80% of trees ≤8 inches in diameter within the treatment areas. This treatment will reduce competition among the remaining trees, remove ladder fuels, while ensuring that the redwood forest alliance composition per the Second Manual of Vegetation is both maintained and improved. The redwood alliance is described as Sequoia sempervirens >50% relative cover in the tree canopy, or >30% relative cover with other conifers such as Douglas-fir (*Pseudotsuga menziesii)* or with a lower tier of hardwood trees such as tanoak (*Notholithocarpus densiflorus*). This description is the target post-treatment condition.

Equipment Alternatives:

Examples of mechanized and handwork treatments are shown below in *Figures 3, 4, 5,* and *6* from recent projects in San Mateo and Santa Cruz Counties in 2020 and 2019. The San Mateo County treatment was a 90-100% mechanized treatment prescription removal of trees ≤12 inches in diameter which still easily maintained each vegetation type's respective vegetative alliance. The Santa Cruz County handwork treatment prescription was a 70-80% removal of trees ≤8 inches in diameter which also easily maintained each vegetation type's respective vegetative alliance.

Figure 3. San Mateo County – Mechanized – Before

Figure 4. San Mateo County – Mechanized – After

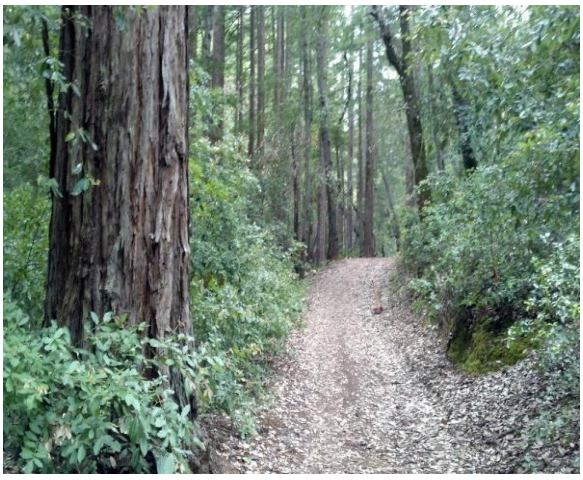


Figure 5. Santa Cruz County – Handwork – Before

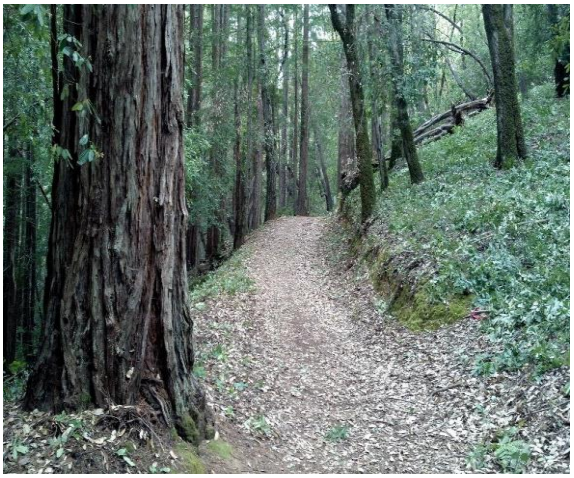


Figure 6. Santa Cruz County – Handwork - After

Mechanized: Low-pressure, smaller (<20,000 lb.), tracked excavators and other tracked equipment with mowing heads that can grind smaller trees and understory vegetation into 1-3-inch large chips on slopes ≤40% and spread chips throughout the forest are preferred. The masticator will access treatment areas from existing roads and in a few cases, when moving from one treatment polygon to another, operate on slopes up to 50% for short distances. Please see SPR AD-3 for information regarding consistency with the San Mateo County LCP Policy 9.18 – Regulation of Development on 30% or Steeper Slopes. Resulting mastication will leave a layer of mulch behind to minimize any erosion and suppress weed invasion, while allowing the existing seedbank to germinate beneath, and give cut root systems the opportunity to resprout. Operators working in smaller enclosed air-conditioned cabs are nimbler in the forest, resulting in lower damage to the residual forest stand and increasing worker safety. General production rates average approximately one acre per day, per piece of tracked equipment. Current costs have recently ranged between $2,000 - $4,000 per acre (prevailing wage indicated on the upper end).

Figure 7: Example of Mechanized Equipment

Figure 8: Example of Mechanized Equipment – 315 Excavator

Figure 9: Example of Mechanized Equipment – 299 CAT

Handwork: Consists of conducting physical labor to remove smaller trees (≤8 inches in diameter) and understory vegetation with various hand operated equipment including chainsaws and chippers. This type of treatment is often utilized in sensitive areas around watercourses, steeper slopes ≥40%, near cultural resources, or other key aesthetic areas. Handwork is physically demanding and inherently exposes workers to increased safety risks. General production rates average approximately ½ an acre per day for a crew of approximately 10 people. Current costs have ranged between $9,000 - $18,000 per acre (prevailing wage indicated on the upper end).

Figure 10: Example of Hand Crew – Hand Operated Equipment

Figure 11: Example of Hand Crew – Chipper

The project was designed in a manner to be both cost-effective and responsive to reducing implementation related resource impacts to the greatest extent feasible. Handwork is being utilized

in areas where sensitive resources are identified but is not an appropriate alternative for the majority of this project based on safety, cost, and efficiency. Burning was also considered for CBC, but the project area is far too dense with trees and understory vegetation near steep surrounding topography to be considered a safe alternative at this time. In addition, weather windows to conduct prescribed fire are very limited recognizing air quality requirements. Meeting the pace and scale of forest health goals based on our current climatic conditions requires balancing all available tools and techniques that consider, safety, cost, available workforce, efficiency, and environmental conditions. The current conditions require the use of mechanized operations in reasonable locations identified through resource analysis and qualified professional evaluation to meet the goals of this project.

Project Justification

Through a collaborative effort between San Mateo RCD, CAL FIRE, and Auten Resource Consulting, the condition of the CBC forest was evaluated and determined to have significant forest health impairments (*Figure 1* and *2*). These impairments occur throughout the forested lands, but the area of focus for this effort is proximal to a well utilized camp and a sub-division to the north called the Butano Creek Subdivision. There is only one way into the camp and community, and one way out from Canyon Road (see *Figure 12* map on the next page).

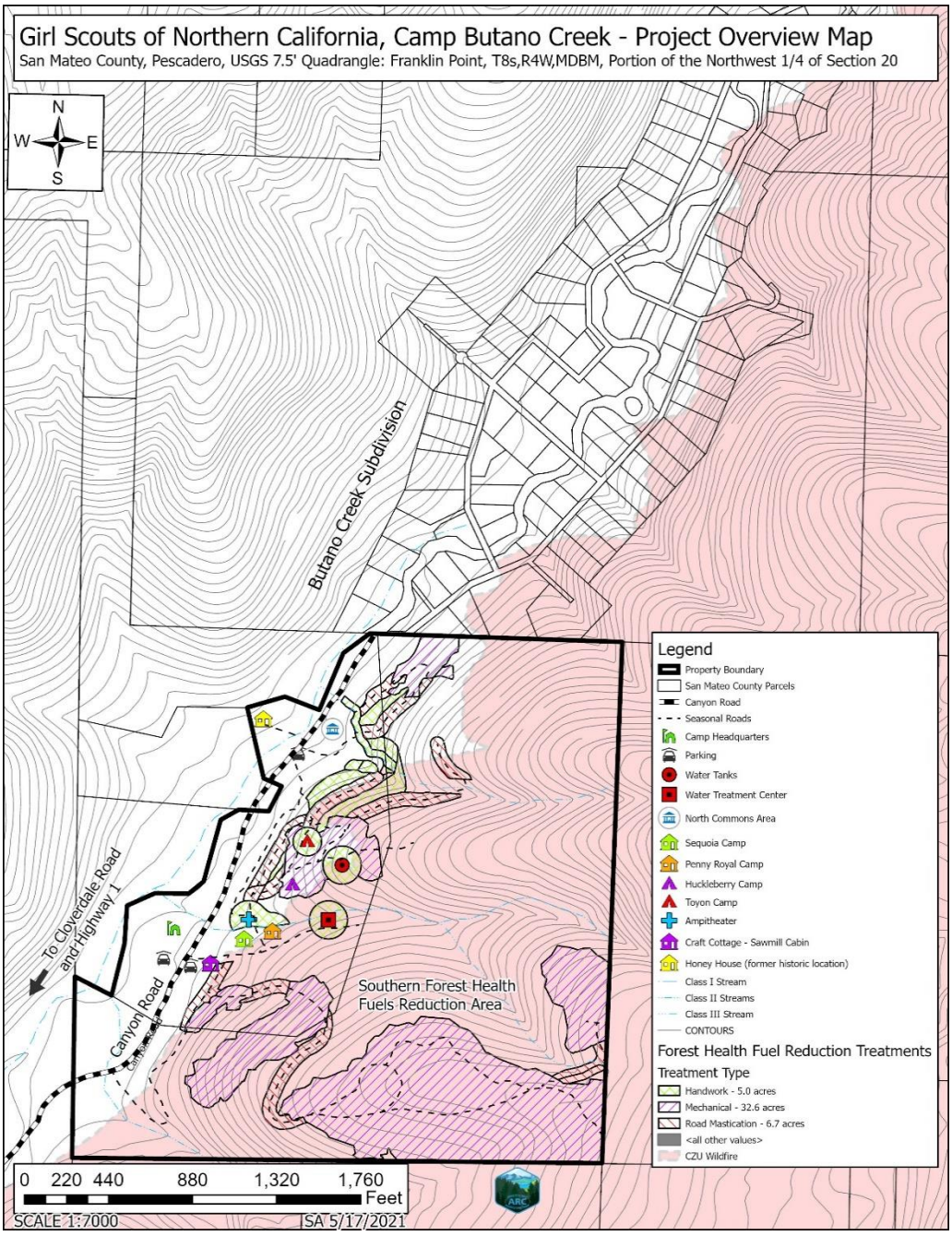


Figure 12. Girl Scouts of Northern California – Camp Butano Creek – Project Overview Map (map not to scale, see full scale map in Attachment 2, Map 1)

Significant planning went into the CBC Forest Health Project, a CAL FIRE CCI grant, to develop ecologically restorative treatments over 44 acres that also supports treatments in proximity to the Wildland-urban Interface. The CBC treatment area development phase began by analyzing where sensitive resource areas were located (e.g., watercourses, steep slopes, sensitive communities/species, etc.). These areas were initially mapped out until the more treatable ground (e.g., less steep, ridges, and areas away from watercourses, etc.) could be field verified for access, to evaluate the level of impaired forest condition, and consider treatment options. Once this step was

complete, field-verified treatment polygons, some with handwork near sensitive resources, were pieced together until it created a mosaic of forest stand treatments that are economically viable and ecologically restorative, while also promoting community protection to the Girl Scout camp and the Butano Creek Subdivision.

There are many more acres on CBC and the rest of the Santa Cruz Mountains that would benefit from the treatments described in this PSA. Collaborative landscape scale prioritization is happening but is very challenging with so much at risk to communities and resources everywhere. Similarly, prioritization of treatment areas occurred on CBC to balance needed ecologically restorative treatments, protection of sensitive resources, reduction of fuels for community protection, worker safety, and the economic realities of project planning, permitting, and implementation.

Although residents of Canyon Road from the camp and subdivision experienced low severity burn conditions from the 2020 CZU fire, it is possible that a wind driven fire could approach from the south or northeast igniting portions of the canyon where a fire could move up Canyon Road. Implementing ecologically restorative mechanized and manual treatments along the southern road on CBC and flatter portions of terrain create a Southern Forest Health Fuels Reduction Area (see *Figure 12* map). In addition, a mosaic of mechanized and handwork treatments near sensitive resources along the east side of the camp, bound also by the northwest from Canyon Road, create an additional level of potential protection for CBC and the Butano Creek Subdivision in the case of a fire moving up Canyon Road.

These kinds of treatments create an opportunity for CAL FIRE to consider a place to stop a wildfire or manage the fire potentially reducing emergency ground disturbing actions with bull dozers. Techniques such as minimum impact suppression techniques (e.g. setting a fire in controlled conditions to burn up fuel load before the major head of the fire arrives, called back burning) may be utilized in areas where forest health fuel reduction treatments and planning have occurred years ahead of a wildfire. Emergency fire suppression actions can create additional environmental impacts whereas the CBC project and other projects to follow will become part of CAL FIRE's fire planning network to increase fire management opportunities and reduce environmental impacts from severe wildfire or firefighting impacts.

Numerous resource protection measures are outlined in this CalVTP PSA for Camp Butano Creek. These measures provide significant avoidance, minimization, and mitigations, and are thoroughly evaluated in this PSA to understand the full extent of the CEQA-compliance. Key measures among many include: Biological and botanical surveys prior to project implementation, bird nesting surveys (if operations occur from February 1st to August 31st), no road building, mechanized operations on slopes less than 50%, no heavy equipment operations in proximity to a watercourse, canopy and native vegetation requirements, control of invasive exotic species, mitigations to reduce the spread of forest pathogens such as sudden oak death, an archaeological survey report, requirements to follow local policies and public noticing, and a pre-operational meeting with the contractors to advise them of key resource issues.

List of Abbreviations %

ASR %	Archaeological Survey Report
CAL FIRE %	California Department of Forestry and Fire Protection
CalVTP	California Vegetation Treatment Program
CAAQS %	California Ambient Air Quality Standards
CCC	California Coastal Commission
CDFW %	California Department of Fish and Wildlife
CEQA %	California Environmental Quality Act
CESA %	California Endangered Species Act
CNDDB %	California Natural Diversity Database
CNPS %	California Native Plant Society
CRPR %	California Rare Plant Rank
CVTS %	Coastal Vegetation Treatment Standards
CWHR %	California Wildlife Habitat Relationships
CZU %	San Mateo Santa Cruz Unit
DBH %	diameter at breast height
DTSC %	Department of Toxic Substances Control
ESA %	Endangered Species Act
ESHA %	Environmentally Sensitive Habitat Area
FRAP %	Fire and Resource Assessment Program
FVS %	Forest Vegetation Simulator
GIS %	Geographic Information Systems
HCP %	Habitat Conservation Plan
IAP %	Incident Action Plan
IFTDSS %	Inter-agency Fuel Treatment Decision Support System
IPC %	Invasive Plant Council
LCP %	Local Coastal Program
NAAQS %	National Ambient Air Quality Standards
NAHC %	Native American Heritage Commission
NCCP %	Natural Community Conservation Plans
NWIC %	Northwest Information Center
PEIR %	Programmatic Environmental Impact Report
PPE %	Personal Protective Equipment
PRC %	Public Resource Code
PSA %	Project-Specific Analysis
PWP %	Public Works Plan
RM %	Resource Management
RPF %	Registered Professional Forester
RTE %	Rare Threatened and Endangered Species
RWQCB %	Regional Water Quality Control Board
SENL %	Single Event Noise Level
SMC %	San Mateo County

SMRCD	San Mateo Resource Conservation District
SOD	sudden oak death
SPR	Standard Project Requirement
TMP	Traffic Management Plan
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
WDR	Waste Discharge Requirements
WLPZ	Watercourse and Lake Protection Zone
WUI	Wildland-urban Interface

Appendix PD-3 !

Project-Specific Analysis

PD-3: PROJECT-SPECIFIC ANALYSIS

PD-3.1: INTRODUCTION

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

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

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

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

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

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

For the purposes of this PEIR and PSA, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. If through the PSA a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

PD-3.1.2: Treatments Addressed in the PEIR

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

TREATMENT TYPES

The CalVTP treatment types are:

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

TREATMENT ACTIVITIES

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

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

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

TREATABLE LANDSCAPE

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

PD-3.2: Evaluation of Environmental Impacts

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

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

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

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

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

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

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

- Relevant PEIR analysis. Identify the specific sections, impact numbers, and page numbers from this PEIR that contain information relevant to the proposed treatment project.
- Additional Studies Prepared and References Cited. Attach to the PSA site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the PEIR. Include copies of references cited in the PSA, which will be made available to the public by the project proponent upon request.
- Standard Project Requirements. Identify each standard project requirement (SPR) that is relevant to the treatment, which will demonstrate that the SPR will be integrated into treatment design. Some SPRs allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.
- Environmental Impacts. Identify which impacts in the PEIR would occur from implementation of the proposed vegetation treatment project. Because the intent of the PEIR is to disclose potentially significant impacts that are reasonably foreseeable to occur from any of the treatments within the extent of the treatable landscape, it is expected that, due to site-specific conditions, proposed vegetation treatment projects may result in impacts less severe than those identified in the PEIR. A project proponent may rely on the impact significance determination in the PEIR, and for significant impacts, apply the relevant mitigation measures. Alternatively, if an impact identified as significant in the PEIR would be less than significant for the later treatment project, the project proponent may demonstrate with substantial evidence in the PSA that the project impact is less than significant and mitigation measure(s) are not needed. Similarly, potentially significant environmental effects identified in the PEIR may be minimized or found to be less than significant without mitigation in the future due to technological advances, further research, or industry response (e.g., air quality, greenhouse gas emissions, utilities and service systems); these effects and the reasons they are less severe than those identified in the PEIR will be documented in the PSA.
- Mitigation Measures. Identify each mitigation measure from the PEIR that is relevant to the proposed treatment project. In the PSA, explain any components of the mitigation measures that are not applicable to the treatment, and for any significance determination that is different than the PEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed vegetation treatment project. Some mitigation measures allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.

PD-3.2.3: Providing Substantial Evidence

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

PD-3.2.4: Project-Specific Analysis

STANDARD PROJECT REQUIREMENTS, MITIGATION MEASURES, AND MONITORING AND REPORTING

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

RESOURCE AREAS

The environmental resource areas in the PSA checklist are the same as those analyzed in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures", of the PEIR. The project proponent will review the environmental analysis in the PEIR for each corresponding resource area in the PSA checklist. The project proponent will consider whether required SPRs and mitigation measures would be effective in avoiding, reducing, or mitigating environmental impacts of the project considering the proposed activities and site-specific characteristics. SPRs are intended to be integrated into treatment design and implementation; therefore, project proponents should determine if it is necessary to implement the SPR during preparation of the PSA, prior to treatment, or during treatment implementation. For example, implementation of SPR BIO-1 is intended to be carried out during PSA preparation; it will identify potentially affected biological resources and assess whether they can be avoided, which will determine whether other SPRs and mitigation measures must be implemented prior to or during treatments.

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

CHECKLIST ANSWERS

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

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

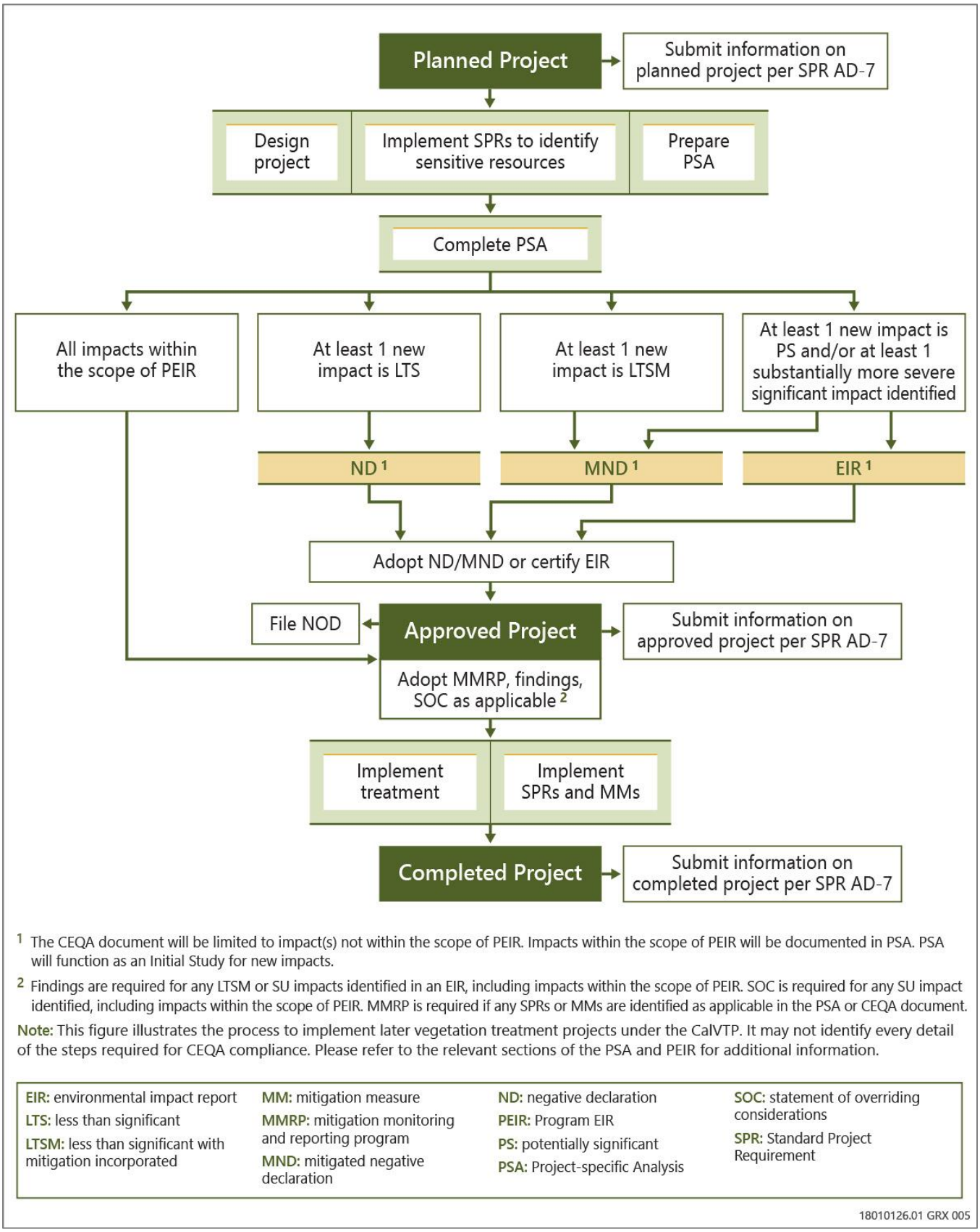
Accordingly, the checklist questions presented for each resource area identify, for each impact addressed in the PEIR, whether the impact applies to the treatment project and if so, identify the SPRs and mitigation measures that are applicable to the treatment project. The checklist is also intended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

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

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

- New Impact that is Less Than Significant: The project would result in a new adverse impact that is not analyzed in the CalVTP PEIR; however, the impact would not be significant. In this case, the impact is not "within the scope" of the CalVTP PEIR and preparation of a Negative Declaration could be prepared. Pursuant to CEQA Guidelines Section 15168(d), a subsequent negative declaration could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Less Than Significant with Mitigation Incorporated: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR, but due to the project proponent's willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not "within the scope" of the CalVTP PEIR and a Mitigated Negative Declaration could be prepared, consistent with CEQA Guidelines Section 15168(d), which allows for use of a subsequent negative declaration to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Potentially Significant: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR (which would be subject to the "fair argument" standard as a new impact), the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not "within the scope" of the CalVTP PEIR and preparation of an Environmental Impact Report (EIR) is required. The EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the PEIR, which are documented in the PSA.

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



Source: Ascent Environmental Inc. 2019 $

Figure 1 CalVTP PSA Process $

AGENCY-SPECIFIC CEQA IMPLEMENTATION PROCEDURES

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

PROJECT-SPECIFIC CEQA FINDINGS AND OVERRIDING CONSIDERATIONS

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

REPORTING REQUIREMENTS

Planned Projects

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

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

Approved Projects

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

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

Completed Projects

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

- GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)
- A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes
  - Size of treated area (typically acres);
  - Treatment types and activities;

- Dates of work;
- A list of the SPRs and mitigation measures that were implemented
- Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b).

ENVRIONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. $ Project Title:	Girl Scouts of Northern California – Camp Butano Forest Health Project
2. $ Project Proponent Name and Address:	San Mateo Resource Conservation District (SMRCD) 80 Stone Pine Road, Suite 100, Half Moon Bay, CA 94019
3. $ Contact Person Information and Phone Number:	David Cowman – Conservation Project Manager 650.712.7765 x 107, David@sanmateorcd.org
4. $ Project Location:	Butano Creek – Girl Scout Camp 1400 Canyon Rd., Pescadero, CA 94060 USGS – Franklin Point Quadrangle, California, T8S, R4W, MDBM, and Portions of NW ¼ of Section 20. Latitude (Y): 37.225056 N Longitude (X): -122.331031 W The main camp entrance is located approximately 1.5 miles onto Canyon Road off Cloverdale Road in Pescadero, California. See project maps (Attachment 2, Map 1, 2, and 3) or see *Figure 7, 8,* and *9* respectively.
5. Total Area to be Treated (acres) $	Approximately 44 acres

6. $ Description of Project: (Describe the whole action involved, including any phasing of initial treatments as well as planned treatment maintenance, including equipment to be used and planned duration of treatments. Provide cross reference to specific subsections and page numbers from Chapter 2 of the PEIR to demonstrate that treatments are consistent with those analyzed in the PEIR. Attach additional sheets if necessary.)

Problem Statement:

Forested landscapes across the Santa Cruz Mountains are undergoing significant change. The climate is becoming warmer and drier, endemic species are at risk, and sudden oak death has taken an immeasurable toll on regional ecosystems and overall forest health. At the same time, drier site conifer species are displacing hardwoods and other sensitive plant species, reducing biodiversity and affecting the suitability of these habitats for rare and special-status wildlife. Altered fire regimes and increased fuel loads are driving larger and more catastrophic wildfires. The result has generated damaging changes to ecosystems that require environmentally sensitive landscape-level treatments to redirect the path of changing climates and ecological conditions impacting the Santa Cruz Mountains and surrounding communities. Most notably for San Mateo and Santa Cruz County in 2020, the CZU Lightning Complex fire burned 86,509 acres, destroyed 1490 buildings, and exhibited extreme fire behavior. Initial estimates suggest that over 50% of the impacted area burned at high fire severities. Many forested stands that were topographically exposed to the extreme fire weather resulted in

significant tree mortality and habitat losses, considered an impaired forest condition, that will take decades to recover.

The Girls Scouts of Northern California Camp Butano Creek redwood forest still holds ecologically resilient characteristics from the past with scattered old growth trees and remnants of a time when the understory was more diverse. The lack of fire, until recently, and a reduced large scale stewardship effort of this property in the last 30 years, coupled with changing climates has left the majority of the property severely over stocked in the understory and mid-range tree diameters.

Goal Statement:
The goal of implementing this project is to ecologically restore forest conditions to exhibit an increase in healthy growth of larger trees and allow sunlight to reach the forest floor to increase plant diversity, while also reducing ladder fuels and the associated fire hazard, and to ultimately maintain and improve the redwood forest alliance composition per the Second Manual of Vegetation. The conditions described in the Second Manual of Vegetation for the redwood alliance, or *Sequoia sempervirens,* is that redwoods make up >50% relative cover in the tree canopy, or >30% relative cover with other conifers, such as Douglas-fir, or with a lower tier of hardwood trees, such as tanoak (please see the *Project Summary* for further details).

The forest growth that had been attributed to approximately 300 – 400 stems per acre, creating weaker forest stand conditions more susceptible to disease and high severity fires, will be adjusted to approximately 200 stems per acre of mid-range and larger diameters trees following treatments. Treatment of the dead, partially consumed understory material left after the CZU fire and removal of small diameter trees up to approximately 8 inches in diameter, and additional retreatments in the years to come can reduce the severity of future wildfire events and maintain the vegetation "membership rules"[1], as described above, for redwood forest in this area. Remaining trees will extend their heights and expand their crowns becoming more vigorous to resist vegetation pattern transformations in the face of a climate change and increase the separation of ladder fuels from tree crowns ultimately reducing the severity of wildfire.

Additionally, this project supports the intent of the Forest Health Program goals, California's climate goals, and the goals of the California Coastal Commission for Environmentally Sensitive Habitat Areas (ESHA) where ecological restoration treatment types may occur to:

- Proactively restore forest health, improve ecosystem resiliency, and conserve working forests, or actively managed forests that promote sustainability and various ecosystem services, by conducting ecologically minded forest health treatments.
- Protect state water supply sources by strategically implementing ecological restoration projects across priority watersheds.
- Encourage the long-term storage of carbon in forest trees and soils through the reduction of dense understory thus promoting larger healthier stands of mature trees.
- Minimize the loss of forest carbon from large, intense wildfires, through reduction of ladder fuels and brush resulting from years of fire suppression.
- Promote public safety, health, and welfare and protect public and private property through the implementation of ecologically restorative fuel reduction treatments in the Wildland-urban Interface (WUI).

[1] Requirements to maintain membership rules at an alliance level under the 2nd edition of the Manual of California Vegetation for redwoods

Project Description: %
Mechanical mastication would be utilized to treat understory vegetation, dead or downed material, % hazard trees, dead, dying, and diseased trees, and live trees up to 8 inches diameter at breast height % (DBH). Understory vegetation, brush, and shrubs under the drip lines of trees shall be cut and masticated leaving root systems intact for resprouting. All debris and materials left by the masticator will be lopped and scattered throughout the treatment area. The manual treatment crew may utilize % chainsaws and/or other various hand mechanized or hand tools to prune trees and woody vegetation, % buck, meaning to cut into smaller sizes and lengths, downed debris and materials, and to treat dead, % dying, and diseased trees of any diameter, and live trees up to 8 inches DBH.

Project Site:
Camp Butano Creek is a private recreational property containing hiking trails, camp facilities, such as cabins, dining halls, and amphitheaters, utilized by campers affiliated with the Girl Scouts during summer camp sessions. Proposed mechanical treatment areas are located within the property boundary along ridges and on slopes less than approximately 40%. Any operations in proximity to the Camp Activity Line during camp sessions may require trail closures and noticing for camper and staff safety.

Project Location:
The project treatment area encompasses a total of approximately 44 acres within the Girl Scouts of Northern California Camp Butano Creek property, which is approximately 143.6 acres total. The property is located south of Pescadero, east of Highway 1, and northeast of Bean Hollow Lakes in San Mateo County, see *Figure 8*.

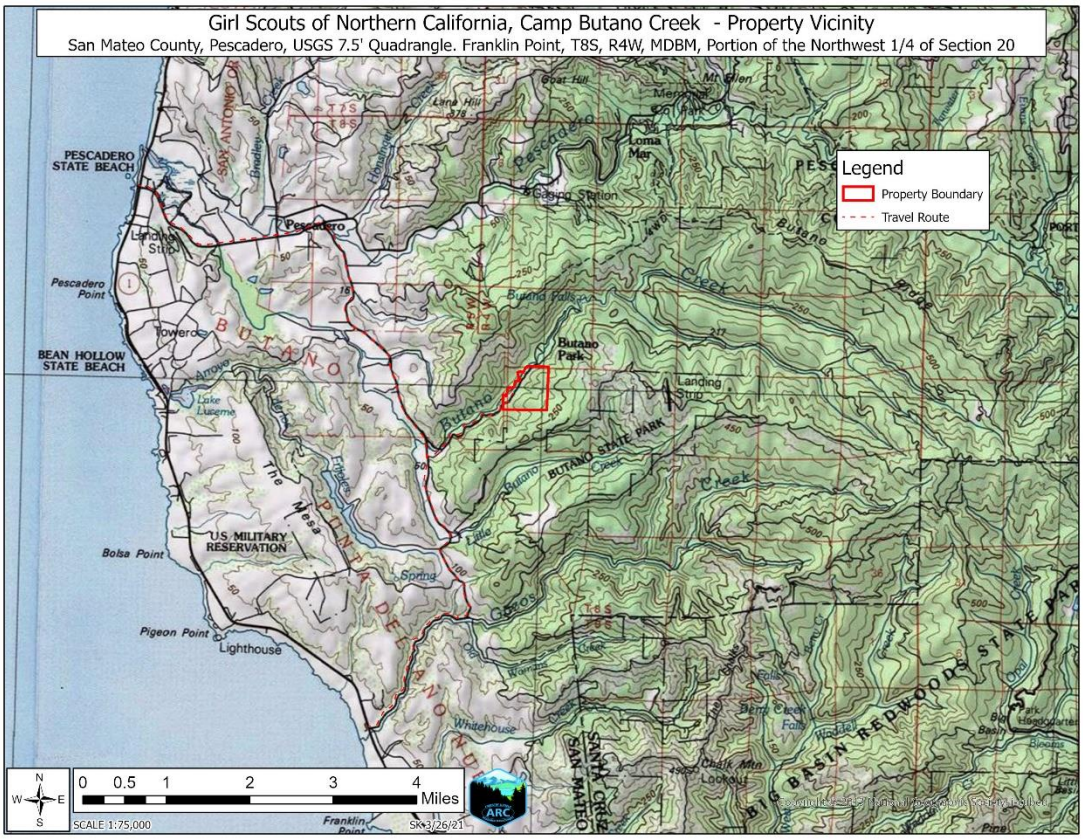


Figure 8: Camp Butano Creek Project Property Vicinity Map (map not to scale, see full scale map in Attachment 2, Map 2).

a. Initial Treatment

Treatment Types

Ecological Restoration

This project proposes ecological restoration treatment types to restore ecosystem processes, conditions, and resiliency through the treatment of dense understory fuels and invasive species in areas generally outside of the WUI, or areas integrated into WUI fuel reductions, as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page15-17). Implementing the treatment activities will result in a modification of the existing fuels that will ultimately support native vegetative species regeneration and restore habitat conditions including, but not limited to habitat quality and natural fire processes. This property experienced low severity burns throughout much of the proposed treatment areas during the 2020 CZU Lightning Complex Fires. Following the fire, much of the understory vegetation was not fully consumed and has added to the dry vegetative fuel load. Thinning the stand through the treatment of small diameter live trees and understory vegetation will result increase the site's carrying capacity for stand volume, which would increase the growth of the residual trees (Skovsgaard, 2008). The build-up of fuels and vegetation creates competition for the available water, nutrients, and sunlight plants need to grow, therefore, the reduction of vegetative competition in the understory would increase the growth and carbon storage capacity in the residual stand.

Wildland-urban Interface Fuels Reduction

The proposed project areas are natural areas that are adjacent to homes, structures, and camp facilities, and are within proximity to a community of homes located along Redwood Avenue just north of the property boundary, called the Butano Subdivision, indicating that the project areas make up a WUI as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 8-10). Fuel reductions in the WUI will directly impact communities and assets at risk, serving as emergency access points along or near evacuation routes for the nearby communities and as an opportunity to slow or stop wildfires. WUI treatments would remove understory vegetation including dead, dying, hazard, and diseased trees of any diameter, ladder fuels, and live trees up to 8 inches DBH to promote a healthier residual stand following treatments. Habitat quality will be enhanced through WUI fuel reductions where existing habitat has been degraded due to invasive species encroachment or the accumulation of fuels.

Treatment Activities

Treatment activities consist of approximately 38.9 acres of mechanical treatments that will occur predominately on slopes below 40% along ridges and may occur reaching off existing road infrastructure on slopes greater than 40%. Masticators will be used to remove dense stands of understory vegetation and ladder fuels and maintain a healthy overstory, which is within the scope of the PEIR. As stated in the CalVTP PEIR Section 2.5.2, mechanical treatments may cut, uproot, crush/compact, or chop existing vegetation through the use of masticators and other methods of application. Understory vegetation, brush, and shrubs under the drip lines of trees shall be cut and masticated leaving root systems intact for resprouting. Understory debris would be chipped and scattered on-site within the treated areas, following the best management practices for reducing the spread of pests, disease, and invasive species (see *Pests and Disease* and *Invasive Species* sections below). The manual and mechanical treatment crews may utilize a chainsaw and/or various other mechanized tools or hand tools to cut, clear, or prune herbaceous or woody species and ladder fuels. Manual treatments will occur over approximately 5.4 acres predominately near sensitive resources and important camp infrastructure, such as the North Commons, Penny Royal, Sequoia, amphitheater, water treatment facility, and water tanks. Some manual treatment areas will occur on steep sleeps between approximately 40-50% where the forest will benefit from treatments, see *Figure 9*.

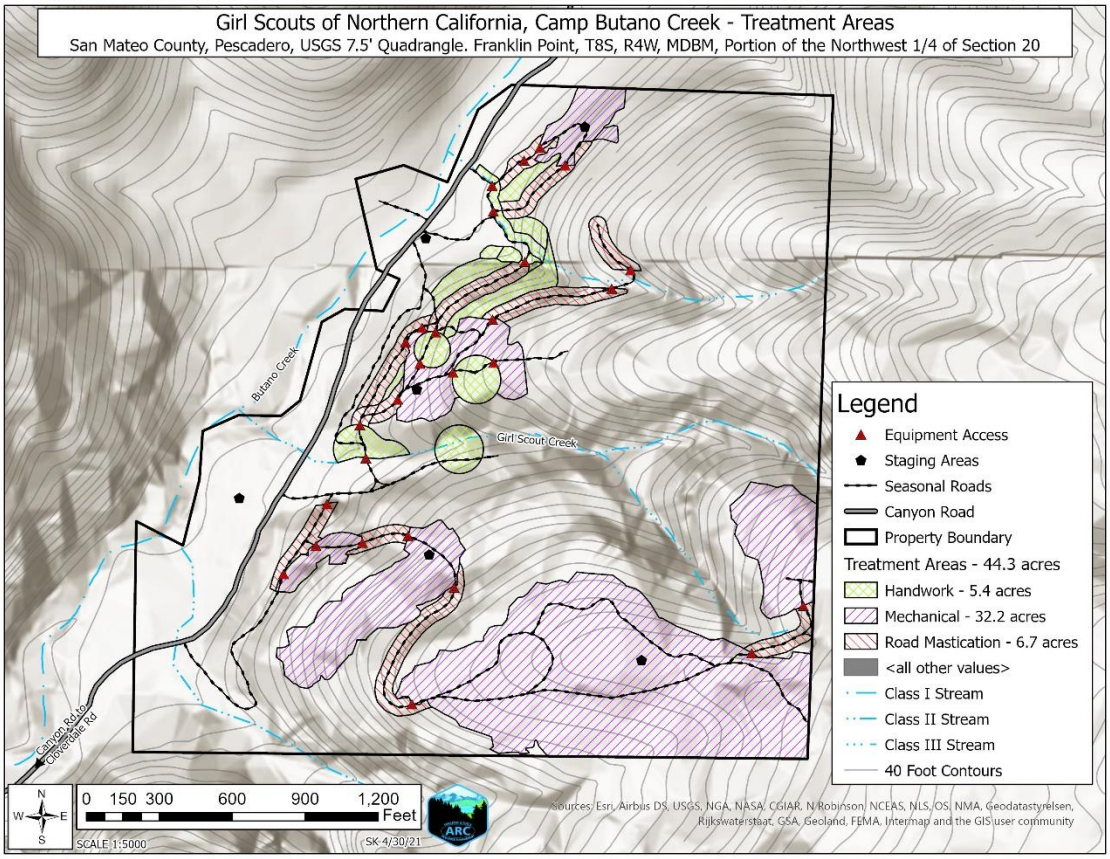


Figure 9: Camp Butano Creek Project Treatment Area Map (map not to scale, see full scale map in Attachment 2, Map 3).

Fuel Types

Proposed treatments would occur predominately in tree fuel types with a shrub fuel type component in the understory as described in the CalVTP PEIR Section 2.4.1. The tree fuel types are dominated by second growth coastal redwood forests mixed with Douglas-fir and mixed hardwood stands. These forests have generally closed canopies with moderate to dense understory fuels. Understories located in areas that experienced the low severity burn during the 2020 CZU Lightning Complex Fires contain moderate fuel loads including dead and/or cured vegetation and a component of regenerative vegetation and tree sprouting. The removal of understory vegetation and ladder fuels in the tree fuel types would reduce the risk of future ground or surface fires spreading into the canopy. There is a small component of the shrub fuel type located in the understory that consists predominately of native shrub species, such as huckleberry, poison oak, and manzanita. However, invasive species, such as French broom, have been documented in treatment areas. The reduction of fuels within all fuel types can prevent stand replacement that may occur in the event of a wildfire that spreads continuously through the flammable foliage and woody materials.

<u>Equipment:</u>

This project proposes the use of the following equipment:
Masticator (see specifications in the *Project Summary*)
Chipper
Chainsaws and/ or other mechanized tools or hand tools
Haul vehicles for equipment transport
Vehicles for contractor transport

Duration of Treatments: %
Initial treatments are estimated to occur within the treatment areas over approximately 42 days within a 2-year period, however, the timeframe may change in the event of delays, such as weather or production rates.

Pests and Disease:
The pathogen, *Phytophthora ramorum,* commonly referred to as Sudden Oak Death (SOD), infects coastal forests throughout California and Oregon and kills susceptible species including tanoak, coast live oak, California black oak, Shreve's oak, canyon live oak, and madrone saplings. Host species that are in the project area include but are not limited to California bay laurel, coast redwood, and Douglas-fir. Along with the mitigation measures under project activities and treatment prescription, to avoid the spread of this pathogen, all hand equipment, including boots, will be sanitized and heavy equipment hosed off prior to operations in areas where the spread of SOD is possible. The California Oak Mortality Task Force website contains additional information regarding treatment and disposal measures for plants infected with SOD. See the attached link for additional information and to monitor changes in SOD treatment recommendations: http://www.suddenoakdeath.org/

Invasive Species:
French broom
French broom is a problematic invasive species due to its ignitability, ability to carry fire into tree canopies, shading out seedlings, and replacing the native plants and forage species. This species has a large seed bank and re-sprouts readily from the root after cutting, freezing, and fire (California Invasive Plant Council, Cal IPC, 2020). Cal IPC recommends pulling French broom to remove the entire plant including its roots to eliminate re-sprouting. The removal of this species is a priority due to its increased fire hazard and adverse impacts to habitat and aesthetics. Additional information about French broom control and treatments are located on the Cal IPC website. See the attached link for additional information and to monitor changes in French broom treatment recommendations: https://www.cal-ipc.org/plants/profile/genista-monspessulana-profile/ and https://wric.ucdavis.edu/information/natural%20areas/wr_G/Genista.pdf

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

☒ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☒ Ecological Restoration

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

☐ Prescribed Burning (Broadcast), _____ acres

☐ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, ___38.9____ acres

☒ Manual Treatment, ___5.4____ acres

☐ Prescribed Herbivory, _____ acres

☐ Herbicide Application, _____ acres

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

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

[Insert description here; identify planned maintenance intervals, including the site conditions that are reasonably expected to be present in the future in response to the initial treatment, and vegetation conditions that would trigger the need for maintenance.]

Maintenance treatments are estimated to occur approximately every 5-10 years, but may occur as needed over the lifetime of the CalVTP in compliance to Item #6b "Use of the PSA for Maintenance Treatments" in this PSA. Following initial treatment, site conditions are expected to resemble a park-like setting with a clear, open understory that would promote a healthier, more vigorous forest. Open understories will create a mosaic of fuel continuity that would support wildlife habitats and the regeneration of native species. Maintenance intervals will be dependent on the re-establishment rate of the understory species and would be triggered by dense, continuous understory and ladder fuels. Maintenance treatments would be conducted through the implementation of mechanical and manual treatments to treat hazard trees, understory vegetation and ladder fuels, and reduce the re-establishment of invasive species.

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

☒ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☒ Ecological Restoration

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

☐ Prescribed Burning (Broadcast), _____ acres

☐ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, ___38.9____ acres

☒ Manual Treatment, ___5.4____ acres

☐ Prescribed Herbivory, _____ acres

☐ Herbicide Application, _____ acres

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

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

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

Physical

The Camp Butano Creek property is located in Pescadero, San Mateo County bound by Butano State Park forests to the southeast and in proximity to a community of rural homes to the northwest, creating the wildland-urban interface (WUI). The project property ranges from approximately 200 feet to 680 feet elevation within the Butano Watershed. The property contains a central Class II watercourse called Girl Scout Creek and several Class III watercourses are located throughout the property. The northwest property boundary is bordered by and overlaps with Butano Creek, a Class I watercourse. Surrounding land uses include recreational land to the south, east, and northeast and several rural communities or private properties located to the north and west. See attached maps (Attachment 2, Map 1, 2, and 3) or *Figure 7, 8,* and *9* respectively.

Vegetation

The vegetation within the Camp Butano Creek property is comprised of forests dominated by predominately second growth coastal redwood, Douglas-fir, and mixed hardwood forests. The understory is comprised of native brush and shrub species, such as huckleberry, poison oak, and manzanita. French broom is a common invasive species located within the project area.

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

No other public agency approval is required for this project.

The California Department of Fish and Wildlife (CDFW) was consulted during the planning phase of this project.

The San Francisco Bay Regional Water Quality Control Board was contacted during the planning phase of this project on April 23, 2021 by the San Mateo Resource Conservation District.

The County of San Mateo was consulted during the planning phase of this project for project reviewal and during the development of the Public Works Plan (PWP) for projects located in the Coastal Zone.

The project property is under a conservation easement with Sempervirens Fund. Sempervirens Fund was consulted during the planning the phase of this project and proposed treatments are designed to operate within the conservation easement.

Coastal Act Compliance

☐ The proposed project is NOT within the Coastal Zone

☒ The proposed project is within the Coastal Zone (*check one of the following boxes*)

☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable

☒ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

The proposed project is within the Coastal Zone, as defined by the California Coastal Act, and pursuant to SPR AD-9 in the PEIR (CalVTP Final PEIR Volume II Section 2.7.1, 34). Communication and coordination between the California Coastal Commission (CCC), San Mateo Resource Conservation District, and similar entities has allowed for the development of a Public Works Program (PWP) in lieu of a coastal development permit through the creation of a set of Coastal Vegetative Treatment Standards (CVTS) (Attachment 7). The CCC received a DRAFT Camp Butano Creek PSA for their review on April 23, 2021. The CCC Board approved the proposed project PSA on July 8, 2021.

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

Due to this project being funded by a CAL FIRE Grant and following CAL FIRE Cultural Resources Review Procedures, the CAL FIRE Associate State Archaeologist, Ben Harris, was consulted during the planning phase of the proposed project on May 4, 2021. A records check through the Northwest Information Center (NWIC) was completed on February 10, 2021. Due to the confidentiality of the records check, results may be available to qualified personnel upon request, see the *Archaeological, Historical, and Tribal Cultural Resources* discussion below. In addition, a letter was written to the geographically affiliated tribes on May 4, 2021 and a full Archaeological Survey Report (ASR) was completed and submitted to the NWIC upon submittal of the CalVTP PSA.

DETERMINATION (To be completed by the project proponent)

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

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

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

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

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

kellyx Nelson
kellyx Nelson (Aug 26, 2021 13:58 PDT)
Signature

Aug 26, 2021
Date

Kellyx Nelson
Printed Name

Executive Director
Title

San Mateo Resource Conservation District
Agency

Camp Butano PSA Determination Page

Final Audit Report 2021-08-26

Created:	2021-08-26
By:	San Mateo RCD (sign@sanmateorcd.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAvkYBQ7cxbOG-wQL-k35vXD1_gPeFpAel

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EVALUATION OF ENVIRONMENTAL IMPACTS

1. $ Refer to the applicable resource analysis section in the CalVTP PEIR for relevant information on each environmental topic.

2. $ A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any "new impacts".

3. $ The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:

   - Briefly describe the impact of the proposed vegetation treatment project.
   - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in PEIR.
   - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed treatment is consistent with the treatment types and activities addressed in the PEIR as well as the associated intensity (i.e., duration).
   - Identify SPRs and MMs applicable to the treatment project.
   - (If applicable) Explain which components of the MM or SPR would be applied. This circumstance exists if the MM or SPR allows for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility. A site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination must be provided in the PSA.
   - (If applicable) Explain why the impact significance in the PSA is different than that found in the PEIR; substantiate the different (new) significance conclusion. $
   - (If applicable) Explain why MM or SPRs identified for this impact in PEIR do not apply to this project. This circumstance may exist where a PS impact was identified in the PEIR, but the impact severity would be less for the treatment project or the MM does not otherwise apply.

4. $ If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.

5. $ "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. AND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.

6. $ Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

A. AESTHETICS AND VISUAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	SPR AES – 2 SPR REC – 1	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	SPR AES – 1 SPR AES – 3 SPR REC – 1	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	NA	None	No Impact	No	Yes

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

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

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

Discussion

Impact AES-1

This project proposes mechanical and manual treatments that will occur predominately in the understory. The potential for these treatments to result in a short-term degradation of the visual character of the land was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 16-19). The treatment activities and potential impacts are within the scope of the PEIR because they are consistent with those addressed in the PEIR. The project area is located on a property used seasonally for recreational purposes by the Girl Scouts of Northern California and contains several hiking trails utilized by campers and staff. The property is located outside of the viewshed of any state highways or public viewpoints. The project area is located along a residential road, called Canyon Road, where manual treatment areas may be visible by local commuters. The project property experienced a low severity burn during the 2020 CZU Lightning Complex Fires that left an understory exhibiting a buildup of burnt, dead fuels with a component of regenerative vegetation and sprouts. The implementation of the applicable SPR's, including SPR AES-2, AQ-2, AQ-3, and REC-1, will minimize the impacts to visual resources within the treatment areas. This project will promote a healthy residual stand and will resemble open, park-like conditions following treatments. Therefore, the potential for this project to result in short-term degradation of a scenic vista, visual character, or damage to scenic resources would be less than significant.

Impact AES-2

Initial and maintenance treatments would include WUI fuel reduction and ecological restoration treatment types. The potential for these treatments to result in long-term substantial degradation of the visual character was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 20-22). The property is seasonally used for recreational activities by campers and staff and is not visible from any public scenic viewpoints or state highways. The implementation of the applicable SPR's, including SPR AES-1, AES-3, AD-4, and REC-1, will minimize the impacts to visual resources within the treatment areas. As analyzed in Impact AES-1, any impacts to aesthetics will be temporary and short-term because understory plants will regenerate and sprout shortly after the treatments are implemented and will resemble park-like conditions. In addition, treatments will remove the dead and burnt understory fuels that are a product of the 2020 CZU Lightning Complex Fires and promote a healthy residual stand. Based on the implementation of the applicable SPR's and the nature of the treatment types, the potential for this project to result in long-term substantial degradation of the visual character of the project site or damage to scenic resources would be less than significant.

Impact AES-3

This impact does not apply to this project because it does not propose non-shaded fuel break treatment types. The treatment areas are located within the tree fuel type that contains a component of the shrub fuel type in the understory, however, the treatment areas do not contain a natural change from a forested to non-forested vegetation type. Therefore, no impact will occur as a result of implementing a non-shaded fuel break treatment.

New Aesthetic and Visual Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the CalVTP PEIR's environmental and regulatory settings (CalVTP Final PEIR Volume II Sections 3.2.1 and 3.2.2). No changed circumstances would lead to new significant impacts not addressed in the CalVTP PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

B. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

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

Discussion

Impact AG-1

The initial and maintenance treatments include mechanical treatments with a component of manual treatments around camp infrastructure and sensitive resources. The treatment areas are comprised of forests dominated by redwoods, Douglas-fir, and mixed hardwood species. There is no farmland within the project area. The potential for the proposed treatments to result in the loss of forest land was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.3.3, page 7-8). Potential impacts resulting in the conversion of forest land are within the scope of the PEIR because the treatment activities are consistent with those addressed in the PEIR. As stated in the PEIR, "treatment activities under the CalVTP would not result in the loss of forest land or conversion of forest land to non-forest use," (CalVTP Final PEIR Volume II Section 3.3.3, page 7). The project treatment does not remove trees for commercial purposes and does not remove live trees established in the overstory canopy due to the 8-inch diameter at breast height (DBH) limitation in the treatment prescription, retaining the dominant vegetation types and avoiding conversion of forest land to non-forest land. Hazard trees, or trees of any size that are considered a direct threat to personal safety or infrastructure, may be removed, which would not convert forest land to non-forest land. Although this project proposes the removal of understory vegetation and ladder fuels, treatments would improve the health and vigor of the forest and develop a shaded fuel break more resilient to changing climates in the

future. Based on the treatment activities and beneficial results of the proposed project, no forestland, timberland, or farmland will be converted, any impact would be less than significant.

New Agriculture and Forestry Resource Impacts

The proposed project treatment is consistent with the treatments and activities that are considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed project and determined that they are consistent with the environmental and regulatory settings stated in the CalVTP PEIR (CalVTP Final PEIR Volume II 3.3.1 and 3.3.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

C. AIR QUALITY

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

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

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

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

Discussion

Impact AQ-1

Initial and maintenance treatments would require the use of vehicles, mechanical equipment, and mechanized hand tools, which would result in criteria pollutants that could exceed California ambient air quality standards (CAAQS) or the national ambient air quality standards (NAAQS) thresholds. The potential for emissions of criteria to exceed CAAQS or NAAQS thresholds was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 26-33). The proposed treatments, treatment equipment, and equipment use duration are consistent with the scope of the PEIR. The proposed treatment types, mechanical and manual treatments, produce much less emissions of criteria air pollutants and precursors per acre than the prescribed burning treatment type (CalVTP Final PEIR Volume II Section 3.4.3 Table 3.4-6). SPR's AD-4, AQ-2, and AQ-6 are not applicable to this project because the project does not involve prescribed burning. Mitigation Measure AQ-1 is applicable to this project and would reduce the mass emissions of criteria air pollutants by implementing vehicle and equipment exhaust emission reduction techniques.

Ultimately, the implementation of this project will reduce long-term impacts to air quality by reducing the amount of vegetative fuels available to burn in the case of a wildfire, indicating air quality impacts would be less than significant. Therefore, any substantial increase in the severity of this significant impact associated with changed circumstances would not occur. Following the implementation of applicable the Mitigation Measure, this project's potential to generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS and conflict with Regional Air Quality Plans would remain potentially significant and unavoidable, because, as stated in the PEIR, the amount of emission reduction as a result of implementing MM AQ-1 cannot be determined due to various variables assessed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33).

Impact AQ-2

The use of vehicles, mechanical equipment, and mechanized hand tools equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33-34). The proposed treatments will occur over a short duration and would not occur next to the same people for an extended period of time. Additionally, the implementation of the applicable SPR's, including SPR HAZ-1, NOI-4, and NOI-5, will minimize human receptor exposure to diesel particulate matter emissions. Diesel particulate matter emissions from the proposed project and its impacts are within the scope of the PEIR and treatment activities are consistent with those addressed in the PEIR. Based on the implementation of the SPR's and the short duration of treatment activities, any impact related to the exposure of people to diesel particulate matter emissions and related health risks would remain less than significant.

Impact AQ-3

This project proposes treatment activities that would involve ground disturbing activities. The potential to expose people to fugitive dust emissions containing naturally occurring asbestos was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 34-35). The implementation of the applicable SPR's, including SPR AQ-4 and AQ-5, will minimize dust emissions as a result of treatment activities. No naturally occurring asbestos appears to be located in the treatment areas per maps created by the California Geologic Survey (ArcGIS Online, 2020). Based on the implementation of the applicable SPR's and the absence of naturally occurring asbestos within the project area, any impact in relation to fugitive dust emissions containing naturally occurring asbestos would be less than significant.

Impact AQ-4

This impact does not apply to this project because the proposed project does not include prescribed burning. Burning treatments will not be considered for the initial or maintenance treatments. Therefore, there will be no impact related to toxic air contaminants released by smoke.

Impact AQ-5

The use of vehicles and mechanical equipment during initial and maintenance treatments may expose human receptors to the objectional odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 37-38). The release of objectional odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the PEIR because the treatment activities are consistent with those analyzed in the PEIR. Hiking trails located within or adjacent to treatment areas will be temporarily closed to access by campers and staff, which would minimize the amount of diesel exhaust exposure to human receptors. The implementation of the applicable SPR's, including SPR HAZ-1, NOI-4, and NOI-5, will minimize the amount of diesel odors exposed to human receptors during treatment activities. Based on the implementation of applicable SPR's and potential for trail closures, any impact in relation to the exposure of people to objectional odors from diesel exhaust would remain less than significant.

Impact AQ-6

This impact does not apply to this project because prescribed burns are not included in the proposed treatments. Burning treatments will not be considered for the initial or maintenance treatments. Therefore, no impact related to exposure to odors released from smoke will occur.

New Air Quality Impacts

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the regulatory and environmental settings as stated in the PEIR (CalVTP Final PEIR Volume II 3.4.1 and 3.4.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to air quality would occur that is not analyzed in the PEIR.

D. ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

Impact CUL-1

Initial and maintenance treatments would include the use of heavy mechanical equipment and manual treatments. The potential for these treatments to cause a substantial adverse change in significance to built historical resources was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 14-15). The potential to change the significance of built historical resources during project operations is within the scope of the PEIR because the treatment activities and level of disturbance are consistent with those addressed in the PEIR. Applicable SPR's will be implemented. If a built historic resource is discovered prior to or during operations, operations in proximity to the resource will cease and the area will be flagged and avoided. Based on the implementation of the applicable SPR's and archaeological protocols for this project, it is likely that any impact that may cause a substantial adverse change in the significance of a built historical resource would be less than significant.

Impact CUL-2

Initial and maintenance treatments would include the use of heavy mechanical equipment that would result in ground disturbance. The potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 15-16). The potential for there to be an inadvertent discovery of unique archaeological resources or subsurface historical resources is within the scope of the activities and impacts discussed in the PEIR because the treatment activities and the extent of ground disturbance of the project treatments are consistent with those analyzed in the PEIR. SPR CUL-1 through CUL-5 and CUL-8 will be implemented to minimize the risk of inadvertently damaging or discovering unknown resources during treatment activities. Mitigation Measure CUL-2 will also be implemented to further minimize impacts on unknown unique archaeological or subsurface historical resources by ceasing all activities within 100-feet of the discovered resource(s) until a qualified archaeologist is contacted and determines the significance of the find. Although the implementation of the protocol and avoidance measures, SPR's, and Mitigation Measure will reduce the risks of this impact, unknown resources could be inadvertently damaged. Therefore, this impact would remain significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 16).

Impact CUL-3

Initial and maintenance treatments would include the use of heavy mechanical and manual treatments, which would result in ground disturbing activities. The potential for treatment activities to cause a substantial adverse change in the significance of tribal cultural resources was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 16-17). The potential for adverse effects to tribal cultural resources during implementation of the project treatments is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. The implementation of SPR CUL-1 through CUL-6 and CUL-8 would minimize the potential for impacting tribal cultural resources. An information request letter was sent out to the geographically affiliated tribes on May 4, 2021. Based on the implementation of the applicable SPR's and the results from consulting with geographically affiliated tribes, it is likely that this project's potential to create an adverse change in the significance of tribal cultural resources is less than significant.

Impact CUL-4

Initial and maintenance treatments would include mechanical treatments utilizing heavy equipment and manual treatments, which would result in ground disturbing activities. The potential for treatment activities to uncover human remains was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 17). The potential for human remains to be uncovered during the implementation of project treatments is within

the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. As stated in the PEIR, this project would comply with the California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097, which indicate that if human remains are discovered, there shall be no further disturbance or excavation of the site and the human remains shall be left undisturbed. There are no SPR's or Mitigation Measures for this impact. Based on this project's compliance with the California Health and Safety Code Sections 7050.5 and 7052 in addition to PRC Section 5097, any impact to discovered human remains is expected to be less than significant.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics of the treatment project and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.5.1 and 3.5.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur that is not addressed in the PEIR.

E. BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	PS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR BIO – 1 SPR BIO – 2 SPR BIO – 9 SPR AQ – 4 SPR GEO – 1 SPR GEO – 3 SPR GEO – 4 SPR GEO – 5 SPR GEO – 7	None	PS	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO – 1 SPR BIO – 2 SPR BIO – 3 SPR BIO – 4 SPR BIO – 8 SPR HYD – 1 SPR HYD – 4	MM BIO – 2a MM BIO – 2b	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO – 1 SPR BIO – 2 SPR BIO – 3 SPR BIO – 4 SPR BIO – 6 SPR BIO – 8 SPR BIO – 9 SPR HYD – 4	None	LTS	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	No	None	None	No Impact	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO – 1 SPR BIO – 4 SPR HYD – 1 SPR HYD – 4	MM BIO – 5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	SPR BIO – 1 SPR BIO – 2 SPR BIO – 3 SPR BIO – 4 SPR BIO – 12	NA	LTS	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	SPR AD – 3	NA	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	NA	NA	No Impact	No	Yes

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

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

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

Discussion

Table BIO-1: Plant Species Returned from a CNDDB Search within a 5-mile Radius of the Project Property.

PLANTS (PROVIDED BY CDFW)	STATUS		HABITAT	
COMMON NAME **SCIENTIFIC NAME**	**FED**	**STATE**	**CNPS LIST**	
Blasedale's bentgrass *Agrostis blasdalei*	--	--	1B.2	This species favors full sun coastal dunes within coastal strand, northern coastal scrub, and coastal prairie communities.
Anderson's manzanita *Arctostaphylos andersonii*	--	--	1B.2	This species grows in openings in redwood forests or near forest edges, usually below 700 meters (2300 feet) elevation. The Anderson manzanita favors hot areas in broadleaved upland forests, chaparral communities, and North coast coniferous forests.

coastal marsh milk-vetch *Astragalus pycnostachyus var. pycnostachyus*	--	--	1B.2	The coastal marsh milk-vetch favors cool areas in coastal dune or scrub communities and often favors moist areas in marshes and swamps along the coast, usually in elevations below 155 meters.
San Mateo woolly sunflower *Eriophyllum latilobum*	--	--	1B.1	This species favors oak woodlands and grows in foothill woodland, cismontane woodland, coastal scrub, lower montane coniferous forest usually in elevations between 45 and 330 meters.
minute pocket moss *Fissidens pauperculus*	--	--	1B.2	Minute pocket moss grows on bare, moist soil banks commonly near the base of redwood trees.
Toren's grimmia *Grimmia torenii*	--	--	1B.3	This species favors rocky openings within chaparral, cismontane woodland, and lower montane coniferous forest communities between 325 and 1160 meters elevation.
Butano Ridge cypress *Hesperocyparis abramsiana var. butanoensis*	--	--	1B.2	This species is known only to occur along the Butano Ridge within the Santa Cruz Mountains within chaparral or closed-cone pine forest communities between 400 and 490 meters in elevation.
perennial goldfields *Lasthenia californica ssp. macrantha*	--	--	1B.2	This species favors grasslands and dunes along the coast within northern coastal scrub communities below 500 meters elevation.
rose leptosiphon *Leptosiphon rosaceus*	--	--	1B.1	This species favors open, grassy slopes within coastal bluff scrub communities below 100 meters elevation.
Point Reyes meadowfoam *Limnanthes douglasii spp. sulphurea*	--	--	1B.2	This species favors full-sun locations within wetland and coastal prairie communities on the edges of meadows, freshwater-marshes, and vernal-pools, generally below 3,300 feet in elevation.
marsh silverpuffs *Microseris paludosa*	--	--	1B.2	This species favors moist grasslands or open woodlands within northern coastal scrub, cismontane woodland, valley and foothill grassland, or closed-cone pine forest communities below 300 meters elevation.
Kellman's bristle moss *Orthotrichum kellmanii*	--	--	1B.2	This species favors sandstone and carbonate rocks within chaparral and cismontane woodlands between 343 and 685 meters elevation.
Choris' popcornflower *Plagiobothrys chorisianus var. chorisianus*	--	--	1B.2	This species grows in moist, grassy areas in wetlands or ephemeral drainages. The Choris' popcornflower favors coastal prairie, chaparral, northern coastal scrub, and wetland-riparian communities below 240 meters elevation.
San Francisco popcornflower *Plagiobothrys diffuses*	--	--	1B.1	This species favors sparsely vegetated areas within coastal prairie and valley grassland communities between 30 and 150 meters in elevation.

Scouler's catchfly *Silene scouleri ssp. scouleri*	--	--	2B.2	This species favors rocky slopes and coastal bluffs within northern coastal scrub or valley and foothill grassland communities below 600 meters elevation.
Santa Cruz microseris *Stebbinsoseris decipiens*	--	--	1B.2	This species favors open, serpentinite areas within northern coastal scrub, closed-cone pine forest, mixed evergreen forest, chaparral, and coastal prairie communities below 500 meters elevation.

California Rare Plant Rank (CRPR)

1B - Plant species rare or endangered in California and elsewhere (Not protected under ESA or CESA)
0.1 - Seriously threatened in California (over 80% of occurrences are threatened; high degree and immediacy of threat)

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

Table BIO-2: Wildlife Species Returned from a CNDDB Search within a 5-mile Radius of the Project Property.

WILDLIFE	STATUS			HABITAT
COMMON NAME **SCIENTIFIC NAME**	**FED**	**STATE**		
Santa Cruz black salamander *Aneides niger*	--	SSC	--	This species occurs in mixed deciduous woodland, coniferous forests, and coastal grasslands in California. This species can be found in riparian areas near streams and under damp debris, but do not inhabit streams.
	-			
pallid bat *Antrozous pallidus*	--	SSC	--	This species favors rocky outcrops in semi-arid climates within grasslands, chaparral, oak woodlands, and coniferous forests. The pallid bat diet consists of ground-dwelling prey like small mammals or reptiles and large flying or ground-dwelling insects.
	-			
marbled murrelet *Brachyramphus marmoratur*	TH	E	--	This species favors nesting sites in old-growth coniferous forests or rocky talus slopes near the Pacific Ocean, up to approximately 15 miles inland. The marbled murrelet nests on large branches approximately 4 inches in diameter or larger that create a platform that may be screened from predators or wind by branches of nearby trees, where the female will lay one yellow, olive, or blue-green egg with brown, black, and lavender specks. This seabird forages in coastal marine habitats, dieting on primarily fish and crustaceans.
	-			
western bumble bee *Bombus occidentalis*	--	CE	--	This is a pollinator species that associates with a wide range of flowering plants and crops within open coniferous, deciduous and mixed-woodland forests, wet and dry meadows. The western bumble bee is capable of foraging in cold, rainy weather conditions and commonly nests underground.
	-			

western snowy plover *Charadrius alexandrines nivosus*	TH	--	--	This species favors coastal beaches, sand spits, dune-backed beaches, sparsely-vegetated dunes, and estuaries at the mouths of rivers or creeks. The western snowy plover breeds above high tide lines and nests are generally located on flat, open areas where females will lay approximately 2-6 eggs.
	-			
Townsend's big eared bat *Corynohinus townsendii*	--	SSC	--	This species favors dense coniferous forests, native prairies, and coastal communities usually below 3,300 meters elevation. This bat prefers dark, open caves or cliffs in cold areas for roosting and does not roost in rock crevices. The primary food source for this species is moths, however, beetles and other small insects are also common.
	-			
California giant salamander *Dicamptodon ensatus*	--	SSC	--	The California giant salamander requires habitat with cover for hiding, sun protection, and breeding and can be found under rocks, logs, or stones. This species' aquatic habitat consists of lakes, ponds, rivers, streams, or fast-moving water. Females deposit 85-200 eggs underwater and protect the eggs until they hatch. This species has a relatively slow reproduction rate due to long gestation period and they do not reach sexual maturity until they are 5-6 years old.
	-			
western pond turtle *Emys marmorata*	--	SSC	--	The habitat for this species consists of aquatic and terrestrial environments, including lakes rivers, streams, ponds, wetlands, vernal pools, creeks, reservoirs, agricultural ditches, estuaries, and brackish waters. Adults favor deep waters while juveniles favor shallow waters, however, both prefer slow moving water. Terrestrial habitats consist of burrows in leaves or soil during the winter season. Nests are built away from water in flat areas with short vegetation and dry soils. The western pond turtle feeds on crustaceans, midges, fish, dragonflies, beetles, and other invertebrates and algae or plant material. Development is a threat to this species.
	-			
tidewater goby *Eucyclogobius newberryi*	E	--	--	The tidewater goby favors shallow, brackish waters at the mouth of freshwater streams and coastal lagoons. This species feeds on crustaceans, dipteran larvae, gastropods, and invertebrate eggs.
	-			
American peregrine falcon *Falco peregrinus anatum*	--	SSC	--	The peregrine falcon occurs primarily in coastal areas with open landscapes. This species nests in cliffs along rivers and the coastline. The nests are simply depressions in the ledges formed from the peregrine falcon scraping the sand, gravel, or substrate to approximately 2 inches deep. The peregrine falcon lays 2-5 pale brown eggs that are dotted with red, brown, or purple. The primary diet of this species is shorebirds and bats, but also prey on small rodents and fish.
	-			
saltmarsh common yellowthroat *Geothlypis trichas sinuosa*	--	SSC	--	This species prefers herbaceous wetland and salt marsh communities usually below 450 meters elevation. Small, cup-shaped nests are usually well-hidden by tall vegetation less than approximately 1 meter above ground. Females will lay 3-6 white eggs with dark spots on one end of the egg. This species primarily consumes insects like spiders and caterpillars.
	-			

San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	--	SSC	--	This species prefers moderate canopy coverage in oak woodland, chaparral or shrubland, and coniferous forest communities. The San Francisco dusky-footed woodrat builds complex nests from sticks and debris that can reach up to approximately 8 feet wide and 6 feet tall. Nests are typically occupied by a single adult, except for a short period of time after the female gives birth to her pups. The diet for this species consists of woody plant species such as maple, coffeeberry, alder, live oak, and elderberry.
	-			
steelhead – central California coast *Onchorhynchus mykiss irideus pop.8*	T	--	--	This is an anadromous fish species that occurs in freshwater Pacific coast streams. This steelhead species will migrate to marine waters once it nears maturity, then returns to freshwater streams for spawning. Typically, this species requires a minimal of approximately 7 inches of water depth for migration and favors spawning habitat between 6 and 24 inches deep, usually in slow moving currents. High water velocities and low water depth can impede on this species' capability to migrate.
	-			
mountain lion *Puma concolor*	--	CE	--	This species prefers dense vegetative areas within mountain ranges of coniferous forests, scrub and oak woodlands, and arid communities. Mountain lions are territorial, and development has limited their available habitat. This species is an opportunistic hunter that primarily feeds on deer, farm animals, and small mammals such as coyotes, raccoons, and feral pigs.
	-			
foothill yellow-legged frog *Rana boylii*	--	E	--	Habitat is primarily foothill and mountain streams with rocky substrate in open, sunny banks within forests, chaparral, or woodland communities.
	-			
California red-legged frog *Rana draytonii*	TH	SSC	--	Common habitat consists of locations near ponds or along streams in humid forests, grasslands, and coastal scrub communities that contain plant cover. This species breeds in permanent water sources and requires moist refuges, like animal burrows, for cover in the dry season.
	-			
bank swallow *Riparia riparia*	--	TH	--	This species favors coastal habitats within holes dug out of cliffs and riverbanks with fine textured, sandy soils near a source of water. Burrows are dug by the males and can reach approximately 25 inches into the bank, where females lay approximately white 3-5 eggs. Feeding occurs primarily over grassland, shrubland, cropland, and open riparian areas and consists of soft-bodied insects.
	-			
Myrtle's silverspot butterfly *Speyeria zerene myrtleae*	E	--	--	This species favors habitat within 3 miles of the coast that is sheltered from wind within coastal dune and coastal prairie habitat and below 250 meters in elevation. Myrtle's silverspot butterfly relies on plants such as gum plant (*Grindelia rubicaulis*), yellow sand verbena (*Abronia latifolia*), coyote mints (*Monardella spp.*), bull thistle (*Cirsium vulgare*), and seaside daisy (*Erigeron glaucus*) as sources of nectar and violets, specifically *Viola adunca*, for laying eggs and larval food.
	-			

longfin smelt *Spirinchus thaleichthys*	CTH	TH	--	This species is euryhaline, meaning it can tolerate a wide range of salinities, and favors nearshore waters, estuaries, and lower freshwater streams. The longfin smelt forages on small shrimp-like crustaceans, such as opossum shrimp.
	-			
American badger *Taxidea taxus*	--	SSC	--	Habitat consists of open areas such as prairies, farmland, and plains as well as edges of woods. The American badger is a nocturnal carnivore and its diet primarily consists of small rodents, reptiles, birds, and insects.
	-			
San Francisco gartersnake *Thamnophis sirtalis tetrataenia*	E	FP	--	This species favors openings in grasslands or wetland areas near ponds, marshes, or sloughs and is capable of swimming. During the dry season, the San Francisco garter snake may become dormant in rodent burrows. The primary diet consists of amphibians, small mammals, reptiles, earthworms, slugs, slugs an leeches.
	-			

Species Status Identifiers Used on the Table

DL– Delisted **E** – Endangered **CE** – Candidate Endangered **CTH** – Candidate Threatened **TH**– Threatened **PTH** – Potential Threatened

N – None **NL** – Not Listed **R** – Rare **WL** – Watch List **SSC** – DFG Species of Special Concern **FP –** Fully Protected

Impact BIO-1

Initial treatments and maintenance treatments include the use of mechanical and manual treatments, which could result in direct or indirect adverse effects to special-status plant species due to the project areas containing potentially suitable habitat for some species. The potential for adverse effects to special-status plants is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Mechanical treatments and manual treatments may directly or indirectly impact special-status species; however, the removal of understory vegetation and invasive species will promote the regeneration of native species that supports a healthier residual forest. SPR's applicable to this project include SPR BIO-1, BIO-2, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, and GEO-7.

Special-Status Plants

According to the CNDDB BIOS search, there are two special-status plants, including Anderson's manzanita and Santa Cruz microseris, that have potentially suitable habitat located within treatment areas. However, there are no known special-status plant species occurrences within the treatment areas, therefore Mitigation Measures BIO-1a, BIO-1b, and BIO-1c do not apply. An analysis for the potential for impact on each special-status plant species that may occur within 5 miles of the project property boundaries and a biological resources survey report have been completed (Attachment 4 and Attachment 5 respectively, also see Table BIO-1). Reconnaissance level surveys will be conducted prior to operations to determine occupancy of special-status species that have potential to occur in the project area. Periodic reconnaissance level surveys will continue at this property throughout the life of the PSA. If any California Endangered Species Act (CESA) or Federally Endangered Species (ESA) listed plant is encountered, operations shall cease

in proximity, and the area shall be avoided. San Mateo County Resource Conservation District, or their supervised designee shall be notified immediately.

Based on the implementation of the applicable SPR's, including survey protocols and pre-operational meetings, and the proximity of special-status plant species to the treatment areas, it is likely that any impacts to special-status plant species could be potentially significant, as determined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 135).

Impact BIO-2

Initial treatments and maintenance treatments include the use of mechanical treatment, which could result in direct or indirect adverse effects to special-status wildlife species or habitat due to the project areas containing potentially suitable habitat for some listed species. The potential for adverse effects to special-status wildlife species is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Mechanical treatments will result in reduced understory vegetation that may modify preferred habitats for some species, however, it will promote a healthier, native residual forest habitat. SPR BIO-1, BIO-2, BIO-3, BIO-4, BIO-9, GEO-1, HYD-1, and HYD-4 will be implemented to minimize impacts, however, the Mitigation Measures listed below would need to be implemented to reduce impact significance.

Special-Status Wildlife

According to the CNDDB BIOS search, there are no special-status wildlife species that are known to occur within the project area and nine special-status wildlife species that have potentially suitable habitat within the project area (Santa Cruz black salamander, pallid bat, marbled murrelet, Townsend's big eared bat, California giant salamander, western pond turtle, San Francisco dusky-footed woodrat, mountain lion, and California red-legged frog). These species are categorized into the following life history groupings: Amphibians and Reptiles, Bats, Burrowing or Denning Wildlife, and Tree-nesting and Cavity-nesting Wildlife. Mitigation Measures BIO-2a, BIO-2b, BIO-3a, BIO-3b, and BIO-3c will be applied based on the life history groupings to minimize residual impacts after the application of the SPR's. Mitigation measure BIO-4 does not apply because the treatment areas are not located in proximity to designated wetlands. An analysis for the potential for impact on each special-status wildlife species that may occur within 5 miles of the project property boundaries and a biological resources survey report have been completed (Attachment 4 and Attachment 5 respectively, also see Table BIO-2). Reconnaissance level surveys will be conducted prior to operations to determine occupancy of special-status species that have potential to occur in the project area. Periodic reconnaissance level surveys will continue at this property throughout the life of the PSA. If any California Endangered Species Act (CESA) or Federally Endangered Species (ESA) listed animal is encountered, operations shall cease in proximity, and the area shall be avoided. San Mateo County Resource Conservation District, or their supervised designee shall be notified immediately.

Marbled Murrelet

The marbled murrelet (*Brachyramphus marmoratur*) is listed as a state endangered and federally threatened seabird species. The California Natural Diversity Database (CNDDB) indicates that the marbled murrelet occurs within one mile of the property boundary within redwood stands near drainages, including upper Girl Scout Creek and Butano Creek, which is a flying corridor for this species. This species was not observed in the project area during preparation of this Project Specific Analysis (PSA). On April 20, 2021, CDFW composed a consultation letter describing habitat conditions before the 2020 CZU Lightning Complex Fires, which states: "Although large diameter residual conifers were present with a moderately closed canopy,

none of the trees observed had large nesting platforms suitable for marbled murrelets. Based on the lack of trees with large suitable nesting platforms, CDFW determined that the fuel reduction treatment areas at Camp Butano Creek do not contain suitable marbled murrelet nesting habitat at this time." (Attachment 6). Following the 2020 CZU Lightning Complex Fires, habitat conditions within the project property remain the same and suitable habitat throughout the Santa Cruz Mountains has been diminished as there are less trees with large platform branches and adequate screen trees. Additionally, the letter from CDFW outlined the following recommendations to be incorporated into the treatment project (Attachment 6):

1. %Following the first five years of forest fuel reduction activities, CDFW shall be contacted and consulted for re-evaluation of habitat suitability for the marbled murrelet.
2. %Within the fuel reduction treatment areas, any non-hazardous trees that do not require removal and exhibit canopy deformities or large diameter limbs that provide relatively flat potential nesting platforms shall be retained as wildlife trees. Where feasible, screen trees and overlapping canopy trees shall be retained to provide protection from wind and predators.
3. %Prior to fuel reduction treatment activities, the location of retained wildlife trees shall be conveyed to crew members to ensure that the identified wildlife habitat is not impacted during hazard tree removal activities. Nearby harvested trees shall be directionally felled away to avoid damage to these retained trees.
4. %To avoid attracting predators of marbled murrelets, all garbage and food scraps shall be packed out and disposed of in animal-proof containers and transport offsite daily.

California Red-Legged Frog

The California red-legged frog (*Rana draytonii*) is listed as federally threatened and is a California Species of Special Concern. The CNDDB indicates that the nearest California red-legged frog occurs in Butano Creek, approximately 0.8 miles south of the property boundary, however, it does not show this species having potential to occur closer than approximately 0.73 miles from the southwestern property corner. Two mechanical treatment areas and several manual treatment areas are located along or in proximity to Canyon Road and fall within 300 feet of Butano Creek; the remaining treatment areas are not within 300 feet of Butano Creek and are focused on ridges, and flat areas near ridges. This species was not discovered in the project area during preparation of this PSA, no additional suitable breeding habitat was found in the proposed treatment areas, and dispersal through the treatment areas are unlikely.

Reconnaissance level surveys will be conducted prior to operations to determine occupancy of this species. Periodic reconnaissance level surveys will continue at this property throughout the life of the PSA.

This Project Specific Analysis occurs within the historic range of California red-legged-frog, so we assume presence unless protocol level surveys demonstrate absence. The following scenarios describe conditions for which take is not likely to occur when presence is known or assumed for timber harvesting plans; provided by "Information Needs and Guidelines for Timber Harvesting Plans (THPs) for US Fish and Wildlife Service Technical Assistance Analysis California Red-legged Frogs (CRF) (USFWS, March 2008). This Project Specific Analysis, although not a timber harvesting plan, utilizes the USFWS March 2008 guidelines scenarios to describe conditions for which take is not likely to occur when presence is known or assumed since some level of ground disturbing activities may occur through understory mastication:

I. % Scenario I: No suitable habitat with harvest units and within 2 miles of harvest units
II. % Scenario II: Suitable habitat within 2 miles of harvest units or in units, but no harvest activities within 300 feet of suitable habitat.

III. % Scenario III: Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the wet season. No take is estimated under the following conditions:
  i. % For Class III watercourse, when dry, maintain a 30-foot buffer, trees felled away from watercourse.
  ii. % For Class II watercourses and intermittent ponds/wetlands that meet the definition of suitable habitat, where water is present, 300 foot no cut buffer, where dry, 30-foot no cut buffer, no equipment within 75 feet of annual high water mark, trees felled away from suitable habitat.
  iii. % Class I watercourse and permanent ponds/wetlands that mee the definition of suitable habitat – no cutting and no equipment with 300 feet of this suitable habitat.

IV. % Scenario IV. Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the dry season.
  i. % All suitable habitat must maintain a 30-foot no-cut buffer; no equipment within the no-cut buffer; trees felled away from suitable habitat

Scenario III and IV described above shall be used during the wet and dry seasons respectively. As stated, the nearest suitable habitat is located adjacent to the western property boundaries within Butano Creek, however, the nearest occupied habitat is located approximately 0.8 miles south of the southwestern property corner.

Based on the survey protocols and pre-operational meetings, the proximity of special-status wildlife species to treatment areas, and the implementation of the SPR's and Mitigation Measures it is likely that this project will result in a less than significant impact on all wildlife species.

Impact BIO-3

Initial and maintenance treatments include mechanical and manual treatments, which could result in direct or indirect adverse effects to sensitive habitats. The potential for treatment activities to result in adverse effects to sensitive habitats was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 187-192). The potential for adverse effects to sensitive habitats is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance as a result of the treatment activities are consistent with those analyzed in the PEIR. The SPR's that apply to this impact are SPR BIO-1, BIO-2, BIO-3, BIO-4, BIO-6, BIO-8, BIO-9, and HYD-4.

Table 3.6-3 in the PEIR (Volume II) for the Central California Coast ecoregion was reviewed and it was determined that the redwood, Douglas-fir, and montane hardwood California Wildlife Habitat Relationship (CWHR) classifications may be present within or in proximity to the treatment areas. Treatments are proposed within the redwood, a sensitive natural community, and Douglas-fir habitats. Due to the redwood forest community being considered a sensitive natural community under the PEIR, SPR BIO-3 will be implemented and requires site-specific surveys and mapping sensitive natural communities within these habitat types (Attachment 2, Map 4, 5, and 6).

Sensitive Natural Communities – Redwood Forest

According to CAL FIRE FRAP vegetation data in combination with aerial photos and field verification points, there is approximately 112.7 acres of redwood forest present within the property boundary. The treatment areas contain a total of approximately 40.2 acres of redwood forest, or approximately 36% of the total redwood acreage present on the property (Attachment 2, Maps 4 and 5).

Due to the treatment areas containing redwood forest, or the Redwood Forest and Woodland Alliance with a rarity rank of S3.2, as defined in the *Manual of California Vegetation,* Mitigation Measure BIO-3a would apply to the proposed project; however, this project falls under the exception of Mitigation Measure BIO-3a due to the determination of qualified registered professional foresters (RPFs) that this area would benefit from the proposed treatments (Sawyer et al., 2009 and CNPS, 2019). The exception to the Mitigation Measure BIO-3a approach states that is acceptable only 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 and it shall be demonstrated in the PSA that the treatment will be beneficial with substantial evidence that habitat function is expected to improve, as outlined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 151 and 152).

The proposed treatments will occur in the redwood forest type that is defined to have a variable fire return interval that depends on the site conditions and has an average of approximately 50 years in redwood forests similar to those within Big Basin Redwoods State Park (Sugihara et al., 2006, CNPS, 2019, and Jones & Russel, 2015). Notably, other redwood forests located in the Santa Cruz Mountains have been estimated to have shorter average fire return intervals as low as approximately 12 years, which may indicate an urgency for initial and maintenance treatments due to the potential for more frequent fires in coast redwood forests (Stephens & Fry, 2005). Although redwoods are a fire adapted species, ecological restoration treatments often include fuel reductions to develop a forest stand more resistant to catastrophic fires (O'Hara et al., 2017). Redwood forests can be at a disadvantage if they experience too much or too little fire frequency or intensity (Thornburgh et al., 2000). Studies have shown that thinning treatments in second growth redwood forests exhibit an increase in growth up to approximately four times than un-thinned or treated areas, developing old growth characteristics more rapidly (Thornburgh, et al., 2000). The development of old growth characteristics, such as stimulated branch growth and canopy complexity, as a result of thinning treatments may increase habitat quality and quantity for species that rely on old grow characteristics, including marbled murrelets (Keyes, 2011). In a case study regarding the redwood forest's response to low to moderate severity prescribed burns, it was suggested that follow-up mechanical thinning may be necessary to achieve restoration objectives, including reducing encroachment from Douglas-fir, due to mortality of younger cohorts in the understory (Engber et al., 2016). Similarly, studies utilizing local forest inventory and the Forest Vegetation Simulator in the Santa Cruz Mountains have suggested a carbon benefit to most ecologically restorative treatments that focus on an understory thinning up to 12 inches in diameter (Cal Poly SPR, 2021 and FVS, 2021).

The 2020 CZU Lightning Complex burned at such a low severity on Camp Butano Creek that it killed much of the understory but did not consume it (meaning turn to ash) and was followed by high wind events that blew down large trees and branches, now priming the area for a more extreme fire event. Similar conditions existed in redwood forests following the 2009 Lockheed Fire that occurred in Davenport, California, south of the project area. The Lockheed Fire burned with predominately low to moderate severities, with pockets of high severity and canopy fires (Lazzeri-Aerts and Russel, 2014). Following the Lockheed Fire, studies determined that coast redwoods exhibited the highest amount of regeneration by seed, basal sprout density, and regenerated canopy on surviving trees than other native species, indicating that redwoods are highly adaptive to fire and disturbance (Lazzeri-Aerts and Russel, 2014). Looking at the aerial photographs of the 2020 CZU Lighting Complex fire scar captured by NASA, the fire footprint of the 2009 Lockheed Fire appears white in coloration, indicating some of the highest severity burned areas (NASA, 2021). The buildup of fuels in the understory, including regenerated vegetation and downed 1,000-hour fuels from delayed tree mortality, following the Lockheed Fire likely contributed to the increase in fire severity during the 2020 CZU Lightning Complex Fires. Therefore, implementing initial and maintenance treatments over a 10-year period within the Camp Butano Creek property will be beneficial for the redwood forest community and improve

habitat quality by maintaining fuel reductions in the understory, including reducing ladder fuels, to potentially minimize the severity of a future wildfire that occurs before the natural fire return interval.

The natural fire regime will not be immediately restored by this treatment, but characteristics of fire, predominantly regenerative action following vegetation treatments and ladder fuel alteration, will be conducted through mastication of understory vegetation, live trees up to 8 inches DBH, and dead, dying, and diseased trees to create a shaded fuel break that will promote the health and resiliency of the residual stand where approximately 80% of the native vegetation cover will be maintained. In treatment areas where multiple age classes are represented, the proposed treatment will promote heterogeneity, resiliency, and health in the residual stand by creating different influences of sunlight through the canopy to the forest floor adding to a mosaic of diversity in the understory.

Based on the research above and collective years of experience managing redwood forests, Steve Auten, RPF #2734, and David Van Lennep, RPF #2591, have determined that the redwood forests within the Camp Butano Creek property would benefit from ecological restoration and WUI fuel reduction treatment types implemented by this project.

Coastal Zone

Due to this project occurring within the coastal zone, SPR BIO-8 applies to this project and includes consultation with the California Coastal Commission (CCC). Efforts have been made between the CCC, San Mateo Resource Conservation District and other similar entities to develop a Public Works Plan (PWP) document that establishes a set of standards for CalVTP projects occurring within the coastal zone within San Mateo and Santa Cruz Counties that allows further treatments than presented in SPR BIO-8. The DRAFT Camp Butano Creek PSA was sent to the CCC on April 23, 2021 for review. A Coastal Vegetation Treatment Standards (CVTS) document has been filled out for this project and was submitted to the CCC on April 23, 2021 with the PSA (Attachment 7). All of the Coastal Zone has been identified as ESHA in San Mateo County by the CCC. The basis of this project is to conduct ecologically restorative treatments that promote the persistence and resiliency of the redwood forest type as an environmentally sensitive habitat area through a myriad of protection, conservation, and avoidance measures.

The vegetation removal hierarchy, as outlined in the attached Coastal Vegetation Treatment Standards document, is as follows: (1) thinning and removal of dead, dying and diseased foliage, shrubs (except that some snags should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition in the plant community with a mix of vegetation age, height and density (Attachment 7). The treatment activities will reduce potential ignition sources, improve the forest's health and vigor, and promote a more resilient forest (see *Initial* and *Maintenance Treatment Descriptions*).

This project proposes all mechanical operations to occur outside of the Watercourse and Lake Protection Zone (WLPZ), however, riparian vegetation may be present outside of the WLPZ. The treatment prescriptions propose the treatment of most understory vegetation, dead, dying, and diseased trees, and live trees up to 8 inches.

Based on the treatment prescription, determination of qualified RPFs for treatments in redwood forests to occur, survey protocol and pre-operational meetings, and the implementation of the applicable SPR's and mitigation measures, it is likely that any impact to riparian habitat or other sensitive natural communities would be less than significant.

Impact BIO-4

Impacts to designated wetlands does not apply to the proposed project because initial and maintenance treatments will not occur in designated wetlands. Therefore, no impact is expected to occur to state or federally protected wetlands as a result of this project.

Impact BIO-5

Initial and maintenance treatments include the use of mechanical and manual treatments that could result in direct or indirect adverse effects to wildlife movement corridors and nurseries because suitable habitat is present within the treatment areas. The potential for treatment activities to result in adverse effects to wildlife movement corridors and nurseries was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 193-197). The potential for adverse effects to wildlife movement corridors and nurseries is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance as a result of the treatment activities are consistent with those analyzed in the PEIR. The applicable SPR's for this proposed project impact include SPR BIO-1, BIO-4, HYD-1, and HYD-4. The proposed treatment areas may contain essential connectivity areas for some ungulate species and mountain lions as well as habitat for breeding sites or cover. This project proposes the use of mechanical treatment outside of the WLPZ and will comply with overstory cover requirements in riparian areas (SPR BIO-4). Mitigation measure BIO-5 will be implemented to retain and avoid nursery habitat through the establishment of buffers where necessary. Based on the implementation of SPR's and the mitigation measure, it is likely that any impact to wildlife movement corridors and nurseries would be less than significant.

Impact BIO-6

Initial and maintenance treatments include the use of mechanical and manual treatments, which could result in direct or indirect effects resulting in the reduction of habitat or abundance of common wildlife, including nesting birds, because suitable habitat is present in the treatment area. The potential for treatment activities to result in adverse effects to habitat and abundance of wildlife was addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 197-199). The potential for adverse effects to common wildlife, including nesting birds, is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance are consistent with those analyzed in the PEIR. The implementation of SPR BIO-1, BIO-2, BIO-3, BIO-4, and BIO-12 will reduce the risk of this project resulting in adverse effects to habitat and the abundance of common wildlife.

The CNDDB review for listed species did not return any special-status birds within the project property boundaries, however, the property is in proximity to occurrences for marbled murrelets, please see the discussion on this species above in Impact BIO-2. Additionally, it is likely that common native birds may be present within or in proximity to the treatment areas. If it is infeasible for operations to occur outside of the active nesting season, between February 1st and August 31st, of common native birds, including raptors, that may be present in the vicinity of the project site, then a survey will be conducted within 7 days prior to operations (SPR BIO-12). Nesting bird surveys will be conducted in compliance to the following provisions:

- Nest tree(s), designated perch tree(s), screening tree(s), and replacement tree(s) shall be left standing and unharmed.
- Operations shall be planned and operated to commence as far as possible from occupied nest trees.
- When an occupied nest site of a listed bird species is discovered during operations, operations shall cease, and the nest tree shall be protected applying the provisions set forth in subsections (b) and (c) above and shall immediately notify CDFW.

The implementation of the nesting bird survey provisions and survey protocol indicate that any impact to nesting birds would be less than significant. Based on the survey protocol, nesting survey protocol, and the implementation of the applicable SPR's, it is likely that any impact to the loss of habitat or abundance of wildlife, including nesting birds, would be less than significant.

Impact BIO-7

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3 page 199). The potential for the proposed project to conflict with local policies or ordinances is within the scope of the activities and impacts addressed in the PEIR because the treatment projects implemented under the CalVTP are required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures (SPR AD-3) and are consistent with those analyzed in the PEIR. The County of San Mateo has been engaged in the development of the PWP for CalVTP projects occurring in the Coastal Zone of San Mateo and Santa Cruz Counties. The County of San Mateo was contacted during the planning phase of this project on May 4, 2021 to review this PSA and ensure compliance with applicable local ordinances and policies. Due to the project design, treatment prescription, including the 8-inch DBH limitation for live tree removal, and the parcel zoning, the proposed project will not conflict, or provides appropriate mitigations, with regard to applicable local policies or ordinances as result of treatment activities. Therefore, no impact is expected to occur.

Impact BIO-8

The proposed project treatments are located outside of any habitat conservation plans (HCP) or natural community conservation plans (NCCP). Therefore, this project would not conflict with any HCP's or NCCP's and no impact is expected to occur.

New Biological Resource Impacts

The proposed project treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (CalVTP Final PEIR Volume II Section 3.6.1 and 3.6.2). no changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

F. GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	SPR GEO – 1 SPR GEO – 2 SPR GEO – 3 SPR GEO – 4 SPR GEO – 5 SPR GEO – 7 SPR HYD – 4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	SPR GEO – 3 SPR GEO – 4 SPR GEO – 7	NA	LTS	No	Yes

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

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

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

Discussion

Impact GEO-1

Initial and maintenance treatments include mechanical treatments and manual treatments that would disturb topsoil and reduce vegetative cover, which has the potential to increase rates of erosion and topsoil loss. The potential for these treatments to result in substantial erosion and loss of topsoil was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, page 26-29). The potential impacts are within the scope of the PEIR because the treatment activities are consistent and will comply with applicable SPR's, including SPR GEO-1 through 5, GEO-7, GEO-8, and HYD-4. All equipment will be limited to operating on slopes less than 40% but may utilize access routes that are 50% or less. The average slope of mechanical operations throughout the treatment areas ranges from approximately 20-30%. Operations will not occur while soils are saturated to avoid disturbances caused by the removal of vegetation. Although treatments will remove

vegetation and disturb topsoil, the implementations of the SPR's, slope limitations, and soil condition limitations indicate that the potential for this project impact to have substantial erosion and loss of topsoil would be less than significant.

Impact GEO-2

The mechanical and manual treatments included in the initial and maintenance treatments will result in the reduction of vegetative cover and may affect root structure, decreasing the stability of slopes, which could increase the risk of landslide. The potential for these treatments to increase the risk of landslide was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, page 29-30). The prescription for these treatments limits mechanical operations to slope equal to or less than 40% and limits equipment access to slopes equal to or less than 50%. The average slope of operation throughout the treatment areas ranges from approximately 20-30%. Equipment will not operate on saturated soils to avoid disturbances caused by the removal of vegetation. The implementation of the applicable SPR's, including SPR GEO-3, GEO-4, GEO-7, and GEO-8, will minimize the risk of a landslide resulting from the prescribed treatment activities. Based on the equipment operation limitations and implementation of SPR's, the potential for this impact to increase the risk of landslide will be less than significant.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and has determined they are consistent with the environmental and regulatory settings discussed in the PEIR (CalVTP Final PEIR Volume II 3.7.1 and 3.7.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

G. GREENHOUSE GAS EMISSIONS

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

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

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

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

Discussion

Impact GHG-1

During initial and maintenance treatments, the use of vehicles and mechanical equipment would result in greenhouse gas (GHG) emissions. The potential for these treatments and treatment activities to result in a conflict with the applicable plans, policies, and regulations regarding GHG emissions was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 10-11). The proposed project is consistent with all applicable plans, policies, and regulations related to the purpose of reducing GHG emissions and treatment activities area consistent with those analyzed in the PEIR. The project impacts relating to the consistency of treatments with the applicable plans, policies, and regulations will remain less than significant.

Impact GHG-2

The use of vehicles and mechanical equipment during initial and maintenance treatments would result in GHG emissions. The potential for treatments to generate GHG emissions was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 11-17). In the long-term, the treatment activities are expected to have carbon sequestration benefits and are intended to reduce the risk of wildfire, which would decrease projected GHG emissions. Based on the tree fuel types listed in the CalVTP Table 3.8-3, mechanical treatments are estimated to produce approximately 36.2 MTCO2e, or 0.92 MTCO2e/acre, and manual treatments are estimated to produce approximately 3.5 MTCO2e, or 0.69 MTCO2e/acre, for a total of

approximately 39.7 MTCO2e produced by this project. The estimated calculation derived from the values in the CalVTP PEIR Table 3.8-3 does not include the GHG emissions from vehicle transport, including the transportation of equipment and contractors. CalVTP PEIR Table 3.8-2 indicates that in 2008, the largest fire year displayed in the table, 1.35 million acres burned producing approximately 45.7 MMTCO2. As of October 2020, approximately 4 million acres have burned in California, which is approximately three times more acres and MMTCO2 produced than in 2008. Implementing the treatment activities for this project would produce significantly less MTCO2 than an average wildfire year and would create an opportunity for wildfire to be stopped or slow the rate of spread. The GHG emissions produced from this treatment project are within the scope of the impacts evaluated in the PEIR because the proposed activities, equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions associated with wildfire are consistent with those analyzed in the PEIR. Therefore, the potential for the project treatment activities to result in GHG emissions is considered potentially significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 17).

New Impacts Related to GHG Emissions

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they are consistent with the environmental and regulatory settings as stated in the PEIR (CalVTP Final PEIR Volume II 3.8.1 and 3.8.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact regarding GHG emissions would occur that is not covered in the PEIR.

H. ENERGY RESOURCES

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

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

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

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

Discussion

Impact ENG-1

The use of vehicles, mechanical equipment, chainsaws, and other mechanized hand tools during initial and maintenance treatments will result in the consumption of energy. The potential for impacts to result in wasteful, inefficient, or unnecessary consumption of energy and the use of fossil fuels was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.9.3, page 7-8). The consumption of energy during the project treatment activities is within the scope of the impacts addressed in the PEIR because the treatment activities, the equipment and its duration of use, are consistent with those analyzed in the PEIR. There are no applicable SPR's or mitigation measures for this project impact, however, idle time for all equipment will be limited and crews will be encouraged to carpool to reduce the amount of energy consumed throughout the duration of this project. Therefore, the potential for this project to result in significant wasteful, inefficient, or unnecessary energy consumption remains less than significant.

New Energy Resource Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they are consistent with the regulatory and environmental setting conditions developed in the PEIR (CalVTP Final PEIR, Volume II, 3.9.1 and 3.9.2). No changed circumstances would lead to significant impacts not addressed in the PEIR. Therefore, no new impact related to energy resources would occur that is not covered in the PEIR.

I. HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	SPR HAZ – 1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	No	None	NA	No Impact	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	MM HAZ – 3	LTSM	No	Yes

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

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

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

Discussion

Impact HAZ-1

The initial and maintenance treatments would include mechanical treatments and manual treatments, both of which would require the use of hazardous materials. The potential for treatment activities to create a significant health hazard from the use of hazardous materials was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 14-15). The potential impacts related to the use of fuels during treatment activities are within the scope of the activities and impacts discussed in the PEIR because the treatment types, equipment, and types of hazardous materials to be used are consistent with those analyzed in the PEIR. Any hazardous materials and emissions would result from the use of diesel fuel, chainsaw and mechanized hand tool fuel, and chainsaw bar oil; these materials will be transported and stored in appropriate containers. All personnel will wear personal protective equipment (PPE) and will be properly trained in the usage of equipment. All equipment associated with the proposed project will comply with SPR HAZ-1 to ensure proper maintenance and minimize leaks. SPR HAZ-2 requires mechanized hand tools to

have spark arrestors and will be implemented to minimize the risk of potential ignitions. Based on the proper storage and transportation of fuels and oils, the use of PPE, and the implementation of the applicable SPR's, the potential for this project to result in significant health hazards from the use of hazardous materials is less than significant.

Impact HAZ-2

This project does not propose the use of herbicides, therefore, this impact does not apply to this project.

Impact HAZ-3

The initial and maintenance treatments of this proposed project include mechanical treatments that will disturb soils, which could expose workers, the public, or the environment to hazardous material if a contaminated site is present within the project area. The potential for the treatment activities to disturb or encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 18-19). Based on the Cortese List from the DTSC, there are no known hazardous waste sites identified within the proposed project area. In addition, the project area does not appear to contain any naturally occurring asbestos. There are no SPR's that apply to this project impact. The project proponent will implement and comply with mitigation measure HAZ-3 to identify and avoid any known hazardous waste sites. Based on the absence of hazardous waste sites and naturally occurring asbestos and the implementation of mitigation measure HAZ-3, the potential for this project to result in public or environmental exposure to hazards from known hazardous waste sites would be reduced to less than significant.

New Hazardous Materials, Public Health and Safety Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they comply with the regulatory and environmental setting conditions as stated in the PEIR (CalVTP Final PEIR Volume II 3.10.1 and 3.10.2). No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to hazardous materials, public health, and safety would occur that are not covered in the PEIR.

J. HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	No	None	None	No Impact	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	SPR HYD – 1 SPR HYD – 4 SPR BIO – 1 SPR GEO – 1 SPR GEO – 2 SPR GEO – 3 SPR GEO – 4 SPR GEO – 7 SPR HAZ – 1	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	None	NA	No Impact	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	None	NA	No Impact	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Ground Application of Herbicides								
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	SPR HYD – 4 SPR HYD – 6 SPR GEO – 5	NA	LTS	No	Yes

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

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

Impact HYD-1

This impact does not apply to the proposed treatment activities because prescribed burning is not a proposed treatment type for this project. Therefore, no impact will occur as a result of prescribed burning.

Impact HYD-2

Initial and maintenance treatments would include the use of mechanical and manual treatments, which would result in ground disturbance. The potential for mechanical and manual treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 27-28). Potential impacts are within the scope of the activities and impacts evaluated in the PEIR because the use of equipment and associated impacts to water quality are consistent with those analyzed in the PEIR. Girl Scout Creek, a Class II watercourse, runs through the project area and is in proximity to some treatment areas, where the Watercourse and Lake Protection Zones shall be delineated and flagged with an appropriate buffer based on slope prior to operations. The centerline of Class III watercourses shall be flagged prior to operations where equipment could potentially cross a Class III due to treatment area proximity and slope. Equipment exclusion zones of 25-feet for slopes less than 30% and 50’ for slopes greater 30% shall be adhered to in this CalVTP. The project proponent will implement SPR GEO-1 through GEO-4, GEO-7, GEO-8, BIO-1, HAZ-1, HYD-1 and HYD-4 to avoid and minimize the risk of substantial degradation to surface or groundwater quality from mechanical treatment activities. Based on avoidance measures and implementation of SPR’s, the potential for this project to result in a violation of water quality standards or waste discharge requirements, degradation of surface and ground water quality, or conflict with or obstruct the Water Quality Control Plan would be less than significant.

Impact HYD-3

This impact does not apply to the initial or maintenance treatments because prescribed herbivory would not be used as a treatment activity for this project. Therefore, no impact would occur as a result of prescribed herbivory.

Impact HYD-4

This impact does not apply to the initial or maintenance treatments because herbicide application would not be used as a treatment activity for this project. Therefore, no impact would occur as a result of herbicide application.

Impact HYD-5

The initial and maintenance treatments include the use of mechanical treatment, which would result in ground disturbance. The potential for mechanical treatment to substantially alter existing drainage patterns of a project site was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 30-31). The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment and treatment activities are consistent with those analyzed in the PEIR. The Girl Scout Creek, a Class II watercourse, Watercourse and Lake Protection Zones shall be flagged in areas in proximity to treatment areas with an appropriate buffer based on slope prior to operations. All Class III watercourses will be flagged prior to operations where equipment could potentially cross a Class III due to project proximity and slope. Chips should not be placed in watercourses or near culverts. The implementation of SPR HYD-1, HYD-2, HYD-4, and HYD-6 would avoid and minimize the risk of substantially altering the existing drainage pattern of the treatment area through compliance to water quality regulations, avoiding construction of new roads, identifying and protecting the WLPZ, and protecting existing drainage systems. Therefore, any impact would be less than significant.

New Hydrology and Water Quality Impacts

The proposed treatment is consistent with the treatment types and activities addressed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental settings discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.11.1 and 3.11.2). No changed circumstances would lead to new significant impacts not analyzed in the PEIR. Therefore, no new impact related to hydrology and water quality would occur not covered in the PEIR.

K. LAND USE AND PLANNING, POPULATION AND HOUSING

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	SPR AD – 3 SPR AD – 9	NA	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	NA	NA	LTS	No	Yes

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

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

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

Discussion

Impact LU-1

The initial and maintenance treatments would occur on private property in Pescadero, San Mateo County, so the project would comply with all applicable city and county general plans, policies, or ordinances. The potential for treatment activities to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, page 13-14). The treatment types and activities are within the scope of those evaluated in the PEIR because the treatment activities and associated impacts are consistent with those analyzed in the PEIR. The implementation of SPR AD-3 will avoid and minimize the risk of significant environmental impact due to conflict with a land use plan, policy, or regulation. Therefore, the impact would be less than significant.

Impact LU-2

The initial and maintenance treatments would require approximately 20 crew members to implement. The potential for treatments to result in substantial population growth as a result of increases in demand for employees was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, page 14-15). Impacts associated with short-term increases in demand for employees during the implementation of the treatment project are within the scope of the activities and impacts addressed in the PEIR because the number of workers required for treatment implementation is consistent with the crew size analyzed in the PEIR for the

types of treatments proposed. Employing local contractors will be encouraged where feasible to minimize the risk of impacting population and housing resources. There are no applicable SPR's for this impact. Based on the minimal crew size and attempting to hire local contractor, it is expected that any impact to population and housing as a result of this project would be less than significant.

New Land Use and Planning, Population and Housing Impacts

The proposed treatment is consistent with the treatment types and activities covered in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.12.1 and 3.12.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning, population and housing would occur that is not covered in the PEIR.

L. NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	SPR NOI – 1 SPR NOI – 2 SPR NOI – 3 SPR NOI – 4 SPR NOI – 5 SPR NOI – 6 SPR AD – 3	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	SPR NOI – 1	NA	LTS	No	Yes

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

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

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

Discussion

Impact NOI-1

The initial and maintenance treatments would include the use of mechanical and manual treatments that require heavy, noise-generating equipment. The potential for substantial short-term increase in ambient noise levels was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, page 9-12). Short-term increases in noise from the use of heavy equipment is within the scope of the activities and impacts addressed in the PEIR because the types and number of equipment proposed, and the duration of use of the equipment are consistent with those analyzed in the PEIR. The implementation of SPR AD-3 and NOI-1 through NOI-6 would minimize the risk of increasing exterior ambient noise levels during treatment implementation. Therefore, the impact would be less than significant.

Impact NOI-2

The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the project site. These haul trucks would pass by residential receptors, which could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, page 12). Short-term increases in noise from the use of heavy equipment during project implementation is within the scope of the treatment activities and impacts addressed in the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. All haul trips and use of heavy equipment will be limited to daytime hours to avoid sleep disturbance of nearby residents. SPR NOI-1 restricts treatment activities to daytime hours, which San Mateo County defines as 7:00am to 6:00 pm Monday through Friday or 9:00 am to 5:00 pm on Saturdays under SMC PRC Sec. 4.88.360 (e). Therefore, the impact would be less than significant.

New Noise Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental setting conditions addressed in the PEIR (CalVTP Final PEIR Volume II 3.13.1 and 3.13.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not analyzed in the PEIR.

M. RECREATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	SPR REC – 1 SPR AD – 3	NA	LTS	No	Yes

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

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

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

Discussion

Impact REC-1

The project area is located on private property designated for recreational use seasonally by campers and staff. The initial and maintenance treatments may result in conflicts with campers and staff due to potential restricted or limited property access, degradation of views, decreased air quality, or traffic during treatment implementation. The potential for treatment activities to disrupt recreational activities was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.14.3, page 6-7). The temporary disruption of recreational activities during project implementation is within the scope of the activities and impacts addressed in the PEIR because the treatments, associated equipment and duration of use is consistent with those analyzed in the PEIR. Maintaining consistency with local plans, policies, and ordinances (SPR AD-3) and posting notification of recreational area closure a minimum of 2 weeks prior to the commencement of treatment activities (SPR REC-1) would reduce the risk of disruption to recreational activities within the project area. Following operations, treated areas may be used as opportunities to educate campers and staff about ecological restoration and fuel reductions in the wildland urban interface. Based on the implementation of SPR's and duration of the project, any impact to recreation as a result of this project would be less than significant.

New Recreation Impacts

The proposed treatment is consistent with the treatment types and activities addressed in the PEIR. The project proponent has considered all site-specific characteristics and determined they are consistent with the regulatory and environmental setting conditions presented in the PEIR (CalVTP Final PEIR Volume II

3.14.1 and 3.14.2). There are no changed circumstances that would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not discussed in the PEIR.

N. TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	SPR TRAN – 1 SPR AD – 3	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	No	None	NA	No Impact	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	MM AQ – 1	PSU	No	Yes

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

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

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

Discussion

Impact TRAN-1

The initial and maintenance treatments would temporarily increase vehicular traffic due to hauling equipment and crew transportation. The potential for a temporary increase in traffic to conflict with a program, plan, or policy addressing roadway facilities or prolonged road closures was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, page 9-10). No road closures would be necessary for the implementation of this project; however, Canyon Road will be crossed by equipment and crew vehicles during operations, which may require traffic control to reduce traffic impacts to residents of the Redwood Avenue community. The proposed treatment project would be short-term and temporary increases in traffic related to the treatments are within the scope of the activities and impacts addressed in the PEIR because the treatment duration and number of vehicles is consistent with those analyzed in the PEIR. The implementation of SPR AD-3 and TRAN-1 will reduce the risk of conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures through the implementation of traffic

control during operations. Vehicles and equipment would be staged within camp boundaries, away from public viewsheds where feasible and not located on permanent roads. Based on the implementation of the applicable SPR's and the short duration of operations, any impact to traffic resulting from this project would be less than significant.

Impact TRAN-2

This impact does not apply to the proposed project initial and maintenance treatments because they would not require the construction or alteration of any roadways and does not include prescribed burning. No impact would occur.

Impact TRAN-3

Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) because the project site is in a remote location, which requires vehicle trips to access the sites. The potential for net increase in VMT to occur was analyzed in the PEIR and was identified as potentially significant and unavoidable (CalVTP Final PEIR Volume II Section 3.15.3, page 11-13). This individual project is expected to require only a small number (fewer than the 110 trips threshold) of trips per day, as discussed in the PEIR and the Technical Advisory on Evaluating Transportation Impacts (OPR 2018). The most VMT would occur at the beginning and end of the project to haul equipment in and out of the project area. Daily VMT would consist of crew transportation to and from the site. Hiring local contractors will be encouraged where feasible to reduce the amount of VMT. No SPR's apply to this impact. The project proponent will implement Mitigation Measure AQ-1 to encourage crew members to carpool and further reduce VMT. Based on the implementation of Mitigation Measure AQ-1, measures to reduce VMT, and short-term duration of this project, the potential for this individual project to result in a net increase in VMT would remain potentially significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, page 12).

New Transportation Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental setting conditions presented in the PEIR (CalVTP Final PEIR Volume II 3.15.1 and 3.15.2). No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to transportation would occur that is not covered in the PEIR.

O. PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	No	NA	NA	No Impact	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 - 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	None	NA	No Impact	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	SPR UTIL – 1	NA	LTS	No	Yes

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

Impact UTIL-1

This impact does not apply to the proposed treatments because it would not include prescribed burning and non-shaded fuel breaks that would require on-site water supplies for fire and dust suppression. No impact would occur.

Impact UTIL-2

The initial and maintenance treatments would generate biomass as a result of vegetation removal within the project site. Biomass generated would be chipped and scattered on-site because there is not a facility within an economically feasible distance to ship biomass off-site during this project, therefore, this impact does not apply to the project. This impact was evaluated in the PEIR and identified as potentially significant and unavoidable with no SPR's or Mitigation Measures because biomass hauled off-site could exceed the capacity of existing infrastructure handling biomass (CalVTP Final PEIR Volume II Section 3.16.3, page 10-12). Due to this project not including hauling biomass off-site, there is no potential to exceed the capacity of existing infrastructure and there would be no impact.

Impact UTIL-3

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the project site. The compliance with federal, state, and local management and reduction goals, statutes, and regulations related to solid waste was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.16.3, page 12). This project would not include hauling biomass off-site because all biomass generated would be chipped and scattered in the treatment areas. Compliance with all management and reduction goals, statutes, and regulations related to solid waste is within the scope of the activities and impacts addressed in the PEIR because the disposal of biomass on-site is consistent with those analyzed in the PEIR. SPR UTIL-1 does not apply to this project because no biomass will be hauled off-site. Based on the compliance with all applicable management and reduction goals, statutes, and regulations, the potential for impact would be less than significant.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics and determined that they are consistent with the regulatory and environmental setting conditions addressed in the PEIR (CalVTP Final PEIR, Volume II, 3.16.1 and 3.16.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the PEIR.

P. WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	SPR HAZ – 2 SPR HAZ – 3 SPR HAZ – 4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	SPR GEO – 3 SPR GEO – 4 SPR GEO – 5	NA	LTS	No	Yes

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

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

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

Discussion

Impact WIL-1

Initial and maintenance treatments would include mechanical treatments using heavy equipment and manual treatments using mechanized hand tools, which could exacerbate fire risk and expose people to uncontrolled spread of wildfire. The potential increase in exposure to wildfire during implementation of the proposed treatments was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, page 13-14). Increased wildfire risk associated with mechanical and manual treatments in vegetated areas is within the scope of the activities and impacts addressed in the PEIR because the equipment types and duration of use are consistent with those analyzed in the PEIR. SPR HAZ-2, HAZ-3, and HAZ-4 will be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors for all mechanical hand tools, a fire extinguisher to be carried with each chainsaw, and restricting smoking areas to non-vegetated areas. Parts of this property, including some treatment areas, experienced a low severity to moderate severity burn during the 2020 CZU Lightning Complex Fires; following the fires, understory conditions include partially consumed, dead, and dried vegetative fuels, a component of regenerated understory fuels, and dead and downed debris and slash following high wind events along ridges. In addition, modeling fire behavior utilizing the Inter-agency Fuel Treatment Decision Support System (IFTDSS) based on the proposed treatments and Fuel Model 10 shows positive changes to fire behavior immediately following treatments similar to the proposed

actions in this project. Fuel Model 10, or Mature/Overmature Timber and Understory, describes an excessively stocked forest environment similar to the conditions represented in the project area following the low to moderate severity burns from the 2020 CZU Lightning Complex Fires, high wind events, and regeneration of understory fuels (Anderson, 1982). This project intends to predominately create shaded fuel breaks that could be used to slow a wildfire's rate of spread, providing an increased chance for nearby residents or campers and staff to escape, and to potentially contain a fire. This project would have a positive impact to wildfire after treatments. Based on the implementation of the SPR's and positive outcome of this project, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.

Impact WIL-2

The initial and maintenance treatments would include mechanical treatments using heavy equipment and manual treatments using mechanized hand tools, which could exacerbate fire risk as discussed above in WIL-1. The potential for post-fire landslides and flooding was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, page 14-15). The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration of use are consistent with those analyzed in the PEIR and prescribed fire would not be included as a treatment in this project. SPR GEO-3 through GEO-5 will be implemented to reduce the risk of erosion and mass wasting post-fire, in the event that a wildfire occurred as a result of the proposed treatments or an unrelated occurrence. The proposed mechanical treatments are limited to slopes equal to or less than 40% and equipment access is limited to slopes equal to or less than 50% and the average slope of operation throughout the treatment areas ranges from approximately 20-30%, therefore, SPR GEO-8 does not apply to this project impact. This project intends to create fuel reductions that will serve as an opportunity for fire resources to stop or slow the spread of wildfire, which may lead to smaller burn scars, or less area susceptible to post-fire flooding or erosion. Based on the implementation of the applicable SPR's, the potential for this project to result in post-fire flooding or landslides would be less than significant.

New Impacts to Wildfire

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered all site-specific characteristics and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR Volume II 3.17.1 and 3.7.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire would occur that is not covered in the PEIR.

Q: MANDATORY FINDINGS OF SIGNIFICANCE

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

Discussion

No additional comments.

ATTACHMENT A – STANDARD PROJECT REQUIREMENTS AND MITIGATION MEASURES CHECKLIST

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
This project proposes mechanical and manual treatments that would require the project proponent, CAL FIRE, to discuss all natural and environmental resources that will be protected using SPR's and mitigation measures, identify sensitive resources onsite, and discuss resource protection measures. This project does not propose prescribed burning.				
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
This project includes mechanical and manual treatments which will occur in delineated treatment areas, with flagging around sensitive resources, such as Watercourse and Lake Protection Zones, archeological resources, or sensitive biological species. The implementation of this SPR will minimize the risk of an impact to sensitive resources resulting from operations.				
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR will be implemented to reduce the risk of inconsistencies with local plans, policies, and ordinances. This project is consistent with the San Mateo County Local Coastal Program (LCP) Policy 9.18 – Regulation of Development on 30% or Steeper Slopes, which indicates that development that does not constitute a building, road or driveway, or require grading shall be exempt from this provision that prohibits development on slopes greater than or equal to 30%. This project does not involve the development of any structures or buildings, roads or driveways, or grading. This project is considered a forest health fuels reduction project that will include the treatment of understory vegetation and small diameter trees that will be chipped and spread as mulch and will leave root systems intact to support regenerative sprouting and decrease the potential for erosion in treated areas. Operations will not occur on unstable soils.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not include prescribed burning, therefore, this SPR does not apply.				
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Contractor compliance with this SPR will maintain the natural landscape within the project area and minimize impacts to wildlife as a result of human generated trash.				
SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions	Initial Treatment: Y	Prior, During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Treatment Maintenance: Y			
The project will occur on a private property that is utilized by campers and staff seasonally for recreational purposes. Notifications shall be located in a location visible by campers, staff, and local residents that may be impacted by traffic along Canyon Road.				
SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point); ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)	Initial Treatment: Y Treatment Maintenance: Y	Prior, During, Post	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
The project proponent will comply with this SPR.				
SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
This project is located on private property owned by the Girls Scouts of Northern California; requests to access the property for post-treatment assessments should be directed to the Girl Scouts of Northern California.				
SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions:	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
The project area is located within the Coastal Zone, therefore, this SPR applies to this project. Efforts have been made between the CCC, San Mateo Resource Conservation District (SMRCD) and other similar entities to develop a Public Works Plan (PWP) document that establishes a set of standards for CalVTP projects occurring within the coastal zone within San Mateo and Santa Cruz Counties that allows further treatments than presented in SPR BIO-8. The DRAFT Camp Butano Creek PSA was sent to the CCC on April 23, 2021 for review. A Coastal Vegetation Treatment Standards (CVTS) document has been filled out for this project and was submitted to the CCC on April 23, 2021 for review with the PSA (Attachment 7). All of the Coastal Zone has been identified as ESHA in San Mateo County by the CCC. The basis of this project is to conduct ecologically restorative treatments that promote the persistence and resiliency of the redwood forest type as an environmentally sensitive habitat area through a myriad of protection, conservation, and avoidance measures. The CCC Board approved the proposed project PSA on July 8, 2021.				
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Contractors implementing manual and mechanical treatments will keep operations within designated treatment boundaries and will perform operations with the intent of exhibiting feathered vegetation densities in treatment areas to mimic natural transitions to changes in vegetation densities. Treatments will result in vegetation resembling open, park-like understories.				
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	Initial Treatment: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Y			
The proposed treatment areas are located within a private property with hiking trails accessible to campers and staff. The property is located along Canyon Road, a public residential road, where equipment may be visible from. Contractors implementing treatments will avoid staging equipment in locations visible to the public utilizing Canyon Road and in areas that are in proximity to frequent camper and staff visitation where feasible.				
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
This project is located on a private property and proposed treatment areas are outside of the viewshed from public parks and state highways. The property contains hiking trails accessible to campers and staff. Contractors will screen vegetation in treatment areas that may be visible from hiking trails and roadways.				
Air Quality Standard Project Requirements				
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The Bay Area Air Quality District guidelines for dust abatement and other air quality concerns was reviewed for this project in compliance to SPR AQ-1.				
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	Initial Treatment: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Treatment Maintenance: N			
This project does not propose prescribed burning treatment activities.				
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose prescribed burning treatment activities.				
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
The listed measures within SPR AQ-4 will be implemented and practiced during operations.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
Pre-operational research indicates that no naturally occurring asbestos appears to be located in the treatment areas per maps created by the California Geologic Survey (ArcGIS Online, 2020). If naturally occurring asbestos is identified within the project area during treatment activities, then the area shall be avoided. Due to the absence of naturally occurring asbestos, this SPR does not apply to this project.				
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose prescribed burning treatment activities.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
A records check was completed by the Northwest Information Center (NWIC) on February 10, 2021. Due to the confidentiality of the records check, results may be available to qualified personnel upon request.				
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
An information request letter was sent out to the geographically affiliated tribes on May 4, 2021.				
SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate	Initial Treatment: Y	Prior	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Y			
Pre-field research has been completed as part of completing a full Archaeological Survey Report (ASR) that will be submitted to CAL FIRE and the NWIC upon submittal of the CalVTP PSA.				
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
Archaeological surveys have been completed as part of completing a full ASR that were submitted to the NWIC upon submittal of the CalVTP PSA. In addition, CAL FIRE Associate State Archaeologist, Ben Harris, was consulted during the planning phase of this project on May 4, 2021 due to this project being funded by a CAL FIRE Grant and following CAL FIRE Cultural Resources Review Procedures.				
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important 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. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The implementation of this SPR will minimize impacts to archaeological cultural resources discovered during operations.				
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The implementation of this SPR will minimize impacts to tribal cultural resources discovered during operations.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The records search did not identify any built historical resources within the project area. However, if a built historical resource is discovered during operations, operations will cease, and the resource will be avoided.				
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The implementation of this SPR will reduce the risk of operations resulting in an impact to sensitive archaeological, historical, or tribal cultural resources.				
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD

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

Per SPR BIO-1, a data review of project-specific biological resources and reconnaissance survey of the project area were conducted. The CalVTP Final PEIR Appendix BIO-3 Tables 1a and 1b were used to identify species known or with potential to occur within the Central California Coast ecoregion and their associated California Wildlife Habitat Relationship (CWHR) types that may be present within or in proximity to treatment areas. The CNDDB BIOS 5 and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database were used to identify the state and federally listed species that may be present within 5 miles of the property boundary. The search yielded 37 federal and state threatened, endangered, or candidate species, CDFW species of special concern and candidate species, and the

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
CNPS's California Rare Plant Rank (CRPR) List 1 and 2. The species reviewed are listed and impacts to each species are analyzed within the "Biological Resources Species List" (Attachment 4). From the complete list of species, two of the special-status plants and eight of the special-status wildlife were determined to have potential to occur within the property boundaries (Attachment 4, Table 1). A pre-treatment biological survey was completed by the San Mateo Resource Conservation District Biologist on May 10, 2021 and a biological resources survey report indicating that no special-status species have been identified within the project area has been completed (Attachment 5).				
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
The implementation of this SPR will minimize the risk of an impact occurring to biological resources during operations.				
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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-1 determined that the project area contains a sensitive natural community, the Redwood Forest and Woodland Alliance, however, adverse impacts can be avoided. Treatments proposed will promote the health, resiliency, and heterogeneity of the residual stand by creating different influences of sunlight through the canopy to the forest floor adding to a mosaic of diversity in the understory. Please refer to Impact BIO-3 for further information.				
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be 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	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
This project proposes the use of mechanical treatment outside of the WLPZ and will comply with overstory cover requirements in riparian areas.				
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. 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 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	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
The project area does not contain any coastal sage scrub or chaparral communities, therefore, this SPR does not apply to this project.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The project area contains species infected with Phytophthora ramorum, or Sudden Oak Death (SOD), therefore, this SPR will be implemented to prevent the spread of the pathogen. This project proposes that chipped material containing material infected with the pathogen only be chipped and spread back into areas already impacted by the pathogen. Please see the discussion on SOD above in Item #6, Project Description, Pests and Diseases.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a 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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
Per SPR BIO-1, it has been determined that suitable habitat may be present for two special-status plant species, however, adverse impacts to the habitat for these species can be avoided. Therefore, this SPR does not apply.				
Environmentally Sensitive Habitat Areas				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts: ▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, 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 vegetation types present in the ESHA. ▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	SMRCD	SMRCD

The project property is located within the Coastal Zone, therefore, this SPR applies to this project. Efforts have been made between the CCC, San Mateo Resource Conservation District and other similar entities to develop a Public Works Plan (PWP) document that establishes a set of standards for CalVTP projects occurring within the coastal zone within San Mateo and Santa Cruz Counties that allows further treatments than presented in SPR BIO-8. The DRAFT Camp Butano Creek PSA was sent to the CCC on April 23, 2021 for review. A Coastal Vegetation Treatment Standards (CVTS) document has been filled out for this project and was submitted to the CCC on April 23, 2021 for review with the PSA (Attachment 7). All of the Coastal Zone has been identified as ESHA in San Mateo County by the CCC. The basis of this project is to conduct ecologically restorative treatments that promote the persistence and resiliency of the redwood forest type as an environmentally sensitive habitat area through a myriad of protection, conservation, and avoidance measures.

The vegetation removal hierarchy, as outlined in the attached Coastal Vegetation Treatment Standards document, is as follows: (1) thinning and removal of dead, dying and diseased foliage, shrubs (except that some snags should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition maintained in the plant community with a mix of vegetation age, height and density in accordance with the standards (membership rules) set forth by the second edition of the Manual of California

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Vegetation (Attachment 7). The treatment activities will reduce potential ignition sources, improve the forest's health and vigor, and promote a more resilient forest (see Initial and Maintenance Treatment Descriptions).				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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.				
The project area contains French Broom, therefore, this SPR applies to this project. Further information regarding the treatment of French Broom is located in the discussion on French Broom above under Item #8, Invasive Species.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
Adverse impacts to potentially suitable habitat for special-status wildlife species or nurseries resulting from the completion of SPR BIO-1 can be avoided during operations, therefore, this SPR does not apply.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not include prescribed herbivory, therefore, this SPR does not apply.				
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the 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	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
The implementation of this SPR and the provisions outlined in Impact BIO-6 will minimize the risk of disturbing or impacting common nesting birds, including raptors during operations.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation	Initial Treatment: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y			
Mechanical treatments will be suspended during heavy precipitation events to minimize the risk of soil compaction and disturbance. This project does not propose prescribed herbivory or herbicide 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.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Contractors will avoid driving heavy equipment and other high ground pressure vehicles on saturated soils to minimize the risk of soil compaction and disturbance.				
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.				
The implementation of this SPR will stabilize soils following the proposed mechanical treatments. This project proposes chipping materials and scattering the chips within the treated areas, which will reduce the amount of exposed bare soil following treatments.				
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During, Post	SMRCD	SMRCD
The implementation of this SPR will minimize the risk of erosion occurring within treatment areas following mechanical treatments.				
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During, Post	SMRCD	SMRCD
The implementation of this SPR will direct stormwater runoff to minimize the risk of erosion occurring within treatment areas or road infrastructure utilized during operations following mechanical and manual treatments that may compact or disturb soils.				
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This project does not include burn piles, therefore, this SPR does not apply to this project.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The proposed mechanical treatments are limited to slopes equal to or less than 40% and equipment access is limited to slopes equal to or less than 50% and the average slope of operation throughout the treatment areas ranges from approximately 20-30%. Please see the discussion under SPR AD-3 for information regarding consistency with the San Mateo County LCP Policy 9.18 – Regulation of Development on 30% or Steeper Slopes.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
The proposed mechanical treatments are limited to slopes equal to or less than 40% and equipment access is limited to slopes equal to or less than 50% and the average slope of operation throughout the treatment areas ranges from approximately 20-30%, therefore, SPR GEO-8 does not apply to this project. Please see the discussion under SPR AD-3 for information regarding consistency with the San Mateo County LCP Policy 9.18 – Regulation of Development on 30% or Steeper Slopes.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Greenhouse Gas Emissions Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The project proponent will comply with SPR GHG-1 to provide all necessary data required by the USFS and FRAP to fulfill AB 1504.				
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Mechanical and manual treatment crews will maintain all equipment in compliance to SPR HAZ-1 to minimize the risk of impacts resulting from leaks.				
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Manual treatment crews will utilize mechanized hand tools that contain spark arrestors.				
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Manual treatment crews will carry one fire extinguisher per chainsaw and vehicles will be equipped with one long-handled shovel and one axe or Pulaski.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Contractor crews shall not smoke in vegetated areas during operations.				
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose the use of herbicides, therefore, this SPR does not apply.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
This project does not propose the use of herbicides, therefore, this SPR does not apply.				
SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose the use of herbicides, therefore, this SPR does not apply.				
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ▶ low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ▶ spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose the use of herbicides, therefore, this SPR does not apply.				
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	Initial Treatment: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Treatment Maintenance: N			
This project does not propose the use of herbicides, therefore, this SPR does not apply.				
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	SMRCD	SMRCD
This project will comply with the San Francisco Bay Regional Water Quality (Region 2) Waste Discharge Requirements (WDRs) and/or Conditional Waivers of Waste Discharge Requirements, and San Francisco Bay Basin Plan Prohibitions.				
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
No new roads will be constructed under this project.				
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ▶ Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ▶ Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
This project does not propose prescribed herbivory, therefore, this SPR does not apply.				
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes. Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	SMRCD	SMRCD

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	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.

Standard Project Requirements				Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
	2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	3) Excludes Class III waters that are tributary to Class I waters.	normal high-water flow conditions after completion of timber operations.				
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ							
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.				
30-50 % Slope	100	75					
>50 % Slope	150	100					

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

The following WLPZ protections will be applied for all treatments:

- Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
- Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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. ▶ 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.				
Girl Scout Creek is a Class II watercourse located in proximity to some treatment areas. The WLPZ for this watercourse shall be flagged prior to operations in compliance to appropriate buffers defined in 14 CCR Section 916.5 of the California Forest Practice Rules to minimize the risk of treatment activities resulting in an impact to watercourses.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides:	Initial Treatment: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: N			
This project does not propose herbicide application, therefore, this SPR does not apply.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
All Class III watercourses in proximity to treatment areas and existing watercourse crossings shall be flagged prior to operations to exclude heavy equipment from accessing the watercourses and minimize the risk of mechanical treatments resulting in an impact to existing drainage systems.				
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
San Mateo County defines daytime hours as 7:00am to 6:00 pm Monday through Friday or 9:00 am to 5:00 pm on Saturdays under SMC PRC Sec. 4.88.360 (e).				
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
Implementation of this SPR will reduce the amount of ambient noise produced during operations.				
SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
The implementation of this SPR will reduce the amount of ambient noise produced during operations.				

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The project area is located on private property with areas designated for recreational use by campers and staff. The implementation of this SPR will increase camper and staff safety during operations and will decrease traffic resulting from ingress/egress of heavy equipment.				
Transportation Standard Project Requirements				
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
The implementation of this SPR will determine if a TMP is needed for Canyon Road during operations.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing 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.	Initial Treatment: N Treatment Maintenance**:** N	NA	NA	NA
This SPR does not apply to this project because no biomass will be hauled off-site.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. ▶ Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.				
The implementing entity has determined the following components of Mitigation Measure AQ-1 to be feasible for reducing emissions: encouraging contractors to carpool, substituting gasoline-powered equipment or renewable diesel fuel equipment where feasible, and utilizing equipment with Best Available Control Technology. Equipment that meets the EPA's Tier 4 emission standards will be utilized if available.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD
This project proposes mechanical and manual treatments that would result in ground disturbance. The implementation of this Mitigation Measure will minimize the impacts to subsurface resources that may be discovered during operations.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
A pre-treatment botanical survey was completed by the San Mateo Resource Conservation District Biologist on May 10, 2021 and a botanical survey report indicating that no special-status species listed under ESA or CESA have been identified within the project area has been completed (Attachment 5). Therefore, Mitigation Measure BIO-1a does not apply to this project.				
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 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	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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.				

A pre-treatment botanical survey was completed by the San Mateo Resource Conservation District Biologist on May 10, 2021 and a botanical survey report indicating that no special-status species not listed under ESA or CESA have been identified within the project area has been completed (Attachment 5). Therefore, Mitigation Measure BIO-1b does not apply to this project.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.				
A pre-treatment botanical survey was completed by the San Mateo Resource Conservation District Biologist on May 10, 2021 and a botanical survey report indicating that no special-status plant species have been identified within the project area has been completed (Attachment 5). Therefore, Mitigation Measure BIO-1c does not apply to this project. If operations result in the discovery of special-status plant species in the project area, it is expected that the avoidance of the species as outlined in Mitigation Measures 1a and 1b will be feasible and further compensatory mitigations will not be necessary.				
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)	Initial Treatment: Y	During	SMRCD	SMRCD

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.				
Utilizing Table 3.6-33 in the PEIR, the special-status species that have potentially suitable habitat within the project area are categorized into the following life history groupings: Amphibians and Reptiles, Bats, Burrowing or Denning Wildlife, and Tree-nesting and Cavity-nesting Wildlife (CalVTP Final PEIR Volume II Section 3.6.3, Table 3.6-33). Therefore, this Mitigation Measure will be implemented to minimize residual impacts after the application of the SPR's.				
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	Initial Treatment: Y Treatment Maintenance: Y	During	SMRCD	SMRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in 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>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ 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.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.				
Utilizing Table 3.6-33 in the PEIR, the special-status species that have potentially suitable habitat within the project area are categorized into the following life history groupings: Amphibians and Reptiles, Bats, Burrowing or Denning Wildlife, and Tree-nesting and Cavity-nesting Wildlife (CalVTP Final PEIR Volume II Section 3.6.3, Table 3.6-33). Therefore, this Mitigation Measure will be implemented to minimize residual impacts after the application of the SPR's. Based on the CNDDB findings, site-specific review, biological surveys, and the determination of qualified RPFs, any potential impact during initial and maintenance treatments that could cause mortality, injury, loss of habitat function, or disturbance to any special-status listed wildlife species would be less than significant and wildlife would most likely benefit from the proposed treatments.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures,	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. ▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				

This Mitigation Measure will not be implemented because the provisions outlined in Mitigation Measures BIO-2a and BIO-2b can be implemented and no additional mitigation or compensatory mitigation would be necessary to reduce significant impacts. Therefore, this Mitigation Measure does not apply to this project.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities) If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle: ▶ If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required. ▶ If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented: ▪ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g., damage to root system) that could damage or kill the plant, with the exception of the following activities: – Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle. – Manual or mechanical vegetation treatment within the drip-line of any elderberry shrub will be limited to the season when adults are not active (August - February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry. ▪ A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The project area does not contain potentially suitable habitat for the Valley Elderberry Longhorn Beetle; therefore, this Mitigation Measure does not apply.				
Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: ▶ Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). ▶ Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. ▶ Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. ▶ Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c. CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity

impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies 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 special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.

Table 3.6-34 Special-status Butterflies and Associated Host Plants

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*)
Behren's silverspot butterfly	blue violet (*Viola adunca*)
callippe silverspot butterfly	California golden violet (*Viola pedunculata*)
Carson wandering skipper	salt grass (*Distichlis spicata*)
El Segundo blue butterfly	seacliff buckwheat (*Eriogonum parvifolium*)
Hermes copper butterfly	spiny redberry (*Rhamnus crocea*)
Kern primrose sphinx moth	plains evening-primrose (*Camissonia contorta*), field primrose (*Camissonia campestris*)
Laguna Mountains skipper	Cleveland's horkelia (*Horkelia clevelandii*), sticky cinquefoil (*Drymocallis glandulosa*)

Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Lange's metalmark butterfly	naked-stemmed buckwheat (*Eriogonum nudum*)				
lotis blue butterfly	seaside bird's foot trefoil (*Hosackia gracilis*)				
Mission blue butterfly	lupine (*Lupinus* spp.)				
Myrtle's silverspot butterfly	blue violet				
Oregon silverspot butterfly	blue violet				
Palos Verdes blue butterfly	Santa Barbara milkvetch (*Astragalus trichopodus*), common deerweed (*Acmispon glaber*)				
San Bruno elfin butterfly	broadleaf stonecrop (*Sedum spathulifolium*), manzanita (*Arctostaphylos* spp.), huckleberry (*Vaccinuum* spp.)				
Smith's blue butterfly	seacliff buckwheat, seaside buckwheat (*Eriogonum latifolium*)				
Quino checkerspot butterfly	dwarf plantain, purple owl's clover				

The project area does not contain potentially suitable habitat for special-status butterflies; therefore, this Mitigation Measure does not apply.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail, Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species. If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.				
The project area does not contain potentially suitable habitat for special-status beetles, flies, grasshoppers, or snails; therefore, this Mitigation Measure does not apply.				
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.				
The project area does not contain potentially suitable habitat for special-status bumble bees; therefore, this Mitigation Measure does not apply.				
Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory) The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: ▶ Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007). ▶ Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).				
This project does not include prescribed herbivory; therefore, this Mitigation Measure does not apply.				
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	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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.				
The project area contains redwood forests, which is considered a sensitive natural community. However, this project falls under the exception for this Mitigation Measure because it has been determined by qualified RPFs that the sensitive natural community would benefit from treatments in the occupied habitat. Please see the substantial evidence provided in Impact BIO-3.				
Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				
This Mitigation Measure does not apply because significant impacts to sensitive natural communities can be avoided. Please refer to Impact BIO-3 for information regarding sensitive natural communities.				
Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: ▪ restoring riparian habitat functions and acreage within the treatment area; ▪ restoring degraded riparian habitat outside of the treatment area; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
This project proposes the use of mechanical treatments outside of the WLPZ and will comply with overstory cover requirements in riparian areas.				
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).	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
▶ 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	Initial Treatment: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 (nor use of associated accelerants) will occur within the wetland buffer	Treatment Maintenance: N			
The project area does not contain state and federally protected wetlands; therefore, this Mitigation Measure does not apply.				
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	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	SMRCD	SMRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
No nursery sites or nursery habitats were identified in the project area during the field visit with CDFW on August 10, 2020 or throughout the duration of project layout. If nursery sites or nursery habitats are identified prior to or during operations, then Mitigation Measure BIO- 5 will be implemented.				
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also 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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
This project does not propose prescribed burns, therefore, this Mitigation Measure does not apply to this project.				
Hazardous Materials, Public Health and Safety				
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Initial Treatment: Y Treatment Maintenance: Y	Prior	SMRCD	SMRCD
The project proponent has completed pre-operational research to determine that there are not any sites known to have previously used, stored, or disposed of hazardous materials within the project area.				