Henninger Flats Fuel Reduction Project

CalVTP Project Specific Analysis

CalVTP ID: 2024-14

prepared for

Los Angeles County Fire Department
Forestry Division
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Acronyms and Abbreviations

AB	Assembly Bill
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CalVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CWHR	California Wildlife Habitat Relationship
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
ELZ	Equipment Limitation Zones
ESA	Endangered Species Act
ESHA	Environmentally Sensitive Habitat Area
FRI	Fire Return Interval
GHG	Greenhouse Gas
HCP	Habitat Conservation Plan
IAP	Incident Action Plan
LACFD	Los Angeles County Fire Department
LSCSBS	Los Angeles County Sensitive Bird Species
LCP	Local Coastal Program
LTS	Less Than Significant
LTSM	Less Than Significant with Mitigation
MCV	Manual of California Vegetation
MCV Alliances	A category of vegetation classification which describes repeating patterns of plants across a landscape. Each alliance is defined by plant species composition, and reflects the effects of local climate, soil, water, disturbance, and other environmental factors. Alliances are commonly used in vegetation mapping.

MCV Associations	A vegetation classification unit defined by a diagnostic species, a characteristic range of species composition, physiognomy, and distinctive habitat conditions. Associations reflect local topo-edaphic climates, substrates, hydrology, and disturbance regimes.
MM	Mitigation Measure
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOx	Nitrous Oxide
NRCS	Natural Resources Conservation Service
NWI	National Wetland Inventory
OPR	Office of Planning and Research
PCA	Pest Control Advisor
PEIR	Programmatic Environmental Impact Report
PM	Particulate Matter
PPE	Personal Protective Equipment
PRC	Public Resources Code
PS	Potential Significant
PSA	Project-Specific Analysis
PSU	Potentially Significant and Unavoidable
RPF	Registered Professional Forester
RUSLE	Revised Universal Soil Loss Equation
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SCCIC	South-Central Coastal Information Center
SENL	Single Event Noise Levels
SMP	Smoke Management Plan
SPR	Standard Project Requirement
SPRP	Spill Prevention and Response Plan
SU	Significantly Unavoidable
TMP	Traffic Management Plan
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

USLE	Universal Soil Loss Equation
VMT	Vehicle Miles Travelled
WDR	Waste Discharge Requirements
WLPZ	Watercourse and Lake Protection Zones
WUI	Wildland-Urban Interface

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1 Henninger Flats Fuel Reduction Project – Introduction

1.1 Program Overview

The California Vegetation Treatment Program (CalVTP) is a Programmatic Environmental Impact Report (PEIR) certified in 2019 as a document compliant with the California Environmental Quality Act (CEQA). The CalVTP PEIR evaluates potential environmental effects of implementing qualifying vegetation treatments to reduce wildfire risk throughout the State Responsibility Area (SRA) in California (Ascent 2019). This PEIR offers an array of permittable vegetation treatments to allow for ecological restoration, promoting forest health, and reducing the risk of wildfire with the submittal of a Project Specific Analysis (PSA). It was designed for use by state, special district, and local agencies to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR.

This PSA serves as an Addendum to the PEIR, evaluating project consistency within the parameters of the CalVTP PEIR. An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. Section 2 *CalVTP Environmental Checklist* includes the criteria to support an Addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape.

The PSA must demonstrate how the project will comply with Standard Project Requirements (SPRs) and Mitigation Measures (MMs) from the CalVTP PEIR. The treatment types and activities proposed for this project align with the allowable actions within CalVTP, or do not otherwise warrant additional CEQA documentation.

1.2 Proposed Project Overview

Serving as the CEQA Responsible Agency, the Los Angeles County Fire Department (LACFD) proposes the implementation of wildfire hazard fuel reduction activities on 50 acres of the Henninger Flats area in Los Angeles County. LACFD is seeking CEQA compliance for the Henninger Flats Fuel Reduction Project (project) through preparation of this CalVTP PEIR PSA. The proposed treatment types (wildland urban interface [WUI] fuel reduction and fuel break) and treatment activities (manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and herbicide application) are consistent with those evaluated in the PEIR.

1.3 Purpose of this Document

This document serves as the PSA and addendum to the PEIR to evaluate whether the proposed project is within the scope of the CalVTP PEIR. As described above, the treatment types and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with State CEQA Guidelines Section 15168(c)(2). The project-specific Mitigation Monitoring and Reporting Program (MMRP), which identifies the CalVTP SPRs and MMs applicable to the proposed project, is presented in Appendix A.

1.4 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 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 scattered collection of area outside of the CalVTP PEIR treatable landscape is due to the digital method with which the treatable landscape was developed and the degree of resolution within the maps. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., SRA and Local Responsibility Area [LRA]), resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable. Approximately 8.6 acres within the approximately 50-acre Henninger Flats proposed treatment area are not included in the treatable landscape model described within the PEIR. Approximately 41 acres within the approximately 50-acre Henninger Flats proposed treatment area are within the CalVTP treatable landscape model described within the PEIR.

2 CalVTP Environmental Checklist

2.1 Project Title

Henninger Flats Fuel Reduction Project

2.2 CalVTP ID Number

2024-14

2.3 Project Proponent Name and Address

Los Angeles County Fire Department
Forestry Division
5823 Rickenbacker Road, Rom 123
Commerce, California 90040

2.4 Contact Person Information and Phone Number

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213-703-8113

2.5 Project Location

Los Angeles County, California; Mt. Wilson Quadrangle; CA270010N0120W0UP010; Section 01; CA270010N0120W0SN120; Section 12.

The proposed project is located in the Henninger Flats Campground area off Mt. Wilson Toll Road in the San Gabriel Mountains above Altadena, California as shown in Figure 1 and Figure 2. The Mt. Wilson Toll Road is a public use trail with a locked gate at the trail entrance off Pinecrest Drive in Altadena, California. Pedestrian and cyclist activity on the road is common. An LACFD key will open the gate to provide vehicle access to the site approximately 2.7 miles up Mt. Wilson Toll Road. There are nine structures and camping infrastructure within the proposed project area. Approximate project center point:

Latitude: 34°11'38.00"N Longitude: 118° 5'19.25"W

2.6 Total Area to be Treated (Acres)

50.01 acres

Figure 1 Regional Location

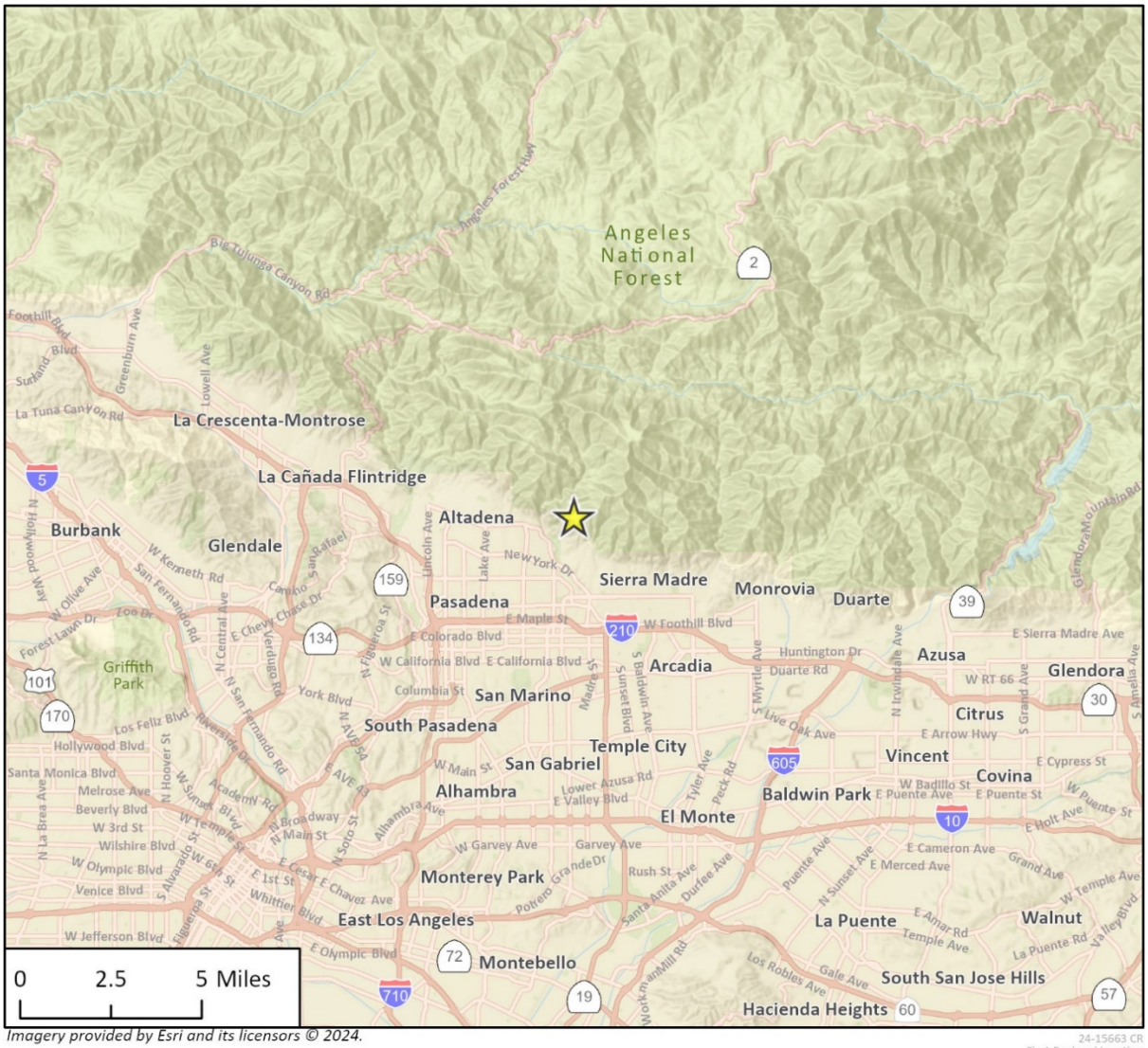

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Fig 1 Regional Location

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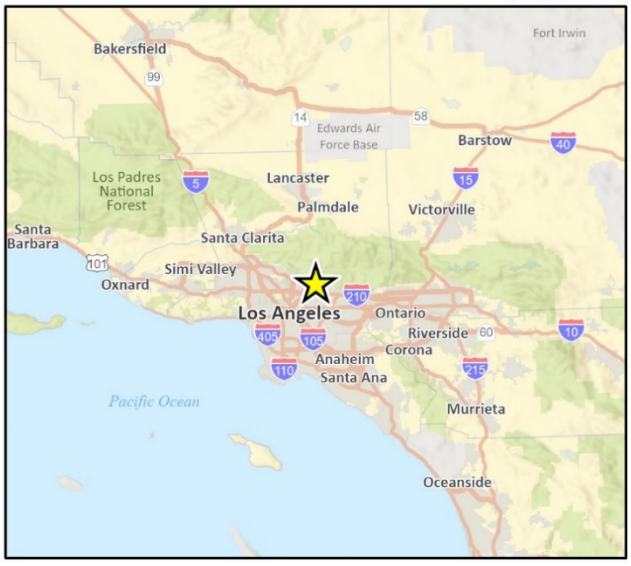
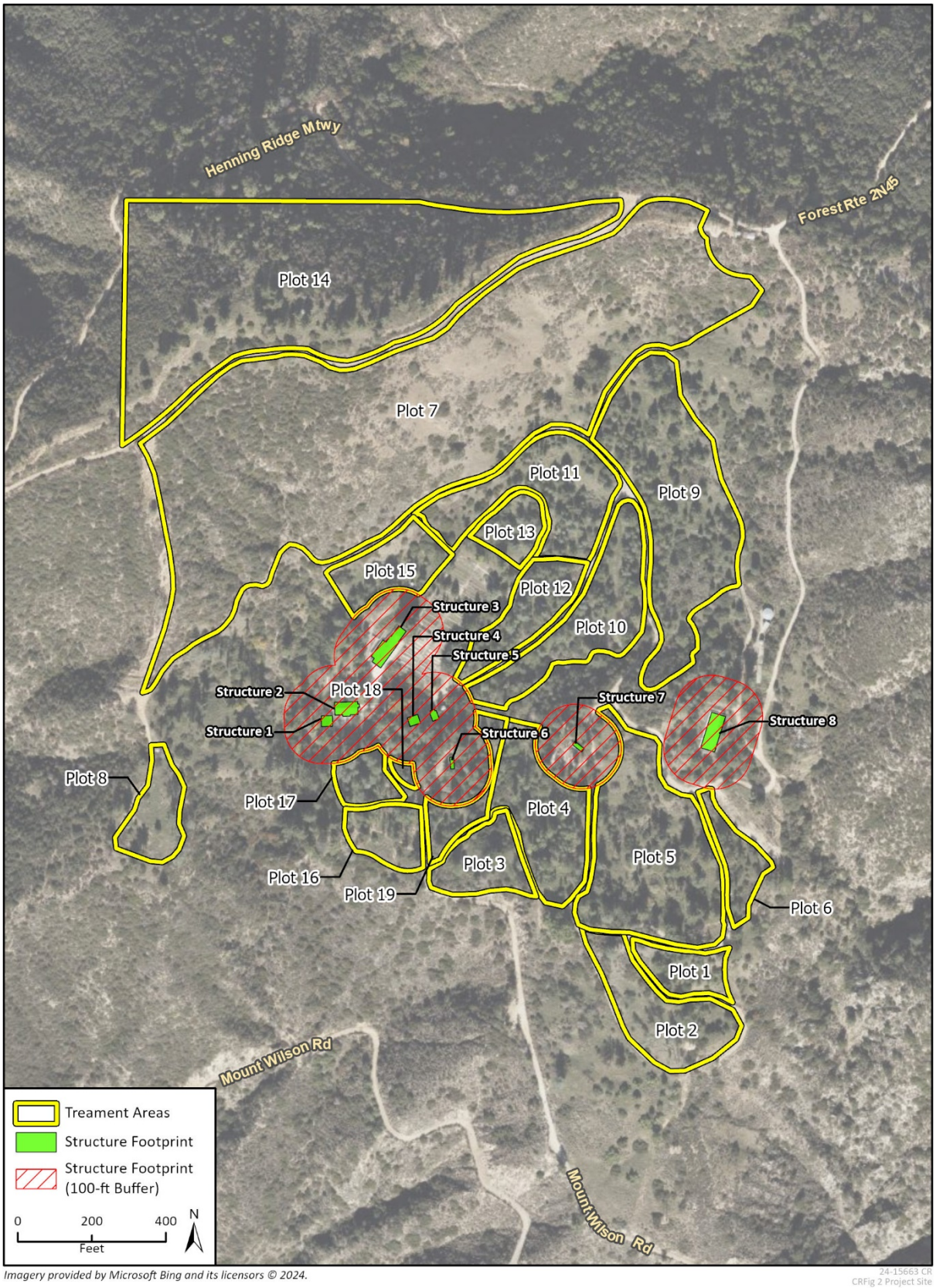


Figure 2 Project Area



2.7 Description of Project

The proposed project will reduce hazardous fuel loads on approximately 50 acres of grass and shrub fuel types in the San Gabriel Mountains above Altadena in Losa Angeles County, California. The site includes varied terrain featuring steep slopes at southerly aspects with elevation ranging from approximately 2,460 to 2,950 feet above mean sea level (AMSL).

The proposed vegetation treatment types that would occur to reduce hazardous fuel loading are:

- Wildland-Urban Interface (WUI) fuel reduction
- Fuel Break

The proposed vegetation treatment activities used to conduct the treatment types are:

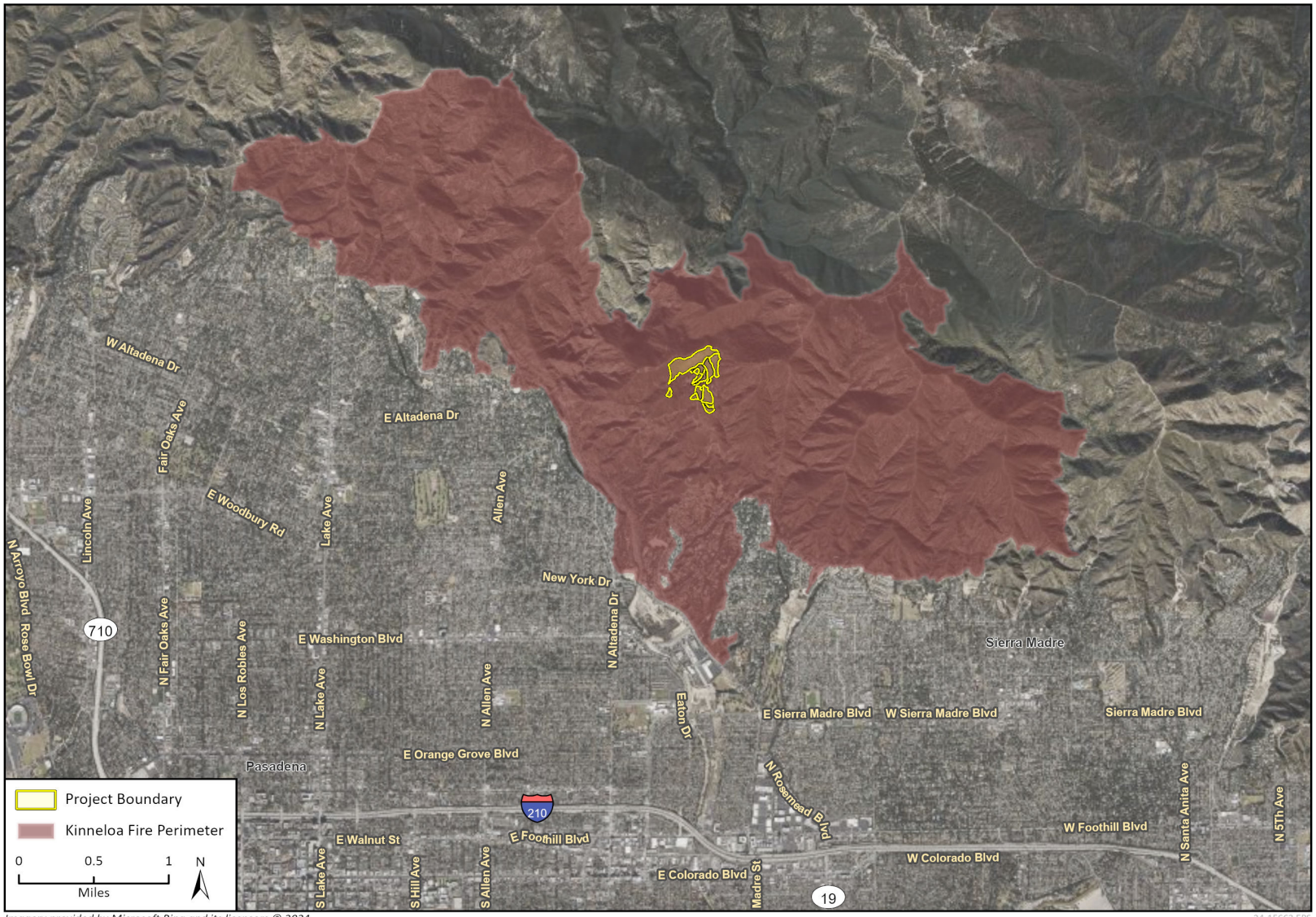
- Manual Treatments
- Mechanical Treatments
- Prescribed Herbivory
- Herbicide Application
- Prescribed Burning

The proposed project area is completely within the 1993 Kinneloa Fire burn scar as shown in Figure 3. At the time, this was the 12th most destructive wildfire in California history and remains one of the most destructive in Los Angeles County history. This fire began from an escaped campfire on the Mt. Wilson Toll Road below Henninger Flats and was driven by strong Santa Ana winds, eventually consuming 5,485 acres and resulting in one fatality.

The LACFD owns and manages the Henninger Flats site providing access control and management of pedestrian traffic. Hazard fuel reduction treatment activities at the site will be conducted by LACFD and will result in a reduction of predominantly shrub and grass fuel loads while providing rare live fire training opportunities. The site includes campground infrastructure and several buildings. Activities implemented within the WUI fuel reduction treatment type would occur outside of the 100-foot defensible space requirements described in Public Resources Code 4291 and within the modeled WUI. WUI fuel reduction treatments would serve as one component of the larger wildfire risk reduction effort occurring in the WUI. WUI building codes (California Building Code Chapter 7A) and other structure hardening and fire safe development requirements would continue to be implemented in addition to and separately from this proposed project. LACFD can use the CEQA Categorical Exemption 15304 Minor Alterations to Land (i) - *Fuel management within 30 feet of structures to reduce the volume of flammable vegetation* to conduct fuel management activities within 100 feet of a structure if LACFD determines extended clearance is necessary based on extra hazardous fire conditions of a site.

The history of wildfire in the region, high public use, and proximity to densely populated areas present an increased risk of wildfire at the proposed project site. The primary objective of this project is the creation of a vegetative mosaic with heterogenous fuel continuity and age class to prevent the spread of wildfires and provide opportunity for wildland firefighting to slow the advance of a wildfire.

Figure 3 Kinneloa Fire



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Additional data provided by NHD, 2024; CPAD, 2024; CALFIRE, 2023.

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Fig X 1993 Kinneloa Fire

2.7.1 Purpose and Need

The purpose of the proposed project is to reduce vegetation density and manage fuel to protect communities and assets from risks associated with wildfire and to provide emergency access points and staging areas for firefighters and equipment within WUI areas in the SRA. The proposed project will also provide safe and effective locations to perform fire suppression operations, slow the spread of a wildland fire at fuel break locations, and reduce the potential for the loss of life, property, and natural resources. The proposed project would protect the public, firefighters, structures, resources, and infrastructure throughout proposed treatment areas.

The proposed project location in the foothills of the San Gabriel Mountains located just above the densely populated residential area of Altadena coupled with the highly trafficked Mt. Wilson Toll Road trail presents an area of high wildfire risk. The additional history of wildfire in the area and site control for LACFD result in an ideal site to implement hazard fuel reduction through the use of prescribed burning.

The proposed site includes steep slopes covered with fine fuels, dense scrub, chaparral, and oak woodlands, which generate an accumulation of woody fuel and other vegetative debris. Annual and perennial fuels including invasive grasses and forbs within campground areas and dense native upland vegetation, respectively, populate the proposed project area posing a particular threat during late summer Santa Ana Wind events common to this region.

The proposed project site includes multiple structures and campground infrastructure as well as a significant cultivated grove of coulter pine (*Pinus coulteri*) and deodar cedar (*Cedrus deodara*). Manual pruning of these and other trees on the site will occur on an as needed basis prior to initial treatments to reduce vertical fuel continuity and avoid crown fires.

LACFD considers the use of prescribed herbivory for long-term site maintenance an effective possible alternative to manual, mechanical, and prescribed fire treatments. While the proposed project area would need more intensive initial treatment, prescribed herbivory is included in this PSA as a treatment activity.

LACFD considers the use of herbicide application for long term management of regrowth and invasive/non-native species at the proposed project site an effective tool. A small grove of eucalyptus within Treatment Plot 7 as well as non-native vegetation on road and trail sides would be typical targets for herbicide applied by a Qualified Pest Control Applicator (PCA).

2.7.2 Project Activities

The proposed project will be implemented on approximately 50 acres of SRA in the foothills of the San Gabriel Mountain range in Los Angeles County. The proposed project area is subdivided into 19 treatment plots of varying acreage as shown in Figure 2 and Table 1.

Table 1 Treatment Plot Acreage

Treatment Plot	Treatment Size
Plot 1	0.61
Plot 2	1.58
Plot 3	0.90
Plot 4	1.78
Plot 5	3.59
Plot 6	0.60
Plot 7	17.38
Plot 8	0.80
Plot 9	4.10
Plot 10	1.94
Plot 11	2.07
Plot 12	1.03
Plot 13	0.55
Plot 14	10.31
Plot 15	0.98
Plot 16	0.69
Plot 17	0.47
Plot 18	0.08
Plot 19	0.55
Total Acreage	**50.01**

Plot boundaries were defined by the LACFD Forestry Division staff and based on existing roads, structures, topography, and fuel density. Treatment types and activities would occur consistently across all project plots. Division of the proposed project area into plots will benefit site access and management of prescribed burning areas, as well as the management and preservation of native vegetation, habitats, and existing site facilities. Proposed fuel reduction treatment types and activities are shown in Table 2.

Proposed fuel reduction treatments include a combination of manual methods, mechanical methods, prescribed herbivory, herbicide application, and prescribed burning of piles and broadcast burning operations to be conducted similarly in all treatment plots. The proposed project is anticipated to be implemented initially during one treatment season by the LACFD if the Prescribed Burn Plan conditions align with staff availability. Initial treatments may extend through several years, if conditions do not align with the Prescribed Burn Plan. Maintenance treatments are planned to occur every year or as needed and will similarly consist of manual, mechanical, prescribed herbivory, herbicide application, and prescribed burning methods.

Target fuel consumption goals for prescribed fire implementation include 60 percent of live fuels and 90 percent dead fuels in the proposed treatment areas. Fuel consumption will be accomplished with moderate intensity mosaic burning occurring in fall (October-December) for ideal burn conditions and management of biological resources. Patches of unburned vegetation will be left on site to increase heterogeneity of vegetation size and age class, and preservation of habitat for

endemic and migratory wildlife and native vegetation. Operational prescribed burning details can be found in the Prescribed Burn Plan which will be developed by LACFD prior to implementation.

Table 2 Proposed Fuel Reduction Treatments

Treatment Type	Treatment Activities	Treatment Acreage	Equipment Used for Treatments	Timing of Treatments
WUI Fuel Reduction	Manual, mechanical, prescribed herbivory, herbicide application, and prescribed burning	22	Bulldozers, masticators, hand crews, chippers, livestock, wildlife friendly fencing, backpack sprayers, vehicle mounted sprayers	Year-round
Fuel Break	Manual, Mechanical, prescribed herbivory, herbicide application, and prescribed burning	28	Bulldozers, masticators, hand crews, chippers, livestock, wildlife friendly fencing, backpack sprayers, vehicle mounted sprayers	Year-round

Treatment activities used in specific locations will be determined on-site based on factors such as vegetation type, annual vegetation growth, previous fuel management, slope, land management objectives, and funding.

Proposed treatment activities include establishment of fire containment lines using existing roads and trails network and strategically located anchor points, topography, and hydrologic features. Due to existing resources and structures in the proposed project area, fire exclusion areas will be established using manual, mechanical, and wetting methods. Areas of native and desirable nonnative trees will be limbed up prior to firing operations to reduce the propensity for scorch and crown fires.

Prescribed herbivory would be used as a maintenance activity after initial site treatments. Appropriate stocking rates and locations will be determined based on annual growth, target species, stock availability, and CRM recommendations.

Herbicide application would be used as a targeted treatment activity to treat specific species. A small eucalyptus grove in Treatment Plot 7 is targeted for removal through manual methodology and herbicide application to the cut stump will inhibit regrowth. Similarly, herbicide application on non-native species bordering roads and trails throughout the project site will reduce fuel burden and maintain site integrity.

The proposed project area does not include aquatic resources or riparian vegetation. Conducting treatment activities within aquatic and riparian features may require further regulatory clearance since they may be State and/or federally regulated by the California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Service (USFWS), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB). This PSA does not provide regulatory compliance coverage for fuel reduction treatment activities within riparian features and jurisdictional waterways.

Treatment Type: Wildland-Urban Interface Fuel Reduction

The proposed project includes fuel reduction activities within WUI SRA areas in Los Angeles County. 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 as shown in Figure 4.

The WUI is the geographic overlap of two diverse systems, wildland and structures. At this interface, buildings and vegetation are sufficiently close that a wildland fire could spread to a structure, or a structure fire could ignite wildland vegetation. Once homes are built within or adjacent to natural areas, they increase the complexity of fighting wildland fires because the priority of extinguishing the wildland fire is often superseded by the necessity to first protect human life and private property. The focus of WUI fuel reduction treatments is to strategically reduce vegetation density and remove fuel to directly protect communities and assets at risk from potential damage from non-wind driven wildfires originating in the adjacent wildlands, as well as to protect the wildlands from fires starting in or near development. WUI fuel reduction treatments also serve as emergency access points and staging areas for firefighters and equipment and reduce flammable vegetation along emergency evacuation routes for the community. Also, where existing habitat within the WUI is degraded, such as by the infestation of non-native plant species, as well as needing fuel reduction, WUI treatments would also help enhance habitat quality. This proposed treatment type is consistent with the PEIR for modifications of landscape to reduce losses and improve resiliency to wildfire (Ascent 2019).

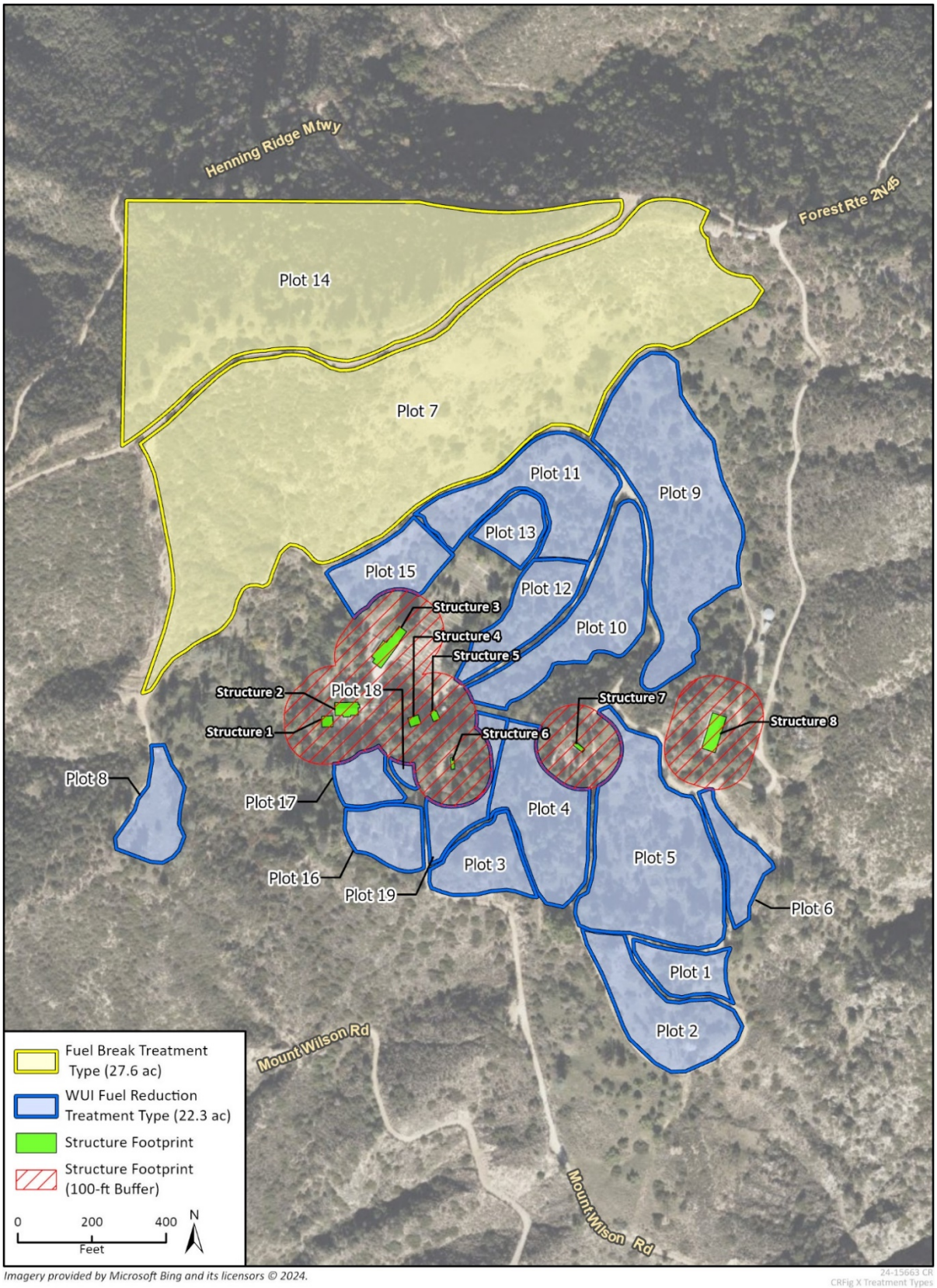
Treatment Type: Fuel Break

The proposed project includes fuel reduction activities to create non-shaded fuel breaks. Non-shaded fuel breaks are typically created where there is a natural change in vegetation type, such as from forest or shrubland to grassland, and all vegetation is removed from the fuel break. Heavy equipment would be used to create these types of fuel breaks, except on slopes steeper than 65 percent or 50 percent in areas susceptible to erosion, where manual or prescribed burning treatments would be employed as shown in Figure 4.

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.

Fuel breaks are a fundamental tool in allowing firefighters access to control wildfires and are useful in slowing non-wind driven fires before they grow beyond initial attack capabilities. Fuel breaks are primarily used to allow responders to reach the leading edges of a fire and increase protection of isolated communities. In non-wind driven fires, fuel breaks can also help to stop or reduce the lateral spread of fires. Studies of past fires have assessed the effectiveness of fuel breaks in reducing wildfire risk. Within seven counties in southern California from 1990 through 2009, ridgeline fuel breaks accounted for 8 percent of the fire perimeters in Santa Ana wind-driven fires and up to 13 percent within non-Santa Ana wind-driven fires. Roads accounted for up to 72 percent of the fire perimeter in non-Santa Ana wind-driven fires and 56 percent in Santa Ana wind-driven fires (Jin et al. 2015). Syphard et al. (2011) conducted a spatial analysis of the Los Padres National Forest in southern California and concluded that fires stopped at fire-crew accessed fuel breaks 46 percent of the time. Preexisting fuel breaks allowed fire suppression activity to take advantage of the lighter fuels along the ridgelines to cut control lines. This was useful in both wildland areas and areas outside the wildland areas where heavy equipment could aid in suppression efforts (Syphard et al. 2011). This proposed treatment type is consistent with the PEIR for modifications of landscape to reduce losses and improve resiliency to wildfire (Ascent 2019).

Figure 4 Treatment Types



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CRFig X Treatment Types

2.7.3 Treatment Descriptions

As described in Table 2, proposed treatment activities include manual and mechanical methods for site preparation, followed by broadcast and pile prescribed burning for fuel reduction. Prescribed herbivory may be utilized as a cost-effective and ecologically restorative maintenance activity throughout the duration of this project. Herbicide application may be utilized to treat specific areas within the proposed project site with precision. Each of these activities are included as vegetation treatment activities in the PEIR and are described in detail below.

Manual Vegetation Treatment

Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species. Manual treatments include the use of chainsaws, handsaws, pole saws, shovels, and weed whips. Manual treatments will be used to create or expand fire containment lines prior to prescribed fire operations. Manual treatments will also be used for trimming and pruning of tree canopy to reduce vertical fuel continuity, raising lower tree limbs to reduce risk of crown fires. In areas with established tree canopy, this process will resemble a small-scale shaded fuel breaks.

Mechanical Vegetation Treatment

Mechanical treatment involves the use of motorized equipment (rather than hand or manual equipment), such as wheeled tractors, crawler-type tractors, or specially designed vehicles with attached implements designed to cut, uproot, crush/compact, or chop target vegetation. The selection of a mechanical treatment and associated equipment is based upon several factors such as the characteristics of the vegetation, seedbed preparation and re-vegetation needs, topography and terrain, soil characteristics, climatic conditions, and a comparison of the improvement cost to the expected increase in productivity or public and/or private benefit. In some cases, mechanical treatment may be used to create a desired stand structure and composition without having to use prescribed burning, or in areas where there are risks and uncertainties with prescribed burning. Mechanical treatment methods that may be used include tilling, mowing, masticating, grubbing, and chipping, among others. Mechanical treatments may be used to create or expand fire containment lines prior to prescribed fire operations.

Prescribed Herbivory

Prescribed herbivory is the use of domestic livestock to accomplish specific and measurable vegetation management objectives. Those would include things like removing biomass (fine fuel loads), reducing populations of specific plant species, slowing the re-establishment of shrubs on burned or mechanically thinned sites, and improving plant community structure for wildlife habitat values. Cattle, sheep, and goats are the animals most commonly used for this purpose because they are relatively common and easy to manage. Grazing/browsing by these animals is best used for green herbaceous plants that produce fine fuels and smaller diameter woody species that produce highly flammable fire fuels (Nader et al. 2007). Animals are best selected according to the types of vegetation that need to be managed. Goats are typically best suited to shrubs, and cattle are better suited to herbaceous plants, especially grasses. Prescribed grazing can enhance habitat for wildlife in addition to controlling fire fuel loads.

For this treatment activity to be effective at reducing wildfire risk or in achieving other applicable objectives of the CalVTP, the right combination of animals, stocking rates, timing, and rest must be used. Prescribed herbivory by domestic livestock should occur when the target plant species is (are)

palatable and when feeding on the plants can damage them or reduce viable seeds. Consulting with a Certified Rangeland Manager (CRM) is advised when prescribed grazing is being considered as a treatment.

Herbicide Application

Herbicides are chemicals that damage or kill plants and can be classified by their mode of action. They include growth regulators, amino acid inhibitors, grass meristem destroyers, cell membrane destroyers, root and shoot inhibitors, and amino acid derivatives, all of which interfere with plant metabolism in different ways.

Herbicides can also be categorized as selective or non-selective. Selective herbicides kill only a specific type of plant, such as broad-leaved plants, which allows the herbicide to be used to control weeds while maintaining grass species. Other herbicides, such as glyphosate (Roundup®), are non-selective and kill any type of plant. These must be used carefully to avoid damaging non-target plants. Herbicides that may be applied under the CalVTP are:

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

Herbicide application under the CalVTP must comply with the U.S. Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency and Department of Pesticide Regulation (DPR) label standards. Only ground-level application would occur; no aerial applications would be allowed under the CalVTP. Several herbicide application methods are available for use by on-the-ground personnel, including as paint-on stems, backpack hand-applicator, hypo-hatchet tree injection, boom sprayers from ATVs (sprayers would be pointing down and only used in when the target species occurs throughout the treated area), or hand placement of pellets. The application method chosen would depend on the written recommendations of an independent Pest Control Advisor (PCA) licensed by DPR for the targeted weed species and characteristics of the site to which the treatment is proposed.

Prescribed Burning

Prescribed low intensity surface fires may be used to control vegetation by enhancing the growth, reproduction, or vigor of certain species, in addition to managing fuel loads and/or maintaining a targeted vegetation community. This activity 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). Prescribed burning can be used to restore the ecological function in areas that have departed from their natural fire regime. Fire suppression has changed fire activity in the 20th century, and prescribed burning is a tool that can restore and maintain appropriate fire regimes (Keeley and Syphard 2016).

Typically, prescribed burning would require the construction of control lines (fuel breaks) using manual or mechanical treatments. In some cases, extensive or mature shrubs may be trimmed or removed manually by hand crews or by mechanical equipment in advance of burning. Prescribed burning may be used where other activities are not feasible because of rocky soils, steep slopes (i.e., greater than 65 percent or 50 percent in high erosion areas), or irregular terrain; although, prescribed burning is limited to situations where sufficient fuel is available and arranged properly to carry the fire.

Prescribed burning could be used in combination with manual and mechanical treatment activities. This treatment activity could occur in every vegetation type. Prescribed burning would take place across the entirety of the project in the form of broadcast burning and pile burning. Site and environmental conditions must align with the Prescribed Burn Plan developed by the LACFD.

Broadcast burning would require one crew consisting of 30 to 60 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 to 3 days. Equipment would include water trucks, fire engines, and bulldozers. All burning would occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a Prescribed Burn Plan that includes a Smoke Management Plan (SMP), pursuant to regulatory requirements.

Per SPR AQ-2 an SMP will be developed by the LACFD and submitted to the South Coast Air Pollution Monitoring District prior to burning operations. Per SPR AQ-3 the LACFD will develop the Prescribed Burn Plan using the CAL FIRE burn plan template prior to burning operations.

Biomass Processing

Where prescribed burning is not feasible, or where increased ground cover is desired, mechanically masticated (shredded) material, or chipped material would remain onsite and would be distributed with an average depth not to exceed 3 inches. Chip piles will be limited to an average of 3 inches in depth and would not exceed 6 inches in depth. Chips would not cover more than 20 percent of a given treatment area. Within 300 feet of aquatic resources such as seasonal drainages, chips will be spread in a mosaic pattern to ensure that vegetative growth is not prevented. Areas where masticated or chipped material exceeds this depth would require redistribution of the material to onsite locations or processing using pile burning or air curtain burners.

2.7.4 Equipment

Equipment necessary to conduct this proposed project includes:

- Chainsaws
- Loppers
- Shovels
- Rakes
- McLeods
- Pulaskis
- Skid steers
- Masticators
- Bulldozers
- Backhoes
- Tracked or wheeled chippers haul vehicles
- Vehicles for transport
- Wildlife friendly fencing
- Backpack sprayers
- Vehicle mounted boom sprayers
- Fire suppression vehicles and equipment

2.7.5 Duration of Treatments

It is anticipated that the initial treatment for the proposed project will be conducted within one year. Maintenance treatments will be planned to occur every year or as needed and will similarly consist of manual, mechanical, prescribed herbivory, herbicide application, and prescribed fire activities. Prescribed burning treatment activities will align with conditions detailed in the LACFD Prescribed Burn Plan. Ideal burning conditions are typically encountered from October through December.

2.8 Treatment Types

The three treatment types available within the CalVTP PEIR are WUI Fuel Reduction, Fuel Break, and Ecological Restoration. This project may use:

- WUI Fuels Reduction
- Fuel Break

2.9 Treatment Activities

The five treatment activities available within the CalVTP PEIR are prescribed burning (broadcast and pile), manual, mechanical, prescribed herbivory, and herbicide. This project may use:

- Prescribed (broadcast) Burning (50 acres)
- Prescribed (pile) Burning (50 acres)
- Manual Treatment (50 acres)
- Mechanical Treatment (50 acres)
- Prescribed Herbivory (50 acres)
- Herbicide Application (50 acres)

2.10 Fuel Type

The three fuel types to be treated within the CalVTP PEIR are grass type, shrub type, and forest type. Fuel types within the proposed project area include:

- Grass Type
- Shrub Type

Treatments will occur predominately in the grass and shrub fuel type as described in the CalVTP PEIR Section 2.4.1.

In the grass fuel type, fire spread is governed by fine, very porous, and continuous herbaceous fuels that have dried or are nearly dry. Fires are typically surface fires that move very rapidly through the dry grass and associated material. Generally, less than one-third of the area is composed of shrubs or timber. Where shrub or tree fuel types exist, fire intensity generally increases along with an increase in the production of embers that spread fire. The grass fuel type in a specific location has historically burned in wildfires at frequencies ranging from every year up to every 35 years. The interval within which fire returns to an area is called “fire frequency” or “fire return interval.” (Ascent 2019)

Fire in the shrub fuel type is generally carried in the surface fuels composed of litter cast by the shrubs, as well as the grasses or forbs (i.e., flowering, non-grass plants) in the understory. Fire intensity is variable in this group; however, fuel and weather conditions can produce intense fast-spreading fires, because of the available live and dead fine woody material in the crowns of a nearly continuous secondary overstory. Besides flammable foliage, dead woody material in the stands substantially contributes to the fire intensity as well as a deep litter layer. Wildfire in the shrub fuel type can completely burn a large stand of vegetation, called stand replacement, and can occur with a frequency ranging from every 35 to 200 years (Ascent 2019).

2.11 Geographic Scope

Sites within the approximately 50 acre proposed Henninger Flats treatment area were not included in the treatable landscape model described within the PEIR. Approximately 8.6 acres within the proposed Henninger Flats treatment area are outside of the CalVTP treatable landscape. The scattered array of acres outside of the CalVTP PEIR treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., SRA and LRA), resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable

2.12 Surrounding Land Use and Setting

The proposed project site is approximately one mile east from the Mt. Wilson Toll Road gate on Pinecrest Drive. This area of Altadena is a densely populated residential community separated from the base of the slope leading up to the proposed project site by the, often dry, Eaton Wash. The

Kinneloa Mesa neighborhood lies approximately three quarters of a mile south of the project site and features homes built into the mixed topography of the San Gabriel Mountain range foothills. The San Gabriel Mountain range expands to the northwest, north, northeast, and east form the proposed project site. This mountainous terrain features varied topography, vegetation type, and density. The Mt. Wilson Toll Road leads through the Henninger Flats area to the Mt. Wilson Observatory approximately three miles northeast of the proposed project site. Many mixed-use recreational trails weave through the San Gabriel Mountains near the proposed project site resulting in variable pedestrian use and increasing the likelihood of wildfire starts.

2.13 Other Public Agencies Whose Approval is Required

Other public agencies who have been or will need to be consulted prior to project implementation include:

- South Coast Air Quality Management District (SCAQMD) – Smoke Management Plan and burn permit consultation
- California Department of Fish and Wildlife (CDFW)

2.14 Native American Consultation

As specified in SPR-CUL-1, Rincon Consultants, Inc. (Rincon) as the specialized environmental services firm hired by LACFD to develop this project specific analysis requested a list of cultural resources site forms (State of California Department of Parks and Recreation Series 523 forms) for cultural resources recorded within the project areas. This records search was conducted at the Southern Central Coastal Information Center – California State University Fullerton (SCCIC). The SCCIC is the official state repository for cultural resources records and reports for Los Angeles County. The records search helps to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the proposed project area and a 0.25-mile radius surrounding it. Rincon also reviewed the National Registry of Historical Places (NRHP), the CRHR, the California Historical Landmarks list, and the Built Environment Resources Directory, as well as its predecessor, the California State Historic Property Data File. Additionally, Rincon reviewed the Archaeological Determination of Eligibility list. Results of the records search indicated no previously recorded cultural resources located within the project area. Results of the records search can be found in Appendix B *Records Search Results* of the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

As specified in SPR-CUL-2, Rincon contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a contact list of Native American tribes culturally affiliated with the proposed project's treatment areas and received a positive response on May 10, 2024. A positive response represents Native American resources withing the project vicinity. The SLF results can be found in Appendix C *Sacred Lands File Search Results* of the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

As part of the Native American outreach, Rincon sent contact letters via certified email on May 10, 2024, to fifteen California Native American Tribes that the NAHC identified as having a traditional and cultural affiliation with the proposed project area. Rincon conducted additional follow up phone calls on May 24, 2024, as a professional best management practice and confirmation of receipt of the certified email. Tribal contact letters can be found in Appendix D *Tribal Notification Letters* of

the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024). Letters were sent to representatives of the following tribes:

- **Gabrieleno Band of Mission Indians - Kizh Nation**
  - Andrew Salas, Chairperson
- **Gabrieleno/Tongva San Gabriel Band of Mission Indians**
  - Anthony Morales, Chairperson
- **Gabrielino /Tongva Nation**
  - Sandonne Goad, Chairperson
- **Gabrielino Tongva Indians of California Tribal Council**
  - Robert Dorame, Chairperson
  - Christina Conley, Tribal Consultant and Administrator
- **Gabrielino-Tongva Tribe**
  - Sam Dunlap, Cultural Resource Director
- **Gabrielino-Tongva Tribe**
  - Charles Alvarez
- **San Fernando Band of Mission Indians**
  - Donna Yocum, Chairperson
- **San Manuel Band of Mission Indians**
  - Alexandra McCleary, Senior Manager of Cultural Resources Management
- **Santa Rosa Band of Cahuilla Indians**
  - Vanessa Minott, Tribal Administrator
  - Steven Estrada, Tribal Chairman
- **Soboba Band of Luiseno Indians**
  - Jessica Valdez, Cultural Resource Specialist
  - Joseph Ontiveros, Tribal Historic Preservation Officer
  - Isaiah Vivanco, Chairperson

In accordance with SPR CUL-2, LACFD is only required to notify interested tribal groups of the proposed project.

In accordance with SPR CUL-5, known archaeological resources within the proposed project area will be avoided or protected during treatment implementation. Further details can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

2.15 Use of PSA for Treatment Maintenance

Maintenance treatments are planned to occur every year or as needed and will similarly consist of manual, mechanical, prescribed herbivory, herbicide application and prescribed fire activities.

Prior to retreating any area within the project boundary, the project proponent will verify that site conditions described in the PSA are still relevant. If site conditions have undergone significant changes that are not reflected in this PSA or accompanying reports, LACFD is responsible for conducting necessary analysis to confirm the proposed treatments and resulting impacts are still within the allowable scope of the CalVTP PEIR. LACFD maintains site management responsibilities and controls access.

2.16 Standard Project Requirements and Mitigation Measures

On the basis of this initial evaluation:

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

☒ There is NO new information which would render mitigation measures previously considered infeasible or not considered in the CalVTP PEIR now feasible OR such mitigation measures have been adopted. [Guidelines Sec. 15162(a)(3); PRC Sec. 21166(c)]

☐ All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented (provide explanation)

2.17 Determination

On the basis of this initial evaluation:

☐ I find that all of the effects of the proposed project (a) have been analyzed adequately in the CalVTP PEIR, (b) have been avoided or mitigated pursuant to the CalVTP PEIR, and (c) all applicable mitigation measures and Standard Project Requirements 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 treatments in proposed project areas outside the CalVTP treatable landscape do not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, this ADDENDUM is adopted to address the project areas outside geographic extent presented in the PEIR.

☐ I find that the proposed project will have effects that were not examined 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 examined in the CalVTP PEIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the CalVTP PEIR, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project will have environmental effects that were not examined in the CalVTP PEIR. Because these effects are or may be significant and cannot be clearly mitigated, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

Agency: _____

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3 Evaluation of Environmental Impacts

A brief explanation is required for each Impact, Standard Project Requirement (SPR), and Mitigation Measure (MM) identified in the Project-Specific Analysis Checklist (PSA Checklist). The information provides direction to the project proponent, clarity for review, and in-field guidance to the field staff implementing the project and utilizing the PSA checklist (persons familiar with the project and preparation of the document may be different through the life span of the document). Answers should consider whether the project would result in new or more substantial environmental effects than described in the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) (SCH# 2019012052) after incorporation of applicable SPRs and MMs required by the CalVTP PEIR.

All answers must take account of the whole action involved, including the following: off-site as well as on-site; cumulative as well as project-level; indirect as well as direct; and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP PEIR for each environmental topic.

Once the project proponent has evaluated the environmental effect that may occur, the PSA checklist answers must indicate whether the impact is:

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

If the impact is equal to or less than the impact identified in the PEIR, the PEIR can be utilized without a Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR). If there are one or more entries where the impact is concluded to be greater than the impact in the PEIR, additional documentation pursuant to the California Environmental Quality Act (CEQA) may be required.

Where a Negative Declaration or Mitigated Negative Declaration may be required, the environmental review would be guided by the directions for use of the PEIR with later activities in Article 11, Section 15168 of the CEQA Guidelines. Where an EIR may be required, the environmental review would be guided by Article 11, Sections 15162 and 15163 of the CEQA Guidelines. When preparing any environmental document, the environmental analysis may incorporate by reference the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.

Project proponents should incorporate references into the PSA checklist to provide 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.

3.1 Standard Project Requirements (SPRs) and Mitigation Measures (MMs)

Each SPR and MM in the following PSA checklist would be addressed as they relate to the project. The following questions must be answered for each SPR and MM listed.

- **Applicable (Yes/No).** Document whether the SPR or MM is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
- **Implementing Entity**. In most cases the implementing entity would be CAL FIRE (or contract county). The implementing entity is the individual or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
- **Verifying/Monitoring Entity**. In most cases the verifying/monitoring agency would be CAL FIRE (or contract county). The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Note: the cited SPRs and MMs are summarized to manage the length of the document. Refer to the approved CalVTP language in Appendix A *Mitigation Monitoring and Reporting Program* for the full list of requirements.

EC-1 Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AD-4 SPR AES-2 SPR AQ-2 SPR AQ-3 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 AD-4 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	PS[3]	Impact AES-3 pp. 3.2-25 – 3.2-27	Yes	NA	MM AES-3	SU[3]	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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.

[3] While these significance conclusions appear inconsistent across the same row for the same impact(s), this information is taken directly from the PEIR (accessed July 2024 https://bof.fire.ca.gov/media/9358/32-aes-vis-res.docx). Refer to the PEIR for additional details that support these conclusions.

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]	☐	☐	☐

3.1.1 Discussion

Impact AES-1: Short-term Aesthetic Degradation

The potential for the proposed treatment activities to result in short-term degradation of the visual character of an area and/or degradation of public viewpoints was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, 16-19) and determined to be less than significant. The proposed project area is not visible from state scenic highways. Varying degrees of temporary degradation of public views may occur during active implementation of vegetation treatment activities for the proposed project. The location of the proposed site, approximately 1,550 feet above the City of Altadena, provides scenic vistas of the Los Angeles County built environment as well as the San Gabriel Mountains. The proposed project activities would not add to degradation of the scenic vista for visitors as they would be temporary and would occur on a midslope bench near existing road cuts and previous landslide scars which currently disrupt the unity of the vista.

Herbicide application and prescribed herbivory would occur intermittently and move throughout the proposed project area. Because these activities would involve manual herbicide application and herds of goats or sheep, these types of activities would not block any views, dominate a viewshed, or significantly disrupt views from a scenic vista.

Equipment and vehicles associated with manual and mechanical treatments and prescribed burning could be visible to public viewers at scenic vistas or other public viewpoints. SPR AES-2 requires the project proponent to avoid staging equipment within viewshed of public trails, recreation areas, and roadways. The Los Angeles County Fire Department (LACFD) maintains site control and has staff present at the Henninger Flats area often; resulting in large firefighting vehicles present at the site currently. Parking and equipment storage, while not abundant, can be established near structures for safety as well as to reduce the degradation of the public scenic vista or character of the site.

Implementation of manual and mechanical fuel reduction activities for site preparation prior to prescribed burning operations requires the use of hand-held and vehicle-mounted equipment, such as chainsaws, loppers, tractors, and other specially designed vehicles with attached implements designed to cut, uproot, crush/compact, or chop vegetation. Equipment typically used for manual treatment activities would be temporary and would not be visible from a scenic vista or degrade visual character or quality of the proposed project area. Mechanical treatments use larger equipment than manual treatments, but occur over a shorter duration than manual treatments, lasting typically between one week and three months in a project area. The treatment and its visibility would be temporary and would not dominate a view nor block any views of scenic vistas. It also would not substantially degrade the existing visual character or quality of the proposed project area given that the activity would be limited in geographic extent. Therefore, manual and

mechanical treatment activities would not result in a substantial degradation of a scenic vista or of visual character and quality.

Varying levels of smoke would be generated by prescribed burning, which could affect scenic vistas and other public viewpoints by dominating or blocking a view if excessive smoke is generated. Compliance with SPR REC-1, SPR AD-4, SPR AQ-2, and SPR AQ-3 minimize smoke emissions and smoke-related impacts by only allowing prescribed burning to occur when the conditions are appropriate to minimize smoke and notifying the surrounding public accordingly. Compliance with each of these SPRs is provided below and describes how prescribed burning would not result in a substantial degradation of a scenic vista or visual character and quality

SPR REC-1 requires the project proponent to identify public recreation areas near prescribed burning operations, coordinate with the agency with jurisdiction over the recreation area to minimize conflicts with recreation, and notify potential users prior to beginning prescribed burning. Although prescribed burning could temporarily degrade the existing visual character and quality of an area, public viewer exposure could be reduced through notification, affording potential viewers the choice to avoid treatment areas. LACFD maintains site control and can limit pedestrian traffic by implementing short-term trail closures. Appropriate signage would be posted at the trailhead, as well as notification of prescribed fire activities per SPR AD-4.

SPR AD-4 requires the project proponent to notify the public of any prescribed burning operations. At least three days prior to the commencement of prescribed burning operations, the project proponent would: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in local newspapers or other widely distributed media sources 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. Through these notifications, the project proponent is providing the public the opportunity for advanced planning to avoid the treatment areas during the proposed operation.

SPR AQ-2 requires the project proponent to develop and submit an SMP for all prescribed burning operations to the South Coast Air Quality Management District (SCAQMD) in accordance with 17 CCR Section 80160. The SMP specifies the “smoke prescription,” which is a set of air quality, meteorological, and fuel conditions needed before burn ignition may be allowed, which are developed with the intention of minimizing smoke emissions. Burning would only be conducted in compliance with the burn authorization program of the SCAQMD. SPR AQ-3 requires the project proponent to create a burn plan using the CAL FIRE burn plan template for all prescribed burns. If conditions deviate from the SMP or burn plan, it may result in unplanned short term aesthetic degradation and the burn would be halted.

All of the proposed treatment activities currently occur within the treatable landscape under existing vegetation treatment programs; the increase in pace and scale under the CalVTP would not introduce a new activity on the landscape, but would expand the areas being treated. The potential for the proposed project to result in short term substantial degradation of the visual character of the proposed project area is within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. All of the treatments described and evaluated above could be used in various combinations to implement the treatment types (i.e., WUI fuel reduction and fuel breaks), which could potentially degrade short-term public views if visible as described

above. However, because of the temporary nature of treatment activities, and incorporation of SPRs, short-term impacts from treatment activities to scenic vistas, to visual character or quality of public views, or to scenic resources in a state scenic highway would remain less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact AES-2: Long-term Aesthetic Degradation (Ecological Restoration, Shaded Fuel Break, WUI Fuel Reduction)

The potential for the proposed project treatment types to result in long-term degradation of the visual character of an area was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, 20-22) and determined to be less than significant. As ecological restoration and shaded fuel break treatment types are not planned for the proposed project, wildland urban interface (WUI) fuel reduction is the only treatment type that could result in long-term aesthetic degradation. Proposed treatment activities within the WUI fuel reduction treatment type include manual, mechanical, prescribed fire, prescribed herbivory, and herbicide use. The proposed project area is located on land managed by LACFD with vehicular access to the site on Mount Wilson Toll Road restricted to LACFD key holders but open to public recreational access for hikers and cyclists. Due to LACFD's control of Henninger Flats and the area's recreational value, the proposed project would comply with standards to maintain the long-term aesthetic value of the area. SPRs AES-1, SPR AES-3, SPR REC-1, and SPR AD-4 would require standards and plans that would prevent long-term aesthetic degradation. Compliance with each SPR is discussed below.

For manual and mechanical treatment activities for WUI fuel reduction treatment type, SPR AES-1 requires that the project proponent use thinning and feathering techniques on the edges of tree and shrub vegetation treatments conducted using manual and mechanical methodologies. These techniques provide less contrast between the edges of treated areas and non-treated areas, mimicking the form of natural clearings and maintaining the natural aesthetics.

SPR AES-3 requires that the project proponent 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. The proposed project area features grass, shrub, and tree fuel types. Natural transitions between these fuel types currently exist amongst unnatural features from the historical campground. LACFD would conduct treatments to retain existing vegetation types adjacent to trails to provide screening while achieving the fuels reduction goals.

SPR REC-1 requires the project proponent to notify public recreation users at the project area and any surrounding recreational areas of prescribed burning operations prior to beginning prescribed burning. Although prescribed burning could temporarily degrade the existing visual character and quality of an area, public viewer exposure could be reduced through notification and affording potential viewers the choice to avoid treatment areas. LACFD maintains site control to limit pedestrian traffic as needed by implementing short-term trail closures. Appropriate signage would be posted at the trailhead, as well as notification of prescribed fire activities per SPR AD-4. SPR AD-4 requires the project proponent notify the public of any prescribed burning operations and the

measures being taken to protect the environment and prevent prescribed burn escape. At least three days prior to the commencement of prescribed burning operations, the project proponent would notify the public of the timing of the prescribed burn and contact information for questions and concerns. These notifications would be accomplished through: 1) posting signs along the closest public roadway to the treatment area; 2) publishing a public interest notification in a local newspaper or other widely distributed media source; 3) sending the local county supervisor and county administrative officer a notification letter.

All of the proposed treatment activities currently occur within the treatable landscape under existing vegetation treatment programs; the increase in pace and scale under the CalVTP would not introduce a new activity on the landscape, but would expand the areas being treated. The potential for the proposed project to result in long-term substantial degradation of the visual character of the proposed project area is within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. WUI fuel reduction would not result in a long-term, substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of a site.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. The proposed treatments would be consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact AES-3: Long-term Aesthetic Degradation (Non-shaded Fuel Break)

Potential for the non-shaded fuel break treatment type to result in long-term degradation of the visual character of an area was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, 25-26). Portions of the proposed project area would use non-shaded fuel breaks as the treatment activity. The potential for these treatment types to result in long-term degradation of the visual character of an area was found to be potentially significant because it may be infeasible to relocate a non-shaded fuel break to avoid public visibility.

Non-shaded fuel breaks (which unlike shaded fuel breaks, remove all the vegetation from within the treatment area) are necessary to implement broadcast prescribed fire. Treatments in the approximately 50-acre proposed project area would not establish new non-shaded fuel breaks. Instead, treatments would be limited to using existing roads and trails as fuel breaks and maintaining these roadside right-of-way clearances with manual or mechanical treatments to broaden the width, as appropriate and feasible, for site conditions. Additionally, MM AES-3 would be implemented to maintain the long-term aesthetic quality of the project area.

Compliance with MM AES-3 would involve conducting visual reconnaissance surveys prior to implementation to identify the locations from where the non-shaded fuel breaks would be visible. LACFD would identify feasible changes in the treatment design to reduce impacts to public views of non-shaded fuel breaks. If MM AES-3 is necessary to reduce a potentially significant impact and cannot be implemented in a way that would feasibly reduce the visual impact below significance, a substantial degradation of a scenic vista or visual character or quality of public views from the non-shaded fuel break treatment type could be unavoidable. Accordingly, the impact if it occurred, would remain significant and unavoidable. This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The potential for the proposed project to result in long-term substantial degradation of the visual character of the proposed project area is within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. For purposes of CEQA compliance, this impact is considered significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Aesthetic and Visual Resource Impacts

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

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR AES-1 Vegetation Thinning and Edge Feathering. This SPR only applies to manual and mechanical treatment activities within all treatment types, including treatment maintenance.	Yes	LACFD Prior-During	LACFD
Prior: Pre-field work to determine treatment types and boundaries would consider topographical features with the intent to create irregular vegetation densities and treatment area size to mimic natural conditions. **During:** If there are areas within the mechanical treatment areas that cannot be completed with the use of equipment due to equipment limitations, they would be treated with manual treatment methods.			
SPR AES-2 Avoid Staging within Viewsheds. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	LACFD Prior-During	LACFD
The proposed project area includes a public trail and recreation area and is visible from scenic vistas. Therefore, equipment staging areas would be located away from these public trails.			
SPR AES-3 Provide Vegetation Screening. This SPR applies to all treatment activities and all treatment types including treatment maintenance.	Yes	LACFD During	LACFD
The proposed project area includes a public trail and recreation area and is visible from scenic vistas. Therefore, vegetation screening would be provided where necessary in areas visible to the public.			
MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks	Yes	LACFD Prior-During	LACFD
MM AES-3 would be implemented for all non-shaded fuel breaks. Visual reconnaissance surveys would be conducted prior to implementation to identify the locations from where the non-shaded fuel breaks would be visible. LACFD would identify feasible changes in the treatment design to reduce impacts to public views of non-shaded fuel breaks.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Aesthetic Resources.

EC-2 Agriculture and Forestry Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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	NA	NA	NA	LTS	No	NA

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.2 Discussion

Impact AG-1: Loss or Conversion of Forest Land to Non-forest Land

The potential for the proposed treatment types and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.3.3, page 7-8) and determined to be less than significant.

The dominant California Wildlife Habitat Relationship (CWHR) vegetation classes present in the proposed project area include montane hardwood-conifer (41 percent total coverage), coastal scrub (36 percent total coverage), coastal oak woodland (12 percent total coverage), mixed chaparral (6 percent total coverage), and annual grasslands (5 percent total coverage). The California Native Plant Society (CNPS) has developed the Manual of California Vegetation (MCV) (Sawyer et. al 2009) for further classification of vegetation. In collaboration with CDFW, this has been adopted as the standard for vegetation classification and description by state and federal agencies. The MCV contains detailed descriptions of vegetation alliances[1]. Coastal oak woodland habitat is comprised of one alliance, Coast live oak woodland and forest, and makes up 6 acres of the 50-acre proposed project area. Montane hardwood-conifer habitat is comprised of the coulter pine woodland and forest alliance and makes up 21 acres of the 50-acre proposed project area. Proposed treatments in the tree dominated areas do not include removal of mature healthy trees, except for a small 0.25-acre stand of non-native eucalyptus. Manual treatment activities include pruning of lower limbs to reduce ladder fuels and increase vertical fuel discontinuity as a site preparation for prescribed fire.

Within the chaparral and grassland vegetation communities, the existing tree canopy cover is less than 10 percent native tree cover, except in scattered, isolated areas. Therefore, these areas would not meet the definition of forest land as defined in Public Resources Code Section (PRC) 12220(g), which defines “forest land” as land that can support 10 percent native tree cover of any species under natural conditions. Portions of the montane hardwood-conifer and oak woodlands would meet the definition of forest land. For those areas where the existing native tree cover exceeds 10 percent, consistent with the PEIR, the vegetation remaining after treatments in those areas would continue to meet the definition of forest land as defined in PRC Section 12220(g), because it would maintain a minimum of 10 percent native tree cover.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the composition of forested land as defined in PRC Section 12220(g) is

[1] MCV alliances are a category of vegetation classification which describes repeating patterns of plants across a landscape. Each alliance is defined by plant species composition, and reflects the effects of local climate, soil, water, disturbance, and other environmental factors. Alliances are commonly used in vegetation mapping.

essentially the same within and outside the treatable landscape; therefore, the impact to forest land is substantially the same as described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

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

EC-3 Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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	PS[3]	Table 3.4-1; Impact AQ-1 pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	SPR AD-4 SPR AQ-2 SPR AQ-3 SPR AQ-4 SPR AQ-5 SPR AQ-6	MM AQ-1	PSU[3]	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	No	None	NA	NA	No	NA
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PS[3]	Section 3.4.2; Impact AQ-4 pp. 3.4-35 – 3.4-37	Yes	SPR AD-4 SPR AQ-2 SPR AQ-6	NA	PSU[3]	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 4 SPR NOI-5	NA	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	**Identify Impact Significance in the PEIR[1]**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[2]**	**List MMs Applicable to the Treatment Project[2]**	**Identify Impact Significance for Treatment Project[1]**	**Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is this Impact Within the Scope of the PEIR?**
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	PS[3]	Section 2.5.2; Impact AQ-6 pp. 3.4-38	Yes	SPR AD-4 SPR AQ-2 SPR AQ-6	NA	PSU[3]	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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.

[3] While these significance conclusions appear inconsistent across the same row for the same impact(s), this information is taken directly from the PEIR (accessed July 2024 https://bof.fire.ca.gov/media/9360/34-air-quality.docx). Refer to the PEIR for additional details that support these conclusions.

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]	☐	☐	☐

3.1.3 Discussion

Impact AQ-1: Generate Criteria Air Pollutants

Use of vehicles, mechanical equipment, and prescribed burning during treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standards (CAAQS) or (National Ambient Air Quality Standards) NAAQS thresholds. The proposed project falls within the jurisdiction of the SCAQMD. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR and found to be potentially significant and unavoidable after the application of all feasible MMs because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects. Emissions of criteria air pollutants related to the treatment are within the scope of the impacts addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 26-33) because the activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. The following describes how the project would comply with the all the SPRs and MMs to mitigate the impacts associated with the generation of criteria air pollutants.

SPR AQ-2, SPR AQ-3, SPR AQ-6, and SPR AD-4 would be implemented to require an SMP, Prescribed Burn Plan, adherence to CAL FIRE prescribed burn safety procedures, and provide public notice for prescribed burns. Compliance with SPR AQ-4 would involve minimizing dust during treatment activities by limiting the speed of vehicle travel on unpaved roads to 15 miles per hour. If road use creates excessive dust, the project proponent would wet the roads using a water truck or treat roads with a non-toxic chemical dust suppressant.

SPR AQ-5 requires the project proponent to avoid naturally occurring asbestos. However, there is no recorded naturally occurring asbestos at the proposed project area. Refer to Impact AQ-3 for more details.

The components of MM AQ-1 that have been determined by CAL FIRE to be feasible and would be implemented to reduce emissions, including the use of gasoline-powered equipment and encouraging carpooling to the proposed project area. MM AQ-1 also requires equipment meeting Tier 4 emission standards [best available control technology for emission reductions of Nitrous Oxide (NO_X) and Particulate Matter (PM)] and the use of renewable fuel to the extent feasible. Compliance with MM AQ-1 would reduce the mass emissions of criteria air pollutants and precursors generated by use of on-road vehicles and off-road equipment during treatment activities by requiring exhaust emission reduction techniques where possible. Given the potential infeasibility of implementing specific emission reduction techniques and the uncertainties associated with treatment activity location, size, and timing, the emission reductions from implementation of MM AQ-1 cannot be meaningfully quantified. MM AQ-1 would not reduce to a less than significant level the potential for treatment-related vehicle travel on unpaved roads to result in, or contribute to,

localized concentrations of PM_{10} and $PM_{2.5}$ that exceed applicable NAAQS and CAAQS. Associated adverse health effects to exposed people could occur and this impact would remain potentially significant and unavoidable. This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This impact would remain potentially significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe or significant impact than what was covered in the PEIR.

Impact AQ-2: Cause Exposure to Diesel Particulate Matter

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33-34) and determined to be less than significant. The treatments would occur over a short duration, as mechanical and manual treatment activities would predominately be implemented as site preparation for prescribed burning. Therefore, these activities would not need to take place in one area for an extended period of time in order to accomplish the proposed project objectives.

The proposed treatments must comply with SPR HAZ-1, which requires that all diesel and gasoline-powered equipment be properly maintained to comply with all state and federal emissions requirements. The project proponent must also comply with SPR NOI-4. which requires vegetation treatment activities and staging areas be located as far as possible from human receptors and SPR NOI-5, which restricts equipment idling time. 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. There are no changes in circumstances that would occur in the proposed project that were not evaluated in the PEIR; therefore, the impacts of the proposed project would remain less than significant.

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

Impact AQ-3: Cause Exposure to Fugitive Dust Containing Naturally Occurring Asbestos

This impact does not apply to this treatment because no naturally occurring asbestos is within the proposed project area (Van Gosen et. al. 2011).

Impact AQ-4: Cause Exposure to Toxic Air Via Prescribed Fire

Prescribed fire treatments could expose people to toxic air contaminants. The potential for prescribed burning to expose people to toxic air contaminants was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 35-37) and found to be potentially significant because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of toxic air contaminants and associated levels of acute health risk with a Hazard Index greater than 1.0. The duration and parameters of the prescribed fire treatment activities are within the scope of the activities addressed in the PEIR; therefore, the potential for exposure to toxic air contaminants is also within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke emissions as well as exposure to smoke are included in SPRs. SPR AD-4 would be implemented to provide sufficient public notice for planned prescribed burning. SPR AQ-2 and SPR AQ-6 would be implemented to require an SMP and adherence to CAL FIRE prescribed burn safety procedures. After the application of all feasible MMs the impact would remain potentially significant and unavoidable. This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This impact would remain potentially significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-5: Cause Exposure to Objectional Odors (Diesel)

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, 37-38) and found to be less than significant. The release of objectional odors from diesel exhaust during proposed project treatments is within the scope of the impacts stated in the PEIR because the treatment activities are consistent with those analyzed in the PEIR. The proposed project would implement SPR HAZ-1 to properly maintain all diesel and gasoline-powered equipment. Compliance with SPR NOI-4 to stage all equipment as far as possible from noise-sensitive receptors and compliance SPR NOI-5 to restrict equipment idle time would also occur. The implementation of these SPRs would reduce the amount of exhaust emissions produced by equipment by restricting idle time. Based on the staging area location requirements and potential road closures, operation limitations, and equipment maintenance, the impacts of the proposed project would remain less than significant.

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

Impact AQ-6: Cause Exposure to Objectional Odors (Prescribed Fire Smoke)

Prescribed fire treatments could expose people to objectionable odors. The duration and parameters of the prescribed fire treatments are within the scope of the activities addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, 37-38) which found impacts to be potentially significant because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. The resultant potential for exposure to objectionable odors from smoke is within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke odors as well as exposure to smoke odors are included in SPRs. SPR AD-4 would be implemented to provide sufficient public notice for planned prescribed burning. SPR AQ-2 and SPR AQ-6 would be implemented to require an SMP and adherence to CAL FIRE prescribed burn safety procedures. No additional MMs are feasible, and this impact would remain potentially significant and unavoidable. This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the air quality conditions present and sensitive receptors in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This impact would remain potentially significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact than what was covered in the PEIR.

New Air Quality Impacts

The proposed treatment project is consistent with the treatment types and activities evaluated in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, “Regulatory Setting,” and Section 3.4.2, “Environmental Setting,” in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR AQ-1 Comply with Air Quality Regulations: This SPR applies to all treatment activities and all treatment types	Yes	LACFD Prior-During	LACFD
All pile and broadcast burns are required to comply with applicable air quality regulations for the air district with jurisdiction in the proposed project area (SCAQMD). An SMP would be submitted to SCAQMD prior to burning and a burn permit from the SCAQMD would be obtained.			
SPR AQ-2 Submit Smole Management Plan: This SPR applies only to prescribed burning activities and all treatment types.	Yes	LACFD Prior-During	LACFD
LACFD would prepare an SMP to be submitted to the SCAQMD prior to treatments.			
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	LACFD Prior-During	LACFD
A burn plan would be prepared by LACFD prior to prescribed burning activities.			
SPR AQ-4 Minimize Dust: This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
To minimize dust during treatment activities, LACFD would implement the measures listed in under SPR AQ-4 in Appendix A *Mitigation Monitoring and Reporting Program.*			
SPR AQ-5 Avoid Naturally Occurring Asbestos: This SPR applies to all treatment activities and treatment types.	No	NA	NA
This SPR does not apply; there is no naturally occurring asbestos mapped in the proposed project area. However, if naturally occurring asbestos not identified on current maps is discovered within the proposed project area during treatment activities, then the area shall be avoided.			
SPR AQ-6 Prescribed Burn Safety Procedures: Prescribed burns will follow all safety procedures, including the implementation of an approved Incident Action Plan (IAP).	Yes	LACFD During	LACFD
A burn boss would prepare an Incident Action Plan which identifies burn dates; burn hours; weather limitations; specific burn prescription; communication plan; medical plan; traffic plan; and other special instructions. The Incident Action Plan would also identify personnel to coordinate with the local air district for onsite briefings, posting notifications, and weather monitoring during burning.			
MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques: Where feasible, project proponents will implement emissions reduction techniques to reduce exhaust emissions from off-road equipment.	Yes	LACFD During	LACFD
The components of MM AQ-1 that have been determined by LACFD to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment rather than diesel-powered equipment whenever possible and encouraging carpooling to the proposed project area. Equipment meeting Tier 4 emission standards and the use of renewable diesel fuel would be implemented to the extent feasible.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Air Quality resources.

EC-4 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[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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-5 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	PS[3]	Impact CUL-2 pp. 3.5-15 – 3.5-16	Yes	SPR AD-3 SPR CUL-1 SPR CUL-2 SPR CUL-3 SPR CUL-4 SPR CUL-5 SPR CUL-8	MM CUL-2	SU3	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 AD-3 SPR CUL-1 SPR CUL-2 SPR CUL-3 SPR CUL-4 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	SPR AD-3	NA	LTS	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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.

[3] While these significance conclusions appear inconsistent across the same row for the same impact(s), this information is taken directly from the PEIR (accessed July 2024 https://bof.fire.ca.gov/media/9360/34-air-quality.docx). Refer to the PEIR for additional details that support these conclusions.

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]	☐	☐	☐

3.1.4 Discussion

Impact CUL-1: Cause Adverse Change in the Significance of Built Historical Resources

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) and determined to be less than significant. The potential to impact built historical resources during proposed 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.

SPR CUL-1 requires the project proponent conduct an archaeological and historical resource record search. This records search was completed in May 2024. The results of a records search from the South-Central Coastal Information Center (SCCIC) identified three historic resources located within the proposed project area. This study did not identify any new archaeological resources (prehistoric and historic) during the project's pre-field research and archaeological survey. A summary of the SCCIC record search results and ground-truthing results of these sites and their associated plots follow and are discussed in depth in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

The SCCIC records request results [Historic resource P-19-002337/ CA-LAN-002337H (Henninger Flats)] includes a historic topographic map dated 1952, which indicates that there are nine buildings/structures located within the Henninger Flats project area (three of which are historic resources). Based on the SCCIC records search results and the age of these structures, these buildings/structures would be avoided with a 100-foot buffer (compliance with California Public Resources Code 4921) and would not be altered or impacted by the proposed treatment activities, as specified in SPR CUL-7. SPR CUL-7 requires the project proponent to avoid built historical resources as defined in Section 15064.5 of the State CEQA Guidelines. Within a buffer of 100 feet of the built historical resource, there would be no prescribed burning or mechanical treatment activities.

Further investigation has determined that historic resource P-19-002343/CA-LAN-002343H (Mt. Wilson Toll Road) is located outside the boundaries of the Henninger Flats Treatment Area. Consequently, this historic resource would not be altered or impacted by the proposed treatment activities. Therefore, no further action is required, as specified in SPR CUL-7.

The SCCIC records request results [Historic resource P-19-188025 (SCE Video 16kV Circuit lines and towers)] consists of 10 H-frame lattice tower structures, six 3-pole structures, and two single-pole structures located between Henninger Flats and Martin's Camp. Two 3-pole structures are in the

proposed project area at 34.190955, -118.086998 and 34.191715, -118.0877335. Compliance with SPR CUL-7 requires that these structures would be avoided with a 30-foot buffer and would not be altered or impacted by the proposed treatment activities[2]. Further details are included in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-8 requires the project proponent to conduct training for all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers would 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).

All sensitive cultural resources would be protected pursuant to SPR CUL-5, which requires that the project proponent 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), would develop effective protection measures for important cultural resources located within treatment areas, if any are encountered during project implementation.

Based on the implementation of the applicable SPRs and archaeological protocols for the proposed project, potential impacts to built historical resources would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact CUL-2: Cause Adverse Change in the Significance of Archaeological or Subsurface Historical Resources

Initial and maintenance treatments would include mechanical and prescribed burning treatment activities that utilize heavy equipment and 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) and found to be a potentially significant impact. This impact was identified as potentially significant in the PEIR because of the large geographic extent of the treatable landscape and the possibility that there could be some rare instances where inadvertent damage of unknown resources may be extensive. The potential for the proposed project to result in 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 proposed treatment project are consistent with those analyzed in the PEIR.

[2] SPR CUL-7 allows for buffers less than 100 feet for built historical resources to be used after consultation with and receipt of written approval from a qualified archaeologist.

SPR CUL-1 requires the project proponent conduct an archaeological and historical resource record search. This records search was completed in May 2024. The results of a records search from the South-Central Coastal Information Center (SCCIC) identified three historic resources located within the proposed project area. This study did not identify any new archaeological resources (prehistoric and historic) during the project's pre-field research and archaeological survey. The record search results and ground-truthing results of these sites and their associated plots are summarized in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-2 requires the project proponent contact all geographically affiliated California Native American Tribes to notify them of the proposed treatment activities. The Native American Heritage Commission (NAHC) was contacted on April 17, 2024, to request a search of the Sacred Lands File (SLF) and a contact list of Native American tribes culturally affiliated with the proposed project treatment areas. The SLF results are detailed in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024). As part of the Native American outreach, LACFD's cultural resources contractor sent contact letters via certified email on May 14, 2024, to 15 California Native American Tribes that the NAHC identified as having a traditional and cultural affiliation with the proposed project area. Additional follow up phone calls were made on May 24, 2024. Tribal contact letters were sent to tribal representatives. Detailed tribal correspondence information can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-3 requires the project proponent to conduct pre-field research. 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 these findings within the context of local history and prehistory. LACFD's cultural resources contractor conducted pre-field research in April and May of 2024 prior to conducting SPR CUL-4 Archaeological Surveys. Detailed pre-field research information can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical* Report (Purtell 2024).

SPR CUL-4 requires the project proponent to conduct archaeological site surveys of the proposed project area prior to project implementation. 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. LACFD's cultural resources contractor conducted an archaeological survey of the 50-acre Henninger Flats Treatment Area on May 8, 2024, and did not encounter any archaeological or subsurface historical resources. Details on methodology and findings can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

If cultural resources are identified within a treatment area and cannot be avoided, SPR CUL-5 requires that the project proponent 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), would develop effective protection measures for important cultural resources located within treatment areas, if any are encountered during project implementation.

SPR CUL-8 requires the project proponent to conduct training for all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers would 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).

MM CUL-2 would be implemented to further minimize impacts on unknown unique archaeological or subsurface historical resources by ceasing all activities within 100 feet of resources discovered during implementation until a qualified archaeologist is contacted and determines the significance of the find.

Although, the implementation of the SPRs and the MM would 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). This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. This impact is within the scope of the PEIR because treatment activities and intensity of ground disturbance of the proposed treatment project are consistent with those analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact CUL-3: Cause Adverse Change in the Significance of Tribal Cultural Resources

Initial and maintenance treatments would include mechanical and prescribed burning treatment activities that utilize heavy equipment and would result in ground disturbance. 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) and found to be less than significant. The potential for adverse effects to tribal cultural resources during implementation of the proposed treatment project 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.

SPR CUL-1 requires the project proponent conduct an archaeological and historical resource record search. This records search was completed in May 2024. The results of a records search from the South-Central Coastal Information Center (SCCIC) identified three historic resources located within the proposed project area. This study did not identify any new archaeological resources (prehistoric and historic) during the project's pre-field research and archaeological survey. The record search results and ground-truthing results of these sites and their associated plots are summarized in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-2 requires the project proponent contact all geographically affiliated California Native American Tribes to notify them of the proposed treatment activities. LACFD's cultural resources contractor contacted the Native American Heritage Commission (NAHC) on April 17, 2024, to request a search of the Sacred Lands File (SLF) and a contact list of Native American tribes culturally affiliated with the proposed project treatment areas. The SLF results are detailed in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024). As part of the Native American outreach, LACFD's cultural resources contractor sent contact letters via certified email on May 14, 2024, to 15 California Native American Tribes that the NAHC identified as having a

traditional and cultural affiliation with the Project area. Additional follow up phone calls were made on May 24, 2024. Tribal contact letters were sent to tribal representatives. Detailed tribal correspondence information can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-3 requires the project proponent to conduct pre-field research. 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 these findings within the context of local history and prehistory. LACFD's cultural resources contractor conducted pre-field research in April and May of 2024 prior to conducting SPR CUL-4 Archaeological Surveys. Detailed pre-field research information can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

SPR CUL-4 requires the project proponent to conduct archaeological site surveys of the proposed project area prior to project implementation. 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. LACFD's cultural resources contractor conducted an archaeological survey of the 50-acre Henninger Flats Treatment Area on May 8, 2024, and did not encounter any Tribal cultural resources. Details on methodology and findings can be found in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).

If unanticipated archaeological or tribal resources are encountered as a result of project treatment activities, the requirements of SPR CUL-5 and SPR CUL-6 must be followed. SPR CUL-5 and SPR CUL-6, which require that the project proponent, in consultation with the culturally affiliated tribe(s), would develop effective protection measures and defer implementing the treatment until the tribe(s) approves of the protection measures; or if an agreement cannot be reached after a good-faith effort, the proponent would determine that any or all measures have been implemented, where feasible, and the resource is either avoided or protected.

SPR CUL-8 requires the project proponent conduct training for all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers would 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 impact is within the scope of the PEIR because the intensity of ground disturbance of the proposed treatment project is consistent with that analyzed in the PEIR. As explained in the PEIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs, which may be tailored to the tribal cultural resources in the proposed project area in coordination with tribes, would avoid any substantial adverse change to any tribal cultural resource resulting in a less than significant impact.

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

Impact CUL-4: Disturb Human Remains

Initial and maintenance treatments would include mechanical treatments utilizing heavy equipment; these treatments may use masticators, loaders, and skidders, which would result in ground disturbing activities and could uncover human remains. 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) and found to be less than significant impact. The potential for human remains to be uncovered during the implementation of the proposed treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and the level of ground disturbance are consistent with those analyzed in the PEIR.

There are no SPRs or MMs established for this impact. As stated in the PEIR, the proposed 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. Furthermore, a CAL FIRE Archaeologist and the Los Angeles County Coroner's Office would be notified immediately. Based on the proposed 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.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the potential for uncovering human remains during implementation of the proposed treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR CUL-1 Conduct Records Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior	LACFD
Consistent with SPR CUL-1, a records search of the proposed project area was performed by the SCCIC. Results were returned on April 23, 2024. This study identified three historic resources within the Henninger Flats Treatment Areas. Additional details are described in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).			
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, as appropriate. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior	LACFD
Consistent with SPR CUL-2, the NAHC was contacted on April 17, 2024, to request a search of the Sacred Lands File (SLF) search and a contact list of Native American tribes culturally affiliated with the proposed project's three treatment areas. A response was received on May 6, 2024, stating that the results of the SLF search were positive. On May 14, 2024, letters inviting the tribes to consult were mailed to the 15 tribal representatives indicated by NAHC's Native American Contact List. These letters identified the location, treatment types, purpose of the treatments, and requested information concerning the location of any cultural resources that may exist within the proposed project area. Four responses were received from Native American tribal representatives. Details about these responses are summarized in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).			
SPR CUL-3 Pre-field Research: LACFD will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior	LACFD
Consistent with SPR CUL-3, pre-field research included review of site records from the SCCIC and reference materials. Additional details are described in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).			
SPR CUL-4 Archaeological Surveys: LACFD will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior	LACFD
Consistent with SPR CUL-4, an archaeological survey was conducted on May 8, 2024, for the proposed project area by qualified archaeologists prior to the start of treatments. Findings are summarized in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024). No new cultural resources were encountered during the survey.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
No new archeological resources were identified during the May 8, 2024, survey. Consistent with SPR CUL-5, archaeological resources would be avoided. Culturally affiliated tribes would be notified if any cultural resources are identified that cannot be avoided.			
SPR CUL-6 Treatment of Tribal Cultural Resources: If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
No new archaeological resources were identified during the May 8, 2024, survey. Consistent with SPR CUL-6, tribal cultural resources would be avoided. If resources are not able to be avoided, effective protection measures would be established in consultation with culturally affiliated tribes.			
SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
Pursuant to SPR CUL-1, a records search of the proposed project area was performed by the SCCIC. Results were returned on April 23, 2024. This study identified three historic resources within the Henninger Flats treatment areas. Additional details are described in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024). One 1952 record shows nine buildings/structures within the proposed project area. Consequently, these buildings/structures would be avoided with a 100-foot buffer and would not be altered or impacted by the proposed treatment activities. The second record consists of 10 H-frame lattice tower structures, six 3-pole structures, and two single-pole structures located between Henninger Flats and Martin's Camp. Two 3-pole structures are in the proposed project area at 34.190955, -118.086998 and 34.191715, -118.0877335. Consequently, these structures would be avoided with a 30-foot buffer and would not be altered or impacted by the proposed treatment activities, as specified in SPR CUL-7. Buffers less than 100 feet for built historical resources would only be used after consultation with and receipt of written approval from a qualified archaeologist. Regardless of the treatment activities, utility, telephone, and/or transmission structures and poles need only a 30-foot physical buffer around this classification of historic resource(s) as detailed in the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell 2024).			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
LACFD would train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological or tribal cultural resources prior to the start of treatments. New crew members joining the proposed project during implementation would receive the cultural resources training prior to joining implementation.			
MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources: If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find.	Yes	LACFD During	LACFD
Should proposed project activities reveal cultural or archaeological resources, all ground-disturbing activity within 100 feet of the resources would be halted and a qualified professional archaeologist or CAL FIRE archeologically trained Registered Professional Forester would assess the significance of the find.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Archaeological, Historical, and Tribal Cultural Resources.

EC-5 Biological Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AQ-3 SPR AQ-4 SPR BIO-1 SPR BIO-2 SPR BIO-7 SPR BIO-9 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-5	MM BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	PS (all wildlife species except bumble bees) SU (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-5 SPR BIO-10 SPR BIO-11 SPR BIO-12 SPR HYD-1 SPR HYD-3 SPR HYD-4 SPR HYD-5 SPR HAZ-5 SPR HAZ-6	MM BIO-2a MM BIO-2b MM BIO-2g MM BIO-3a	LTSM (all wildlife species except bumble bees) SU (bumble bees)	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or	PS	Impact BIO-3 pp 3.6-186–3.6-191	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4	MM BIO-3a	LTSM	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Degradation that Leads to Loss of Habitat Function				SPR BIO-5 SPR BIO-6 SPR BIO-9 SPR HYD-4 SPR HYD-5				
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	PS	Impact BIO-4 pp 3.6-191–3.6-192	Yes	SPR BIO-1 SPR BIO-4 SPR HYD-1 SPR HYD-3 SPR HYD-4	MM BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	PS	Impact BIO-5 pp 3.6-192–3.6-196	Yes	SPR BIO-1 SPR BIO-4 SPR BIO-5 SPR BIO-10 SPR BIO-11 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-5 SPR BIO-12	NA	LTS	No	Yes
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	MM BIO-3a	No Impact	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
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	NA

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.5 Discussion

Impact BIO-1: Substantially Affect Special-Status Plants

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide) could result in direct or indirect adverse effects on special-status plant species (refer to Appendix B *Biological Technical Report* for additional detail). The potential for treatment activities to result in adverse effects on special-status plant species was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6, 132-139) and determined to be potentially significant.

The SPRs and MMs that most directly influence the potential impact to special-status plant species are SPR BIO-1, SPR BIO-7, and MM BIO-1b. How these SPRs and MM have been or would be implemented is discussed in detail below. Additional SPRs applicable to the proposed project include SPR BIO-2, which requires a Worker Environmental Awareness Program (WEAP) training for all on-site workers prior to proposed project implementation. The training would describe the appropriate work practices necessary to effectively implement the biological SPRs and MM and to comply with the applicable environmental laws and regulations. Additionally, SPR BIO-9 requires actions taken to prevent the spread of invasive plants that could threaten special-status plant populations. Lastly, SPR AQ-3 and SPR AQ-4 require the creation of a burn plan and minimization of dust during treatment activities, SPR HYD-5 requires protections for non-target vegetation and special-status plants from herbicide application, and SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, and SPR GEO-7 would ensure minimization of erosion would occur. All these SPRs would be implemented by the LACFD.

SPR BIO-1 requires a qualified Registered Professional Forester (RPF) or biologist to conduct data review and reconnaissance-level survey of the site prior to treatment. SPR BIO-1 was completed for this project in May of 2024. Details of the data review process including the potential-to-occur table and results of the surveys can be found in Appendix B *Biological Technical Report.* Based on the data review and habitat assessment completed consistent with SPR BIO-1 and SPR BIO-3, non-listed special-status species have a potential to occur within the proposed project area. Sensitive biological resources include those that are protected by local, state, and federal agencies, including special-status species, sensitive native plant communities, aquatic resources, and wildlife connectivity. Special status species that were assessed for potential presence on the treatment area are defined in the CalVTP PEIR Section 3.6.1. Determinations were based upon known ranges, habitat preferences (e.g., vegetation, soils, slope, and elevation), onsite habitat quality, and occurrence records from CNDDB and CNPS (refer to Appendix B *Biological Technical Report* for additional detail). The findings of SPR BIO-1 indicate two plant species considered by CDFW to be

"rare, threatened or endangered in California[3]" (CESA) with a moderate likelihood of occurring in the treatment area. The two non-listed plants are the Palmer's mariposa-lily (*Calochortus palmeri* var*. palmeri*) and the intermediate mariposa-lily (*Calochortus weedii* var*. intermedius*). The Palmer's mariposa lily is a perennial bulbiferous herb that is endemic to California. This species is found in chaparral, lower montane coniferous forest, meadows and seeps and is most successful in mesic sites. It typically blooms from April through July. The intermediate mariposa-lily is also a perennial bulbiferous herb that is endemic to California. It occurs in chaparral, coastal scrub, valley and foothill grassland typically on rocky soils and blooms between May and July (CNPS 2024). No listed special-status species were determined to have potential to occur within the proposed project area.

These two non-listed plant species are geophytes, meaning they are perennial plants with regenerating organs with buds, such as corms or rhizomes, buried well below the soil surface. Geophytes are insulated from heating during fire by the soil. Numerous geophytes, or bulb-bearing plants, that show an increased flowering and growth response following fire are scattered in chaparral. Common examples are soap plant *(Chlorogalum pomeridianum)*, death camas *(Zigadenus* spp.*)*, and mariposa lilies *(Calochortus* spp.*)* (Sugihara et.al. 2006).

The potential presence of non-listed species, Palmer's mariposa-lily and the intermediate mariposa-lily, found during SPR BIO-1, would trigger SPR BIO-7, which is the implementation of protocol-level botanical surveys to delineate the exact location of the special-status species and mark the area for avoidance, as well as MM BIO-1b which requires the establishment of a no-disturbance buffer. However, there is an exception to this mitigation approach in cases where the plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. Therefore, treatments may be conducted within the no-disturbance buffer of special-status plant species when 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. In the case of these geophytic species it has been determined that treatment activities would be beneficial.

In response to MM BIO-1b, no treatment activities would be implemented on sites with any likelihood of species occurrence during the collective blooming periods for these species from April through July. Prescribed burning operations in central and southern California typically occur during the historical rainy season from November 1 through March 31. The truncated window of opportunity should not significantly reduce the likelihood of project success. Therefore, compliance with MM BIO-1b would occur as the treatment would be conducted outside of the growing season or during the dormant season, and employing only treatment activities that would not damage the stump, root system or other underground parts of the non-listed special-status plants or destroy the seedbank. Additionally, the potential reproductive benefits of prescribed fire for the two mariposa-lily species results in no further mitigation requirements. This assumption, and adherence to treatment avoidance timelines would provide sufficient protections for these geophytic special-status species. Therefore, protocol-level survey for special-status plant species would not be required.

In summary, MM BIO-1b would be implemented for prescribed burning, manual treatments, mechanical treatments, prescribed herbivory, and herbicide application to avoid loss of non-listed

[3] Plants considered by CDFW to be "rare, threatened, or endangered in California" have a California Rare Plant Rank of 1A, 1B, or 2A.

special-status plants as described in the PEIR by limiting the annual treatment window to avoid the collective blooming periods of the two non-listed special-status plant species. Initial and maintenance treatments would not result in the unavoidable loss of special-status plants. Residual effects of treatments to special-status plant species would continue to be less than significant and treatments would be designed to maintain and conditionally enhance the function of the special-status species plant habitat.

This impact on special-status plants is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities is consistent with the analysis in the PEIR. Proposed project effects on special-status plants would be less than significant with the implementation of SPRs and the appropriate MM.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status plant species to occur within the proposed project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to special-status plant species is also the same as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-2: Substantially Affect Special-Status Wildlife

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide) could result in direct or indirect adverse effects on special-status wildlife due to the proposed project areas containing potentially suitable habitat for some listed and non-listed special-status wildlife species (refer to Appendix B *Biological Technical Report* for additional detail). The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6, 139-187) and determined to be potentially significant. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

The SPRs and MMs that most directly influence the potential impact to special-status wildlife species are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-10, MM BIO-2a, MM BIO-2b, and MM BIO-2g. How these SPRs and MMs have been or would be implemented is discussed in detail below. Additional SPRs applicable to the proposed project include SPR BIO-4, which requires treatments to be designed to avoid the loss or degradation of riparian habitat function, SPR BIO-5 which requires treatments to be designed to activities to avoid type conversion where native coastal sage scrub and chaparral are present, SPR BIO-11 which requires the use of wildlife-friendly fencing for prescribed herbivory operations, and SPR BIO-12 requiring nesting bird surveys during nesting season (February 1 through August 31). Additionally, SPR HYD-1 requires compliance with water quality regulations including vegetation and land disturbance related Waste Discharge Requirements, SPR HYD-3 requires water quality protections for prescribed herbivory treatments including riparian exclusions, SPR HYD-4 requires establishment of watercourse and lake protection zones (WLPZs) and equipment limitation zones (ELZs), and SPR HYD-5 requires protection of non-target vegetation and special-status species from herbicides. Furthermore, SPR HAZ-5 requires preparation of a spill prevention and response plan prior to the beginning of herbicide treatment activities and SPR HAZ-6 requires the project proponent to comply with all herbicide application regulations, including coordination with the Los Angeles County Agricultural Commissioner's office. Finally, MM BIO-3a

requires designing treatments to avoid loss of sensitive natural communities and oak woodlands. All of these SPRs and MMs would be implemented by the LACFD.

SPR BIO-1 requires a data review and reconnaissance-level survey of the proposed project area prior to treatment and SPR BIO-3 requires protocol-level surveys for sensitive natural communities and other sensitive habitats if SPR BIO-1 determines that adverse effects cannot be avoided. Both SPR BIO-1 and SPR BIO-3 were completed in July 2024 to assess the site's sensitive natural communities and habitats. Appendix B *Biological Technical Report* provides the results of SPR BIO-1 and SPR BIO-3 compliance and includes comprehensive lists of species with the potential to occur within the proposed project area. The list of potential species to occur was developed using CalVTP PEIR Appendix BIO-3 *Special-Status Species Tables* and Table 3.6-32 *Special-Status Species Considered in this PEIR Grouped by Life History Characteristics* (CalVTP PEIR Volume II, 139-142).

Based on the data review completed consistent with SPR BIO-1, no designated critical habitat is present in the treatment area. The nearest designated critical habitat to the proposed project area is for the Braunton's milk-vetch (*Astragalus brauntonii*), approximately four miles east of the treatment area. Critical habitat for the arroyo toad (*Anaxyrus californicus*) is located seven miles north of the treatment area, and southwestern willow flycatcher (*Empidonax traillii extimus*) critical habitat is over nine miles east of the treatment area in San Gabriel River.

Based on the data review and habitat assessment completed consistent with SPR BIO-1 and SPR BIO-3, several special-status species have a moderate to high potential to occur within the proposed project area. Sensitive biological resources include those that are protected by local, state, and federal agencies, including special-status species, sensitive native plant communities, aquatic resources, and wildlife connectivity. Special status species that were assessed for potential presence on the treatment area are defined in the CalVTP PEIR Section 3.6.1. Determinations were based upon known ranges, habitat preferences (e.g., vegetation, soils, slope, and elevation), onsite habitat quality, and occurrence records from CNDDB and CNPS (refer to Appendix B *Biological Technical Report* for additional detail) and are described as follows.

One listed special-status invertebrate species has a moderate potential to occur in the proposed treatment area. Crotch's bumble bee (*Bombus crotchii*) is a CESA candidate (Insects and Other Terrestrial Invertebrates). Crotch's bumble bee are a native species and a candidate for potential listing by the State as endangered. Crotch's bumble bee occurs in coastal California east to the Sierra-Cascade crest and south into Mexico. It can be found within shrubland and open grassland habitats, and their nesting occurs underground. This species may occur throughout the treatment area. Therefore, in compliance with MM BIO-2g, prescribed burning may only occur from October through February, or outside of the bumble bee flight season, and herbicide would not be applied to flowering native plants within occupied or suitable habitat during flight season (March through September). Therefore, by avoiding bumble bee flight season, feasible mitigation would be implemented, and surveys would not be required for Crotch's bumble bee.

Other special status species (animals identified by CDFW as Species of Special Concern, species considered locally significant, and species that otherwise meet the definition of rare or endangered under CEQA Section 15380) have a moderate or high potential to occur or are known to be present in the treatment area.

Two non-listed reptile state Species of Special Concern have a moderate potential to occur in the proposed treatment area. Coastal whiptail (*Aspidoscelis tigris stejnegeri*) is typically found in deserts and semi-arid areas with sparse vegetation and open areas and found in woodland and riparian areas. The coast horned lizard (*Phrynosoma blainvillii*) is found in a wide variety of habitats, most

common in lowlands along sandy washes with scattered low bushes and open areas with loose soils for burial.

Cooper's hawk (*Accipiter cooperii*) is on the CDFW Watch List. It is an uncommon resident species found in various wooded areas. It nests in tall trees and often hunts around human structures such as houses and birdfeeders and has been known to successfully breed in urban areas.

Turkey vulture (*Carthartes aura*) was observed at the site during the reconnaissance survey. It occurs in most open habitats that provide adequate cliffs or large trees for nesting, roosting, and resting. This species primarily eats carrion and was observed overhead during the field survey. Though common throughout California, the turkey vulture is a Los Angeles County Sensitive Bird Species due to habitat loss (LACSBS 2009). Proposed treatment activities occurring during nesting bird season (February 1 through August 31) would require nesting bird survey (SPR BIO-12) prior to implementation. Reduced or no-treatment buffer zones would be established for active nests.

Pallid bat (*Antrozous pallidus)* is a state Species of Special Concern that occurs over a wide variety of habitat types, including deserts, grasslands, shrublands, woodlands, and forests. While it is most common in open, dry habitats with rocky areas for roosting, it can be found roosting under bridges and in some areas in old structures such as barns. This bat is a resident species that occurs throughout the state, commonly at elevations below 6,000 feet.

SPR BIO-10 requires focused or pre-activity surveys for special-status wildlife and wildlife nursery sites if SPR BIO-1 determines suitable habitat is present in the treatment area. Therefore, in compliance with SPR BIO-10, pre-activity surveys would be conducted no more than 14 days prior to the beginning of treatment activities. Treatments would be designed to avoid mortality, injury, or disturbance and maintain habitat function for the special-status reptiles and mammals with potential to occur in the project area (per MM BIO-2a and MM BIO-2b). This may require establishing a no treatment zone and maintaining certain habitat features (e.g., snags, downed woody debris).

In addition to conducting pre-activity surveys, SPR BIO-2 requires a Worker Environmental Awareness Program (WEAP) training for all on-site workers prior to proposed project implementation. This training would be tailored for the project, highlighting specific species and habitats determined to be at risk from project implementation as defined by SPR BIO-1 and SPR BIO-3 and appropriate actions in case of discovery. The training would describe the appropriate work practices necessary to effectively implement the biological SPRs and MMs and to comply with the applicable environmental laws and regulations and would be conducted by LACFD for all on site workers prior to implementation.

This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Based on the survey protocols and pre-operational meetings, the proximity of special-status wildlife species to treatment areas, and the implementation of the SPRs and MMs, the proposed project would result in a less than significant impact on all wildlife species, except for bumble bees, whose impact would remain potentially significant and unavoidable due to the difficulty in detecting overwintering and nesting bumble bees as addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 171).

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status wildlife species to occur within the proposed project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable

landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to special-status wildlife species is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide) could result in adverse effects on sensitive habitats, including riparian habitat and designated sensitive natural communities (refer to Appendix B *Biological Technical Report* for additional detail). The potential for treatment activities to result in adverse effects on riparian habitat or other sensitive natural communities was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, 187-192) and determined to be potentially significant. This impact on riparian and sensitive habitats is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

The SPRs and MMs that most directly influence the potential to impact riparian habitat or other sensitive natural communities are SPR BIO-1, SPR BIO-3, SPR BIO-4, SPR BIO-5, and MM BIO-3a. How these SPRs and MMs have been or would be implemented are discussed in detail below. Additional SPRs applicable to the proposed project include SPR BIO-2, which requires a Worker Environmental Awareness Program (WEAP) training for all on-site workers prior to proposed project implementation. The training would describe the appropriate work practices necessary to effectively implement the biological SPRs and MMs and to comply with the applicable environmental laws and regulations. Additionally, SPR BIO-6 and SPR BIO-9 require actions be taken to prevent the spread of plant pathogens and invasive plants that could threaten special-status plant populations. SPR HYD-4 includes the identification and protection of water courses and lake protection zones and includes restrictions that would protect these areas. Lastly, SPR HAZ-5 requires preparation of a spill prevention and response plan prior to the beginning of herbicide treatment activities. All of these SPRs would be implemented by the LACFD.

Pursuant to SPR BIO-1, reconnaissance-level surveys were conducted which identified sensitive natural communities that may not be avoided. Consequently, pursuant to SPR BIO-3, protocol-level surveys for sensitive natural community surveys were conducted for the proposed project area and vegetation communities and habitat types were surveyed, mapped, and are described below. Appendix B *Biological Technical Report* provides the results of SPR BIO-1 and SPR BIO-3. The report also indicates that minimal riparian habitat has been determined to be present in the proposed project area. A full wetland delineation has not been conducted and a definitive determination of wetland status was not made during the reconnaissance survey. The proposed project area may contain ephemeral (Class III) streams (USFWS NWI Mapper 2024). Although riparian and wetland habitats are not considered sensitive natural communities pursuant to CDFW, these areas are considered sensitive habitat types pursuant to CEQA and the CalVTP PEIR. Pursuant to SPR BIO-4, the proposed project would be designed to retain or improve riparian habitat function, and pursuant to SPR HYD-4 a qualified professional would characterize all waterways prior to proposed project activities and appropriate WLPZs and ELZs would be implemented. No direct treatments are proposed within any WLPZs on the proposed project property. ELZs would be designated adjacent to Class III 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. Equipment use would be excluded 50-100 feet from WLPZ as well as from Class III ELZs.

Appendix B *Biological Technical Report* demonstrates how the methodology used to characterize communities is consistent with the Southern California Coast Section Ecoregion 261B and Table 3.6-27 of the CalVTP PEIR Volume II and describes the how the California Wildlife Habitat Relationship (CWHR) system was used to categorize land cover in the treatable landscape. It also provides the distribution of CWHR classifications and Manual of California Vegetation (MCV) associations[4] recorded within the treatment area. The dominant CWHR classifications present are montane hardwood conifer, coastal sage scrub, and coastal oak woodland which collectively make up 89 percent of the of the 50-acre treatment area.

Montane hardwood conifer habitat is comprised of the Coulter pine woodland and forest alliance which makes up 20.61 acres (41 percent) of the 50 acres proposed treatment area. This community was only mapped as a single association during the reconnaissance survey. However, this community included areas with deodar cedar and canyon live oak occurring as subdominants in the canopy. The majority of the understory in the Coulter pine forest is dominated by non-native grasses (*Bromus diandrus*, *Avena barbara*, *Bromus rubens*) and forbs (*Brassica nigra*, *Hirschfeldia incana*).

Coastal sage scrub and mixed chaparral habitats are present within the treatment area and are considered sensitive habitat types based on Senate Bill 1260 (2018), which prohibits type conversion of these vegetation communities. Coastal sage scrub constitutes 18.13 acres (36 percent) of the proposed project area and mixed chaparral constitutes 12.96 acres (6 percent) of the proposed project area. Coastal sage scrub is comprised of one alliance type within the proposed treatment area: laurel sumac scrub. Laurel sumac scrub contains two associations: laurel sumac scrub constituting 1.16 acres (2.3 percent) and laurel sumac - California buckwheat - black sage scrub constituting 16.97 acres (33.9 percent). Both are facultative seeders with mean fire return intervals ranging from 10-60 years. Mixed chaparral habitat is comprised of one alliance type within the proposed treatment area: scrub oak chaparral. It contains an eponymous association and is an obligate sprouter with a fire return interval ranging from 30-100 years or more. The laurel sumac scrub and scrub oak chaparral alliances at the proposed project area are both within their fire return intervals, exhibit characteristics of condition class[5] two, and would be suitable for prescribed fire treatment activities.

Coastal oak woodland habitat is comprised of one alliance: coast live oak woodland and forest, which make up 5.97 acres (11.9 percent) of the 50-acre proposed treatment area. This alliance is comprised of the coast live oak/poison oak forest association. This community is tree dominated, generally on the north-facing aspects. Coastal oak woodland is not a sensitive natural community, but it does qualify for protection under County of Los Angeles Oak Tree Ordinance [(Ord. 88-0157 § 1, 1988: Ord. 82-0168 § 2 (part), 1982) as outlined in Chapter 22.56.2050 *et seq.*] and the Los Angeles County Oak Woodlands Conservation Management Plan (County of Los Angeles 2014). In addition, the Los Angeles County CEQA thresholds apply to this community, which specifically requires the evaluation of potential adverse effects on riparian habitat and conversion of oak

[4] Associations are a vegetation classification unit defined by a diagnostic species, a characteristic range of species composition, physiognomy, and distinctive habitat conditions (Jennings et al. 2006). Associations reflect local topo-edaphic climates, substrates, hydrology, and disturbance regimes.

[5] Condition class is a function of the degree of departure from historical fire regimes (Hardy et al. 2001). Condition Classes 2 and 3 identify areas that have the greatest departure from historic conditions, where fire behavior is uncharacteristic and vegetation composition is altered from the loss of the key components of an ecosystem. Condition class, however, does not distinguish between a negative and positive deviation from the fire return interval.

woodlands. As described in Impact BIO-7, and pursuant to SPR BIO-7 and SPR AD-3, the proposed project would comply with local policies and ordinances. If treatment activities occur in coastal oak woodland, then MM BIO-3a would apply in these areas to design treatments to maintain habitat function of oak woodlands. Treatments within coastal oak woodlands should include manual pruning to raise the canopy away from understory fuels and reduce vertical fuel continuity, lowering the likelihood of crown fires. Alternatively, establishing physical or wetted fuel breaks around groves of coastal oak woodlands as a prescribed fire exclusion tactic would reduce the likelihood of adverse effects in this sensitive natural community.

Pursuant to SPR BIO-5, chaparral and coastal sage scrub habitat function would remain, and type conversion would not occur. SPR BIO-5 requires the project proponent to design treatments to avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub. This would be accomplished through the establishment of fuels breaks within the coastal sage scrub and chaparral communities in a limited manner and in strategic locations such as ridgelines and existing roadways. Non-shaded fuel breaks remove all vegetation and may be implemented in coastal scrub or chaparral communities. Although the expectation for a non-shaded fuel break is that it would be permanently cleared, fuel breaks typically regenerate and would need to be retreated every 5-10 years. The result is a landscape level mosaic of regenerating chaparral and coastal scrub in various levels of recovery adding complexity to the ecosystem. The WUI fuel reduction treatment would consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands; therefore, treatment in the WUI fuel reduction treatment area may selectively avoid sections of chaparral if they are not determined to be at significant risk for wildfire. Target fuels consumption for prescribed burning operations is 70 percent of live material and 90 percent of dead materials. Fuels remaining unburned would remain on site. Prescribed burning treatment activities would occur under conditions described in the burn plan (SPR AQ-3) which results in low-intensity fire. Targeted residual vegetation would remain in a heterogenous mosaic providing increased edge habitat and a mix of habitat structure and density across the proposed project area. Mechanical treatment activities would be designed to maintain the root system and root crown of vegetation allowing the majority of the coastal scrub and chaparral species to resprout. Additional coastal scrub and mixed chaparral are also present in the surrounding landscape outside of the proposed project. Therefore, fuel break and WUI fuel reduction treatments in coastal scrub and mixed chaparral ecosystems would not constitute a landscape-level conversion to other habitat types because these ecotypes would exist in a younger regenerative and vigorous state with a greater frequency of treatment intervals to maintain these areas as fuel break and WUI fuel reduction.

CDFW maintains a list of plant communities that are native to California. Sensitive natural communities are ranked by CDFW from S1 to S3, where S1 is critically imperiled, S2 is imperiled, and S3 is vulnerable. CDFW's natural-community rarity rankings follow the 2009 NatureServe Conservation Status Assessments: Methodology for Assigning Ranks (Faber-Langendoen et al. 2012), in which all alliances are listed with a global (G) and state (S) rank, where G1 is critically imperiled, G2 is imperiled, G3 is vulnerable, G4 is apparently secure, and G5 is secure. Pursuant to SPR BIO-1 and SPR BIO-3, there are no sensitive natural communities present in the proposed project area. One sensitive natural community, Incense Cedar Forest and Woodland ranked G4/S3, is immediately adjacent to treatment area boundary between plots 15 and 18, but it is not within the proposed treatment area as mapped in Appendix B *Biological Technical Report.*

Pursuant to MM BIO-3a, treatments would not be implemented in sensitive natural communities that are within their natural fire return interval or within Condition Class 1[6]. To the extent feasible, fuel breaks would not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in oak woodlands. Manual pruning of trees in the treatment area to avoid scorching and canopy fires as well as establishment of fire exclusion zones around densely treed areas would reduce the impact to protected oak woodlands.

It is anticipated that significant impacts on sensitive natural communities or oak woodlands and loss of riparian habitat can feasibly be avoided or reduced through implementation of the applicable SPRs and as specified under MM BIO-3a; therefore, effects on riparian and other sensitive natural communities would be less than significant with mitigation. This impact on riparian and other sensitive habitat is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

After completion of the PSA checklist and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA checklist, this would be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). Compensatory mitigation detailed in MM BIO-3b and MM BIO-3c may be required in the event that CAL FIRE determines loss of sensitive natural communities, oak woodlands, or riparian habitat were not sufficiently avoided due to infeasibility during project implementation.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on sensitive habitats is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-4: Substantially Affect State or Federally Protected Wetlands

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide) could result in direct or indirect adverse effects on state or federally protected wetlands. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, 192-193) and the impacts were determined to be potentially significant.

The SPRs and MMs that most directly influence the potential impact to state or federally protected wetlands are SPR BIO-1, SPR BIO-4, SPR HYD-4, and MM BIO-4. How these SPRs and MMs have been or would be implemented are discussed in detail below. An additional SPR applicable to the proposed project includes SPR HYD-1, which requires compliance with water quality regulations including vegetation and land disturbance related Waste Discharge Requirements (WDR). 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

[6] Condition class is a function of the degree of departure from historical fire regimes (Hardy et al. 2001). Condition Classes 2 and 3 identify areas that have the greatest departure from historic conditions, where fire behavior is uncharacteristic and vegetation composition is altered from the loss of the key components of an ecosystem. Condition class, however, does not distinguish between a negative and positive deviation from the fire return interval.

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. Additionally, SPR HYD-3 requires water quality protection for prescribed herbivory operations. This includes identification and exclusion of riparian areas during herbivory activities and provision of water for on-site grazing animals. All of these SPRs and MMs would be implemented by the LACFD.

SPR BIO-1 (completed July 2024) requires data review and reconnaissance surveys to identify potential sensitive biological resources, including an overview of potential wetland areas and WLPZs or ELZs. Figure 4 in Appendix B *Biological Technical Report* includes the USFWS National Wetland Inventory (NWI) dataset and National Hydrography Flow Lines for the proposed project area. LACFD would avoid conducting treatments within these identified wetlands. If avoidance is not feasible, in compliance with MM BIO-4, a wetland delineation[7] would be required to determine if a wetland would be state or federally protected. MM BIO-4 would reduce potentially significant impacts on state and federally protected wetlands because it would require delineation and avoidance of these wetlands with no-disturbance buffers clearly marked so that no inadvertent damage or destruction to these habits would occur during treatment activities. Compliance with standards in SPR BIO-4 would also require treatments to be designed to retain or improve riparian habitat functions. Additionally, in portions of the proposed project area where prescribed burning is proposed, no fire ignition (or use of associated accelerants) would occur within wetlands. Compliance with SPR HYD-4 would occur by using the USFWS NWI dataset and National Hydrography Flow Lines to identify waterways and establish appropriate WLPZs and ELZs and avoid any direct treatment in WLPZs in the proposed project area.

This impact on state or federally protected wetlands is within the scope of the PEIR because these potential impacts were covered in the PEIR, and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. With implementation of these SPRs and MMs, adverse effects to wetlands would not be substantial. This impact would be less than significant with mitigation.

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

Impact BIO-5: Interfere with Wildlife Corridors or Impede Nurseries

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide) could result in adverse effects on wildlife movement corridors and nursery sites. The potential for treatment activities to result in adverse effects on wildlife

[7] To qualify for federal protection, wetlands must occur in hydrologic locations subject to federal jurisdiction and meet three wetland delineation criteria: hydrophytic vegetation, hydric soil types, and wetland hydrology. Waters of the state are defined as any surface water or groundwater, including saline waters, within the boundaries of the state. This includes all waters of the United States, but also areas not regulated under the federal Clean Water Act. The State Water Resources Control Board (California Water Boards 2019) defines an area as a wetland as follows: *An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater or shallow surface water or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes the area lacks vegetation.*

movement corridors and nursery sites was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, 193-197) and the impacts were determined to be potentially significant.

The SPRs and MMs that most directly influence the potential impact to state or federally protected wetlands are SPR BIO-1, SPR BIO-5, SPR BIO-10, and MM BIO-5. How these SPRs and MMs have been or would be implemented are discussed in detail below. Additional SPRs applicable to the proposed project include SPR BIO-4, SPR BIO-11, SPR HYD-1, and SPR HYD-4. Compliance with standards in SPR BIO-4 would require treatments to be designed to retain or improve riparian habitat functions when avoidance of riparian habitat is not feasible. SPR BIO-11 would require the use of wildlife-friendly fencing for prescribed herbivory operations. SPR HYD-1 requires compliance with water quality regulations, including vegetation and land disturbance related Waste Discharge Requirements (WDR). And lastly, compliance with SPR HYD-4 would occur by using the USFWS NWI dataset and National Hydrography Flow Lines to identify waterways, establish appropriate WLPZs and ELZs, and avoid direct treatments within any WLPZs in the proposed project area. This would minimize disturbance to wildlife movement and nursery sites within aquatic and riparian habitat by avoiding erosion and associated sedimentation that could degrade aquatic nursery sites or sensitive riparian habitat. All of these SPRs and MMs would be implemented by the LACFD.

Suitable habitat for wildlife was observed throughout the proposed project area during the May 2024 reconnaissance survey that was completed in compliance with SPR BIO-1. Presence of suitable habitat requires LACFD to conduct SPR BIO-10, pre-treatment survey for nursery sites. Unless otherwise specified in a protocol that requires multiple survey visits and in the appropriate season, the pre-activity survey would be conducted no more than 14 days prior to the beginning of treatment activities. This survey would only need to be conducted within the anticipated treatment area, not the entire proposed project area. Additionally, MM BIO-5 requires the retention of nursery habitat and implementation of buffers to avoid nursery habitat. LACFD would establish avoidance buffers around nursery sites if activities are conducted while the nursery site is active/occupied. Buffer dimensions would be determined by a qualified registered professional forester (RPF) or biologist. SPR BIO-5 requires treatments to be designed to avoid type conversion in chaparral and coastal sage scrub habitats and therefore, would avoid long-term loss of these habitats, which may be used for movement or nursery sites.

The surrounding landscape contains habitat consistent with the treatment areas; these areas would function as wildlife corridors if any existing corridor is temporarily inaccessible during treatment. Temporary shifts in wildlife movements to avoid or navigate around active treatment sites and associated disturbances would not substantially interfere with movement or migration patterns; and proposed project implementation would not create long-term barriers to local or landscape-level movements. Additionally, WLPZ setbacks would retain untreated vegetation such that the riparian areas would continue to serve as wildlife corridors during and after treatment activities. Treatment activities may temporarily interrupt wildlife movement in the portions of the proposed project area where activities are occurring; however, the treatments would occur over approximately 10 years and would not necessarily be implemented in the entire proposed project area in any given year. Therefore, treatment activities would not have a substantial adverse effect on wildlife movement through the proposed project area as a whole. Effects on wildlife movement corridors and nursery sites were covered in the PEIR, and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Based on the implementation of SPRs and MMs, it is likely that any impact to wildlife movement corridors and nurseries would be less than significant with mitigation.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential existence of wildlife movement corridors and wildlife nurseries within the proposed project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to wildlife movement corridors and wildlife nurseries is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife Including Nesting Birds

Proposed project treatment activities (manual treatment, mechanical treatment, prescribed burning, prescribed herbivory, and herbicide) could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because suitable habitat is present in the proposed project area. The potential for adverse effects to common wildlife, including nesting birds, is within the scope of the activities and impacts addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, 197-199) because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The impact was determined to be less than significant.

The SPRs that most directly influence the potential impact to habitat or abundance of common wildlife including nesting birds are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-5, and SPR BIO-12. How these SPRs have been or would be implemented are discussed in detail below. SPR BIO-4 is an additional SPR applicable to the proposed project. Compliance with standards in SPR BIO-4 would require treatments to be designed to retain or improve riparian habitat functions when avoidance of riparian habitat and associated riparian wildlife species is not feasible. All of these SPRs would be implemented by the LACFD.

Suitable habitat for common wildlife species was observed throughout the proposed project area during the May 2024 reconnaissance survey required by SPR BIO-1. The implementation of treatment activities for WUI fuel reduction and fuel break treatments within the proposed project area would not result in substantial loss of habitat or abundance of common wildlife because treatment would occur over a small physical and temporal scale and surrounding habitat areas would be preserved in their current condition with no substantial barriers to movement as detailed in Impact BIO-5 of this PSA.

LACFD would implement SPR BIO-2, which requires Worker Environmental Awareness Program (WEAP) training for all on-site workers prior to proposed project implementation. The training would include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities, common wildlife, and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training would 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.

Due to findings of SPR BIO-1, SPR BIO-3 protocol-level surveys and mapping for vegetation communities and habitat types were completed in May 2024 for the proposed project area. The methodology used to characterize communities is consistent with the Southern California Coast

Section Ecoregion 261B and Table 3.6-27 of the CalVTP PEIR Volume II which describes how the California Wildlife Habitat Relationship (CWHR) system was used to categorize land cover in the treatable landscape. The distribution of CWHR classifications and Manual of California Vegetation (MCV) associations recorded within the treatment area are presented in Appendix B *Biological Technical Report*. Restrictions to proposed project implementation within identified sensitive natural communities are detailed in Impact BIO-3 of this PSA.

Pursuant to SPR BIO-5, treatments implemented in coastal scrub and chaparral would be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function, which would maintain the function of coastal scrub and chaparral as habitat suitable for scrub-adapted nesting birds as well as common species of mammals, reptiles, and amphibians that may inhabit these areas. Work in coastal scrub and chaparral would include determining appropriate treatments based on current fire return interval (FRI), departure and condition class of the chaparral vegetation on site and retaining a mix of middle to older aged shrubs to maintain heterogeneity and cover. In addition, the proposed project would be implemented over approximately 10 years and different treatment activities would be employed from year to year. Furthermore, because treatments would occur over the course of several years, areas of initial treatment would be partially recovered (i.e., within 3 years (Potts 2010)) and fully recovered (i.e., within in 10 years (McMurray 1990) prior to completion of the final treatments). Therefore, coastal sage scrub and chaparral habitat treated in the first years of treatment would partially recover and would provide habitat value for wildlife before implementation of treatments on other sites. Due to this mosaic and sequenced approach, habitat function would be maintained for common wildlife.

Treatment activities may occur within portions of the nesting bird season (February 1–August 31). Therefore, treatment activities could result in direct loss of active nests or disturbance to active nests of cavity, ground, and shrub nesting species from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel, prescribed burning), potentially resulting in abandonment and loss of eggs or chicks. If treatments are conducted within the nesting bird season, LACFD would conduct nesting bird surveys prior to treatment activities per the requirements of SPR BIO-12. If nests are detected during nesting bird surveys, active nests, including raptor nests, would be protected per the requirements of SPR BIO-12, either by establishing a no-disturbance buffer, modifying treatment activity, or deferring treatment. Potential adverse effects to nesting birds and common wildlife would be avoided with the implementation of SPR BIO-12.

This impact on habitat or abundance of common wildlife is within the scope of the PEIR because effects on habitat or abundance of common wildlife were covered in the PEIR, and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Because treatments would be implemented within relatively small proportions of the extensive ranges of common species, and suitable habitat would remain available to these species across the broader landscape surrounding treatment areas, the magnitude of these potential losses would not substantially reduce the overall abundance of any common wildlife species. The implementation of these survey protocols and the retention and planned improvement of suitable habitat for common wildlife would prevent a substantial reduction of any common species; therefore, any impact to the abundance of common wildlife would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the habitat characteristics within the proposed project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to habitat and abundance for common wildlife is also the same, as described above. This impact of the proposed project is consistent with

the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-7: Conflict with Local Policies Protecting Biological Resources

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, 199) and determined to result in no impact. Vegetation treatment projects implemented under the CalVTP PEIR that are subject to local policies or ordinances would be required to comply with any applicable County, City, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3. Several ordinances in Los Angeles County are applicable to biological resources.

The proposed project area is located within the Altadena Foothills and Arroyos Significant Ecological Area (SEA) as described in the Los Angeles County Zoning Code Chapter 22.102 (County of Los Angeles 2009). The ordinance provides requirements for projects that would remove protected trees. This project is consistent with the Configuration and Use section of the SEA ordinance in that the project is being conducted for fire protection.

The Los Angeles County Oak Woodlands Conservation Management Plan (2014) is intended to maintain the benefits provided by oak woodland ecosystems by managing "…oak woodlands in such a way as to protect or restore natural ecosystem processes, including fire regimes, hydrologic regimes, oak regeneration and understory components of oak woodland systems". The goal of the Los Angeles County Oak Woodlands Conservation Management Plan aligns with the proposed project. This plan recognizes "Oak stands that are well maintained (deadwood removed, retaining native leaf litter and perennial native shrubs and forbs) prevent slope failure, reduce erosion and can slow down a wildfire." Additionally, it acknowledges that, "low intensity fires (such as prescribed burns) have traditionally been used by Native Americans and fire managers to reduce the fuel loads within oak woodlands, reduce pests and diseases and recycle nutrients." LACFD's preferred treatment activity would use prescribed fire for fuel management of this area which can benefit native oak tree ecosystems.

The importance of protecting oak woodlands is recognized through the passage of the Oak Woodlands Conservation Act and Public Resources Code Section 21083.4, which discusses how County lead agencies must address impacts to oak woodlands in environmental documents. Los Angeles County protects oak woodlands through County of Los Angeles Oak Tree Ordinance and the Los Angeles County Oak Woodlands Conservation Management Plan (County of Los Angeles 1988 and County of Los Angeles 2014). This project does not propose the removal of trees or oak woodlands and is not in conflict with Oak Woodlands Conservation Act or Public Resources Code Section 21083.4.

If treatment activities occur in coastal oak woodland, then MM BIO-3a would apply in these areas to design treatments to maintain habitat function of oak woodlands. Treatments within coastal oak woodlands should include manual pruning to raise the canopy away from understory fuels and reduce vertical fuel continuity, reducing the likelihood of crown fires. Alternatively, establishing physical or wetted fuel breaks around groves of coastal oak woodlands as a prescribed fire exclusion tactic would reduce the likelihood of adverse effects in this sensitive natural community. In addition, no tree removal in oak woodlands is proposed as part of the treatments.

The potential for the treatments to conflict with local policies is within the scope of the PEIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the PEIR. Application of SPR AD-3 in the planning process renders this impact less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the applicable local policies or ordinances protecting biological resources within the proposed project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to conflicts with local policies or ordinances protecting biological resources is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact BIO-8: Conflict with Provisions of Adopted Conservation Plans

Implementation of the proposed project would not conflict with the provisions of an adopted natural community conservation plan (NCCP), habitat conservation plan (HCP), or other approved habitat plan because there are no adopted NCCPs, HCPs or other adopted plans within or adjacent to the proposed project area.

New Biological Resource Impacts

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD 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 (refer to Section 3.6.1, “Environmental Setting,” and Section 3.6.2, “Regulatory Setting,” in Volume II of the Final PEIR). The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to biological resources would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR BIO-1 Review and Survey Project Specific Biological Resources: 1. Suitable Habitat is Present but Adverse Effects Can Be Clearly Avoided. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. This SPR applies to all treatment activities and treatment types.	Yes Yes No	LACFD Prior	LACFD

Queries of the CDFW California Natural Diversity Database (CNDDB, CDFW 2021a) and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2021) were conducted to obtain comprehensive information of recorded occurrences of special-status wildlife and plant species within a 12-quadrangle search area centered on the proposed project (Pasadena, Mt. Wilson, Sunland, Condor Peak, Chilao Flat, Waterman Mtn., Azusa, Baldwin Park, El Monte, Los Angeles, Hollywood, and Burbank). Additional databases were also reviewed for identifying regionally occurring sensitive biological resources and soils, geological and hydrological information related to the site. In addition, Appendix BIO-3 (Tables 3.6-27, 16a, 16b, and 19) in Volume II of the Final PEIR was reviewed for sensitive natural communities, habitat information, and special-status plants and wildlife that could occur in the southern California coast ecoregion.

Following the database queries, a reconnaissance survey of the proposed project area was conducted on May 6, 2024, by qualified botanists. The Biological Technical Report was prepared in July 2024 with the findings and is included as Appendix B. Complete lists of special-status species and their potential to occur within the proposed project area are presented in Appendix B *Biological Technical Report*. Based on the results of the data review and reconnaissance-level survey, LACFD determined that adverse effects can be avoided for special-status species' suitable habitat in the proposed project area.

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

Biological resource training for workers would be conducted prior to and during implementation of treatments.

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

SPR BIO-1 determined that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. A qualified biologist has conducted a survey following the CDFW "*Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*" prior to the start of treatment activities (CDFW 2018). Sensitive natural communities and other sensitive habitats, including oak woodlands and riparian habitat, within the proposed project area have been mapped by a qualified botanist as a result of this survey and can be found in Appendix B *Biological Technical Report*.

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

Class III watercourses that contain riparian habitat have the potential to occur in the proposed project area. WLPZs and ELZs would be established adjacent to all Class III watercourses within the proposed project area. No herbicide treatment would occur within the WLPZ. Treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, prior to any treatments in riparian habitat, LACFD would notify CDFW pursuant to California Fish and Game Code 1602, when required.

A qualified professional would characterize all waterways prior to proposed project activities and appropriate WLPZs and ELZs would be implemented. No direct treatments are proposed within any WLPZs on the proposed project property. In portions of the proposed project area where prescribed burning is proposed, no fire ignition (or use of associated accelerants) would occur within the riparian areas.

ELZs would be designated adjacent to Class III 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. Off established roads, equipment use would be excluded 50-100 feet from WLPZs and Class III ELZs. While these measures would reduce potential impacts on riparian habitat, the extent of riparian habitat within the proposed project area has not been delineated and riparian habitat that exist without the defining characteristics of WLPZs may be present outside of the areas encompassed by WLPZs.

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

The proposed project area contains sensitive habitats including coastal oak woodland, coastal sage scrub, and mixed chaparral. Treatments implemented in coastal sage scrub and chaparral would be designed to avoid type conversion of coastal sage scrub and chaparral vegetation and to maintain function of these habitats. This would include designing treatments based on current FRI departure and condition class of the coastal sage scrub and chaparral vegetation onsite, maintaining a minimum percent cover of mature native shrubs, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Treatments in all sensitive habitats in the proposed project area would be designed to maintain the membership rules of the affected vegetation alliance, maintain ecological function, and improve wildfire resilience.

Non-shaded fuel breaks remove all vegetation and may be implemented in coastal sage scrub or chaparral communities. Although the expectation for a non-shaded fuel break is that it would be permanently cleared, fuel breaks typically regenerate and would need to be retreated every 5-10 years. The result is a landscape level mosaic of regenerating chaparral and coastal sage scrub in various levels of recovery adding complexity to the ecosystem. The WUI fuel reduction treatment would consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands; therefore, treatment in the WUI fuel reduction treatment area may selectively avoid sections of chaparral if they are not determined to be at significant risk for wildfire. Additional coastal sage scrub and mixed chaparral are also present in the surrounding landscape outside of the proposed project. Therefore, fuel break and WUI fuel reduction treatments in coastal sage scrub and mixed chaparral ecosystems would not constitute a landscape-level conversion to other habitat types because these ecotypes would exist in a younger regenerative and vigorous state with a greater frequency of treatment intervals to maintain these areas as fuel break and WUI fuel reduction. Additionally, botanical surveys identified vegetative groups to the alliance level determining the predominance of coastal sage scrub and chaparral species present to be facultative seeders and obligate sprouters. These reproductive strategies

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
can benefit from the prescribed burning treatment activity when planned strategically with appropriate intensity at appropriate intervals			
SPR BIO-6 Prevent Spread of Plant Pathogens: When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of Phytopthora and other plant pathogens (e.g., pitch canker (Fusarium), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
There are no known plant pathogens in the proposed project area. It is likely that personnel and equipment assigned to work on the proposed project would be from the local area and the likelihood of pathogens entering from other areas would be low. However, because crews and associated equipment (e.g., chainsaws, hand tools) and vehicles could have been used in outside of the proposed project vicinity either fighting wildfires or implementing other fuel treatment projects, LACFD would implement Best Management Practices (BMPs) listed under SPR BIO-6 in Appendix A *Mitigation Monitoring and Reporting Program*.			
SPR BIO-7 Survey for Special-Status Plants: If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities." This SPR applies to all treatment activities and treatment types.	No	NA	NA
It has been determined that habitat potentially suitable for special-status plants may be present in the proposed project area for two special-status plant species (refer to Impact BIO-1). However, there is an exception to this mitigation approach in cases where the plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. Therefore, treatments may be conducted within the no-disturbance buffer of special-status plant species when 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. In the case of these geophytic species it has been determined that treatment activities would be beneficial. Adherence to treatment avoidance timelines as discussed in Impact BIO-1 (avoidance of blooming period May through July) would provide sufficient protections for these listed geophytic species.			
SPR BIO-8 Identify and Minimize Impacts in Coastal Zone ESHAs: This SPR applies to all treatment activities and only the ecosystem restoration treatment type.	No	NA	NA
The proposed project area is outside of the Coastal Zone; therefore, this SPR does not apply.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR BIO-9 Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife: This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
LACFD would implement BMPs listed under SPR BIO-9 in Appendix A *Mitigation Monitoring and Reporting Program* to prevent the spread of invasive plants, noxious weeds, and invasive 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) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
Pre-activity surveys would be required prior to treatment activities in habitat suitable for the following special-status wildlife species identified with the potential to occur in the proposed project area (Appendix B *Biological Technical Report*, Table 1): coastal whiptail, coast horned lizard, Cooper's hawk, turkey vulture, and pallid bat. As prescribed burning would be conducted outside of the Crotch's bumble bee flight season and outside of nesting bird season, surveys for the Crotch's bumble bee, Cooper' hawks, and turkey vulture would not be required during this time.			
SPR BIO-11 Install Wildlife-Friendly Fencing (Prescribed Herbivory): This SPR applies only to prescribed herbivory and all treatment types.	Yes	LACFD During	LACFD
LACFD would use wildlife friendly fence designs during prescribed herbivory treatments. A qualified RPF or biologist would approve the design prior to installation to ensure minimization of wildlife entanglement risk. Fence designs would avoid barbed wire, loose wiring, or any material that could impale or snag leaping animals. Temporary electric net fencing should be energized at all times when in use with intermittent pulse energizers. All fencing should be no more than 40 inches high on flat ground and be marked for increased visibility for wildlife.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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 or peak nesting season will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
For treatments implemented during the nesting bird season (February 1–August 31), a survey for common nesting birds would be conducted within the proposed project area prior to treatment activities. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests would be avoided by modifying treatments to avoid disturbance to the nests, deferring treatment until the nests are no longer active as determined by an RPF or qualified biologist, or establishing an appropriate buffer around the nests. Buffers may be reduced by a qualified biologist or RPF based on rationale such as species sensitivity, vegetative cover, nest height, and topography that would attenuate noise and visual disturbance. In addition, trees with visible raptor nests would be retained, whether or not the nest is occupied.			
MM BIO-1a Avoid Loss of Special-Status Plants Listed under ESA or CESA: If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).	Yes	LACFD Prior-During	LACFD
Through application of SPR BIO-1 and SPR BIO-3, it has been determined that no listed special-status plant species have the potential to occur in the proposed project area. Therefore, MM BIO-1a does not apply.			
MM BIO-1b Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA: If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement measures to avoid loss of individuals and maintain habitat function of occupied habitat.	Yes	LACFD Prior-During	LACFD
Measures to avoid loss of individuals and maintain habitat function of occupied habitat for Palmer's mariposa-lily and intermediate mariposa-lily would be implemented. Impacts to listed special-status plants would be avoided by physically avoiding the location of special-status plants using seasonal avoidance buffers (May through July) and designing projects to maintain the function of special-status plant habitat.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
MM BIO-1c Compensate for Unavoidable Loss of Special-Status Plants: If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.	No	NA	NA
Through application of SPR BIO-1, SPR BIO-3, SPR BIO-7, and implementation of MM BIO-1a it has been determined that significant impacts on listed and non-listed special-status plants can be feasibly avoided. Therefore, MM BIO-1c does not apply.			
MM BIO-2a Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities): If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species.	Yes	LACFD Prior-During	LACFD
The measures listed in Appendix A *Mitigation Monitoring and Reporting Program* would be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetation cover, nesting trees, host plants) for Crotch's bumble bee. In addition, LACFD would consult with CDFW in conformance with the requirements of MM BIO-2a. A CDFW consultation letter was submitted via email on August 7, 2024. A confirmation email was received from CDFW South Coast Region 5 on August 20, 2024, initiating consultation. This correspondence is included as Appendix C *Correspondence*.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
MM BIO-2b Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities): If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species.	Yes	LACFD Prior-During	LACFD
The measures listed in Appendix A *Mitigation Monitoring and Reporting Program* would be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetative cover, nesting trees, host plants) for coastal whiptail, coast horned lizard, Cooper's hawk, turkey vulture, and pallid bat.			
MM BIO-2c Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities): If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.	No	NA	NA
This MM does not apply to the proposed project. As required, MMs BIO-2a, BIO-2b, and BIO-2g would be implemented to reduce impacts to species.			
MM BIO-2d Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities).	No	NA	NA
This MM does not apply to the proposed project because the proposed project area is outside of the range of valley elderberry longhorn beetle.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
MM BIO-2e Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities): The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.	No	NA	NA
Reconnaissance-level field surveys determined no suitable habitat for special-status butterflies or host plants in the proposed project area. This MM does not apply to the proposed project because the proposed project area does not contain special-status butterflies or special-status butterfly host plants.			
MM BIO-2f Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities.	No	NA	NA
Reconnaissance-level field surveys determined no suitable habitat for special-status beetles, flies, grasshoppers, or snails exists within the proposed project area. Therefore, this MM does not apply.			
MM BIO-2g Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities): The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.	Yes	LACFD Prior-During	LACFD
MMs listed in Appendix A *Mitigation Monitoring and Reporting Program* would be implemented to avoid or minimize impacts to and maintain habitat function (e.g., floral resources) for Crotch's bumble bee. Habitat potentially suitable for Crotch's bumble bee has been documented in the vicinity of the proposed project area. Pursuant to MM BIO-2g, prescribed burning would occur from October through February, outside of the bumble bee flight season, and herbicide would not be applied to flowering native plants within occupied or suitable habitat during flight season (March through September) (Appendix A *Mitigation Monitoring and Reporting Program*).			
MM BIO-2h Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory).	No	NA	NA
Reconnaissance-level field surveys determined no suitable habitat for special-status ungulates with the potential to occur in the proposed project area. Therefore, MM BIO-2h does not apply.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
MM 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: The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.	Yes	LACFD Prior-During	LACFD
The proposed project area contains no sensitive natural communities as defined by the Manual of California Vegetation and one oak woodland type (coast live oak woodland and forest) (Appendix B *Biological Technical Report*, Table 3). Under MM BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and FRI for each sensitive natural community and oak woodland type. Treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function.			
MM BIO-3b Compensate for Loss of Sensitive Natural Communities and Oak Woodlands: If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects.	No	NA	NA
Through implementation of SPR BIO-1 SPR BIO-3 and MM BIO-3a, significant impacts on sensitive natural communities and oak woodlands would be avoided. Therefore, MM BIO-3b does not apply.			
MM BIO-3c Compensate for Unavoidable Loss of Riparian Habitat: Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.	No	NA	NA
Through implementation of SPR BIO-1 and SPR BIO-4, WLPZs and ELZs would be established adjacent to all Class I, Class II, and Class III streams within the proposed project area, and protections applied in all WLPZs and ELZs would avoid the loss or degradation of riparian habitat functions. Therefore, MM BIO-3c does not apply.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
MM BIO-4 Avoid State and Federally Protected Wetlands.	Yes	LACFD Prior-During	LACFD
LACFD would avoid conducting treatments within identified wetlands. If avoidance is not feasible, this MM would be applied to delineate the boundaries of federally and state protected wetlands and waters, and a minimum 25-foot buffer would be established around wetlands			
MM BIO-5 Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites.	Yes	LACFD Prior-During	LACFD
If wildlife nursery habitat is identified during SPR BIO-10 surveys, treatment activities could result in disturbance of nursery behavior causing loss of young or result in direct removal of nursery habitat and this MM would apply. A qualified RPF or biologist would conduct a pre-treatment survey and would establish buffers around active nursery sites during the maternity season for species such as deer, bats, herons, and other species which breed in nursery sites. Buffers would be established of the appropriate size prior to implementation of treatment activities. The appropriate size and shape of the buffer would be based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for biological resources.

EC-6 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[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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-6 SPR GEO-7 SPR GEO-8 SPR HYD-3 SPR HYD-4 SPR AQ-3 SPR AQ-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 SPR GEO-8 SPR AQ-3	NA	LTS	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.6 Discussion

Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil

Proposed project treatments would include manual treatment, pile burning, and mechanical treatment, which would result in vegetation removal and soil disturbance. Potential impacts related to soil erosion during implementation of the proposed treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the extent of vegetation removal, pile burning, and use of mastication equipment are consistent with those analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, 26-29). These impacts were determined to be less than significant.

The potential impacts are within the scope of the PEIR because the proposed treatment activities are consistent with the PEIR and would comply with SPR GEO-1 through SPR GEO-8, SPR HYD-4, SPR AQ-3, and SPR AQ-4, which would avoid and minimize the risk of substantial erosion and loss of topsoil.

Table 3 indicates the dominant soil types present within the proposed project area. Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. Factor K is one of six factors used in the Universal Soil Loss Equation (USLE) and the Revised Universal Soil Loss Equation (RUSLE) to predict the average annual rate of soil loss by sheet and rill erosion in tons per acre per year. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity (Ksat). Values of K range from 0.02 to 0.69. Other factors being equal, the higher the value, the more susceptible the soil is to sheet and rill erosion by water (NRCS 2024)

Table 3 Summary of Dominant Soil Types That May be Present in the Proposed Project Area

Soil Type	Erosion Factor K	Erosion Potential	Acres
Trigo family, granitic substratum, 60 to 90 percent slopes	.43	High	41.6
Olete-Kilburn-Etsel families complex, 50 to 80 percent slopes	.15	Low	8.3

Although the erosion potential is high in most of the proposed project acreage, implementation of SPRs would reduce the potential for substantial erosion or loss of topsoil. SPR GEO-1 requires suspension of mechanical soil disturbance during precipitation, SPR GEO-2 limits high ground pressure vehicles, SPR GEO-3 requires stabilization of disturbed soil areas, SPR GEO-4 requires inspection prior to the rainy season and immediately following the first large rainfall event, SPR AQ-

4 requires wetting of unpaved dirt roads to control dust, SPR GEO-5 requires stormwater to be drained via water breaks which would decrease the potential for channelized erosion down the fuel break, and SPR GEO-6 minimizes burn pile size. Soil disturbance and erosion from heavy equipment is typically greater on steeper slopes (Grigal 2000) which would be addressed by SPR GEO-7 which minimizes erosion from use of heavy equipment on slopes and SPR GEO-8 which requires evaluation of treatment areas with slopes greater than 50 percent for unstable areas. SPR HYD-3 requires temporary exclusion fencing around riparian areas for prescribed herbivory as well as providing an on-site water source for grazing animals. SPR HYD-4 requires the identification and establishment of ELZs. SPR AQ-3 requires the development of a burn plan, and SPR AQ-4 requires minimization of dust during treatment activities. All these SPRs work in combination to stabilize the soil and prevent the increase of landslide risk.

Although proposed treatments activities would reduce vegetation and disturb topsoil, the implementations of the SPRs, slope limitations, and soil condition limitations indicate that the potential for the proposed project impact to have substantial erosion and loss of topsoil would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the soil characteristics of the proposed project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact GEO-2: Increase Risk of Landslide

Initial and maintenance treatments would include vegetation removal in areas with steep slopes. The potential for treatment activities to increase landslide risk was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, 29-30) and determined to be less than significant. The impact of the proposed treatment project is within the scope of the PEIR because the extent of vegetation removal and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR.

Much of the proposed project area would include treatments on hillsides. The Sierra Madre Fault Zone and associated faults run northwest to southeast parallelling the foothills of the San Gabriel Mountains (USGS 2000). Much of the soil in the proposed project area has a high erosion potential (refer to Table 3 under Impact GEO-1). All mechanized equipment would operate on slopes less than 35 percent, except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent. Manual treatment may occur on slopes steeper than 35 percent.

Prescribed burns are designed to be low-severity burns in confined areas, which leave fine fuels such as litter and small woody debris partially charred and consumed, and little mineral soil exposed (Lewis et al. 2006, Cawson et al. 2012). A 10-year study of prescribed burns and wildfire in chaparral found that sediment delivery from prescribed burns in chaparral environments produced only ten percent of the sediment that is produced after a wildfire in chaparral. Also, after prescribed burns, erosion levels typically return to pre-burn levels within 2 to 4 years (Wohlgemuth et al. 1999).

The implementation of SPR AQ-3, SPR GEO-3, SPR GEO-4, SPR GEO-7, and SPR GEO-8 would avoid or minimize the risk of landslide resulting from CalVTP treatments. SPR GEO-3 would require stabilization of disturbed soil, SPR GEO-4 would require erosion inspections, SPR AQ-3 would

minimize soil burn severity resulting in some vegetation remaining which retains root structures, SPR GEO-7 would minimize erosion by prohibiting mechanical treatment on steep slopes, and SPR GEO-8 would require that a RPF or licensed geologist evaluate treatment areas with slopes greater than 50 percent. All these SPRs work together to stabilize the soil and prevent the increase of landslide risk. Therefore, consistent with the PEIR and through implementation of the SPRs, this impact would be less than significant, and no new impact would occur.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is not substantially greater than described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to geology and soil would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR GEO-1 Suspend Disturbance During Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.	Yes	LACFD During	LACFD
Mechanical activities would be suspended depending on forecasted precipitation to minimize the risk of soil compaction and disturbance.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	LACFD During	LACFD
LACFD would 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. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types.	Yes	LACFD During-Post	LACFD
LACFD would stabilize soils following mechanical treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the proposed project area. The proposed project includes chipping materials and scattering the chips within the treated areas in non-burning areas, which would 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. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types.	Yes	LACFD During	LACFD
After the first storm event where 1.5 inches of rain or more falls within a 24-hour period, the proposed project area would be inspected to determine if erosion control measures functioned properly. If any area is identified where erosion could result in substantial discharge, the area would be stabilized within 48 hours of the rainfall event.			
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. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.	Yes	LACFD During	LACFD
Stormwater runoff would be drained via water breaks to minimize the risk of erosion occurring within the proposed project area or on road infrastructure following mechanical and manual treatments that may compact or disturb soils.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types.	Yes	LACFD During	LACFD
Pile burning activities would be implemented and supervised by LACFD. Burn piles would not exceed 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the PEIR (CalVTP Final PEIR Volume II Section 2.7.6, 47).			
SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads: This SPR applies to all treatment activities and all treatment types.	Yes	LACFD During	LACFD
The use of heavy equipment (i.e., bulldozers, masticators, and chippers) would not occur on slopes over 35 percent except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent.			
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types.	Yes	LACFD Prior-During	LACFD
The use of heavy equipment (i.e., bulldozers, masticators, and chippers) for mechanical treatment activities would not occur on slopes over 50 percent. For other treatment activities, an RPF or licensed geologist would evaluate proposed project areas with slopes greater than 50 percent for any unstable areas and unstable soils. If these areas are unavoidable, additional measures would be implemented to ensure that substantial erosion or loss of topsoil would not occur.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Geology, Soils, Paleontology, and Mineral Resources.

EC-7 Greenhouse Gas Emissions

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AD-3 SPR GHG-1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PS[3]	Impact GHG-2 pp. 3.8-11 – 3.8-17	Yes	SPR AQ-3	MM GHG-2	PSU[3]	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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.

[3] While these significance conclusions appear inconsistent across the same row for the same impact(s), this information is taken directly from the PEIR (accessed July 2024 https://bof.fire.ca.gov/media/9365/38-ghg-emissions.docx). Refer to the PEIR for additional details that support these conclusions.

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]	☐	☐	☐

3.1.7 Discussion

Impact GHG-1: Conflict with Adopted Plans to Reduce GHG Emissions

During initial and maintenance treatments, the use of vehicles, mechanical equipment, and prescribed burning treatment activities would result in greenhouse gas (GHG) emissions. Although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which reduces GHG emissions and can maintain or increase carbon sequestration over the long term. 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) and determined to be less than significant. LACFD would implement SPR AD-3 to ensure consistency with local plans, policies, and ordinances. SPR AD-3 requires the project proponent to design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, and CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the proposed project is subject to them. The proposed project is consistent with all applicable plans, policies, and regulations related to the purpose of reducing GHG emissions and treatment activities are consistent with those analyzed in the PEIR. The proposed project impacts relating to the consistency of treatments with the applicable plans, policies, and regulations would remain less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact GHG-2: Generate 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) and found to be potentially significant. The use of manual equipment, mechanical equipment, prescribed burning, prescribed herbivory, and herbicide during initial and maintenance treatments would result in GHG emissions. Based on the treatments in tree, shrub grass, and tree fuel types listed in the CalVTP Table 3.8-3, proposed treatment activities are estimated to produce a range from less than 0.01 MT CO_2e/ acre to 63.15 MT CO_2e/ acre.

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 MMT CO_2. Implementing the treatment activities for the proposed project would produce significantly less MT CO_2 than an average wildfire year and would create an opportunity for wildfire to be contained or slow the rate of its spread.

SPR AQ-3 requires the project proponent to create a burn plan using the CAL FIRE burn plan template for all prescribed burns. Adherence to the site-specific burn plan requires the quantification of GHG emissions when feasible to track and monitor GHG emissions associated with prescribed burning.

MM GHG-2 in the CalVTP PEIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. LACFD would schedule initial and maintenance burns before new fuels appear and reduce fuel loading by treating some areas with manual and mechanical treatment activities prior to ignition. Reduction of the fuel load would cause reduction in the overall GHG emissions associated with prescribed burning. 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.

The GHG emissions produced from the proposed treatment project are within the scope of the impacts evaluated in the PEIR because the 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. Even though the long-term outcome may yet become beneficial, the "potentially significant and unavoidable" determination alerts the public to the potential that net positive emissions may persist over time. Therefore, it has been determined that the impacts of GHG emissions are potentially significant and unavoidable after the application of all feasible MMs because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

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

New Impacts Related to GHG Emissions

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside

the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the treatments and inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types.	No	NA	NA
SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. As such, the requirement to inform reporting under Assembly Bill 1504 does not apply.			
MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns: The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Yes	LACFD Prior-During	LACFD
A burn plan pursuant to SPR AQ-3 would be prepared by LACFD prior to pile and broadcast burn treatments.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Greenhouse Gas Emissions.

EC-8 Energy

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.8 Discussion

Impact ENG-1: Result in Wasteful Consumption of Energy

The use of vehicles for hauling, mechanical equipment, chainsaws, and other mechanized hand tools as well as use of accelerants for prescribed burning activities during initial and maintenance treatments would 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) and determined to be less than significant. The consumption of energy during the proposed 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 SPRs or MMs for this impact; however, idle time for all equipment would be limited and crews would be encouraged to carpool to reduce the amount of energy consumed throughout the duration of the proposed project. Therefore, the potential for the proposed project to result in significant wasteful, inefficient, or unnecessary energy consumption remains less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, existing energy consumption is essentially the same within and outside the treatable landscape; thus, the increase in the use of vehicles and mechanical equipment, and related energy use, would not be substantially greater than that analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Energy Resource Impacts

The use of vehicles, mechanical equipment, chainsaws, and other mechanized hand tools as well as use of accelerants for prescribed burning activities during initial and maintenance treatments would 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 proposed 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 SPRs or MMs for this impact; however, idle time for all equipment would be limited and crews would be encouraged to carpool to reduce the amount of energy consumed throughout the duration of the proposed project. Therefore, the potential for the proposed project to result in significant wasteful, inefficient, or unnecessary energy consumption remains less than significant.

EC-9 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[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 SPR HYD-4	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2 pp. 3.10-15 – 3.10-18	Yes	SPR HAZ 5 SPR HAZ-6 SPR HAZ-7 SPR HAZ-8 SPR HAZ-9	NA	LTS	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] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.9 Discussion

Impact HAZ-1: Create a Significant Health Hazard Through the Use of Hazardous Materials

Initial and maintenance treatments would include mechanical treatments, manual treatments, prescribed herbivory, herbicide, and prescribed burning (broadcast and pile burning). These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to create a significant health hazard from the use of hazardous materials was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 14-15) and determined to be less than significant. The potential impacts related to the use of fuels during proposed project 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 would be transported and stored in appropriate containers. All personnel would wear personal protective equipment (PPE) and would be properly trained in the usage of equipment. All equipment associated with the proposed project would comply with SPR HAZ-1 to ensure proper maintenance and minimize leaks. Additionally, SPR HYD-4 requires that accelerants for prescribed fire are not used within watercourse and lake protection zones (WLPZs) to protect water quality.

Based on the proper storage and transportation of fuels and oils and the implementation of the applicable SPRs, the potential for the proposed project to result in significant health hazards from the use of hazardous materials is less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HAZ-2: Create a Significant Health Hazard Through the Use of Herbicides

Initial and maintenance treatments may include herbicide application that would require the transportation, storage, and disposal of various herbicides. The potential for treatment activities to

create a significant health hazard from the use of herbicides was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 15- 18) and determined to be less than significant. The potential impacts related to the use of herbicides during treatment activities are within the scope of the activities and impacts discussed within the PEIR because the application methods and herbicides to be used are consistent with those analyzed in the PEIR.

Under the CalVTP, herbicide treatments would be limited to ground-level application and must comply with all Environmental Protection Agency (EPA) label directions. According to the PEIR Table 3.10-1, the herbicides proposed under the CalVTP pose low levels of toxicity to humans (CalVTP Final PEIR Volume II Section 3.10.3 Table 3.10-1, page 16-17). In addition, the proposed project treatments would comply with SPR HAZ-5 through SPR HAZ-9, which requires the following: a Spill Prevention and Response Plan would be prepared prior to any herbicide treatment activities (SPR HAZ-5), compliance to herbicide application regulations including permitting and licensing through the Los Angeles County Agricultural Commissioner's office prior to herbicide application (SPR HAZ-6), triple rinse herbicide containers and dispose of rinsed materials at an approved site (SPR HAZ-7), minimize herbicide drift into public areas through application parameters such as limitations for nozzle pressure and nozzle distance from vegetation (SPR HAZ-8), and notification of herbicide within 500 feet of public areas including posting signs on either side of herbicide treatment areas (SPR HAZ-9). Based on compliance to regulatory requirements and SPR's in addition to utilizing low-level toxicity herbicides proposed under the PEIR, the potential for this project to result in significant health hazard from the use of herbicides is less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HAZ-3: Cause Exposure to Significant Hazards From Disturbance to Known Hazardous Sites

The proposed project area is accessible to the public. Pedestrian traffic is common, although LACFD maintains site control and is able to restrict public access to the site temporarily. However, initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose the public, workers, or the environment to hazardous materials if a contaminated site is present within the proposed project area. The potential for workers participating in treatment activities to encounter contamination that could expose them or the environment to hazardous materials was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 18- 19). This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards.

As directed by MM HAZ-3, database searches for hazardous materials sites within the proposed project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the proposed project area (DTSC 2024, CalEPA 2016). Additionally, there are no recorded occurrences of naturally occurring asbestos, fibrous amphibole, or ultramafic rock near the proposed project area (Van Gosen et. al. 2001). Therefore, this impact is less than significant with mitigation. The potential impacts related to known hazardous sites affected during treatment

activities are within the scope of the activities and impacts discussed within the PEIR because they are consistent with impacts to known hazardous sites analyzed in the PEIR.

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

New Hazardous Materials, Public Health and Safety Impacts

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
Mechanical and manual treatment crews and pile burn crews would maintain all equipment in compliance with SPR HAZ-1 to minimize the risk of impacts resulting from leaks.			
SPR HAZ-2 Require Spark Arrestors: This SPR applies only to manual treatment activities and all treatment types.	Yes	LACFD During	LACFD
All mechanized hand tools would have federal- or state-approved spark arrestors.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types.	Yes	LACFD During	LACFD
Manual treatment crews would carry one fire extinguisher per chainsaw and vehicles would be equipped with one long-handled shovel and one axe or Pulaski.			
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
Crews would not be permitted to smoke in vegetated areas prior to or during treatment activities.			
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	LACFD Prior	LACFD
The project proponent (LACFD) or a licensed Pest Control Advisor (PCA) would prepare a SPRP prior to herbicide treatments.			
SPR HAZ-6 Comply with Herbicide Application Regulations: This SPR applies only to herbicide treatment activities and all treatment types.	Yes	LACFD Prior-During	LACFD
The project proponent (LACFD) would coordinate herbicide use with the Los Angeles County Agricultural Commissioner's Office prior to implementation of herbicide treatments.			
SPR HAZ-7 Triple Rinse Herbicide Containers: This SPR applies only to herbicide treatment activities and all treatment types.	Yes	LACFD During	LACFD
The project proponent (LACFD) or a supervised designee would triple rinse herbicide containers at approved locations and dispose of rinsate in batch tanks per Rinse and Drain Procedures defined in 3 CCR Section 6684.			
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: This SPR applies only to herbicide treatment activities and all treatment types.	Yes	LACFD During	LACFD
The project proponent (LACFD) or a supervised designee would minimize herbicide drift to public areas by employing responsible herbicide application parameters including, but not limited to, avoiding application in excessive winds, applying large droplet sizes, maintaining low nozzle pressure, and application in close proximity to the target vegetation.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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. This SPR applies only to herbicide treatment activities and all treatment types.	Yes	LACFD Prior-During	LACFD
The project proponent (LACFD) or a supervised designee would distribute notices of herbicide use prior to the implementation of herbicide treatments in public areas within the vicinity of the project area.			
MM HAZ-3: Identify and Avoid Known Hazardous Waste Sites: Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, LACFD will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials.	Yes	LACFD Prior	LACFD
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.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Hazardous Materials, Public Health and Safety.

EC-10 Hydrology and Water Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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	Yes	SPR AQ-3 SPR BIO-4 SPR BIO-5 SPR GEO-4 SPR GEO-6 SPR HYD-4	NA	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2 pp. 3.11-27 – 3.11-29	Yes	SPR BIO-1 SPR GEO-1 SPR GEO-2 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR GEO-8 SPR HAZ-1 SPR HAZ-5 SPR HYD-1 SPR HYD-4	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	Yes	SPR HYD-3	NA	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	**Identify Impact Significance in the PEIR[1]**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[2]**	**List MMs Applicable to the Treatment Project[2]**	**Identify Impact Significance for Treatment Project[1]**	**Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is this Impact Within the Scope of the PEIR?**
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4 pp. 3.11-30 – 3.11-31	Yes	SPR HYD-5 SPR BIO-4 SPR HAZ-5 SPR HAZ-7	NA	LTS	No	Yes
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 GEO-5 SPR HYD-1 SPR HYD-2 SPR HYD-4 SPR HYD-6	NA	LTS	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.10 Discussion

Impact HYD-1: Violate Water Quality or Waste Discharge Standards (Prescribed Burning)

Initial and maintenance treatments would include prescribed burning. Ash and debris from the proposed project area could be washed by runoff into adjacent drainages and streams. WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within the proposed project area. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 25-27) and determined to be less than significant. This impact is within the scope of the PEIR for the proposed project because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR.

The proposed project area is within the South Coast Hydrologic Region and is under the jurisdiction of the Los Angeles Regional Water Quality Control Board. The proposed project area is within the Los Angeles River watershed which encompasses 834 square miles in Los Angeles County. Runoff from the project area would reach Eaton Wash, a mixed perennial/intermittent channel at the base of the San Gabriel Mountains, below the proposed project area. A formal delineation of jurisdictional waters was not conducted in support of this document. In Treatment Plot 7, there is a feature mapped by the USFWS NWI that is likely an ephemeral drainage. Riparian vegetation was not observed in this treatment area. Details and a map of the riparian features in proximity to the proposed project area can be found in Appendix B *Biological Technical Report.*

The SPRs and MMs that most directly influence the potential impacts to water quality and waste discharge standards are SPR GEO-6, SPR HYD-4, and SPR BIO-5. How these SPRs and MMs have been or would be implemented are discussed in detail below. Additional SPRs applicable to the proposed project include SPR AQ-3 which requires all prescribed burns to include the development of a burn plan and excludes ignition points within WLPZs, SPR BIO-4 which requires treatments to be designed to avoid the loss or degradation of riparian habitat function, and SPR GEO-4 which requires the project proponent to conduct post implementation erosion monitoring. Refer to Appendix A *Mitigation Monitoring Reporting Program* for more detail.

SPR GEO-6 requires the project proponent to regulate the size and location of prescribed burn piles. Although pile burning would result in localized high severity burn conditions, piles would be dispersed throughout the landscape with unburned areas between each pile to act as buffers and to reduce hydrologic connectivity. Pile burning activities would be implemented and supervised by LACFD. Burn piles would not exceed 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the PEIR (CalVTP Final PEIR Volume II Section 2.7.6, 47).

SPR HYD-4 requires the project proponent to establish WLPZs on either side of watercourses as defined in 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version) and prohibits the placement of burn piles within the WLPZ. WLPZs are classified based on the uses of the stream and the presence of aquatic life. The watercourse present within the proposed project area meets the definition of a Class III Watercourse: No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations. This requires a WLPZ to be established that is sufficient to prevent the degradation of downstream beneficial uses of water. Equipment limitation zones (ELZs) would be designated adjacent to Class III 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. Limitations of heavy equipment within the ELZ would include additional measures to protect the beneficial uses of water.

The SPRs described above would minimize the likelihood that prescribed burning in tree and grass fuel types would result in adverse effects to water quality. However, in chaparral and shrub dominated environments the risk to water quality is greater due to the potential for severe burns and water repellency. SPR BIO-5 requires the project proponent to avoid the environmental effects of type conversion, maintaining habitat function in chaparral and coastal sage scrub. This would be accomplished through the establishment of fuels breaks within the coastal sage scrub and chaparral communities in a limited manner and in strategic locations such as ridgelines and existing roadways. The result is a landscape level mosaic of regenerating chaparral and coastal sage scrub in various levels of recovery adding complexity to the ecosystem. WUI fuel reduction treatments may selectively avoid sections of chaparral and coastal sage scrub if they are not determined to be at significant risk for wildfire. Target fuels consumption for prescribed burning operations is 70 percent of live material and 90 percent of dead materials. Fuels remaining unburned would remain on site aiding in slowing the flow of stormwaters runoff and increasing infiltration. Prescribed burning treatment activities would occur under conditions described in the burn plan (SPR AQ-3) which results in low-intensity fire. Targeted residual vegetation would remain in a heterogenous mosaic providing increased edge habitat and a mix of habitat structure and density across the proposed project area. Additional coastal scrub and mixed chaparral are also present in the surrounding landscape outside of the proposed project. Therefore, fuel break and WUI fuel reduction treatments in coastal sage scrub and mixed chaparral ecosystems would not constitute a landscape-level conversion to other habitat types because these ecotypes would exist in a younger regenerative and vigorous state with a greater frequency of treatment intervals to maintain these areas as fuel break and WUI fuel reduction.

CalVTP includes SPRs incorporating best management practices to protect water quality. The potential for prescribed burns implemented under the CalVTP to adversely affect water quality would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HYD-2: Violate Water Quality or Waste Discharge Standards (Manual or Mechanical Treatments)

Initial and maintenance treatments would include the use of mechanical and manual treatments, which would result in ground disturbance. The potential for mechanical treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, 27-28) and determined to be less than significant.

The SPRs that most directly influence the potential impacts to water quality and waste discharge standards are SPR HYD-1, SPR HYD-4, and SPR BIO-1. How these SPRs have been or would be implemented are discussed in detail below. Additional SPRs applicable to the proposed project include SPR GEO-1 and SPR GEO-2 which limit ground disturbance during precipitation or heavy equipment operation over saturated soils, when such activity could produce ruts where runoff could concentrate. Additionally, SPR GEO-3 requires highly disturbed areas to be stabilized with mulch and SPR GEO-4 requires treatment areas to be inspected for erosion and remediated prior to the rainy season and following the first large storm or rainfall event. SPR GEO-5 requires the project proponent to drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks and SPR GEO-7 and SPR GEO-8 limit equipment operation on steep or unstable slopes to reduce the potential for erosion. Furthermore, operating equipment requires fuel and lubricants which can negatively impact water quality. SPR HAZ-1 requires the project proponent to maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Finally, SPR HAZ-5 requires the project proponent or licensed Pest Control Advisor (PCA) prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities. Refer to Appendix A *Mitigation Monitoring Reporting Program* for more detail.

SPR BIO-1 requires that a qualified RPF or biologist identify sensitive habitats such as wetlands, wet meadows, or riparian areas as well as a suitable buffer area for avoidance during project activities. This buffer would act as a filter to slow runoff from adjacent treatment areas, allow infiltration of stormwater, and trap sediment that could otherwise be carried into surface waters. A field reconnaissance survey in support of SPR BIO-1 was conducted in May 2024. A formal delineation of jurisdictional waters was not conducted, although within Treatment Plot 7, there is a feature mapped by the USFWS NWI that is likely an ephemeral drainage. Riparian vegetation was not observed in this treatment area. Details and a map of the riparian features in proximity to the proposed project area can be found in Appendix B *Biological Technical Report.* SPR HYD-1 requires compliance with water quality regulations including vegetation and land disturbance related Waste Discharge Requirements (WDR). 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.

SPR HYD-4 requires the project proponent to establish WLPZs on either side of watercourses as defined in 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. The watercourse present within the proposed project area meets the definition of a Class III Watercourse: No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations. This requires a WLPZ to be established that is sufficient to prevent the

degradation of downstream beneficial uses of water. ELZs would be designated adjacent to Class III 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. Limitations of heavy equipment within the ELZ would include additional measures to protect the beneficial uses of water. No direct manual or mechanical treatments are proposed within any WLPZs on the proposed project area. Pursuant to SPR HYD-4, ELZs would be designated adjacent to Class III 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. Equipment use would be excluded 50-100 feet from WLPZs, Class III, and ELZs except on existing roadways.

The project proponent would implement SPRs to avoid and minimize the risk of substantial degradation to surface or groundwater quality from mechanical treatment activities. The implemented SPRs include limitations to precipitation, soil saturation, and operable slopes, stabilizing disturbed soil and erosion monitoring, equipment maintenance, preliminary review of biological resources, and compliance with water quality regulations.

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. Based on avoidance measures and implementation of SPRs, the potential for the proposed 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 unlikely and impacts would continue to be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HYD-3: Violate Water Quality or Waste Discharge Standards (Prescribed Herbivory)

Initial and maintenance treatments would include the use of prescribed herbivory treatments, which would result in ground disturbance. The potential for prescribed herbivory treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, 29) and determined to be less than significant.

When allowed to move according to their own preferences, grazing animals would often congregate near water sources and in riparian areas. The potential for water quality effects from prescribed herbivory can be effectively controlled through active grazing management and application of best practices (Freitas et al. 2014, Higgins et al. 2011). Compliance with SPR HYD-3, would utilize the following best management practices: include active herding to prevent livestock from lingering in riparian areas, establish riparian buffers where livestock are excluded, fence streams, and provide access to alternative water sources.

Qualifying prescribed herbivory projects implemented under the CalVTP would exclude grazing animals from sensitive areas, provide alternative water sources, and move animals when erosion is observed. The risk of substantial degradation to surface or groundwater quality from prescribed herbivory would be avoided and minimized; this impact would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed herbivory treatments is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HYD-4: Violate Water Quality or Waste Discharge Standards (Herbicide)

Treatment activities may include herbicide application, which can affect water quality through runoff, leaching, drift, and misapplication or spills. The potential for herbicide treatment activities to violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the ground application of herbicides was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, 29-30) and found to be less than significant.

Potential impacts are within the scope of the activities and impacts addressed in the PEIR because the methods of herbicide application, transportation, storage, and disposal are consistent with those analyzed in the PEIR. Pursuant to SPR BIO-4, herbicide treatment activities are limited to ground-level application by hand and compliance to EPA labels is required. SPR HYD-5 prohibits nonaquatic herbicide formulations from being applied within 50 feet of a waterbody or riparian area and prohibits application during precipitation or within 24 hours of forecasted precipitation. In addition, SPR HAZ-5 requires the project proponent to prepare an SPRP prior to herbicide treatment activities. Furthermore, pursuant to SPR HAZ-7, all herbicide containers must be triple rinsed and hazardous waste materials must be disposed of at an approved site.

Due to the compliance with these SPRs, the potential for this project to result in a violation of water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the ground application of herbicides is less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from herbicide treatments is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact HYD-5: Substantially Alter Existing Drainage

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 area was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, 30 31) and determined to be less than significant. 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 implementation of SPR HYD-1, SPR HYD-2, SPR HYD-4, and SPR 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 WLPZs, and protecting existing drainage systems. Additionally, chipped material should not be placed in watercourses or near culverts. SPR GEO-5 requires the project proponent 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 (2024 Version). Therefore, any impact would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Hydrology and Water Quality Impacts

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

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
Initial and maintenance treatments would be implemented in conformance with applicable regulatory requirements of the Waste Discharge Requirements and/or related Waivers and the water quality control plan for the South Coast Hydrologic Region, pursuant to the standards adopted by the Los Angeles Regional Water Quality Control Board (Region 4). The proposed project is automatically enrolled in the Vegetation Treatment General Order (ORDER WQ 2021-0026-DWQ).			
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	LACFD During	LACFD
No new roads would be constructed under the proposed project.			
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Yes	LACFD During	LACFD
Environmentally sensitive areas would be excluded from prescribed herbivory treatment activities using temporary fencing. Water would be provided on site for grazing animals. Soil stability would be protected by removing grazing animals from areas showing accelerated rates of soil erosion.			
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916 .5 of the California Forest Practice Rules on either side of watercourses. This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
WLPZs would be established for watercourses within the proposed project area based on the widths and protective measures established for each water and slope class defined in Table I of 14 California Code of Regulations Section 916.5 (CalVTP Final PEIR Section 3.7-24). In Treatment Plot 7 there is a feature mapped by the USFWS NWI that is likely an ephemeral drainage and tributary to Eaton Creek. ELZs would be designated adjacent to Class III 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. Limitations of heavy equipment within the ELZ would include additional measures to protect the beneficial uses of water.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: This SPR applies to herbicide treatment activities and all treatment types.	Yes	LACFD During	LACFD
Herbicide application would be conducted in accordance with applicable local ordinances and polices, SPRs and MMs, and manufacturer recommendations to protect non-target and special-status plant species.			
SPR HYD-6 Protect Existing Drainage Systems: This SPR applies to all treatment activities and treatment types.	Yes	LACFD During	LACFD
All stormwater drainage infrastructure would be flagged prior to treatment activities to prevent disturbance or modification. If stormwater drainage infrastructure is inadvertently disturbed or modified, LACFD would repair any damage and restore pre-project drainage conditions.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Hydrology and Water Quality Resources.

EC-11 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[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.11 Discussion

Impact LU-1: Cause Significant Environmental Impact in Conflict with a Land Use Plan or Policy

The proposed project would occur on property owned and managed by the LACFD and is required to comply with applicable city and county general plans and other local policies and ordinances. Parts of the proposed project area are within the Kinneloa Mesa Open Space Land Use Planning Area, the Altadena Foothills and Arroyos Significant Ecological Area, West San Gabriel Planning Area, and the Antelope Valley Area. All these plans provide policies and standards to protect open space in Los Angeles County including addressing the increasing risk of wildfire while maintaining the ecological benefits of functional habitat. Factors addressed in these plans include biological resources, water quality, erosion control, noise, and air quality, among others. The PEIR SPRs and MMs require projects developed within the CalVTP framework to address all applicable environmental factors. Proactive wildfire hazard reduction activities are a key element in the protection of open space and the CalVTP PEIR requirements provide further protections and specificity in treatments than these policies. Therefore, the proposed project would not conflict with these planning documents.

Pursuant to SPR BIO-1 and SPR BIO-3, the coastal oak woodland vegetative community is present in the proposed project area. It qualifies for protection under County of Los Angeles Oak Tree Ordinance [(Ord. 88-0157 § 1, 1988: Ord. 82-0168 § 2 (part), 1982) as outlined in Chapter 22.56.2050 *et seq.*] and the Los Angeles County Oak Woodlands Conservation Management Plan (County of Los Angeles 2014). In addition, the Los Angeles County CEQA thresholds apply to this community which specifically asks about adverse effects on riparian habitat and conversion of oak woodlands. Oak tree removal is not part of the project design, although trimming and pruning native oak trees at the proposed project area in preparation for broadcast prescribed fire may be necessary. This would comply with County of Los Angeles – County Code, Title 22: Planning and Zoning, Part 6: Oak Tree Permits, Section 22.56.2070 (D) *Exemptions from Part 16 applicability*: (Oak) Tree maintenance limited to medium pruning of branches not to exceed two inches in diameter.

This Project Specific Analysis would be submitted to local agencies including, but not limited to, Los Angeles County Planning & Building Department to ensure all standards of county land use plans, and local ordinances, regulations, and policies are satisfied prior to treatments. The potential for treatment activities to cause a significant environmental impact to these standards was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, 13-14) and determined to be less than significant. The treatment types and activities of the proposed project 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 would avoid and minimize the risk of significant environmental impact due to conflict with a land use plan, policy, or regulation. Therefore, the impact would continue to be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, land uses in the proposed project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. Treatment types would be consistent with those described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact LU-2: Cause Substantial Unplanned Population Growth

The initial and maintenance treatments would require local LACFD crews for implementation. 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 1415) and determined to be less than significant. The potential for initial treatments and maintenance treatments to result in substantial population growth because of increases in demand for employees was examined in the PEIR. The PEIR assumed that treatment activities would have an average crew size of 20 to 40 workers for manual treatments, 20 workers for mechanical treatments, 45 workers for prescribed burns, 2-5 workers for prescribed herbivory, and 1-5 workers for herbicide application. Due to the temporary nature of the increase in demand for workers, the treatments would not cause a need for new housing, roads, or infrastructure, and impacts associated with short-term increases in the demand for workers during implementation of the proposed treatment project are within the scope of the PEIR. In addition, the proposed project would not require the hiring of new permanent employees.

Impacts associated with short-term increases in demand for employees during the implementation of the proposed 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.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the population and housing characteristics of the proposed project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed treatment project is consistent with the treatment types and activities considered in the CalVTP PEIR. LACFD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.12.1, “Environmental Setting,” and Section 3.12.2, “Regulatory Setting,” in Volume II of the Final PEIR). Including land in the proposed project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing conditions that are pertinent to land use and planning and population and housing that are present in the areas outside the treatable landscape are essentially the same as those within the treatable

landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to land use and planning or population and housing would occur.

EC-12 Noise

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AD-3 SPR NOI-1 SPR NOI-2 SPR NOI-3 SPR NOI-4 SPR NOI-5 SPR NOI-6	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] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.12 Discussion

Impact NOI-1: Result in Substantial Short-Term increase in Noise Levels

The initial and maintenance treatments would include the use of mechanical and manual treatment requiring heavy-duty, noise generating equipment such as chippers, mowers, masticators, and chainsaws. The potential for substantial short-term increases in ambient noise levels were evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, 9-12) and determined to be less than significant. Short-term increases in noise from the use of heavy equipment from the proposed project 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 nearest residences to the proposed project area are located over 2,500 feet (0.5 miles) from the southern side of the proposed project area. Treatment activities would occur during daytime hours, which is consistent with the County Noise Ordinance which establishes noise control between the hours of 8:00 p.m. and 7:00 a.m. (Los Angeles County 2024)[8]. This would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

The implementation of SPR AD-3 and SPR NOI-1 through SPR NOI-6 would minimize the risk of increasing exterior ambient noise levels during treatment implementation. SPR AD-3 requires compliance with local laws and ordinances. The applicable noise SPRs require that heavy equipment use would be limited to daytime hours (SPR NOI-1), equipment would be maintained and equipped with exhaust mufflers and engine shrouds (SPR NOI-2), engine shrouds would be closed during operations (SPR NOI-3), staging areas would be located away from noise-sensitive land uses (SPR NOI-4), equipment idle time would be limited to 5 minutes (SPR NOI-5), and noise-sensitive receptors located within 1,500 feet of treatment activities would be notified (SPR NOI-6).

Vegetation treatment activities implemented under the CalVTP would adhere to the SPRs and would be consistent with local noise policies and ordinances that: limit vegetation treatment activities to daytime hours, ensure proper notification of nearby sensitive receptors, and locate treatment activities and staging areas away from sensitive receptors to minimize noise exposure. Additionally, any increase in noise exposure at nearby receptors would be temporary and periodic. Therefore, implementation of the CalVTP for the proposed project would not result in the exposure of noise-sensitive receptors to a substantial temporary increase in ambient noise levels. This impact would remain less than significant.

[8] SPR NOI-1 allows for project proponents not subject to local ordinances (e.g., CAL FIRE) to adhere to operational hour limitations described in the PEIR (CalVTP Final PEIR Volume II Section 2.7.10, 52-53) or elect to adhere to the local Noise Level Standards.

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

Impact NOI-2: Result in Substantial Increase in Truck Generated SENL's

The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the proposed project area. 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, 12) and determined to be less than significant. Short-term increases in noise from the use of heavy equipment during proposed 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.

The nearest residences to the proposed project area are located over 2,500 feet (0.5 miles) from the southern side of the proposed project area. Trucks would access the proposed project area via Mt. Wilson Toll Road; the entrance to this road is approximately 5,000 feet (1 mile) from the residential area to the west. Therefore, truck noise would be limited to trucks entering and exiting Mt. Wilson Toll Road, and truck movement on the proposed project area would be 0.5 to 1 mile from the nearest residences. Also, treatment activities would occur during daytime hours and truck traffic would occur during these times, which is consistent with the County Noise Ordinance, which establishes noise control between the hours of 8:00 p.m. and 7:00 a.m. (Los Angeles County 2024)[9]. Therefore, all haul trips and use of heavy equipment would be limited to daytime hours and occur a considerable distance from nearby residences. The impact would be less than significant.

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

New Noise Impacts

The proposed treatment project is consistent with the treatment types and activities discussed in the PEIR. LACFD has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable

[9] SPR NOI-1 allows for project proponents not subject to local ordinances (e.g., CAL FIRE) to adhere to operational hour limitations described in the PEIR (CalVTP Final PEIR Volume II Section 2.7.10, 52-53) or elect to adhere to the local Noise Level Standards.

landscape are essentially the same as those within the treatable landscape. Therefore, impacts of the proposed treatment project are also consistent with those covered in the PEIR. 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.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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). This SPR applies to all treatment activities and all treatment types.	Yes	LACFD During	LACFD
Noise-generating vegetation treatment activities would be consistent with the County Noise Ordinance which establishes noise control between the hours of 8:00 p.m. and 7:00 a.m.			
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools 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.	Yes	LACFD During	LACFD
All diesel- and gasoline-powered treatment equipment would be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations			
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.	Yes	LACFD During	LACFD
LACFD would ensure that engine shrouds are closed during equipment operation			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and 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.	Yes	LACFD During	LACFD
Equipment would be staged within the property boundaries and not immediately adjacent to any sensitive receptors.			
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.	Yes	LACFD During	LACFD
LACFD would ensure that equipment would be shut down when not in use and idling of equipment and haul trucks would be limited to 5 minutes.			
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. This treatment applies only to mechanical treatment activities and all treatment types.	Yes	LACFD Prior	LACFD
Treatment activities using heavy equipment would occur within 1,500 feet of several rural residential noise-sensitive receptors. No schools, hospitals, or places of worship are present within 1,500 feet of the project area. All noise-sensitive receptors would be notified prior to treatment activities.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Noise Resources.

EC-13 Recreation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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	NA	LTS	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.13 Discussion

Impact REC-1: Disrupt Recreational Activities Within Designated Recreation Areas

The potential for proposed treatment activities to directly or indirectly disrupt recreational activities within designated recreation areas of a project area was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, 6-7) and determined to be less than significant. 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 northern section of the proposed project area is zoned Watershed (Los Angeles County Code of Ordinances, Title 22, Chapter 22.16). The Watershed Zone (Zone W) provides conservation of water and other natural resources and limited recreational development. This partial recreational use zoning, as well as the publicly accessible Mount Wilson Toll Road trail system, results in possible disruption of recreational activities in designated recreational areas. Possible disruptions include access restrictions or nuisance impacts during treatment activities including degradation of views, dust emissions, and increased traffic that disrupt the recreational experience.

SPR REC-1 requires the project proponent to coordinate with the owner/manager of any public recreation area or facility that would require temporary closure as a result of treatment activities and post notifications of the closure at least approximately two weeks prior to the commencement of the treatment activities. LACFD is the landowner for the proposed project area. Signage informing recreationalists of project timelines would be posted at trailheads prior to and during proposed project activities informing users of temporary access limitations and restrictions. Additionally, notification of temporary access limitations and restrictions would be provided to the Los Angeles County Administrative Officer for further public notification.

Any access restrictions would be temporary. Integration of signage pursuant to SPR REC-1 would minimize disruptions to recreational users by affording recreationists the opportunity to use alternate recreation areas. This impact would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the recreational characteristics of the proposed project area are essentially the same within and outside the treatable landscape; therefore, the recreation impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Recreation Impacts

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

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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 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.	Yes	LACFD During	LACFD
LACFD would post notifications at trailheads and other strategic locations to inform recreationalists and the public of impending project activities that would require temporary access limitation or restriction from the proposed project area at least two weeks prior to the commencement of proposed project activities. Additionally, notification of temporary access limitations and restrictions would be provided to the Los Angeles County Administrative Officer for further public notification.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Recreation Resources.

EC-14 Transportation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AD-3 SPR TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	SPR AD-3 SPR TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PS[3]	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	MM AQ-1	PSU[3]	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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.

[3] While these significance conclusions appear inconsistent across the same row for the same impact(s), this information is taken directly from the PEIR (accessed July 2024 https://bof.fire.ca.gov/media/9372/315-transportation.docx). Refer to the PEIR for additional details that support these conclusions.

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]	☐	☐	☐

3.1.14 Discussion

Impact TRAN-1: Result in Traffic or Road Closures

The initial and maintenance treatments would temporarily increase vehicular traffic on Mount Wilson Toll Road 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, 9-10) and determined to be less than significant. 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. In addition, the treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The implementation of SPR AD-3 requires the project proponent to design and implement the treatment in a manner that is consistent with applicable local plans and SPR TRAN-1 would require the project proponent to work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. Vehicles and equipment would be staged within proposed project boundaries, with the closest developed road entrances being approximately a mile from the site. Additionally, LACFD Station 66 is located approximately a mile from the project area and would be used for staging vehicles, as necessary. Therefore, vehicles and equipment would not be located within/on the developed areas/road and the impacts would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact TRAN-2: Substantially Increase Traffic Hazards Due to a Design Feature

The potential for smoke to affect visibility along roadways during implementation of the proposed treatment project was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, 10-11) and determined to be less than significant. Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. Due to the site of the proposed project nearly 1,000

feet above the nearest residential areas and over half of a mile away, the likelihood of smoke impacting roadways is low. Additionally, SPR AQ-3 and SPR AQ-4 require the development of a Prescribed Burn Plan and SMP. These documents detail specific conditions under which prescribed fire would be allowed, significantly reducing the possibility of unplanned smoke impacts. This impact is within the scope of the activities and impacts addressed in the PEIR because the proposed project burn duration is consistent with that analyzed in the PEIR.

The implementation of SPR AD-3 requires the project proponent to design and implement the treatment in a manner that is consistent with applicable local plans and SPR TRAN-1 would require the project proponent to work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. Vehicles and equipment would be staged within proposed project boundaries, with developed road entrances being approximately a mile from the site. Additionally, LACFD Station 66 is located approximately a mile from the project area and would be used for staging vehicles, as necessary. Therefore, vehicles and equipment would not be located within/on the developed areas/road. After application of appropriate SPRs, this impact would remain less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact TRAN-3: Result in a Net Increase in Vehicle Miles Traveled

Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) due to additional field crews on-site to conduct the treatment activities. The potential for net increase in VMT to occur was analyzed in the PEIR and was identified as potentially significant (CalVTP Final PEIR Volume II Section 3.15.3, page 11-13). This individual proposed 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 proposed project to haul equipment in and out of the proposed project area. Daily VMT would consist of crew transportation to and from the site. Hiring local contractors would be encouraged where feasible to reduce the amount of VMT. No SPRs apply to this impact. LACFD would implement MM AQ-1 to encourage crew members to carpool and further reduce VMT. Based on the implementation of MM AQ-1, measures to reduce VMT, and short-term duration of the proposed project, the potential for this individual proposed 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). This analysis has determined that the proposed project would not cause a change in impact significance as was concluded in the PEIR. The determination of impact significance for the treatment project is consistent with the findings of the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact for areas outside the CalVTP treatable

landscape is also potentially significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Transportation Impacts

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

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. This SPR applies to all treatment activities and all treatment types.	Yes	LACFD Prior	LACFD
The proposed project would not result in a permanent increase in traffic beyond existing conditions for the local area. During treatment activities, vehicles would access the proposed project area from the Mount Wilson Toll Road. LACFD would coordinate with the California Department of Transportation, Los Angeles County, the City of Altadena, or other applicable agencies with jurisdiction to determine if traffic control is needed at any affected roadway segment within or surrounding the proposed project area. At a minimum, signs would be placed along all affected roadways to advise motorists of slow vehicles entering and exiting these roadways. Additionally, signs would be placed along affected roadways to advise of smoke conditions during prescribed burning operations.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Transportation Resources.

EC-15 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[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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	Yes	NA	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PS	Section 3.16.1 pp. 3.16-3 – 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	None	NA	NA	No	NA
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	No	None	NA	NA	No	NA

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.15 Discussion

Impact UTIL-1: Result in Physical Impacts Associated with Water Supplies

Vegetation treatments would include prescribed burning, which would require an on-site water supply. Multiple water tanks are located around the Henninger Flats area. These tanks provide water to all plumbed structures on the site as well as the (currently closed) campground area. Water would be supplied from the existing on-site water supply or water trucks would be available as a safety precaution during prescribed burning. During pile burning operations, fire equipment would come equipped with water prior to entering the proposed project location. No significant impact to the local water supply in the form of increased demand for water as a result of the proposed project would occur. This impact is within the scope of the activities and impacts addressed in the PEIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.16.3, 9) and remains less than significant and unavoidable.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity

The initial and maintenance treatments would generate biomass as a result of vegetation removal within the proposed project area. Biomass generated would be chipped and scattered on-site, piled and burned, or left as fuel for broadcast prescribed burning, therefore, this impact does not apply to the proposed project. This impact was evaluated in the PEIR and identified as potentially significant with no SPRs or MMs because biomass hauled off-site could exceed the capacity of existing infrastructure handling biomass (CalVTP Final PEIR Volume II Section 3.16.3, 10-12). The proposed project does not include hauling any biomass off-site, therefore, there is no potential to exceed the capacity of existing infrastructure and there would be no impact.

Impact UTIL-3: Comply with Federal, State, and Local Waste Management and Reduction Goals

This impact does not apply to the proposed project because all biomass generated from the treatments would be disposed of on-site.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatment project is consistent with the treatment types and activities considered in the PEIR, and the proposed project is consistent with the regulatory and environmental conditions presented in the PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). However, within the boundary of the proposed project area, the existing environmental conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. 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.

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR UTIL-1 Solid Organic Waste Disposition Plan: For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. This SPR applies only to mechanical and manual treatment activities and all treatment types	No	NA	NA
This SPR does not apply; there is no planned solid organic waste disposal off-site as a component of the proposed project. All solid material waste would be chipped back onto the treatment site or consumed in pile and broadcast burning operations.			

Refer to Appendix A *Mitigation Monitoring and Reporting Program*, for guidance on the project-specific review and survey procedures for Public Services, Utilities, and Service Systems Resources.

EC-16 Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project[1]	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 AQ-3 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 AQ-3 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-8	NA	LTS	No	Yes

[1] LTS: Less than significant; LTSM: Less than significant with mitigation; PS: Potentially significant; PSU: Potentially significant and unavoidable; SU: Significantly unavoidable; NA: Not applicable

[2] 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]	☐	☐	☐

3.1.16 Discussion

Impact WIL-1: Exacerbate Wildfire Risk

The initial and maintenance treatments would include mechanical treatments using heavy equipment, mechanized handheld equipment, pile burning, and broadcast burning which could exacerbate fire risk and expose people to uncontrolled spread of wildfire. The proposed project is mapped within very high fire severity zone areas (CAL FIRE 2024). The potential increase in exposure to wildfire during implementation of the treatments was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, 13-14) and determined to be less than significant. Increased wildfire risk associated with mechanical treatment 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. SPRs HAZ-2, SPR HAZ-3, and SPR HAZ-4 would 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. SPR AQ-3 Requires the development of a burn plan for every prescribed fire event. This plan details specific conditions under which a prescribed fire may occur, significantly limiting the risk of unplanned adverse fire events when using prescribed fire as a treatment activity. The proposed project would have a long-term positive impact to wildfire hazards after treatments. Based on the implementation of the SPRs and positive outcome of the proposed project, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the wildfire risk of the proposed project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

Impact WIL-2: Expose People or Structures to Post-fire Flood Risk or Landslides

The potential for post-fire landslides and flooding to occur was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3,14-15) and determined to be less than significant.

The proposed project area has steep slopes and has experienced a history of rockslide events in recent years (DOC and CGS 2015). Establishment and maintenance of the Mount Wilson Toll Road as well as the 1993 Kinneloa Fire may play a role in the severity of these events through reduction of vegetation on steep slopes and road cuts. Long term maintenance is necessary on steep unpaved mountain roads to control erosion. Mount Wilson Toll Road is navigable, although shows signs of

significant erosion. Approximately 80 percent of the treatment area has a "high" erosion potential rating (NRCS 2024).

SPR GEO-3, SPR GEO-4, SPR GEO-5, and SPR GEO-8 would be implemented to reduce the risk of erosion and mass wasting post-fire, in the event that a wildfire occurs as a result of the treatments or an unrelated occurrence. The applicable SPRs require the following: disturbed soil areas exhibiting bare soil over 50% or more of the treatment area would be stabilized with mulch or organic matter produced from mastication (SPR GEO-3), erosion would be monitored by the project proponent through an inspection for proper implementation of applicable SPRs and MMs prior to the rainy season, an inspection of the treated areas for evidence of erosion after the first large storm or rainfall event (SPR GEO-4), compacted treatment areas would be drained via water breaks (SPR GEO-5), and licensed inspection of treatment areas with slopes greater than 50 percent for unstable areas and unstable soils (SPR GEO-8). The proposed project intends to create conditions that would 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. The potential risk of exposure of people or structures to post-fire landslides for the proposed project is within the scope of the PEIR because the severity and duration of the prescribed burn are consistent with those analyzed in the PEIR. Based on the implementation of the applicable SPRs, the potential for the proposed project to result in post-fire flooding or landslides would be less than significant.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the post-fire landslide risk of the proposed project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe or significant impact than what was covered in the PEIR.

New Impacts to Wildfire

LACFD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.17.1, "Regulatory Setting," and Section 3.17.2, "Environmental Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the proposed project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to wildfire risk would occur.

EC-17 Administrative Standard Project Requirements

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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, LACFD would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.	Yes	LACFD Prior-During	LACFD
LACFD is a CAL FIRE Contract County and would implement the proposed project in close coordination with CAL FIRE.			
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 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.	Yes	LACFD Prior-During	LACFD
Prior to beginning any treatment activities, LACFD would clearly define the boundaries of the proposed project area and protected resources on maps for the proposed project area with highly-visible flagging or clear, existing landscape demarcations.			
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.	Yes	LACFD Prior-During	LACFD
The proposed project would not conflict with any local plans, policies, or ordinances, including: the Los Angeles County General Plan 2015, the West San Gabriel Valley Area Plan, and the Antelope Valley Area Plan, the County of Los Angeles Oak Tree Ordinance, and the Los Angeles County Oak Woodlands Conservation Management Plan.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
SPR AD-4 Public Notifications for Prescribed Burning: At least three 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 newspaper 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.	Yes	LACFD Prior-During	LACFD
At least three days prior to the commencement of prescribed burning, LACFD would post signs along North Altadena Drive, Eaton Canyon Trailhead, Pinecrest Drive, and in the Kinneloa Mesa neighborhood area describing the activity and timing and publish a public interest notification in a local newspapers or other widely distributed media source.			
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.	Yes	LACFD During-Post	LACFD
Trash receptacles would not be required on-site. LACFD staff would be instructed to remove all trash generated daily. Following completion of treatment activities, all flagging, trash, debris, and barriers would be removed from the proposed project area.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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 or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Yes	LACFD Prior	LACFD
One to three days prior to the commencement of a treatment activity, LACFD would post signs in a conspicuous location near the proposed project area describing the activity and timing and requesting persons in the area to contact a designated LACFD representative.			
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. This SPR applies to all treatment activities and all treatment types	Yes	LACFD Prior-During-Post	LACFD
Information on the proposed treatment project was submitted to the Board on Monday July 8, 2024, though the online submission portal on the CAL FIRE website. Once the proposed project is approved and completed, respectively, updated information would be submitted to the Board for online posting on the CalVTP Project Viewer.			
SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE 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.	Yes	LACFD Post	LACFD
LACFD owns and controls access to the proposed project area. Follow-up and maintenance treatment activities would be conducted as needed.			

	Applicable	Implementing Entity and Timing Relative to Implementation	Verifying and Monitoring Entity
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.	No	NA	NA
The proposed project is not within the Coastal Zone and this SPR does not apply to the treatments.			

4 List of Preparers

Los Angeles County Fire Department (Responsible Agency)

- Brad Weisshaupt, Assistant Chief, Forestry
- Daniel Sanchez, Deputy Forester/Pre-Fire Engineer
- Haddee Hammoud, Forestry Assistant

Rincon Consultants, Inc. (CEQA Compliance)

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Appendix A

Mitigation Monitoring and Reporting Program

Henninger Flats Fuel Reduction Project Mitigation, Monitoring, and Reporting Program

Introduction

A Mitigation Monitoring Reporting Program (MMRP) is a requirement for approval of any project proposed as part of a Project Specific Analysis (PSA). As such, this MMRP was prepared in compliance with California Environmental Quality Act (CEQA) Guidelines that require public agencies to "adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." The Standard Project Requirements (SPRs) and Mitigation Measures (MMs), outlined below and in the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR), have been adopted in the PSA and will be implemented accordingly. These SPRs and MMs are intended to avoid or mitigate any significant environmental impacts that were identified in the CalVTP PEIR.

Roles and Responsibilities

As the implementing entity, Los Angeles County Fire Department (LACFD) is responsible for ensuring that the SPRs and MMs described below are implemented and that the applicable treatment types/activities and actions are accomplished. As the verifying and monitoring entity, LACFD is also responsible for verifying if requirements of the proposed projects have been accomplished. The lead agency, Los Angeles County, is responsible for determining whether the proposed project complies with CEQA requirements and the CalVTP PEIR. If it is determined that the proposed project is not in compliance, the lead agency is responsible for communicating that further review and additional actions may be necessary.

Reporting

To record proposed project compliance with the SPRs and MMs, the implementing entity will either prepare a separate post-project implementation report or modify the MMRP below.

Standard Project Requirements and Mitigation Measures Checklist

Applicable The "Applicable? (Y/N)" column in the matrix below indicates if the SPR or MM listed is applicable to the proposed treatment project during initial treatments, maintenance treatments, or both.

Treatment Type The "Treatment Type" column in the matrix below indicates whether the SPR or MM listed applies to WUI (Wildland-Urban Interface) Fuel Reduction treatment, Fuel Break treatment, or both.

Treatment Activity	The "Treatment Activity" column in the matrix below indicates whether the SPR or MM listed applies to all or specific activities, including Manual, Mechanical, Herbicide, Prescribed Fire, and/or Prescribed Herbivory.
Action Required	The "Action Required" column in the matrix below provides focused project details for SPR or MM implementation. Several SPRs have been completed prior to the creation of this MMRP and will be noted as such.
Frequency	The "Frequency" column in the matrix below indicates whether the SPR or MM in question should be implemented Prior To, During, and/or Post proposed project activities. Several SPRs, upon completion, have temporal limitations to their validity which will be noted.
Timing	The "Timing" column in the matrix below indicates the time frame during which the SPR or MM in question should be implemented.
Implementing Entity	The "Implementing Entity" is the agency responsible for ensuring that the SPRs and MMs described below are implemented and that the treatments are accomplished. For this proposed project, the implementing agency is LACFD.
Verifying/ Monitoring Entity	The "Verifying/Monitoring Entity" is the agency responsible for verifying if requirements of the proposed projects have been accomplished. For this proposed project, the verifying agency is LACFD.

SPR Matrix

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
Aesthetics and Visual Resources 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical	The project applicant shall perform vegetation thinning and feathering so that the vegetation densities and treatment area mimic natural conditions with the use of mechanical and manual treatment methods.	Prior-During	During mechanical and manual treatment activities	LACFD	LACFD
SPR AES-2 Avoid Staging within Viewsheds. The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall locate equipment staging areas away from public roadways and that the proposed project area is not located on any public parks, trails, or recreational areas.	Prior-During	During treatment	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall screen project areas visible to the public with vegetation.	Prior-During	During design of treatment	LACFD	LACFD
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 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct visual reconnaissance studies prior to implementation to identify the locations from where the non-shaded fuel breaks would be visible.	Prior-During	During the planning phase of the proposed project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall comply with all applicable air quality regulations during all pile and broadcast burns, in addition to the submission of a Smoke Management Plan.	Prior-During	During treatment	LACFD	LACFD
SPR AQ-2 Submit Smoke Management Plan. The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Fire	LACFD shall prepare and submit a Smoke Management Plan before any prescribed burning treatments commence.	Prior-During	Prior to prescribed burn treatment activities	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2.								
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Fire	The project applicant shall create a CAL FIRE burn plan for all prescribed burns with input from a qualified technician or certified State burn boss.	Prior-During	Prior to prescribed burn treatment activities	LACFD	LACFD
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 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall minimize fugitive dust emissions by limiting speed on unpaved roads, wetting unpaved or dirt roads, and removing dust and debris from vehicles and equipment daily.	During	During all treatment activities	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Fire	The project applicant shall follow all safety procedures, including the implementation of an IAP, as required by a CAL FIRE crew.	During	During prescribed fire treatment activities	LACFD	LACFD
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 be 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical	The project applicant shall implement on and off-road vehicle and equipment emissions reduction techniques, where feasible, including using certified renewable diesel fuel, carpooling to work sites, using public transportation for commutes, and equipping equipment with Best Available Control Technology for reductions of NOX and PM.	During	Duration of project	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
▪ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▫ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▫ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▫ contain no fatty acids or functionalized fatty acid esters; and ▫ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▪ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▪ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes when feasible ▪ Off-road equipment, diesel truck, and generators will be equipped with Best Available Control Technology for emission reductions of NO^X and PM.								
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct an archaeological and historical resource record search per the applicable state or local agency procedures. **Completed**.	Prior (Valid for 5 years)	During the planning phase of the proposed project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall obtain the latest Native American Heritage Commission provided Native Americans Contact List and notify the California Native American Tribes in the counties where the treatment activity is located. **Completed**.	Prior	During the planning phase of proposed project	LACFD	LACFD
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 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct research prior to implementing treatments in accordance with the *Henninger Flats Fuel Reduction Project Cultural Resources Technical Report* (Purtell, 2024), including reviewing records, studying maps, reading pertinent ethnography, and more. **Completed.**	Prior (Valid for 5 years)	During the planning phase of proposed project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct a site-specific archaeological survey with an archeologically trained resource professional or qualified archaeologist. **Completed.**	Prior (Valid for 5 years)	During the planning phase of proposed project	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall notify culturally affiliated tribes to assess whether an archaeological find qualifies as a unique resource and develop effective protection measures for these resources within treatment areas.	Prior-During	Upon discovery of cultural resource	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall take effective protection measures for important tribal cultural resources located within treatment areas.	Prior-During	Prior to project implementation if resources are present to allow for tribal approval of protection measures before implementation. During project implementation if resources are found during treatment.	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall avoid any built historical resources area and not resume treatment activities within 100 feet of these resources if discovered during the course of the treatment..	Prior-During	Identify built historical resource before implementation of proposed project, avoid resources during implementation of proposed project	LACFD	LACFD
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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall train all crew members and contractors on the protection of sensitive archeological, historical, or tribal cultural resources.	Prior-During	Prior to proposed project implementation for each on -site crew member.	LACFD	LACFD
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:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Prescribed Fire, Prescribed Herbivory	Should proposed project activities reveal cultural or archeological resources, the project applicant shall halt all ground-disturbing activity within 100 feet of the resource and a qualified professional archaeologist or CAL FIRE archaeologically trained Registered Professional Forester shall assesses the significance of the find.	During	Duration of proposed project	LACFD	LACFD
Biological Resources Standard Project Requirements								

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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: 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 by: a. physically avoiding the suitable habitat, or b. 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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct a review of the project site to determine the existing environmental setting of the site, including whether the project will cause adverse effects to sensitive biological resources and best implementable avoidance mechanisms. **Completed.**	Prior (Valid for 1 year)	No more than 1 year prior to the submittal of the PSA	LACFD	LACFD
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	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall require all crew members and contractors receive training from a qualified RPF or biologist prior to beginning a treatment project.	Prior-During	Prior to proposed project implementation for each on -site crew member.	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).								
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, 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). ▪ 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall hire a qualified RPF or biologist to determine if sensitive natural communities or sensitive habitats may be present and, if so, will map and digitally record the limits of any potential sensitive habitat or community in the area. **Completed**.	Prior	Prior to implementation of proposed project treatments.	LACFD	LACFD
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 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall design riparian habitat treatments to retain or improve habitat functions and follow treatments to avoid loss or degradation of riparian habitats.	Prior-During	During design of treatment	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
▪ 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.								
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 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. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall avoid type conversion where native coastal sage scrub and chaparral are present, by maintaining habitat function even if treatment activity modifies habitat.	Prior-During	During design of treatment	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.								
SPR BIO-6: Prevent Spread of Plant Pathogens. 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 Phytophthora 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 Phytophthora 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 Phytophthora in Native Habitats 2016).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement best management practices to avoid the spread of plant pathogens when working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens.	During	Daily	LACFD	LACFD
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 ▪ 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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement Best Management Practices to prevent the spread of invasive plants, noxious weeds, and invasive wildlife, including maintaining clean clothing, footwear, and equipment when entering and exiting the site, and applying anti-fungal washes if there has been exposure to any pathogen.	During	Daily	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall require that a qualified RPF or biologist conducts focused or protocol-level surveys for special-status wildlife species or 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.	Prior-During	No more than 14 days prior to treatment activities	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Herbivory	The project applicant shall install pre-approved wildlife-friendly fence designs during prescribed herbivory treatments.	During	Duration of project	LACFD	LACFD
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 identify the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▪ **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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall schedule treatment activities to avoid the active nesting season of common native bird species, if feasible. If not feasible, nesting bird survey will be conducted by a qualified biologist prior to treatment activities. If an active nest is observed, the project applicant shall implement feasible avoidance strategies.	Prior-During	Up to 3 weeks before implementation in specific treatment areas during nesting bird season; February 1 through August 31.	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
▪ **Treatment activities will be implemented outside of the buffer.** The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▪ **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▪ **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▪ **Monitor Active Raptor Nest During Treatment.** A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other 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.								
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement measures to avoid loss of non-listed special status plant species individuals such as establishing a no-disturbance buffer, marking the boundary with high-visibility flagging, and adjusting the buffer boundary in coordination with a qualified RPF or botanist.	Prior-During	Reconnaissance survey no more than 1 year prior to the submittal of the PSA Implementation throughout entire proposed project time (daily)	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
▪ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▪ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▪ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.								
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities). If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following: ▪ **Avoid Mortality, Injury, or Disturbance of Individuals.** The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: ▫ 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 ▫ 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. ▪ **Maintain Habitat Function.** The project proponent will design treatment activities to maintain the habitat function, by implementing the following:	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement strategies to avoid mortality, injury, or disturbance of listed wildlife species by avoiding treatment within the occupied habitat, implementing treatment outside the species' sensitive life history, and maintaining habitat function.	Prior-During	Reconnaissance survey no more than 1 year prior to the submittal of the PSA Implementation throughout entire proposed project time (daily)	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
▫ 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 habitat requirements of the affected species and the most current, commonly accepted science. ▫ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.								
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities). If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following: ▪ **Avoid Mortality, Injury, or Disturbance of Individuals.** The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: ▫ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer 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,	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement strategies to avoid mortality, injury, or disturbance of non-listed wildlife species by avoiding treatment within the occupied habitat, implementing treatment outside the species' sensitive life history, and maintaining habitat function.	Prior-During	Reconnaissance survey no more than 1 year prior to the submittal of the PSA Implementation throughout entire proposed project time (daily)	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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. ▪ **Maintain Habitat Function.** 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. 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.								
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	**Initial Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed	The project applicant shall design treatment activities to avoid mortality, injury, or disturbance for Special-Status	Prior-During	Reconnaissance survey no more than	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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 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.	**Maintenance Treatment:** Yes		Fire, Prescribed Herbivory	bumble bees by conducting treatment outside bumble bee flight season, retaining suitable habitat, and preventing the use of herbicides to flowering native plants during flight season.		1 year prior to the submittal of the PSA Implementation throughout entire proposed project time (daily) Treatments should occur October through February to avoid bumblebee flight season		
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	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall hire a qualified RPF or biologist to determine the natural fire regime, condition class, and FRI for each sensitive natural community and oak woodland type to avoid losses to natural communities.	Prior-During	Implementation during entire proposed project time (daily)	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▪ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in Fire in California's Ecosystems (Van Wagtendonk et al. 2018) and the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▪ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ▪ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▪ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in Fire in California's Ecosystems (Van Wagtendonk et al. 2018) and the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▪ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the								

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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.								
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands. Impacts to wetlands will be avoided using the following measures: ▪ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▪ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▪ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▪ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▪ Within this buffer, herbicide application is prohibited. ▪ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▪ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▫ No special-status species are present in the wetland habitat ▫ The wetland habitat function would be maintained ▫ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▫ Fire containment lines and pile burning are prohibited within the buffer ▫ No fire ignition (and associated use of accelerants) will occur within the wetland buffer	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall delineate the boundaries of federally and state-protected wetlands and waters, and implement measures to avoid these wetlands, such as establishing a minimum 25-foot buffer around wetlands.	Prior-During	Duration of project	LACFD	LACFD
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites. The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▪ **Retain Known Nursery Sites.** A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment ▪ **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct a pre-treatment survey and establish buffers around active nursery sites during the maternity season for species such as deer, bats, herons, and other species which breed in nursery sites.	Prior-During	Habitat features identified and non-disturbance buffer established before any implementation actions RPF or biologist confirmation needed to commence any treatment activity	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Prescribed Herbivory, Herbicide	The project applicant shall suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" of rain within the next 24 hours.	During	During implementation, if there is a 30 percent chance or greater of rain within the next 24 hours	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical	The project applicant shall avoid soil disturbance or compaction when soils are wet and saturated, especially via high ground pressure vehicles.	During	At any point in project treatment, until soils are no longer saturated	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Prescribed Herbivory, Prescribed Fire	The project applicant shall stabilize soils that become disturbed during mechanical, prescribed herbivory, and prescribed burns.	During-Post	At any point during project treatment if the site has greater than 50 percent bare soil exposure.	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Prescribed Herbivory, Prescribed Fire	The project applicant shall inspect the project area for erosion control SPRs and mitigations prior to the rainy season.	During	Inspect treatment areas for the proper implementation of erosion control SPRs and MMs prior to the rainy season; if erosion control measures are not properly implemented, remediate prior to the first rainfall event; inspect for evidence of erosion after the first large storm or rainfall event (i.e., greater than or equal to 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	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
						remediated within 48 hours		
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. treatment maintenance.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Manual, Prescribed Fire	The project applicant shall utilize water breaks to drain stormwater runoff to minimize the risk of erosion.	During	Implementation during entire proposed project time (whenever water is present)	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Manual, Prescribed Fire	The project applicant shall prevent pile burning activities from exceeding 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the PEIR.	During	During mechanical, manual, and prescribed fire activities	LACFD	LACFD

SPR GEO-7 Minimize Erosion. To minimize erosion, the project proponent will:
▪ Prohibit use of heavy equipment where any of the following conditions are present:
  ▫ Slopes steeper than 65 percent.
  ▫ Slopes steeper than 50 percent where the erosion hazard rating is high or extreme.
  ▫ Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake.
▪ 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:
  ▫ Existing tractor roads that do not require reconstruction, or
  ▫ New tractor roads flagged by the project proponent prior to the treatment activity.
▪ Prescribed herbivory treatments will not be used in areas with over 50 percent slope.
	Initial Treatment: Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall avoid the use of heavy equipment on slopes over 35 percent except during control line construction for broadcast burning.	During	Duration of project	LACFD	LACFD

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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical	The project applicant shall require an RPF or geologist evaluation of treatment areas with steep slopes or unstable soils.	Prior-During	At any point during project treatment, when slopes greater than 50 percent are being treated	LACFD	LACFD
Greenhouse Gas Emissions Standard Project Requirements								
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	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Fire	The project applicant shall incorporate feasible GHG emissions reductions strategies, in accordance with NWCG Smoke Management Guide and document these methods in the Burn Plan, pursuant to SPR AQ-3.	Prior-During	Prior to and during all prescribed fire activities	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.								
Hazardous 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall maintain all equipment in compliance with all state and federal emissions requirements and inspect all equipment daily.	During	Daily	LACFD	LACFD
SPR HAZ-2 Require Spark Arrestors. The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual	The project applicant shall utilize spark arrestors for all mechanized hand tools.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual	The project applicant shall require that one fire extinguisher per chainsaw is carried by tree cutting crews and that vehicles are equipped with one long-handed shovel and one axe or Pulaski.	During	Duration of project	LACFD	LACFD
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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall prohibit smoking in vegetated areas prior to or during treatment activities.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall prepare a SPRP internally or by a licensed Pest Control Advisor.	Prior	Prior to commencement of treatment activities	LACFD	LACFD
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:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall verify that all herbicide use complies with the Los Angeles County Agricultural Commissioner's Office prior to implementation of herbicide treatments.	Prior-During	Duration of project	LACFD	LACFD
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	**Initial Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall triple rinse and properly dispose of herbicide containers in batch tanks.	During	Duration of project	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
recycling program, in which case the manufacturer's instructions will be followed. Disposal of nonrecyclable 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.	**Maintenance Treatment:** Yes							
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall employ responsible herbicide application parameters to minimize herbicide drift to public areas.	During	Duration of project	LACFD	LACFD
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas. For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall distribute notices of herbicide use to inform the public of herbicide use prior to the implementation of herbicide treatments in public areas.	Prior-During	Signage posted prior to treatment and remain in place at least 72 hours after treatments	LACFD	LACFD
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:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical, Prescribed Fire	The project applicant shall complete pre-operational research to determine that there are not any sites known to have previously used, stored, or disposed of hazardous materials within the proposed project area. **Completed**.	Prior	Prior to commencement of treatment activities	LACFD	LACFD
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 noncommercial 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall conduct proposed vegetation treatments in conformance with appropriate water quality regulations.	Prior-During	Duration of project	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall not construct or reconstruct any new roads.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Herbivory	The project applicant shall implement water quality protections for all prescribed herbivory treatments.	Prior-During	Planning phase of the project and Duration of project	LACFD	LACFD
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. 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. ▪ 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	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall establish Watercourse and Lake Protection Zones, as defined in 14 CCR Section 916.5 of the California Forest Practice Rules, on either side of water courses.	Prior-During	Establish WLPZs during the design phase of the treatment project; implement WLPZ protections during treatment projects.	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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. **Procedures for determining WLPZ Widths** Water Class: Class I — 1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning. Class II — 1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters. Class III — No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations. Class IV — Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use. WLPZ Width (ft) – Distance from top of bank to the edge of the protection zone < 30 % Slope: Class I 75, Class II 50 30-50 % Slope: Class I 100, Class II 75 >50 % Slope: Class I 150, Class II 100 Class III: Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.								
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides. The project proponent will implement the following measures when applying herbicides: 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Herbicide	The project applicant shall conduct herbicide application in accordance with applicable local ordinances and policies, SPRs and MMs, and manufacturer recommendations to protect non-target and special-status plant species.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall flag all stormwater drainage infrastructure prior to treatment activities.	Prior-During	Drainage infrastructure marked prior to any treatment activities Implementation during entire	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
						proposed project time		
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall limit noise-generating vegetation treatment activities, consistent with the County Noise Ordinance.	During	Duration of project	LACFD	LACFD
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 in accordance with manufacturers' recommendations.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall properly maintain and equip all diesel and gas-powered treatment equipment in accordance with manufacturers' recommendations.	During	Duration of project	LACFD	LACFD
SPR NOI-3 Engine Shroud Closure. The project proponent will require that engine shrouds be closed during equipment operation.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical	The project applicant shall close engine shrouds during operation.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall stage equipment within the project boundaries and not immediately adjacent to any sensitive receptors.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall shut down equipment when not in use and keep idling to a limit of 5 minutes.	During	Duration of project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Mechanical	The project applicant shall notify any noise-sensitive receptors of anticipated dates and hours during which treatment activities are anticipated to occur and contact information of a project representative.	Prior	15 to 30 days before treatment activity begins	LACFD	LACFD
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 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	**Initial Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall notify recreational users of temporary closures via notifications at trailheads and other strategic locations.	During	Approximately 2 weeks prior to treatment projects requiring temporary	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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.	**Maintenance Treatment:** Yes					closure of public recreation areas or facilities.		
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall implement traffic control during treatments through posted signage.	Prior	Traffic Management Plan submitted at least 30 days before commencement of treatment activity	LACFD	LACFD
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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall coordinate with CAL FIRE prior to and during the implementation of this project.	Prior-During	Discussion with CAL FIRE must occur at any point prior to the commencement of any treatment activities	LACFD	LACFD
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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall clearly define boundaries of the proposed project area and any protected resources in the project area with clear flagging and landscape demarcations.	Prior-During	Prior to treatment; maintained/replaced as needed for the duration of the project	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall design the project so that it does not conflict with any local plans, policies, or ordinances.	Prior-During	Duration of project	LACFD	LACFD
SPR AD-4 Public Notifications for Prescribed Burning. One to three 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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Prescribed Fire	The project applicant shall post signs along roadways describing the activity and timing and publish a public interest notification in a local newspaper or other widely distributed media source.	Prior-During	Public notified one to three days before a prescribed burn	LACFD	LACFD

Standard Project Requirements	Applicable? (Y/N)	Treatment Type	Treatment Activity	Action Required	Frequency	Timing	Implementing Entity	Verifying/ Monitoring Entity
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 trash, debris, and barriers from the project site upon completion of project activities.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall maintain site cleanliness by instructing staff to remove all trash generated daily.	During-Post	Daily	LACFD	LACFD
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 or concerns.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall notify the public of treatment projects and maintenance via signage posted one to three days prior to the commencement of a treatment activity.	Prior	1-3 days prior to the commencement of an activity	LACFD	LACFD
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 (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 (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).	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall make information about proposed, approved, and completed projects available to the public by submitting it to CAL FIRE. **Completed project preparation notice sent to CAL FIRE 7/8/24.**	Prior-During-Post	Information made public prior to the commencement of treatment activities and updated throughout entire proposed treatment activities	LACFD	LACFD
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.	**Initial Treatment:** Yes **Maintenance Treatment:** Yes	WUI Fuel Reduction, Fuel Breaks	Manual, Mechanical, Herbicide, Prescribed Fire, Prescribed Herbivory	The project applicant shall request access for post-treatment assessment of the project to CAL FIRE.	Post	Up to three years	LACFD	LACFD

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Appendix B

Biological Technical Report

Henninger Flats Fuel Reduction Project

Biological Technical Report

For CalVTP Project Specific Analysis

prepared for

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August 2024

RINCON CONSULTANTS, INC. SINCE 1994

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1 Introduction

This Biological Technical Report provides the required information to analyze potential impacts to special status and sensitive biological resources within the Henninger Flats treatment area and was completed as a requirement of the California Department of Forestry and Fire Protection (CAL FIRE) California Vegetation Treatment Program (CalVTP) and California Environmental Quality Act guidelines. The purpose of this project is to conduct fire prevention services in unincorporated areas northeast of the City of Altadena, located in Los Angeles County, California.

Project activities are described in detail in Section 2.8.2 of the Project Specific Analysis. The proposed project will be implemented on approximately 50 acres in the foothills of the San Gabriel Mountain range in Los Angeles County. The proposed project area is subdivided into 19 treatment plots of varying acreage as shown in Figure 1. Plot boundaries were defined by the Los Angeles County Fire Department Forestry Division staff and based on existing roads, structures, topography, and fuel density. Treatment types and activities would occur consistently across all project plots. Division of the proposed project area into plots will benefit site access and management of prescribed burning areas, as well as the management and preservation of native vegetation, habitats, and existing site facilities. Proposed fuel reduction treatments include a combination of manual methods, mechanical methods, prescribed herbivory, herbicide application, and prescribed burning of piles and broadcast burning operations to be conducted similarly in all treatment plots.

2 Literature Review

The literature reviewed for this report is based on the currently proposed site plans for the project and publicly available aerial images. Queries of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB, CDFW 2024) and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2024a) were conducted to obtain comprehensive information. A 12-quadrangle search area centered on the Study Area was used which included Pasadena, Mt. Wilson, Sunland, Condor Peak, Chilao Flat, Waterman Mtn., Azusa, Baldwin Park, El Monte, Los Angeles, Hollywood, and Burbank. In addition, regionally occurring sensitive biological resources and geological and hydrological information related to the site were researched from the following sources:

- USFWS Critical Habitat Portal (USFWS 2024a)
- USFWS Information, Planning, and Conservation System (USFWS 2024b)
- USFWS National Wetland Inventory (NWI) Mapper (USFWS 2024c)
- California Vegetation Treatment Program Programmatic Environmental Impact Report (CalVTP PEIR)
- Natural Resources Conservation Service (NRCS) Web Soil Survey (United States Department of Agriculture [USDA], NRCS 2024a)
- CDFW California Wildlife Habitat Relationship (CWHR) System
- Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element (County of Los Angeles 2015a)
- Los Angeles County Sensitive Bird Species (Los Angeles County Sensitive Bird Species Working Group 2009)
- Significant Ecological Ares (SEA) Ordinance Implementation Guide (Los Angeles County Regional Planning 2020)

3 Regulatory Overview

Regulated or sensitive biological resources reviewed and analyzed herein include special status plant and animal species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and other locally protected resources, such as protected trees. Regulatory authority over biological resources is shared by federal, state, and local authorities. Biological resources that are analyzed in this report are generally regulated in accordance with the following statutes:

- California Environmental Quality Act (CEQA)
- Federal Endangered Species Act (FESA)
- California Endangered Species Act (CESA)
- Federal Clean Water Act (CWA)
- California Fish and Game Code (CFGC)
- Migratory Bird Treaty Act (MBTA)
- Bald and Golden Eagle Protection Act
- Porter-Cologne Water Quality Control Act
- County of Los Angeles General Plan (2015a)
- County of Los Angeles Oak Tree Ordinance (Section 22.56.2050 *et seq*.)
- County of Los Angeles Oak Woodlands Conservation Management Plan (2011) and accompanying guide (2014)

4 Field Reconnaissance and Plant Community Survey

Rincon's qualified biologists/botanists knowledgeable in plant taxonomy, familiar with special-status plants and sensitive natural communities of the region, and with experience conducting floristic botanical field surveys as described in CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (current version dated March 20, 2018) conducted a field reconnaissance of the treatment area on May 6, 2024. Weather conditions were mostly sunny with temperatures ranging from 65-75 degrees Fahrenheit. The extent of the field reconnaissance and plant community surveys covered the extent of the 50-acre treatment area.

4.1 Field Reconnaissance

Rincon biologists completed the field reconnaissance by surveying the treatment area on foot, binoculars were utilized to survey steep and inaccessible areas. Wildlife species were identified by direct visual observation, vocalization, or by sign (e.g., tracks, scat, burrows). The habitat assessment included identifying nursery sites. Nursery sites are locations where fish and wildlife concentrate for hatching and/or raising young, such as nesting rookeries for birds, spawning areas for native fish, fawning areas for deer, and maternal roosts for bats. The USFWS National Wetland Inventory GIS Dataset and the National Hydrography Dataset were referenced during the assessment to identify the general extent of aquatic resources on the site, including seasonal drainages (creeks and streams) and wetlands potentially under state and federal jurisdiction. A formal jurisdiction delineation, an assessment and mapping of hydrophytic vegetation, hydric soil types, and wetland hydrology, was not conducted.

4.2 Vegetation and Sensitive Plant Community Survey

Rincon biologists completed SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats following the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* [CDFW 2018], and vegetation communities and land cover types were characterized and mapped. Much of the treatment area consists of dense vegetation, poison oak, and steep slopes; therefore, the field reconnaissance and plant community survey were accomplished by visually observing the treatment area from various vantage points. In some instances, where access was limited, binoculars were used to confirm dominant plant species. Vegetation communities and land cover types were characterized and mapped in accordance with SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats following the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018]. Natural communities were translated into the CWHR classifications via the CNPS classification converter (CNPS 2024b). Vegetation data collected included observations 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). Plants and animals observed were recorded. A compendium of plants and animals observed is provided in Appendix A. Protocol surveys for specific rare plants were not completed. Invasive species were recorded and are

discussed in Appendix B, in relationship to the vegetative communities in which they were observed.

Resources and vegetation communities were digitally mapped and recorded using a Global Positioning System (GPS) device and ArcGIS Field Maps software.

5 Sensitive Biological Resources Potential to Occur

The potential for sensitive biological resources to occur in the treatment area is evaluated in this section. Sensitive biological resources include those that are protected by local, state, and federal agencies, including special-status species, sensitive native plant communities, aquatic resources, and wildlife connectivity. Special status species that were assessed for potential presence on the treatment area are defined in the CalVTP PEIR Section 3.6.1 as follows:

- Species listed or proposed for listing as threatened or endangered under ESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species) or candidates for possible future listing as threatened or endangered under ESA (75 CFR 69222)
- Species listed or candidates for listing by the State of California as threatened or endangered under CESA (14 Cal. Code Regs., Section 670.5)
- Animals fully protected under the California Fish and Game Code (FGC) (Section 3511 for birds, Section 4700 for mammals, Section 5050 for reptiles and amphibians, and Section 5515 for fish)
- Plants listed as rare under the California Native Plant Protection Act (FGC Section 1900 et seq.)
- Plants considered by CDFW to be "rare, threatened or endangered in California" (California Rare Plant Ranks [CRPR] of 1A, presumed extinct in California and either rare or extinct elsewhere 1B, considered rare or endangered in California and elsewhere; 2A, presumed extinct in California but common elsewhere; and 2B, considered rare or endangered in California but more common elsewhere)
- Animals identified by CDFW as species of special concern
- Species considered locally significant, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA Section 15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G) or
- Species that otherwise meets the definition of rare or endangered under CEQA Section 15380

Determinations were based upon known ranges, habitat preferences (e.g., vegetation, soils, slope, and elevation), onsite habitat quality, and occurrence records from CNDDB and CNPS. The potential for special status species to occur was evaluated according to the following criteria in the PEIR:

- **Not expected to occur:** Species is unlikely to be present on the treatment area due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
- **May occur:** Suitable habitat is available on the treatment area; however, there are little to no other indicators that the species might be present.
- **Known to occur:** The species, or evidence of its presence, was observed on the treatment area during project surveys, or was otherwise documented.

The record search conducted for this analysis included species known to occur within the 12-quadrant search area. Table 1 below provides details regarding the special status species analyzed. The list was developed from the 12-quadrant CNDDB search, and the literature review described in

Section 2 above. The presence and characteristics of suitable habitat were assessed and recorded during the protocol vegetation and sensitive plant community survey completed.

5.1 Special Status Species

As described, the potential for a species to occur per the PEIR criteria is one of the following three: Not Expected, May Occur or Known to Occur. An additional likelihood determination for the species to occur is discussed below and is based on the field reconnaissance and vegetation community and habitat survey results. Special status species known to occur within the 12-quadrant search area were analyzed. A summary of all species with recorded occurrence within the search area, a summary of habitat requirements, and a brief discussion regarding the species' potential to occur is provided in Appendix C. The additional potential for each special-status species to occur in the Study Area was evaluated according to the following criteria:

- **No Potential.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime), and species would have been identifiable on the site if present (e.g., oak trees). Protocol surveys (if conducted) did not detect species.
- **Low Potential.** Few of the habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site. Protocol surveys (if conducted) did not detect species.
- **Moderate Potential**. Some of the habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All the habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species is observed on the site or has been recorded (e.g., CNDDB, other reports) on the site recently (within the last 5 years).

Special status species determined to be present or with a high or moderate potential to occur are discussed in the sections below. Species with a low potential to occur or not expected are not discussed further in this report. The SEA Ordinance Implementation Guide protects 37 native trees in the Altadena Foothills & Arroyos SEAs. The trees are not analyzed here because occurrence data is not available and the ordinance is applicable to trees and this project does not propose tree removal. The SEA protected trees are not discussed further in this report. See Appendix D for the list of protected trees. Los Angeles County's list of Sensitive Bird Species is included as Appendix E.

5.1.1 Special Status Plants Listed Under ESA or CESA

No plants listed under ESA and/or CESA considered to have a moderate or high potential to occur or are present within the treatment area.

5.1.2 Listed Wildlife Species and Fully Protected Species

Listed wildlife are defined as species listed or proposed for listing as threatened or endangered under ESA, listed animals and various notices in the Federal Register for proposed species, candidates for possible future listing as threatened or endangered under ESA, species listed or candidates for listing by the State of California as threatened or endangered under CESA, and animals fully protected under the California Fish and Game Code. One listed species that is candidate for listing by the State of California, has a moderate potential to occur in the treatment area, Crotch bumble bee.

Crotch bumble bee (*Bombus crotchii*) is a native species and a candidate to be listed under the California Endangered Species Act. Crotch bumblebee occurs in coastal California east to the Sierra-Cascade crest and south into Mexico. It can be found within shrubland and open grassland habitats and their nesting occurs underground. Food plant genera for this species include *Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia,* and *Eriogonum*. This species may occur throughout the treatment area.

5.1.3 Special Status Plants Not Listed Under ESA or CESA

Two special status plants not listed under ESA or CESA have a moderate potential to occur in the treatment area, the Palmer's mariposa-lily (*Calochortus palmeri* var. *palmeri*) and intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*). Both have a CRPR rarity ranking of 1B.2, meaning they are considered "rare, threatened, or endangered in California and elsewhere and fairly threatened in California" (CNPS, 2024). They are both perennial bulbiferous herbs that are endemic to California and Palmer's mariposa-lily occurs in chaparral, lower montane coniferous forest, meadows and seeps and is most successful in mesic sites, it typically blooms April through July. Intermediate mariposa-lily occurs in chaparral, coastal scrub, valley and foothill grassland typically on rocky soils and blooms between May and July.

5.1.4 Other Special Status Wildlife

Other special status species are defined as animals identified by CDFW as species of special concern, species considered locally significant, and species that otherwise meet the definition of rare or endangered under CEQA Section 15380) There are five other special status wildlife that have a moderate or high potential to occur or are known to be present in the treatment area.

Coastal whiptail (*Aspidoscelis tigris stejnegeri*) is a state Species of Special Concern. This lizard is typically found in deserts and semi-arid areas with sparse vegetation and open areas and found in woodland and riparian areas.

Coast horned lizard (*Phrynosoma blainvillii*) is a state Species of Special Concern. This species is found in a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes and open areas with loose soils for burial.

Cooper's hawk (*Accipiter cooperii*) is on the CDFW Watch List. It is an uncommon resident species found in various wooded areas. It nests in tall trees and often hunts around human structures such as houses and bird feeders and has been known to successfully breed in urban areas. This species occurs throughout most of the state.

Turkey vulture (*Carthartes aura*) is known throughout most of California during the typical breeding season. It occurs in most open habitats that provide adequate cliffs or large trees for nesting, roosting, and resting. This species primarily eats carrion and was observed overhead during the field

survey. Though common throughout California, the turkey vulture is a Los Angeles County Sensitive Bird Species due to habitat loss (LACSBS 2009).

Pallid bat (*Antrozous pallidus)* is a state Species of Special Concern that occurs over a wide variety of habitat types, including deserts, grasslands, shrublands, woodlands, and forests. While it is most common in open, dry habitats with rocky areas for roosting, it can be found roosting under bridges and in some areas in old structures such as barns. This bat is a resident species that occurs throughout the state, commonly at elevations below 6,000 feet.

Table 1 Special Status Species

Scientific Name Common Name	*Federal/State Status	CRPR	**Other	***Potential to Occur	****Potential to Occur
Plants and Lichens					
Calochortus palmeri var. *palmeri* Palmer's mariposa-lily	None/None	1B.2	BLM S SB USFS S	May Occur	Moderate potential
Calochortus weedii var. *intermedius* intermediate mariposa-lily	None/None	1B.2	SB USFS S	May Occur	Moderate potential
Invertebrates					
Bombus crotchii Crotch bumble bee	None/SCE			May Occur	Moderate potential
Reptiles					
Aspidoscelis tigris stejnegeri coastal whiptail	None/None		SSC	May Occur	Moderate potential
Phrynosoma blainvillii coast horned lizard	None/None		BLM S SSC	May Occur	Moderate potential
Birds					
Accipiter cooperii Cooper's hawk	None/None		WL	May Occur	High potential
Carthartes aura turkey vulture	None/None		LACSBS	Known to Occur	Present
Mammals					
Antrozous pallidus pallid bat	None/None		BLM S SSC USFS S	May Occur	Moderate potential

Note: CNDDB = California Natural Diversity Database; CRPR = California Rare Plant Rank; DPS= Distinct Population Segment; ESU = Evolutionarily Significant Unit
1 Legal Status Definitions

Status (Federal/State)
FE = Endangered (legally protected)
FT = Threatened (legally protected)
FC = Candidate for listing as endangered
SE = Endangered (legally protected)
FP = Fully protected (legally protected)
FD = Federally delisted
CT = Candidate for listing as threatened (legally protected)
ST = Threatened (legally protected)
SR = Rare (legally protected by NPPA)
SCE= Candidate for listing as endangered

CRPR (CNPS California Rare Plant Rank)
1B = Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)
2A = Plant species that occur outside of California but are presumed extirpated in the state because they have not been observed or documented in California for many years.
2B = Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)
Threat Ranks

Scientific Name Common Name	*Federal/State Status	CRPR	**Other	***Potential to Occur	****Potential to Occur
SSC = Species of special concern (no formal protection other than CEQA consideration) WL=Watch List LACSBS = Los Angeles County Sensitive Bird Species (Los Angeles Audubon, 2009 USFS S= United States Forest Service Sensitive SB= SB CalBG/RSABG-California/Rancho Santa Ana Botanic Garden/CRES-San Diego Zoo CRES Native Gene Seed Bank/SBBG-Santa Barbara Botanic Garden BLM S = Bureau of Land Management Sensitive *Includes CDFW Fully Protected species **Includes CDFW Species of Special Concern ***PEIR criteria ****Criteria based on survey observations			0.1 = Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat) 0.2 = Fairly threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat) 0.3 = Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known)		

5.2 Critical Habitat

No designated critical habitat is present in the treatment area, the nearest designated critical habitat is for Braunton's milk-vetch, approximately four miles east of the treatment area, arroyo toad seven miles north of the treatment area, and southwestern willow flycatcher, over nine miles east of the treatment area in the San Gabriel River.

5.3 Vegetation and Habitat Types

Vegetation communities and habitat types were surveyed and mapped and are described below consistent with the Southern California Coast Section Ecoregion 261B and Table 3.6-27 of the CalVTP PEIR. The California Wildlife Habitat Relationship (CWHR) system's classifications are presented in Table 2 below. Figure 1, displays CWHR types within the treatment area. There were no sensitive natural communities observed that are subject to Standard Project Requirements of the PEIR as shown in Figure 2.

Habitat types within the project area are coastal oak woodland, coastal scrub, mixed chaparral, riparian, annual grassland, and developed/disturbed. The CWHR classifications shown in Table 2 below have been cross referenced with the MCV alliances to determine the sensitivity ranking assigned to each community (CNPS 2024b). Table 1 shows the CWHR Classifications with the MCV Alliances and Associations and their acreages in the treatment area. Figure 1, show the CWHRs of the treatment area.

Tree Dominated Communities

Coastal Oak Woodland

Coastal oak woodland habitat is comprised of one alliance: coast live oak woodland and forest (*Quercus agrifolia* Forest & Woodland Alliance), which make up approximately 5.97 acres of the nearly 50 acres. This community is tree dominated generally on the north-facing aspects with the coast live oak/poison oak forest alliance. Coast live oak woodland is not a sensitive natural community and has a rank of G5S4.

Eucalyptus

Eucalyptus habitat is comprised of a single alliance: Eucalyptus - tree of heaven - black locust groves. This habitat makes up approximately 0.25 acres of the nearly 50 acres. This community is dominated by blue gum (*Eucalyptus globulus*) and is ranked GNASNA due to the predominance of non-native species and is not considered sensitive (CDFW 2024). Eucalyptus is a non-native species.

Montane hardwood-conifer

Montane hardwood habitat is comprised of one alliance: coulter pine woodland and forest, which makes up approximately 20.61 acres of the 50 acres. Coulter pine woodland and forest habitat is ranked G4S4 and is not considered sensitive (CDFW 2024). This community was only mapped as a single association during the vegetation survey. However, this community included areas with deodar cedar and canyon live oak occurring as subdominants in the canopy. The majority of the understory in the Coulter pine forest is dominated by non-native grasses (*Bromus diandrus*, *Avena barbara*, *Bromus rubens*) and forbs (*Brassica nigra*, *Hirschfeldia incana*).

Shrub Dominated Communities

Coastal Scrub

Coastal scrub habitat is comprised of one alliance: laurel sumac scrub that makes up approximately 18.13 acres of the nearly 50 acres. Laurel sumac scrub contains two associations: laurel sumac scrub and laurel sumac - California buckwheat - black sage scrub, which are both facultative seeders with mean fire return intervals ranging from 10-60 years. Laurel sumac scrub has a rank of G4S4 and is not considered sensitive (CDFW 2024). Giant reed (*Arundo donax*) is a Cal-IPC high rated species that occurs within this vegetation community.

Mixed Chaparral

Mixed chaparral habitat is comprised of one alliance: scrub oak chaparral that makes up approximately 2.96 acres of the nearly 50 acres. Scrub oak (*Quercus berberidifolia)* is an obligate sprouter with a fire return interval ranging from 30-100+ years. Scrub oak chaparral has a rank of G4S4 and is not considered sensitive (CDFW 2024).

Grass Dominated Communities

Annual Grassland

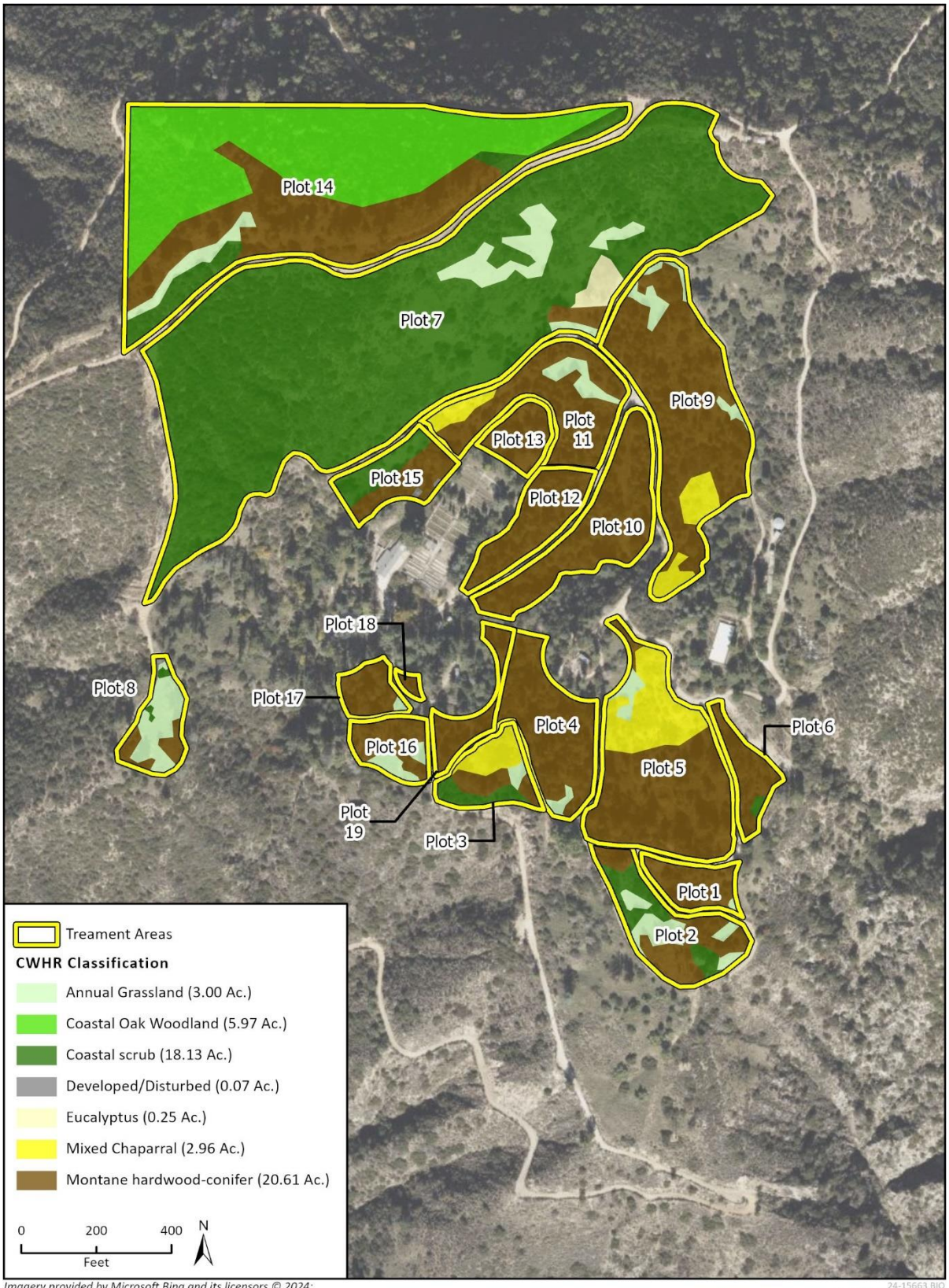
Annual grassland habitat is comprised of two alliances; wild oats and annual brome grasslands and upland mustards or star-thistle fields and is approximately 3 of the 50 acres. These alliances are generally found in open areas and have a predominance of non-native annual grasses and weedy annual and perennial forbs. Both vegetation alliances are ranked GNASNA and are not considered sensitive (CDFW 2024).

Other Land Covers

Developed/Disturbed

Developed and disturbed areas include roadways, buildings, and ornamental vegetation that has been landscaped maintained or are free of vegetation that is approximately 0.07 acre of the 50 acres.

Figure 1 CWHR Classifications



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24-15663 BIO
Fig 1 CWHR Classifications

5.4 Sensitive Natural Communities

There are eight MCV alliances in the treatment area, none of which are sensitive. Table 2 provides the alliances as they relate to the CWHR classifications and goes further to describe the associations of each alliance with acreages. One sensitive natural community, Incense Cedar Forest and Woodland ranked G4/S3, is immediately adjacent to treatment area boundary between plots 15 and 18, but it is not within the treatment area. Figure 2 shows the plots and their locations. Figure 3 shows the MCV alliances within the plots. Appendix B provides the Vegetation Communities that are present on the treatment area, including the associations, sensitivity ranking, and species composition for each vegetation alliances, as well as dominant plant species of each community.

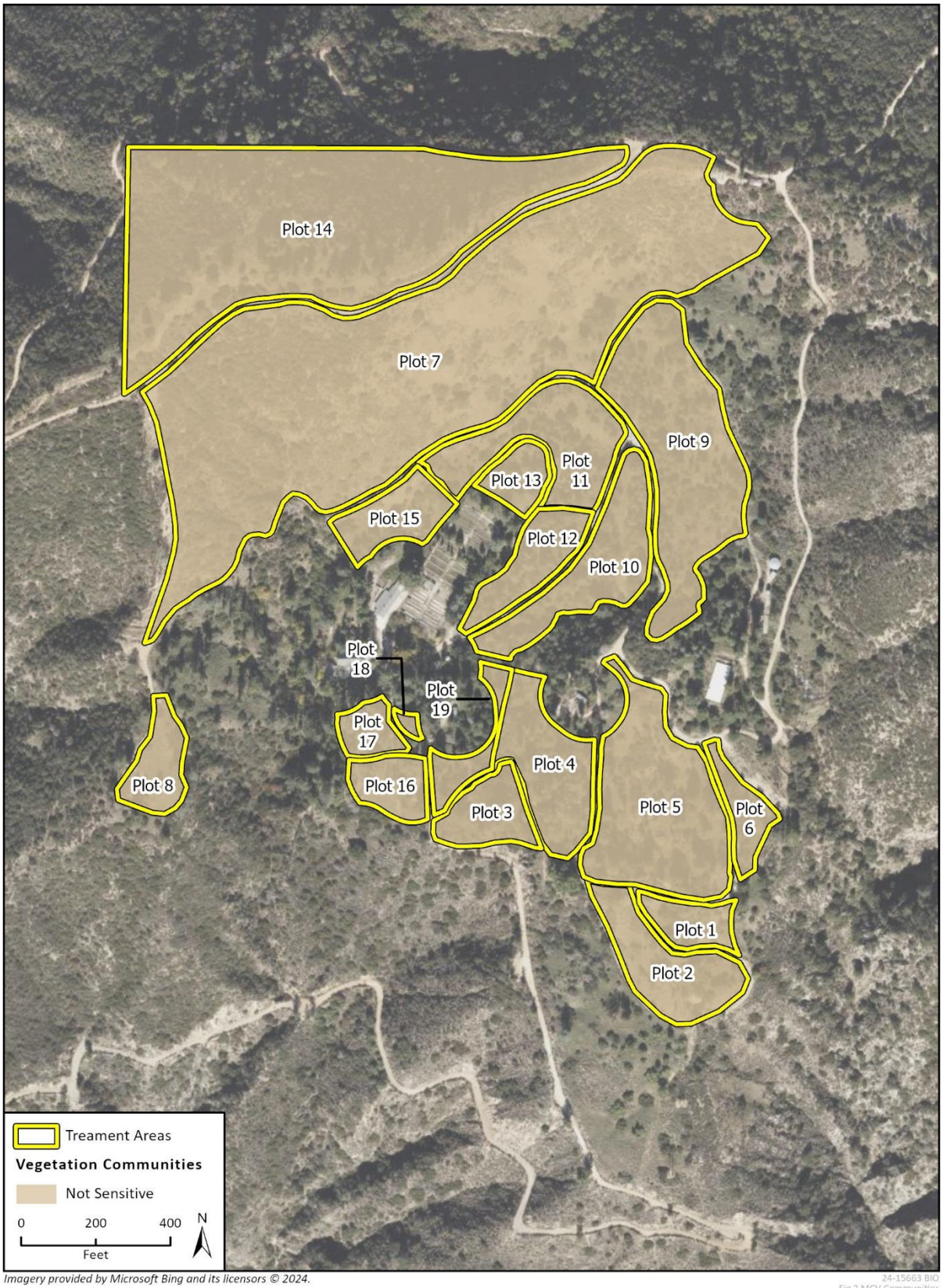
Table 2 CWHR Classifications and MCV Associations

CWHR Classification	MCV Alliance	MCV Association	Sum of Acreage	Acreage
Coastal oak woodland	Coast live oak woodland and forest	Coast Live Oak/Poison Oak Forest		5.97
[N] Eucalyptus	Eucalyptus - tree of heaven - black locust groves	Eucalyptus groves		0.25
Montane hardwood-conifer	Coulter pine woodland and forest	Coulter pine forest		20.61
Mixed chaparral	Scrub oak chaparral	Scrub Oak Chaparral		2.96
Coastal scrub	Laurel sumac scrub	Laurel sumac scrub		1.16
		Laurel sumac - California buckwheat - black sage scrub		16.97
			subtotal	18.13
[N] Annual grassland	Wild oats and annual brome grasslands	Wild oats and annual brome grasslands		2.29
	Upland mustards or star-thistle fields	Summer mustard fields		0.72
			subtotal	3
Other Land Covers	Developed/Disturbed	Roads/Maintained Areas		0.07
			Total	***50**

[N] Non-native species

*Acreage shown is adjusted for some minor overlap of community boundaries

Figure 2 Vegetative Community Sensitivity Rating



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24-15663 BIO
Fig 2 MCV Communities

Fire Regimes and Condition Class

The treatment area consists of 13 MCV alliances, as shown in Table 2 above. All alliances' fire responses and fire return intervals are discussed in the PEIR for chaparral and coastal scrub and are shown below in Table 3 for this treatment area. These fire regime concepts are designed to assist fire managers and the public in setting priorities for fuel management based on the frequency and severity of fire under pre- European conditions (fire regime) and departure from these regimes that has occurred during the fire suppression era (condition class) (Schmidt et al. 2002). Table 3 shows the fire responses and return intervals for the scrub oak chaparral and laurel sumac scrub.

Table 3 Fire Return Intervals and Chaparral and Coastal Scrub

CWHR Classification/MCV Alliance	Fire Response	Fire Return Interval	Condition Class
Scrub oak chaparral	Obligate sprouter	Medium 20-100 years	2
Laurel sumac scrub	Facultative seed	Short to medium 10-60 years	2

Condition class is a function of the degree of departure from historical fire regimes (Hardy et al. 2001). Condition Classes 2 and 3 identify areas that have the greatest departure from historic conditions, where fire behavior is uncharacteristic and vegetation composition is altered from the loss of the key components of an ecosystem. Condition class, however, does not distinguish between a negative and positive deviation from the fire return interval. The most recent fire activity at the treatment area occurred in 1993 during the Kinneloa Fire, 31 years ago. Based on the passage of 31 years since the past fire activity and observations of the vegetative communities having a relatively mature age class and moderate density, the condition class of the two alliances is considered to be moderate (Condition Class 2).

5.5 Other Sensitive Habitats

Coastal oak woodland is not a sensitive natural community, but it does qualify for protection under County of Los Angeles Oak Tree Ordinance [(Ord. 88-0157 § 1, 1988: Ord. 82-0168 § 2 (part), 1982.) as outlined in Chapter 22.56.2050 *et seq.*] and the Los Angeles County Oak Woodlands Conservation Management Plan (County of Los Angeles 2014). In addition, the Los Angeles County CEQA thresholds apply to this community and specifically ask about adverse effects on riparian habitat and conversion of oak woodlands. A total of 5.97 acres of coastal oak woodlands are present in the treatment area.

Coastal scrub and mixed chaparral are both scrub communities that are not designated sensitive natural communities but are considered sensitive habitat types because of the large-scale loss of these vegetation types from development and type conversion. Senate Bill 1260 (2018) mandates that CAL FIRE's "prescribed burning, mastication, herbicide application, mechanical thinning, or other vegetative treatments" can only be carried out if they will not result in "type conversion" away from existing chaparral and coastal sage scrub vegetation types (Ascent 2019). A total of 21.09 acres of these shrub communities are present in the treatment area.

5.6 Invasive Plants and Animals

Invasive plant species were observed and are recorded in the Species Compendium (Appendix A). The vegetative community of upland mustards with yellow starthistle (*Centaurea solstitialis*) is

mapped in Figure 3, as is the community of wild oats and annual grasses. The upland mustard community is dominated by summer mustard (*Hirschfeldia incana*) and ripgut brome (*Bromus diandrus*). The wild oats and annual grasses community is dominated by ripgut brome and has red brome (*Bromus rubens*) and cheatgrass (*Bromus tectorum*). Starthistle has a relatively even distribution throughout the site with the exception of the open scrub understory, where there is a higher abundance. Invasive animals were not observed.

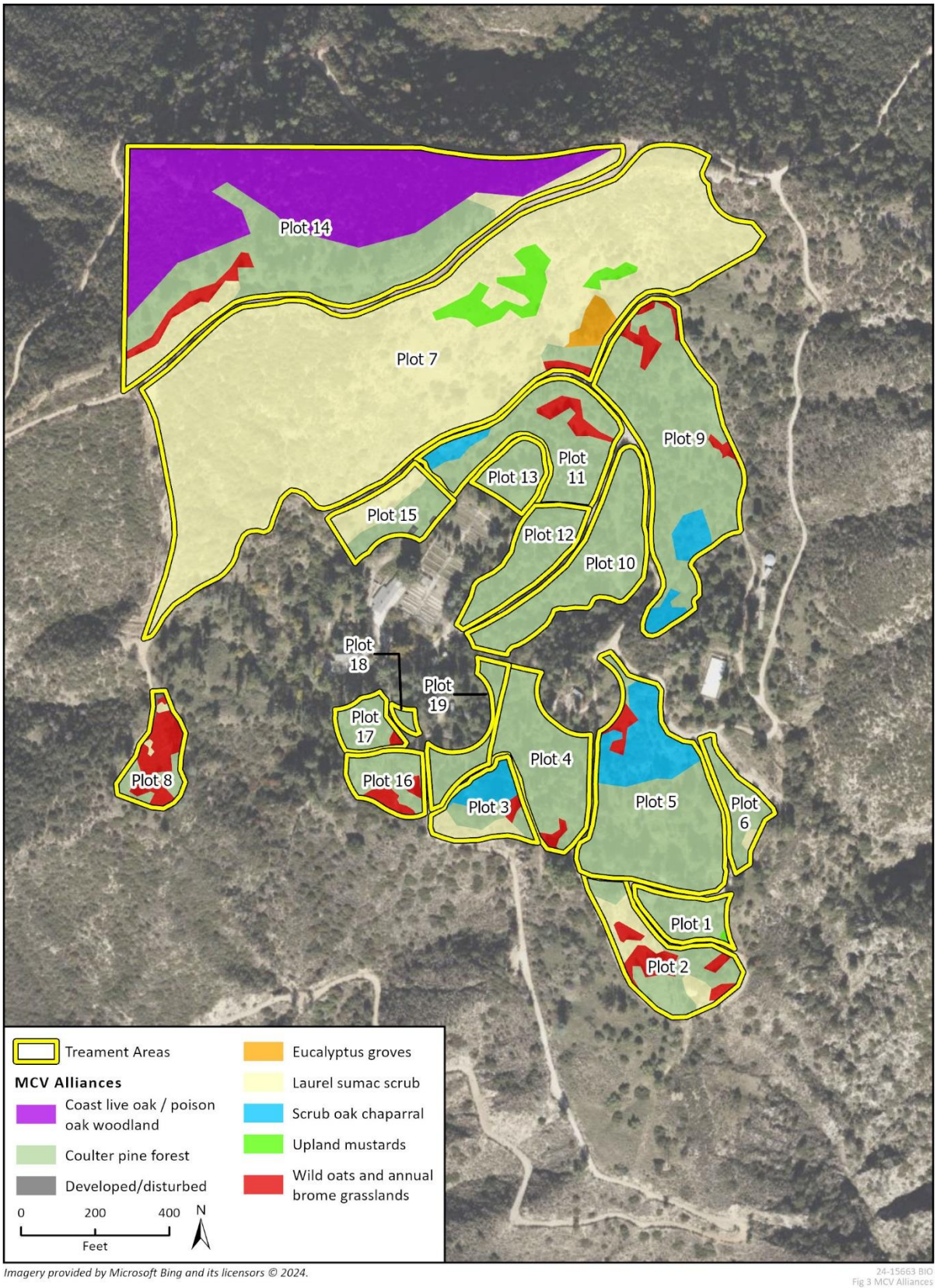
5.7 Wetlands and Waters of the United States and State

Waters of the United States include navigable waters of the United States; interstate waters; all other waters where the use, degradation, or destruction of the waters could affect interstate or foreign commerce; tributaries to any of these waters; and wetlands that meet any of these criteria or that are adjacent to any of these waters or their tributaries. Wetlands are defined as those areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

Waters of the State are defined as any surface water or groundwater, including saline waters, within boundaries of the State. Wetlands are defined as an area if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Figure 4 displays wetland and aquatic features mapped in the treatment area sourced from the US Fish and Wildlife Service's (USFWS) National Wetland Inventory GIS dataset and the National Hydrography Dataset (USFS 2024c and USGS 2024). A formal delineation of jurisdictional waters was not conducted in support of this document. In Treatment Plot 7 there is a feature mapped by USFWS's National Wetland Inventory that is likely an ephemeral drainage. Riparian vegetation was not observed in this treatment area, but this feature may be jurisdictional and would require avoidance during treatment activities. If avoidance is not feasible, a Streambed Alteration Agreement with CDFW may be necessary prior to implementing the treatment(s).

Figure 3 MCV Vegetation Alliances



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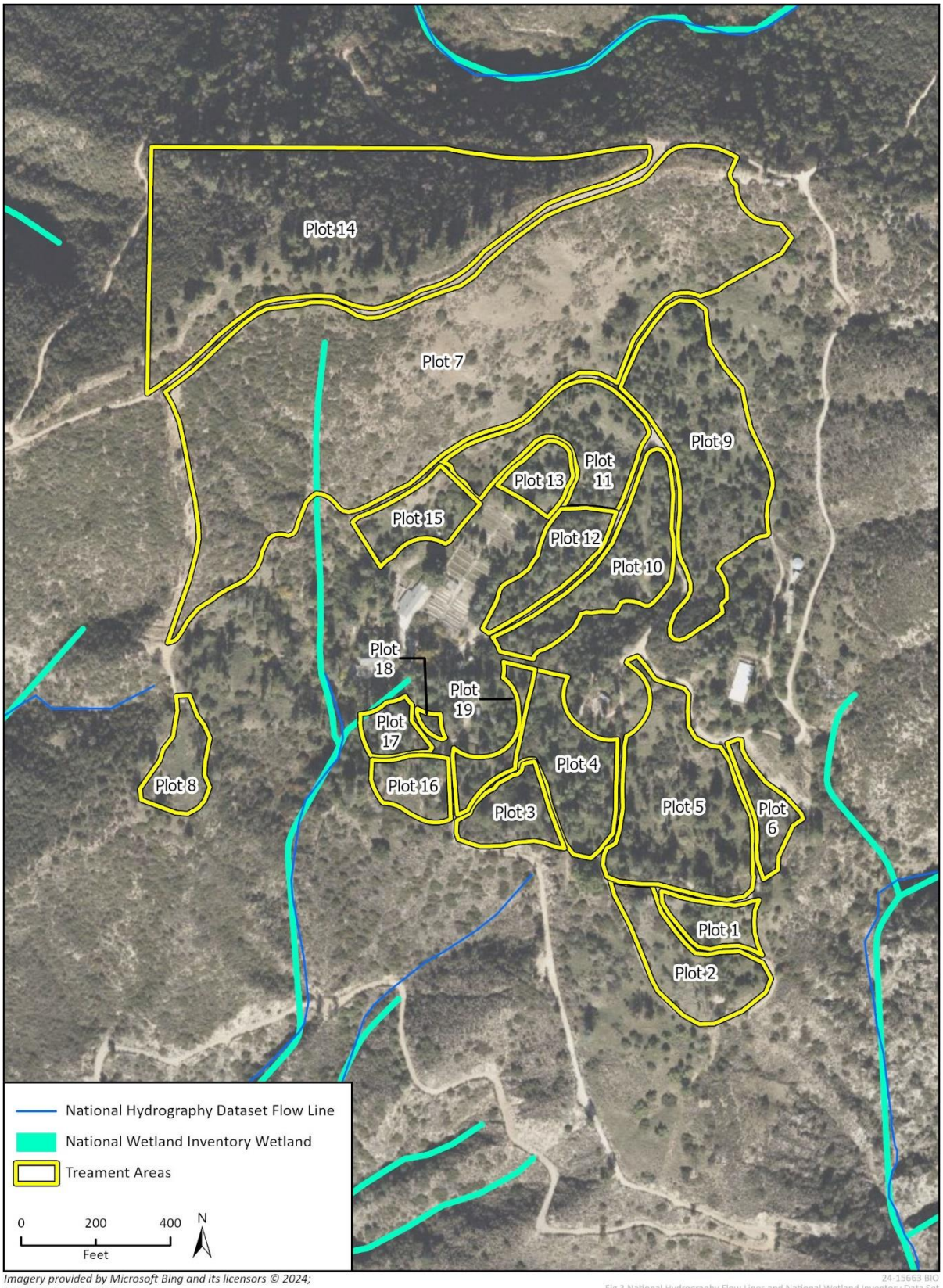
24-15663 BIO
Fig 3 MCV Alliances

Figure 4 National Hydrography Flow Lines and National Wetland Inventory Data Set



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24-15663 BIO
Fig 3 National Hydrography Flow Lines and National Wetland Inventory Data Set

5.8 Conservation Lands, Special Management Areas, and Other Biologically Important Lands

Conservation lands, special management areas, and other biologically important land include land with Habitat Conservation Plan (HCPs)s, Natural Community Conservation Plan (NCCPs), and other Conservation Plan Areas (CPAs), as wells as numerous open space lands protected and managed for natural resource values such as State Parks, CDFW Wildlife Areas and Ecological Reserves, County parks, and other open space and habitat preserves. Henninger Flats is not located within an HCP, NCCP or CPA and is not protected and managed for natural resource values.

5.9 Local Ordinances

The treatment area is located in the Altadena Foothills SEA as described in LA County's Zoning Code Chapter 22.102 (County of Los Angeles 2009). The ordinance provides requirements for projects that will remove protected trees. This project is consistent with the Configuration and Use section of the SEA ordinance in that the project is being conducted for fire protection. The Los Angeles County Oak Woodlands Conservation Management Plan (May 2011) goal is to maintain the benefits provided by oak woodland ecosystems by managing "… oak woodlands in such a way as to protect or restore natural ecosystem processes, including fire regimes, hydrologic regimes, oak regeneration and understory components of oak woodland systems."

The importance of protecting oak woodlands is recognized through the passage of the Oak Woodlands Conservation Act and Public Resources Code Section 21083.4, which discusses how county lead agencies must address impacts to oak woodlands in environmental documents. Los Angeles County protects oak woodlands through County of Los Angeles Oak Tree Ordinance and the Los Angeles County Oak Woodlands Conservation Management Plan (County of Los Angeles 1988 and County of Los Angeles 2014). This project does not propose the removal of trees or oak woodlands and is not in conflict with Oak Woodlands Conservation Act and Public Resources Code Section 21083.4.

6 Standard Project Requirements

Project Specific Requirements (SPRs) will be implemented to be consistent with the PEIR. Table 4 below provides the pertinent details for all 12 SPRs, including the current status of completion of each SPR, the timing for completion, and the responsible parties. Please note that all of the CalVTP PEIR SPRs are written to note that it's the Project Proponent's responsibility to engage a Registered Professional Forest (RFP) or qualified biologist (biologist) to complete these activities. The RFP or biologist will know the details of the requirements and when appropriate, when and how to engage the agencies to get their feedback/approval/etc.

The field reconnaissance survey and survey to map the natural vegetation and sensitive communities have been completed. The habitat present has been recorded and the potential for special status species to occur has been analyzed. This information will be used to prepare the Worker Environmental Awareness training and to design the treatment activities.

Table 4 below provides a summary of SPRs that apply to the project as a result of the biological resources within the treatment area. A qualified biologist is required to review the treatment plan, once it has been prepared, to confirm consistency with these requirements. SPRs that are shaded in dark grey are completed and SPRs shaded in light grey still need to be completed.

Table 5 provides the applicable PEIR Mitigation Measures that are and may be applicable, depending upon when the treatment is conducted, and which type of treatment is applied.

Table 4 Henninger Flats Project – Applicable Standard Projects Requirements (SPRs)

Applicable Standard Projects Requirements (SPRs)
SPR BIO-1: Review and Survey Project-Specific Biological Resources
Design treatment activities to avoid type conversion, Assess the suitability of habitat for special-status plant and animal species, Identify/document sensitive resources, nursery and sensitive habitats, sensitive natural community riparian and wildlife, and wetlands. Record any incidental wildlife observations. Target significant infestations of invasive plant species for removal during treatment activities
Completed
SPR BIO-2: Require Biological Resource Training
Training to include laws and regulations, species information, and instructions of when to stop work
Not Completed
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats
Biologists perform a protocol-level survey following the CDFW Protocol
Completed
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function
Retain at least 75 percent of the overstory and 50 percent of the understory: Treatments will be limited to removal of uncharacteristic fuel loads, Removal of large, native riparian hardwood trees will be minimized, Removed trees will be felled away from adjacent streams and piled outside of the riparian vegetation, Only hand application of herbicides approved for use in aquatic areas
Not Completed
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal
Treatment design must evaluate and determine the appropriate spatial scale at which the proponent would consider type conversion and substantiate its appropriateness. The design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function
Not Completed
Define type conversion in the context of the project and make the finding that type conversion would not occur, as required by SB 1260.
Not Completed
SPR BIO-6: Prevent Spread of Plant Pathogens
Implement the CalVTP 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.
Not Completed

Applicable Standard Projects Requirements (SPRs)
SPR BIO-7: Survey for Special-Status Plants
Conduct protocol-level surveys for special-status plant species during the appropriate blooming period
Not Applicable
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs
Design treatment in compliance with the Coastal Act or LCP if a site is within a certified LCP area
Not Applicable
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife
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); 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.
Not Completed
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites
Focused or protocol surveys for a special-status species with potential to occur in the treatment area, If species are present and cannot be avoided and have a potential to be directly or indirectly affected, a qualified biologist will conduct focused or protocol-level surveys for special-status wildlife species or nursery sites. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities.
Not Completed
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory)
Not Completed
SPR BIO-12. Protect Common Nesting Birds, Including Raptors
A survey for active nests will be conducted, typically up to 3 weeks before the activities. 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, a feasible strategy to avoid disturbance of the nest will be implemented.
Not Completed

Table 5 Henninger Flats Project – Applicable CalVTP PEIR Mitigation Measures

Applicable CalVTP PEIR Mitigation Measures
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA and CESA
Treatments will be conducted for geophytic, stump-sprouting, or annual species, outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season
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.
Consultation w/ CDFW not needed because special status plants will not be killed.
***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)**
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.
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment
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.
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).
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities
The project proponent will implement the following specific measures when working in treatment areas that contain sensitive natural communities identified during survey
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
Design treatments in riparian habitats to retain or improve habitat functions by implementing the PEIR specific measures within riparian habitats:
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites
Retain Known Nursery Sites. Establish Avoidance Buffers. notify CDFW pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats

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Appendix A

Species Observed Compendium

24-15663: Henninger Flats CALVTP

Scientific Name	Common Name	Origin
Acmispon americanus	Spanish lotus	Native
Acmispon glaber	deerweed	Native
Acmispon strigosus	strigose lotus	Native
Adenostoma fasciculatum	chamise	Native
Aesculus californica	California buckeye	Native; SEA Protected Tree
Alnus rhombifolia	white alder	Native; SEA Protected Tree
Arctostaphylos glauca	bigberry manzanita	Native; SEA Protected Tree
Artemisia californica	California sagebrush	Native
Arundo donax	giant reed	Introduced; Cal-IPC - High
Asphodelus fistulosus	onionweed	Introduced; Cal-IPC - Moderate
Baccharis pilularis	coyote brush	Native
Bromus diandrus	ripgut brome	Introduced; Cal-IPC - Moderate
Bromus hordeaceus	soft brome	Introduced; Cal-IPC - Limited
Bromus rubens	red brome	Introduced; Cal-IPC - High
Bromus tectorum	cheat grass	Introduced; Cal-IPC - High
Calocedrus decurrens	California incense cedar	Native; SEA Protected Tree
Carduus pycnocephalus	Italian thistle	Introduced; Cal-IPC - Moderate
Castilleja affinis	Indian paintbrush	Native
Casuarina equisetifolia	ironwood	Introduced; Cal-IPC - Watch
Ceanothus crassifolius	hoaryleaf ceanothus	Native
Ceanothus leucodermis	chaparral whitethorn	Native
Cedrus deodara	deodar cedar	Introduced
Celtis sinensis	Chinese hackberry	Introduced
Cenchrus setaceus	fountain grass	Introduced; Cal-IPC - Moderate
Centaurea melitensis	tocalote	Introduced; Cal-IPC - Moderate
Cercis occidentalis	western redbud	Native
Chlorogalum pomeridianum	wavy-leaf soap plant	Native
Cirsium occidentale	cobwebby thistle	Native
Cistus crispus	rockrose	Introduced
Claytonia perfoliata	miner's lettuce	Native
Corethrogyne filaginifolia	common sandaster	Native
Cryptantha intermedia	common cryptantha	Native
Diplacus longiflorus	monkeyflower	Native
Ehrharta erecta	panic veldtgrass	Introduced; Cal-IPC - Moderate
Erigeron canadensis	Canada horseweed	Native
Eriogonum fasciculatum	California buckwheat	Native
Eriodictyon crassifolius	thick-leaved yerba santa	Native
Festuca microstachys	small fescue	Native
Festuca myuros	rattail fescue	Introduced; Cal-IPC - Moderate
Festuca perennis	Italian rye grass	Introduced; Cal-IPC - Moderate
Fraxinus velutina	velvet ash	Native; SEA Protected Tree
Galium angustifolium	narrow leaved bedstraw	Native
Galium aparine	common bedstraw	Native
Hesperoyucca whipplei	chaparral yucca	Native
Heteromeles arbutifolia	toyon	Native; SEA Protected Tree
Heterotheca grandiflora	telegraph weed	Native
Hirschfeldia incana	summer mustard	Introduced; Cal-IPC - Moderate
Hordeum murinum	foxtail barley	Introduced; Cal-IPC - Moderate
Hypochaeris glabra	smooth cat's ear	Introduced; Cal-IPC - Limited
Juglans californica	southern California black walnut	Native; CRPR 4.2
Linanthus californicus	prickly phlox	Native
Liquidambar styraciflua	sweetgum	Introduced
Logfia gallica	narrowleaf cottonrose	Introduced

Lonicera subspicata var. denudata	southern honeysuckle	Native
Malosma laurina	laurel sumac	Native; SEA Protected Tree
Marah sp.	marah	Native
Marrubium vulgare	white horehound	Introduced; Cal-IPC - Limited
Melia azeradach	chinaberry	Introduced; Cal-IPC - Watch
Nicotiana glauca	tree tobacco	Introduced; Cal-IPC - Moderate
Phacelia ramosissima	branching phacelia	Native
Pinus canariensis	Canary Island pine	Introduced
Pinus coulteri	Coulter pine	Native; SEA Protected Tree
Pinus halepensis	aleppo pine	Introduced
Pinus ponderosa	ponderosa pine	Native; SEA Protected Tree
Platanus racemosa	western sycamore	Native
Prosopis chilensis	algarrobo	Introduced
Prunus ilicifolia	hollyleaf cherry	Native; SEA Protected Tree
Pseudognaphalium biolettii	two-color rabbit-tobacco	Native
Pseudognaphalium californicum	California cudweed	Native
Pseudotsuga macrocarpa	bigcone douglas fir	Native
Quercus agrifolia	coast live oak	Native; SEA Protected Tree
Quercus berberidifolia	scrub oak	Native; SEA Protected Tree
Quercus chrysolepis	canyon live oak	Native; SEA Protected Tree
Quercus durata	leather oak	Native
Quercus engelmanii	Engelmann oak	Native; CRPR 4.2; SEA Protected Tree
Quercus lobata	valley oak	Native
Quercus wislizeni	interior live oak	Native
Rhamnus ilicifolia	hollyleaf redberry	Native
Rhus ovata	sugar bush	Native
Ribes cereum	wax currant	Native
Robinia pseudoacacia	black locust	Introduced; Cal-IPC - Limited
Rosmarinus officinalis	rosemary	Introduced
Salix lasiolepis	arroyo willow	Native; SEA Protected Tree
Salvia apiana	white sage	Native
Salvia columbiarae	chia	Native
Salvia mellifera	black sage	Native
Sambucus mexicana	blue elderberry	Native; SEA Protected Tree
Schinus molle	Peruvian pepper tree	Introduced; Cal-IPC - Limited
Schismus sp.	Mediterranean grass	Introduced; Cal-IPC - Limited
Silene gallica	common catchfly	Introduced
Sonchus asper	spiny sowthistle	Introduced
Sonchus oleraceus	common sow thistle	Introduced
Spartium junceum	Spanish broom	Introduced; Cal-IPC - High
Stellaria media	common chickweed	Introduced
Stipa miliaceae	smilo grass	Introduced
Torilis arvensis	field hedge parsley	Introduced; Cal-IPC - Moderate
Toxicodendron diversilobum	poison oak	Native
Trifolium hirtum	rose clover	Introduced; Cal-IPC - Limited
Vicia americana	American vetch	Native
Vinca major	periwinkle	Introduced; Cal-IPC - Moderate

Birds

Corvus brachyrhynchos	American crow
Melanerpes formicivorus	acorn woodpecker
Aphelocoma californica	California scrub jay
Buteo jamaicensis	red tailed hawk
Callipepla californica	California quail
Thryomanes bewickii	Bewick's wren
Troglodytes aedon	house wren

Haemorhous mexicanus	house finch
Zenaida macroura	mourning dove
Spinus psaltria	lesser goldfinch
Calypte anna	Anna's hummingbird
Junco hyemalis	dark-eyed junco
Chamaea fasciata	wrentit
Psaltriparus minimus	American bushtit
Haemorhous purpureus	purple finch
Melozone crissalis	California towhee
Cathartes aura	turkey vulture
Pipilo maculatus	spotted towhee
Melospiza melodia	song sparrow
Other Taxa	
Sceloporus occidentalis	western fence lizard
Otospermophilus beecheyi	California ground squirell
Odocoileus hemionus	mule deer

Appendix B

Vegetation Communities Data

24-15663: Henninger Flats CALVTP

Vegetation Alliance Name	Vegetation Association	Vegetation Common Name	Sensitivity Ranking	Sensitive? (Y/N)	Webpage Line	Species Composition
Upland mustards or star-thistle fields	Hirschfeldia incana	summer mustard fields	GNA SNA	N	https://vegetation.cnps.org/alliance/564	Dominant Tree: N/A Subdominant Tree: N/A Dominant Shrub: N/A Subdominant Shrub: N/A Dominant Herb: HIRINC Subdominant Herb: BRODIA, HORMUR, STIMIL
Coulter pine woodland and forest	Pinus coulteri	Coulter pine forest	G4 S4	N	https://vegetation.cnps.org/alliance/50	Dominant Tree: PINCOU Subdominant Tree: QUECHR, JUGCAL, CALDEC, PSEMAC, PINPON, CEDDEO Dominant Shrub: N/A Subdominant Shrub: MALLAU, HETARB, QUEBER Dominant Herb: HIRINC Subdominant Herb: BRODIA, FESMYU, MARVUL
Wild oats and annual brome grasslands	Bromus diandrus - Mixed herbs	Wild oats and annual brome grasslands	GNA SNA	N	https://vegetation.cnps.org/alliance/535	Dominant Tree: N/A Subdominant Tree: N/A Dominant Shrub: N/A Subdominant Shrub: N/A Dominant Herb: BRODIA Subdominant Herb: HIRINC, EROCIC, AVEBAR
Laurel sumac scrub	Malosma laurina	Laurel sumac scrub	G4 S4	N	https://vegetation.cnps.org/alliance/235	Dominant Tree: N/A Subdominant Tree: QUEAGR Dominant Shrub: MALLAU Subdominant Shrub: ARTCAL, SALMEL, HETARB, PRUILI Dominant Herb: BRODIA Subdominant Herb: HIRINC
Scrub oak chaparral	Quercus berberidifolia	Scrub oak chaparral	G4 S4	N	https://vegetation.cnps.org/alliance/251	Dominant Tree: QUECHR Subdominant Tree: QUEAGR, PINCOU Dominant Shrub: QUEBER Subdominant Shrub: HETARB, MALLAU, ARTCAL, SALMEL, ACMGLA Dominant Herb: BRODIA Subdominant Herb: N/A
Eucalyptus - tree of heaven - black locust groves	Eucalyptus globulus	Eucalyptus groves	GNA SNA	N	https://vegetation.cnps.org/alliance/31	Dominant Tree: EUCGLO Subdominant Tree: N/A Dominant Shrub: NICGLA Subdominant Shrub: N/A Dominant Herb: BRODIA Subdominant Herb: HIRINC, CENMEL
Laurel sumac scrub	Malosma laurina – Eriogonum fasciculatum – Salvia mellifera	Laurel sumac - California buckwheat - black sage scrub	G4 S4	N	https://vegetation.cnps.org/alliance/235	Dominant Tree: N/A Subdominant Tree: PINCOU, QUECHR Dominant Shrub: MALLAU, SALMEL, ERIFAS Subdominant Shrub: HETARB, CEALEU, QUEBER, CEACRA, ACMGLA, ARTCAL Dominant Herb: BRODIA Subdominant Herb: HIRINC, SILGAL, CRYINT
Coast live oak woodland and forest	Quercus agrifolia / Toxicodendron diversilobum	Coast live oak / poison oak forest	GNR	N	https://vegetation.cnps.org/alliance/78	Dominant Tree: QUEAGR Subdominant Tree: PINCOU, JUGCAL, PLARAC Dominant Shrub: TOXDIV Subdominant Shrub: QUEAGR, HETARB, QUEBER, SAMMEX, MALLAU, LOSUDE, ARTCAL, SALMEL, ADEFAS Dominant Herb: N/A Subdominant Herb: PHARAM, BRODIA, CASAFF, FESMYU, HIRINC

Appendix C

Species Potential to Occur

24-15663: Henninger Flats CALVTP

Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Plants and Lichens							
Anomobryum julaceum slender silver moss	None/None	4.2	SB USFS S	Broadleafed upland forest, lower montane coniferous forest, north coast coniferous forest. Moss which grows on damp rocks and soil; acidic substrates. Usually seen on roadcuts. Elevations: 330-3280ft. (100-1000m.)	Not Expected to Occur	Not expected	No suitable habitat. The one historical occurrence is from 1946.
Aphyllon validum ssp. *validum* Rock Creek broomrape	None/None	1B.2	SB USFS S	Chaparral, pinyon and juniper woodland. On slopes of loose decomposed granite; parasitic on various chaparral shrubs. 1030-2000m. Blooms May-Sep.	May Occur	Low potential	Chaparral vegetation community occurs on site. There are no CNDDB records within 5 miles of the study area.
Arctostaphylos glandulosa ssp. *gabrielensis* San Gabriel manzanita	None/None	1B.2		Perennial evergreen shrub. Chaparral. Rocky outcrops; can be dominant shrub where it occurs. Elevations: 1950-4920ft. (595-1500m.) Blooms Mar.	May Occur	Low potential	Potentially suitable chaparral vegetation community and rocky outcrops are present in the study area. However, there are no CNDDB records within 5 miles of the study, and the most recent observation was in 2010.
Asplenium vespertinum western spleenwort	None/None	4.2		Perennial rhizomatous herb. Chaparral, cismontane woodland, coastal scrub. Rocky. Elevations: 590-3280ft. (180-1000m.) Blooms Feb-Jun.	May Occur	Moderate potential	Potentially suitable chaparral vegetation community present in the study area.
Astragalus brauntonii Braunton's milk-vetch	FE/None	1B.1	SB	Perennial herb. Chaparral, coastal scrub, valley and foothill grassland. Recent burns or disturbed areas; usually on sandstone with carbonate layers. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops,	Not Expected to Occur	Not expected	The study area is outside this species' known the known elevation range. Parts of the plant survey area were recently burned, and the soils present are unsuitable.
Atriplex serenana var. *davidsonii* Davidson's saltscale	None/None	1B.2	SB	Annual herb. Coastal bluff scrub, coastal scrub. Alkaline. Elevations: 35-655ft. (10-200m.) Blooms Apr-Oct.	Not Expected to Occur	Not expected	The study area does not contain coastal bluff scrub or coastal dune vegetation communities, which are necessary habitat components. The study is outside of this species known the known elevation range.
Berberis nevinii Nevin's barberry	FE/SE	1B.1	SB	Perennial evergreen shrub. Chaparral, cismontane woodland, coastal scrub, riparian scrub. Gravelly (sometimes), sandy (sometimes). Elevations: 230-2705ft. (70-825m.) Blooms (Feb)Mar-Jun.	Not Expected to Occur	Not expected	No suitable soils present. There are no CNDDB records within 5 miles of the study. Most recent observation was 1987.
Calochortus clavatus var. *clavatus* club-haired mariposa-lily	None/None	4.3		Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Clay, Rocky, serpentinite (usually). Elevations: 100-4265ft. (30-1300m.) Blooms (Mar)May-Jun.	May Occur	Low potential	Potentially suitable chaparral vegetation community present in the study area. However, serpentine soils are not present.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Calochortus clavatus var. *gracilis* slender mariposa-lily	None/None	1B.2	SB USFS S	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland. Shaded foothill canyons; often on grassy slopes within other habitat. Elevations: 1050-3280ft. (320-1000m.) Blooms Mar-Jun(Nov).	Not Expected to Occur	Not expected	Potentially suitable foothill canyons and coastal scrub are present in the study area. However, the study area is outside of the known the known elevation range for this species and no CNDDB records have been recorded within 5 miles of the study area.
Calochortus palmeri var. *palmeri* Palmer's mariposa-lily	None/None	1B.2	BLM S SB USFS S	Perennial bulbiferous herb. Chaparral, lower montane coniferous forest, meadows and seeps. Mesic. Elevations: 2330-7840ft. (710-2390m.) Blooms Apr-Jul.	May Occur	Moderate potential	Potentially suitable chaparral and lower coniferous forest present. Most recent observation was 2010.
Calochortus plummerae Plummer's mariposa-lily	None/None	4.2	SB	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Granitic, rocky. Elevations: 330-5580ft. (100-1700m.) Blooms May-Jul.	May Occur	Low potential	Potentially suitable cismontane woodland, coastal scrub, and grasslands are present in the study area. However, soils present are not suitable and the only CNDDB occurrence within 5 miles of the study area is from before 1999.
Calochortus striatus alkali mariposa-lily	None/None	1B.2	BLM S SB USFS S	Perennial bulbiferous herb. Chaparral, chenopod scrub, meadows and seeps, mojavean desert scrub. Alkaline, mesic. Elevations: 230-5235ft. (70-1595m.) Blooms Apr-Jun.	Not Expected to Occur	Not expected	No suitable meadows, desert scrub or chenopod vegetation communities present. There are no CNDDB records within 5 miles of the study. Most recent observation was 1972.
Calochortus weedii var. *intermedius* intermediate mariposa-lily	None/None	1B.2	SB USFS S	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland. Rocky. Elevations: 345-2805ft. (105-855m.) Blooms May-Jul.	May Occur	Moderate potential	Potentially suitable chaparral and lower coniferous forest present. There are no CNDDB records within 5 miles of the study. Most recent observation was 2010.
Castilleja gleasoni Mt. Gleason paintbrush	None/SR	1B.2	SB | USFS S	Perennial herb (hemiparasitic). Chaparral, lower montane coniferous forest, pinyon and juniper woodland. Granitic. Elevations: 3805-7120ft. (1160-2170m.) Blooms May-Jun(Sep).	Not Expected to Occur	Not expected	No suitable habitat. The study area is outside of the known elevation range for this species. There are no CNDDB occurrences within 5 miles of the study area.
Castilleja plagiotoma Mojave paintbrush	None/None	4.3		Perennial herb (hemiparasitic). Great basin scrub, joshua tree woodland, lower montane coniferous forest, pinyon and juniper woodland. Alluvial fans. Elevations: 985-8205ft. (300-2500m.) Blooms Apr-Jun.	Not Expected to Occur	Not expected	No suitable basin scrub, joshua tree woodland present. Coniferous forest present but alluival fan sediment is not present in study area.
Centromadia parryi ssp. *australis* southern tarplant	None/None	1B.1	SB	Annual herb. Marshes and swamps, valley and foothill grassland, vernal pools. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. Elevations: 0-1575ft. (0-480m.) Blooms May-Nov.	Not Expected to Occur	Not expected	No suitable marshes and swamps, vernally mesic grasslands, or vernal pools are present in the study area.
Centromadia pungens ssp. *laevis* smooth tarplant	None/None	1B.1	SB	Annual herb. Chenopod scrub, meadows and seeps, playas, riparian woodland, valley and foothill grassland. Alkaline. Elevations: 0-2100ft. (0-640m.) Blooms Apr-Sep.	Not Expected to Occur	Not expected	One historical occurance documented in 1901. This species is presumed extripated.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Chorizanthe parryi var. *parryi* Parry's spineflower	None/None	1B.1	BLM S SB USFS S	Annual herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Openings, Rocky (sometimes), sandy (sometimes). Elevations: 900-4005ft. (275-1220m.) Blooms Apr-Jun.	May Occur	Low potential	Potentially suitable cismontane woodland, coastal scrub, and grasslands are present in the study area. However, no CNDDB records have been recorded within 5 miles of the study area.
Cladium californicum California saw-grass	None/None	2B.2		Perennial rhizomatous herb. Marshes and swamps, meadows and seeps. Freshwater or alkaline moist habitats. Elevations: 195-5250ft. (60-1600m.) Blooms Jun-Sep.	Not Expected to Occur	Not expected	No suitable marshes and swamps, meadows and seeps are present in the study area.
Claytonia peirsonii ssp. *peirsonii* Peirson's spring beauty	None/None	1B.2	SB USFS S	Perennial herb. Subalpine coniferous forest, upper montane coniferous forest. Granitic, metamorphic, scree, talus. Elevations: 4955-9005ft. (1510-2745m.) Blooms (Mar)May-Jun.	Not Expected to Occur	Not expected	No suitable habitat. The study area is outside of the known elevation range for this species. There are no CNDDB occurrences within 5 miles of the study area.
Clinopodium mimuloides monkey-flower savory	None/None	4.2		Perennial herb. Chaparral, north coast coniferous forest. Mesic, streambanks. Elevations: 1000-5905ft. (305-1800m.) Blooms Jun-Oct.	May Occur	Moderate potential	A potentially suitable rocky outcrop is present in the study area.
Diplacus johnstonii Johnston's monkeyflower	None/None	4.3		Annual herb. Lower montane coniferous forest. On scree, in rocky or gravelly sites. Also in disturbed areas. Elevations: 3200-9580ft. (975-2920m.) Blooms May-Aug.	Not Expected to Occur	Not expected	A potentially suitable rocky outcrop is present in the study area. The study area is outside of the known elevation range for this species.
Dodecahema leptoceras slender-horned spineflower	FE/SE	1B.1	SB	Annual herb. Chaparral, cismontane woodland, coastal scrub. Flood deposited terraces and washes; associates include Encelia, Dalea, Lepidospartum, etc. Sandy soils. Elevations: 655-2495ft. (200-760m.) Blooms Apr-Jun.	Not Expected to Occur	Not expected	Potentially suitable habitat present, however the most recent CNDDB occurrece was 1979 and the majority of the study area is outside of the species the known elevation range. This species is possibly extirpated.
Dudleya cymosa ssp. *crebrifolia* San Gabriel River dudleya	None/None	1B.2	SB USFS S	Perennial herb. Chaparral. On granite cliffs and outcrops, surrounded by scrub. Elevations: 900-1500ft. (275-457m.) Blooms Apr-Jul.	Not Expected to Occur	Not expected	A potentially suitable outcrop is present in the study area, however, study area is outside of the known elevation range for this species and there are no CNDDB records within 5 miles.
Dudleya densiflora San Gabriel Mountains dudleya	None/None	1B.1	SB USFS S	Perennial herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland. In crevices and on decomposed granite on cliffs and canyon walls. Elevations: 800-2000ft. (244-610m.) Blooms Mar-Jul.	Not Expected to Occur	Not expected	The study area contains potentially suitable woodland. However, it is outside this species' the known elevation range, and there are no CNDDB records within 5 miles.
Dudleya multicaulis many-stemmed dudleya	None/None	1B.2	SB USFS S	Perennial herb. Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. Elevations: 50-2590ft. (15-790m.) Blooms Apr-Jul.	Not Expected to Occur	Not expected	The study area has no suitable soils or grassy slopes. There are no CNDDB occurences within 5 miles and the most recent observation was between 1986 and 1992.
Galium angustifolium ssp. *gracillimum* slender bedstraw	None/None	4.2		Perennial herb. Joshua tree woodland, sonoran desert scrub. Shaded places among granite boulders in canyons, and on outcrops. Elevations: 425-5085ft. (130-1550m.) Blooms Apr-Jun(Jul).	Not Expected to Occur	Not expected	No suitable habitat present.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Galium cliftonsmithii Santa Barbara bedstraw	None/None	4.3		Perennial herb. Cismontane woodland. Light shade, coastal canyons, dry banks. Elevations: 655-4005ft. (200-1220m.) Blooms May-Jul.	Not Expected to Occur	Not expected	No suitable habitat present.
Galium grande San Gabriel bedstraw	None/None	1B.2	SB USFS S	Perennial deciduous shrub. Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest. Open chaparral and low, open oak forest; on rocky slopes; probably undercollected due to inaccessible habitat. Elevations: 1395-4920ft. (425-1500m.) Blooms Jan-Jul.	May Occur	Low potential	Suitable habitat present within the study area. However, this is a conspicuous perennial shrub that would have been identifiable during the field survey. There are three CNDDB occurences within 5 miles, in 1901 and 1918 and less than 100 individuals 2003.
Harpagonella palmeri Palmer's grapplinghook	None/None	4.2		Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within scrub. Elevations: 65-3135ft. (20-955m.) Blooms Mar-May.	May Occur	Moderate potential	Chaparral vegetetation commmunity present in study area.
Helianthus nuttallii ssp. *parishii* Los Angeles sunflower	None/None	1A		Perennial rhizomatous herb. Marshes and swamps. Elevations: 35-5005ft. (10-1525m.) Blooms Aug-Oct.	Not Expected to Occur	Not expected	No suitable marsh or swamp habitat present. There are no CNDDB records within 5 miles of the study. Most recent observation recorded in 1901.
Hordeum intercedens vernal barley	None/None	3.2		Annual herb. Coastal dunes, coastal scrub, valley and foothill grassland, vernal pools. Vernal pools, dry, saline streambeds, alkaline flats. 5-. Elevations: 15-3280ft. (5-1000m.) Blooms Mar-Jun.	Not Expected to Occur	Not expected	No suitable coastal habitat or vernal pools present. There are no CNDDB records within 5 miles of the study.
Horkelia cuneata var. *puberula* mesa horkelia	None/None	1B.1	SB USFS S	Perennial herb. Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. Elevations: 230-2660ft. (70-810m.) Blooms Feb-Jul(Sep).	May Occur	Low potential	Potentially suitable cismontane woodland and coastal scrub habitats are present in the study area. However, no CNDDB records have been recorded within 5 miles of the study area.
Imperata brevifolia California satintail	None/None	2B.1		Perennial rhizomatous herb. Chaparral, coastal scrub, meadows and seeps, mojavean desert scrub, riparian scrub. Mesic sites, alkali seeps, riparian areas. 3-. Elevations: 0-3985ft. (0-1215m.) Blooms Sep-May.	May Occur	Low potential	Potentially suitable riparian scrub and coastal scrub vegetation communities are present in the study area. However, no CNDDB records have been recorded within 5 miles of the study area.
Lasthenia glabrata ssp. *coulteri* Coulter's goldfields	None/None	1B.1	BLM S SB	Annual herb. Marshes and swamps, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-. Elevations: 5-4005ft. (1-1220m.) Blooms Feb-Jun.	Not Expected to Occur	Not expected	Soils in the study area are unsuitable, and no CNDDB records have been recorded within 5 miles of the study area.
Lepechinia fragrans fragrant pitcher sage	None/None	4.2		Perennial shrub. Chaparral. Elevations: 65-4300ft. (20-1310m.) Blooms Mar-Oct.	Not Expected to Occur	Moderate potential	No suitable chaparral is present in the study area.
Lepidium virginicum var. *robinsonii* Robinson's pepper-grass	None/None	4.3		Annual herb. Chaparral, coastal scrub. Dry soils, scrub. 4-. Elevations: 5-2905ft. (1-885m.) Blooms Jan-Jul.	May Occur	Low potential	Potentially suitable habitat is present in the study area. However, the only CNDDB record within the study area is from 1987.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Lilium humboldtii ssp. *ocellatum* ocellated humboldt lily	None/None	4.2		Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland. Yellow-pine forest or openings, oak canyons. Elevations: 100-5905ft. (30-1800m.) Blooms Mar-Jul(Aug).	May Occur	Moderate potential	Potentially suitable cismontane woodland, coastal scrub, and riparian woodland habitats are present in the study area.
Lilium parryi lemon lily	None/None	1B.2		Perennial bulbiferous herb. Lower montane coniferous forest, meadows and seeps, riparian forest, upper montane coniferous forest. Wet, mountainous terrain; generally in forested areas; on shady edges of streams, in open boggy meadows and seeps.	Not Expected to Occur	Not expected	No suitable habitat is present in the study area. No CNDDB records have been recorded within 5 miles of the study area. The study area is outside the known the known elevation range for this species.
Linanthus concinnus San Gabriel linanthus	None/None	1B.2	SB USFS S	Annual herb. Chaparral, lower montane coniferous forest, upper montane coniferous forest. Dry rocky slopes, often in Jeffrey pine/canyon oak forest. Elevations: 4985-9185ft. (1520-2800m.) Blooms Apr-Jul.	Not Expected to Occur	Not expected	No suitable habitat is present in the study area. No CNDDB records have been recorded within 5 miles of the study area. The study area is outside the known the known elevation range for this species.
Lupinus peirsonii Peirson's lupine	None/None	1B.3	SB USFS S	Perennial herb. Joshua tree woodland, lower montane coniferous forest, pinyon and juniper woodland, upper montane coniferous forest. Decomposed granite slide and talus, on slopes and ridges. Elevations: 3280-8205ft. (1000-2500m.) Blooms Apr-Jun.	Not Expected to Occur	Not expected	No suitable habitat is present in the study area. No CNDDB records have been recorded within 5 miles of the study area. The study area is outside the known the known elevation range for this species.
Malacothamnus davidsonii Davidson's bush-mallow	None/None	1B.2	SB	Perennial deciduous shrub. Chaparral, cismontane woodland, coastal scrub, riparian woodland. Sandy washes. Elevations: 605-3740ft. (185-1140m.) Blooms Jun-Jan.	May Occur	Low potential	Potentially suitable habitat is present in the study area, however, no CNDDB records are located within 5 miles of the study area.
Monardella australis ssp. *gabrielensis* San Gabriel Mountains monardella	None/None	1B.2		Broadleaved upland forest, chaparral (montane), lower montane coniferous forest. Granitic openings, outcrops. 1600-2200m. Blooms Jul-Sep.	Not Expected to Occur	Not expected	No suitable habitat is present in the study area, and no CNDDB records are located within 5 miles. Most recent observation is from 1958.
Muhlenbergia californica California muhly	None/None	4.3		Perennial rhizomatous herb. Chaparral, coastal scrub, lower montane coniferous forest, meadows and seeps. Usually found near streams or seeps. Elevations: 330-6560ft. (100-2000m.) Blooms Jun-Sep.	May Occur	Low potential	Suitable habitat is present in the study area, however, the only obervation of this species is from 1899.
N avar*retia prostrata* prostrate vernal pool navarretia	None/None	1B.2		Annual herb. Coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. Elevations: 10-3970ft. (3-1210m.) Blooms Apr-Jul.	Not Expected to Occur	Not expected	No suitable soils or vernal pools present in the study area.
Nemacladus secundiflorus var. *robbinsii* Robbins' nemacladus	None/None	1B.2	USFS S	Annual herb. Chaparral, valley and foothill grassland. Dry, sandy or gravelly slopes. Openings. Elevations: 1150-5580ft. (350-1700m.) Blooms Apr-Jun.	Not Expected to Occur	Not expected	No suitable valley or foothill grasslands present in the study area. The only CNDDB occurrence documented within 5 miles of the study area is from 1929.
Opuntia basilaris var. *brachyclada* short-joint beavertail	None/None	1B.2	BLM S USFS S	Perennial stem. Chaparral, joshua tree woodland, mojavean desert scrub, pinyon and juniper woodland. Sandy soil or coarse, granitic loam. Elevations: 1395-5905ft. (425-1800m.) Blooms Apr-Jun(Aug).	Not Expected to Occur	Not expected	No suitable woodland or desert scrub habitat present. No CNDDB records have been recorded within 5 miles of the study area.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Oreonana vestita woolly mountain-parsley	None/None	1B.3	BLM S SB USFS S	Perennial herb. Lower montane coniferous forest, subalpine coniferous forest, upper montane coniferous forest. High ridges; on scree, talus, or gravel. Elevations: 5300-11485ft. (1615-3500m.) Blooms Mar-Sep.	Not Expected to Occur	Not expected	No CNDDB records have been recorded within 5 miles of the study area. Additionally, the study area is out of the species' known the known elevation range.
Pelazoneuron puberulum var. *sonorense* Sonoran maiden fern	None/None	2B.2	USFS S	Meadows and seeps. Along streams, seepage areas. 50-610m. Blooms Jan-Sep.	Not Expected to Occur	Not expected	No suitable habitat is present in the study area. No CNDDB records have been recorded within 5 miles of the study area and is out of the known the known elevation range for this species.
Phacelia hubbyi Hubby's phacelia	None/None	4.2		Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Gravelly, rocky areas and talus slopes. Elevations: 0-3280ft. (0-1000m.) Blooms Apr-Jul.	May Occur	Low potential	Potentially suitable chaparral habitat is present in the study area. However, soils are not suitable.
Phacelia stellaris Brand's star phacelia	None/None	1B.1	SB	Annual herb. Coastal dunes, coastal scrub. Open areas. Elevations: 5-1310ft. (1-400m.) Blooms Mar-Jun.	Not Expected to Occur	Not expected	No coastal dunes or suitable coastal scrub is present in the study area. No CNDDB records have been recorded within 5 miles of the study area.
Pseudognaphalium leucocephalum white rabbit-tobacco	None/None	2B.2		Perennial herb. Chaparral, cismontane woodland, coastal scrub, riparian woodland. Sandy, gravelly sites. Elevations: 0-6890ft. (0-2100m.) Blooms (Jul)Aug-Nov(Dec).	May Occur	Low potential	Potentially suitable cismontane woodland, coastal scrub, and riparian woodland habitats are present in the study area. However, soil types present are not suitable. No CNDDB records have been recorded within 5 miles of the study area.
Quercus durata var. *gabrielensis* San Gabriel oak	None/None	4.2		Perennial evergreen shrub. Chaparral, cismontane woodland. Elevations: 1475-3280ft. (450-1000m.) Blooms Apr-May.	May Occur	Moderate potential	Potenitally suitable habitat present.
Quercus engelmannii Engelmann oak	None/None	4.2		Perennial deciduous tree. Chaparral, cismontane woodland, riparian woodland, valley and foothill grassland. Elevations: 165-4265ft. (50-1300m.) Blooms Mar-Jun.	May Occur	Moderate potential	Potenitally suitable habitat present.
Ribes d ivaricatum *var. parishii* Parish's gooseberry	None/None	1A		Perennial deciduous shrub. Riparian woodland. Salix swales in riparian habitats. Elevations: 215-985ft. (65-300m.) Blooms Feb-Apr.	Not Expected to Occur	Not expected	No CNDDB records have been recorded within 5 miles of the study area and is out of the known elevation range for this species.
Romneya coulteri Coulter's matilija poppy	None/None	4.2		Perennial rhizomatous herb. Chaparral, coastal scrub. In washes and on slopes; also after burns. Elevations: 65-3935ft. (20-1200m.) Blooms Mar-Jul(Aug).	May Occur	Moderate potential	Suitable chaparral vegetation present.
Rupertia rigida Parish's rupertia	None/None	4.3		Perennial herb. Chaparral, cismontane woodland, lower montane coniferous forest, meadows and seeps, pebble (pavement) plain, valley and foothill grassland. Elevations: 2295-8205ft. (700-2500m.) Blooms Jun-Aug.	May Occur	Moderate potential	Potenitally suitable habitat present.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Scutellaria bolanderi ssp. *austromontana* southern mountains skullcap	None/None	1B.2		Perennial rhizomatous herb. Chaparral, cismontane woodland, lower montane coniferous forest. In gravelly soils on streambanks or in mesic sites in oak or pine woodland. Elevations: 1395-6560ft. (425-2000m.) Blooms Jun-Aug.	May Occur	Low potential	Potenitally suitable habitat present, however, the only CNDDB record of this species is from 1943 and is not within 5 miles of the study area.
Senecio astephanus San Gabriel ragwort	None/None	4.3		Perennial herb. Chaparral, coastal bluff scrub. Rocky slopes. Elevations: 1310-4920ft. (400-1500m.) Blooms May-Jul.	May Occur	Moderate potential	Potenitally suitable habitat present.
Sidalcea neomexicana salt spring checkerbloom	None/None	2B.2	USFS S	Perennial herb. Chaparral, coastal scrub, lower montane coniferous forest, mojavean desert scrub, playas. Alkali springs and marshes. Elevations: 50-5020ft. (15-1530m.) Blooms Mar-Jun.	Not Expected to Occur	Not expected	No suitable springs or marsh habitat present. No CNDDB records have been recorded within 5 miles of the study area.
Symphyotrichum defoliatum San Bernardino aster	None/None	1B.2	SB USFS S	Perennial rhizomatous herb. Cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, meadows and seeps, valley and foothill grassland. Vernally mesic grassland or near ditches, streams and springs; disturbed areas. Elevations: 5-6695ft. (2-2040m.) Blooms Jul-Nov.	May Occur	Low potential	Potenitally suitable habitat present, however, the only CNDDB record of this species is from 1930 and is not within 5 miles of the study area.
Symphyotrichum greatae Greata's aster	None/None	1B.3	SB	Perennial rhizomatous herb. Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, riparian woodland. Mesic canyons. Elevations: 985-6595ft. (300-2010m.) Blooms Jun-Oct.	May Occur	Low potential	Potenitally suitable habitat present, however, the only CNDDB record of this species within 5 miles of the study area is from 1933.
Invertebrates							
Bombus crotchii Crotch bumble bee	None/SCE			Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	May Occur	Moderate potential	Potentially suitable floral resources are present in the study area.
Bombus pensylvanicus American bumble bee	None/None			Long-tongued; forages on a wide variety of flowers including vetches (Vicia), clovers (Trifolium), thistles (Cirsium), sunflowers (Helianthus), etc. Nests above ground under long grass or underground. Queens overwinter in rotten wood or underground.	May Occur	Low potential	Potentially suitable floral resources are present in the study area.
Glyptostoma gabrielense San Gabriel chestnut	None/None			Terrestrial snail found only in the San Gabriel Mountains and foothills near Los Angeles, California.	May Occur	High potential	Mulitple records recorded within the study area. Found along recreation and hiking trails during 2018 fuel maintenance projects.
Gonidea angulata western ridged mussel	None/None			Primarily creeks and rivers and less often lakes. Originally in most of state, now extirpated from Central and Southern California. .		Not expected	No suitable creek, river or lake habitat are present in the study area.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Helminthoglypta traskii pacoimensis Pacoima shoulderband	None/None			Air-breathing terrestrial snail. Known from type locality, Pacoima Canyon on the west side of the San Gabriel Mountains. Additional specimens from Elizabeth Lake Canyon in the Sierra Pelona Mountains may merit review. Found mostly under bark and fragments of rotten logs.	May Occur	Low potential	Potentially suitable habitat however, the most recent CNDDB observation is from 1960.
Palaeoxenus dohrni Dohrn's elegant eucnemid beetle	None/None				May Occur	Low potential	Potentially suitable sugar pine present, however, the most recent CNDDB observation is from 1903.
Fish							
Catostomus santaanae Santa Ana sucker	FT/None		AFS TH SSC	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	Not Expected to Occur	Not expected	No suitable creek, river or lake habitat are present in the study area.
Gila orcuttii arroyo chub	None/None		AFS VU SSC USFS S	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave and San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and	Not Expected to Occur	Not expected	No suitable creek, river or lake habitat are present in the study area.
Rhinichthys osculus ssp. *8* Santa Ana speckled dace	None/None		AFS TH SSC USFS S	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.	Not Expected to Occur	Not expected	No suitable creek, river or lake habitat are present in the study area.
Amphibians							
Anaxyrus californicus arroyo toad	FE/None		SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	Not Expected to Occur	Not expected	No suitable washes, streams or rivers are present in the study area.
Rana boylii pop. 6 foothill yellow-legged frog - south coast DPS	FE/SE		BLM S USFS S	Southern Coast Ranges from Monterey Bay south through San Gabriel Mountains; west of the Salinas River in Monterey Co, south through Transverse Ranges, and east through San Gabriel Mountains. Historically may have ranged to Baja California. Partly	Not Expected to Occur	Not expected	No suitable aquatic habitat are present in the study area.
Rana muscosa southern mountain yellow-legged frog	FE/SE		WL USFS S	Disjunct populations known from southern Sierras (northern DPS) and San Gabriel, San Bernardino, and San Jacinto Mtns (southern DPS). Found at 1,000 to 12,000 ft in lakes and creeks that stem from springs and snowmelt. May overwinter under frozen lakes.	Not Expected to Occur	Not expected	No suitable aquatic habitat are present in the study area.
Spea hammondii western spadefoot	FPT/None		BLM S SSC	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	Not Expected to Occur	Not expected	No suitable vernal pools are present in the study area.
Taricha torosa Coast Range newt	None/None		SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats and will migrate over 1 km to breed in ponds, reservoirs and slow moving streams.	Not Expected to Occur	Not expected	No suitable aquatic habitat are present in the study area.

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Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Reptiles							
Anniella spp. California legless lizard	None/None G3G4/S3S4 SSC		SSC	Contra Costa County south to San Diego, within a variety of open habitats.This element represents California records of Anniella not yet assigned to new species within the Anniella pulchra complex. Variety of habitats; generally in moist, loose soil. They prefer	May Occur	Low potential	Potentially suitable habitat and soils are present in the study area.
Anniella stebbinsi Southern California legless lizard	None/None		SSC USFS S	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist,	May Occur	Low potential	Potentially suitable habitat and soils are present in the study area.
Arizona elegans occidentalis California glossy snake	None/None		SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or	May Occur	Low potential	Potentially suitable habitat and soils are present in the study area.
Aspidoscelis tigris stejnegeri coastal whiptail	None/None		SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	May Occur	Moderate potential	Potentially suitable woodland and riparian habitats are present in the study area. Individuals ovserved by USGS during 2000 field work surveys and within Sycamore Canyon.
Diadophis punctatus modestus San Bernardino ringneck snake	None/None		USFS S	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.	Not Expected to Occur	Not expected	No suitable streams or moist microhabitat present. No CNDDB occurences within 5 miles of the study area.
Emys marmorata western pond turtle	FPT/None		BLM S SSC USFS S	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	Not Expected to Occur	Not expected	No suitable aquatic habitat is present in the study area.
Phrynosoma blainvillii coast horned lizard	None/None		BLM S SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	May Occur	Moderate potential	Moderately suitable habitat and soils are present in the study area, though non- developed open areas are limited due to the dense herbaceous layer. The CNDDB occurrence within 5 miles of the study area is located approximately 2.5 miles north.
Thamnophis hammondii two-striped gartersnake	None/None		BLM S SSC USFS S	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	May Occur	Low potential	No suitable aquatic habitat present.
Birds							
Accipiter cooperii Cooper's hawk	None/None		WL	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	May Occur	High potential	Suitable riparian, woodland, and grassland habitats are present in the study area.

24-15663: Henninger Flats CALVTP

Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Athene cunicularia burrowing owl	None/None		BLM S SSC BCC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not Expected to Occur	Not expected	No suitable grasslands, deserts or scrub land are present in the study area. No CNDDB observation are located within 5 miles of the study area. Most recent occurrence is from 1921.
Carthartes aura turkey vulture	None/None		LACSBS	Open areas including mixed farmland, forest, and rangeland. They are particularly noticeable along roadsides and at landfills. At night, they roost in trees, on rocks, and other high secluded spots.	Known to Occur	Present	Individuals were observed during field surveys.
Coccyzus americanus occidentalis western yellow-billed cuckoo	FT/SE		BLM S USFS S	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Not Expected to Occur	Not expected	No suitable flood-bottoms or nesting habitat are present in the study area. No CNDDB observation are located within 5 miles of the study area.
Cypseloides niger black swift	None/None		SSC BCC	Coastal belt of Santa Cruz and Monterey counties; central and southern Sierra Nevada; San Bernardino and San Jacinto mountains. Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely.	Not Expected to Occur	Not expected	No suitable sea-bluffs or waterfall habitat are present in the study area. One CNDDB observation are located within 5 miles of the study area from 1986.
Empidonax traillii extimus southwestern willow flycatcher	FE/SE			Riparian woodlands in Southern California.	Not Expected to Occur	Not expected	Suitable riparian woodland habitats are not present in the study area.
Falco peregrinus anatum American peregrine falcon	FD/SD		CDF S	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	Not Expected to Occur	Not expected	No suitable wetlands, lakes or rivers are present in the study area. No CNDDB observation are located within 5 miles of the study area
Icteria virens yellow-breasted chat	None/None		SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 ft of ground.	Not Expected to Occur	Not expected	Suitable riparian habitat is not present in the study area.
Polioptila californica californica coastal California gnatcatcher	FT/None		SSC	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	May Occur	Low potential	The coastal scrub habitat is dominated by laural sumac with hollyleaf cherry, California sagebrush, black sage as other shrubs. CNDDBB occurences within 10 miles document the treatment area were recorded in the early 1900s.
Riparia riparia bank swallow	None/ST		BLM S	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Not Expected to Occur	Not expected	No cliffs suitable for nesting are present in the study area and this species is considered extirpated as a breeder in southern California.
Setophaga petechia yellow warbler	None/None		SSC	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including	May Occur	Low potential	Suitable riparian plants are present in the study area. However, no water is found near the study area.

24-15663: Henninger Flats CALVTP

Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Vireo bellii pusillus least Bell's vireo	FE/SE			Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	May Occur	Low potential	Suitable riparian habitat is not present in the study area. CNDDB records have been documented within 5 miles of the study area; however, all these records are near aquatic habitat.
Mammals							
Antrozous pallidus pallid bat	None/None		BLM S SSC USFS S	Found in a variety of habitats including deserts, grasslands, scrubs, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live	May Occur	Moderate potential	Live and dead tree potentially suitable for nesting are present in the study area. However, the nearest CNDDB occurrence is from 2004 and is located approximately 10 miles to the east.
Corynorhinus townsendii Townsend's big-eared bat	None/None		BLM S SSC USFS S	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls & ceilings in caves, lava tubes, bridges, and buildings. This species is extremely	Not Expected to Occur	Not expected	No caves or lava tubes suitable for roosting occur in the study area. However, potentially suitable cliffs occur in the area, so this species may forage in the study area.
Eumops perotis californicus western mastiff bat	None/None		BLM S| SSC	Occurs in open, semi-arid to arid habitats, including coniferiferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces and caves, and buildings. Roosts typically occur high above ground.	May Occur	Low potential	No cliff faces or caves suitable for roosting occur in the study area. However, potentially suitable cliffs occur in the area. The nearest CNDDB occurrence is from 1987.
Lasionycteris noctivagans silver-haired bat	None/None			Primarily a coastal and montane forest dweller, feeding over streams, ponds and open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes, and rarely under rocks. Needs drinking water.	May Occur	Low potential	Trees in study area may be suitable for roosting. However, no streams or ponds are present in the study area and the nearest CNDDB occurrence is from 1978.
Lasiurus cinereus hoary bat	None/None			Typically roosts in trees in deciduous and coniferous forests and woodlands but occassionally roosts in rocks crevices. Forages in open areas, typically along riparian corridors or over water. Diet primarily consists of moths.	May Occur	Low potential	Trees in study area may be suitable for roosting. Riparian habitat and open water may provide suitable foraging grounds. However, the nearest CNDDB occurrence is from 1974 and is located approximately 11 miles to the southeast.
Lasiurus frantzii western red bat	None/None		SSC	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May Occur	Low potential	Trees in study area may be suitable for roosting. However, no streams or ponds are present in the study area and the nearest CNDDB occurrence is from 2015 to the east.
Lasiurus xanthinus western yellow bat	None/None		SSC	Occurs in arid regions of the southwestern United States. Typically found in riparian woodlands, oak or pinyon-juniper woodland, desert wash, palm oasis habitats, and urban or suburban areas. Roosts in trees, often between palm fronds.	May Occur	Low potential	Potentially suitable riparian woodlands, however, the nearest CNDDB occurrence is from 1987.
Lepus californicus bennettii San Diego black-tailed jackrabbit	None/None			Occurs in Los Angeles, San Bernardino, Riverside, and San Diego Counties of southern California. Typically found in open shrub habitats. Will also occur in woodland habitats with open understory adjacent to scrubs.	Not Expected to Occur	Not expected	No suitable open shrub habitat. No CNDDB occurences within 5 miles.
Myotis thysanodes fringed myotis	None/None		BLM S USFS S	Occurs in a variety of habitats including pinyon-juniper, valley foothill hardwood, and hardwood-coniferous forest. Roosts in caves, abandoned mines, buildings, and snags.	Not Expected to Occur	Not expected	No suitable hardwood habitat. No CNDDB occurences within 5 miles.

24-15663: Henninger Flats CALVTP

Scientific Name Common Name	Status	CRPR	Other	Habitat Requirements	Potential to Occur in Project Area (PEIR)	Potential to Occur in Project Area	Habitat Suitability/ records
Myotis volans long-legged myotis	None/None			Occur in mountainous woodlands and forests, typically above 4000 feet. Can also be found in desert and riparian habitats. Roosts in tree hollows and under bark, in crevices in caves and mines, and in buildings.	May Occur	Low potential	Potentially suitable habitat, however, study area is outside of the the known elevation range. No CNDDB occurences within 5 miles.
Neotamias speciosus speciosus lodgepole chipmunk	None/None			Summits of isolated Piute, San Bernardino, and San Jacinto mountains. Usually found in open-canopy forests. Habitat is usually lodgepole pine forests in the San Bernardino Mts and chinquapin slopes in the San Jacinto Mts.	Not Expected to Occur	Not expected	No suitable open canopy habitat. Not within haitat summits . No CNDDB occurences within 5 miles. One observation in 1957.
Nyctinomops femorosaccus pocketed free-tailed bat	None/None		SSC	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	Not Expected to Occur	Not expected	No suitable desert habitat. No CNDDB occurences within 5 miles. One observation in 1985.
Nyctinomops macrotis big free-tailed bat	None/None		SSC	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	May Occur	Low potential	Potentially suitable habitat, however, no CNDDB occurences within 5 miles and most recent observation was in 1997.
Onychomys torridus ramona southern grasshopper mouse	None/None		SSC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.	Not Expected to Occur	Not expected	No suitable desert habitat. No CNDDB occurences within 5 miles. One historic observation in 1904.
Ovis canadensis nelsoni desert bighorn sheep	None/None		BLM S FP USFS S	Widely distributed from the White Mtns in Mono Co. to the Chocolate Mts in Imperial Co. Open, rocky, steep areas with available water and herbaceous forage.	Not Expected to Occur	Not expected	No suitable open, rocky habitat. No CNDDB occurences within 5 miles.
Taxidea taxus American badger	None/None		SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not Expected to Occur	Not expected	No suitable open habitat. No CNDDB occurences within 5 miles.

S=Calif Dept of Forestry & Fire Protection - Sensitive
AFS T=American Fisheries Society - Threatened
AFS V=American Fisheries Society - Vulnerable
SB=SB CalBG/RSABG-California/Rancho Santa Ana Botanic Garden/CRES-San Diego Zoo CRES Native Gene Seed Bank/SBBG-Santa Barbara Botanic Garden
BCC=USFWS_BCC-Birds of Conservation Concern
WL=CDFW_WL Watch List

Appendix D

Altadena Foothills & Arroyos SEA Protected Tree Species

SEA Protected Tree Species

ALTADENA FOOTHILLS & ARROYOS SEA

Scientific Name	Common Name	Protected DBH	2-trunk Protected DBH	Heritage DBH	2-trunk Heritage DBH
Abies concolor	white fir	5"	7"	30"	47"
Acer macrophyllum	bigleaf maple	3"	4"	18"	28"
Acer negundo	boxelder	6"	8"	36"	56"
Aesculus californica	California buckeye	6"	8"	36"	56"
Alnus rhombifolia	white alder	3"	4"	18"	28"
Arbutus menziesii	Pacific madrone	6"	8"	36"	56"
Arctostaphylos glandulosa (all subspecies)	Eastwood manzanita	6"	8"	36"	56"
Arctostaphylos glauca	big berry manzanita	6"	8"	36"	56"
Calocedrus decurrens	incense cedar	5"	7"	30"	47"
Ceanothus spinosus	greenbark ceanothus	6"	8"	36"	56"
Cercocarpus betuloides	mountain mahogany	6"	8"	36"	56"
Fraxinus dipetala	California ash	3"	4"	18"	28"
Fraxinus velutina	velvet ash, Arizona ash	3"	4"	18"	28"
Heteromeles arbutifolia	toyon	6"	8"	36"	56"
*Juglans californica**	southern California black walnut	3"	4"	18"	28"
Malosma laurina	laurel sumac	6"	8"	36"	56"
Pinus coulteri	Coulter pine	5"	7"	30"	47"
Pinus jeffreyi	Jeffrey pine	5"	7"	30"	47"
Pinus lambertiana	sugar pine	5"	7"	30"	47"
Pinus ponderosa	ponderosa pine	5"	7"	30"	47"
Platanus racemosa	western sycamore	3"	4"	18"	28"
Populus trichocarpa	black cottonwood	3"	4"	18"	28"
Prunus ilicifolia	holly leaf cherry	3"	4"	18"	28"
Pseudotsuga macrocarpa	bigcone spruce	5"	7"	30"	47"
Quercus agrifolia	coast live oak	6"	8"	36"	56"
Quercus berberidifolia	inland scrub oak	6"	8"	36"	56"
Quercus chrysolepis	canyon oak	6"	8"	36"	56"
Quercus durata var. *gabrielensis**	San Gabriel Mtns. leather oak	3"	4"	18"	28"
*Quercus engelmannii**	Engelmann oak	3"	4"	18"	28"
Quercus wislizeni	interior live oak	6"	8"	36"	56"
Salix exigua	narrowleaf / sandbar willow	3"	4"	18"	28"

24-15663: Henninger Flats CALVTP

Scientific Name	Common Name	Protected DBH	2-trunk Protected DBH	Heritage DBH	2-trunk Heritage DBH
Salix gooddingii	Goodding's black willow	3"	4"	18"	28"
Salix laevigata	red willow	3"	4"	18"	28"
Salix lasiandra	yellow willow	3"	4"	18"	28"
Salix lasiolepis	arroyo willow	3"	4"	18"	28"
Sambucus nigra ssp. *caerulea*	blue elderberry	6"	8"	36"	56"
Umbellularia californica	California bay	6"	8"	36"	56"

Appendix E

Los Angeles County Sensitive Bird Species

Los Angeles County Sensitive Bird Species

Los Angeles County Sensitive Bird Species	
Species Scientific Name	**Species Common Name**
Anser albifrons	Greater white-fronted goose
Anser caerulescens	Snow goose
Asio flammeus	Short-eared owl
Asio otus	Long-eared owl (wintering)
Botaurus lentiginosus	American bittern
Buteo regalis	Ferruginous hawk
Cardellina pusilla	Wilson's warbler (montane br.)
Cardellina pusilla	Wilson's warbler (lowland br.)
Cathartes aura	Turkey vulture (br.)
Catharus ustulatus	Swainson's thrush (br.)
Chordeiles acutipennis	Lesser nighthawk (coastal slope)
Cistothorus palustris	Marsh wren (interior br.)
Dryobates villosus	Hairy woodpecker (lowland)
Empidonax wrightii	Gray flycatcher (br.)
Eremophila alpestris	Horned lark (coastal slope)
Falco mexicanus	Prairie falcon (br.)
Geococcyx californianus	Greater roadrunner
Hydroprogne caspia	Caspian tern (br.)
Icterus parisorum	Scott's oriole (br.)
Lanius ludovicianus	Loggerhead shrike (coastal slope wintering)
Megaceryle alcyon	Belted kingfisher (br.)
Melospiza lincolnii	Lincoln's sparrow (br.)
Numenius americanus	Long-billed curlew (wintering)
Plegadis chihi	White-faced ibis (br.)
Podiceps nigricollis	Eared grebe (br.)
Pooecetes gramineus	Vesper sparrow
Porzana carolina	Sora (br.)
Rallus limicola	Virginia rail
Sialia currucoides	Mountain bluebird (wintering)
Sturnella neglecta	Western meadowlark
Thalasseus elegans	Elegant tern (br.)
Thalasseus maximus	Royal tern (br.)
Toxostoma lecontei	Le Conte's thrasher

Los Angeles County Sensitive Bird Species Recognized as Threatened, Endangered, or California BSSC	
Species Scientific Name	**Species Common Name**
Agelaius tricolor	Tricolored blackbird
Ammodramus savannarum	Grasshopper sparrow (br.)
Antigone canadensis	Sandhill crane
Aquila chrysaetos	Golden eagle
Asio otus	Long-eared owl (br.)
Athene cunicularia	Burrowing owl
Aythya americana	Redhead (br.)
Branta bernicla	Brant (wintering)
Buteo swainsoni	Swainson's hawk (br.)
Campylorhynchus brunneicapillus	Cactus wren (coastal slope)
Charadrius montanus	Mountain plover
Charadrius nivosus	Snowy plover (coastal)
Charadrius nivosus	Snowy plover (inland)
Circus hudsonius	Northern harrier (br.)
Cistothorus palustris clarkii	Marsh wren (clarkii)
Coccyzus americanus	Yellow-billed cuckoo
Contopus cooperi	Olive-sided flycatcher (br.)
Cypseloides niger	Black swift (br.)
Dendrocygna bicolor	Fulvous whistling-duck
Elanus leucurus	White-tailed kite
Empidonax traillii	Willow flycatcher (montane br.)
Empidonax traillii	Willow flycatcher (lowland br.)
Gymnogyps californianus	California condor
Haliaeetus leucocephalus	Bald eagle (wintering)
Icteria virens	Yellow-breasted chat (br.)
Ixobrychus exilis	Least bittern (br.)
Lanius ludovicianus	Loggerhead shrike (desert slope br.)
Lanius ludovicianus	Loggerhead shrike (coastal slope br.)
Passerculus sandwichensis beldingi	Savannah sparrow (beldingi)
Piranga rubra	Summer tanager (br.)
Polioptila californica	California gnatcatcher
Progne subis	Purple martin (br.)
Rallus crepitans	Clapper rail
Riparia riparia	Bank swallow (br.)
Rynchops niger	Black skimmer (br.)
Setophaga petechia	Yellow warbler (br.)
Sternula antillarum browni	California least tern (br.)
Strix occidentalis	Spotted owl
Vireo bellii	Bell's vireo (br.)
Vireo vicinior	Gray vireo (br.)
Xanthocephalus xanthocephalus	Yellow-headed blackbird

Appendix C

Correspondence

From: Blackhall, Jennifer@Wildlife <Jennifer.Blackhall@Wildlife.ca.gov>
Sent: Tuesday, August 20, 2024 2:51 PM
To: Lexi Journey <ljourney@rinconconsultants.com>
Cc: Barrera, Baron@Wildlife <Baron.Barrera@Wildlife.ca.gov>
Subject: [EXT] RE: Mitigation Measure BIO-2a Agency Consultation – Henninger Flats, CalVTP EIR PSA

Hi Lexi,

This email is to confirm that we are initiating consultation to review consistency with the PEIR and to provide feedback on any impacts and appropriate measures, particularly with the species listed in the provided document. If we require any additional information, I will let you know immediately.

Thanks for your patience,

Jennifer Blackhall
(she/her, Miss/Ms.)
Environmental Scientist
Timberland Conservation & Wildfire Prevention Program
California Department of Fish and Wildlife
South Coast Region 5
Work Cell: (858) 354-3285

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003
805-644-4455

August 7, 2024

Baron Barrera & Jennifer Blackhall
South Coast Region - California Department of Fish and Wildlife
Via email: AskR5@wildlife.ca.gov

Subject: Mitigation Measure BIO-2a Agency Consultation – Henninger Flats, CalVTP EIR PSA

Dear Baron & Jennifer:

I am supporting the Los Angeles County Fire Department to conduct CEQA for their fuel reduction project in Henninger Flats, by conducting a California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) Project Specific Analysis (PSA). Mitigation Measure BIO-2a of the CalVTP PEIR pertains to wildlife species that are listed under CESA or ESA or that are fully protected under the California Fish and Game Code, and therefore, requires consultation with CDFW to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of species that could be present in a project area year round, as well as to review the project proponent's determination that habitat function would be maintained. The following information is recommended to be provided to CDFW via email to facilitate CDFW determination (see page 16 of this 2023 CalVTP FAQ).

Project client: Los Angeles County Fire Department

Project name: Henninger Flats Fuel Reduction Project

Treatment description and location: The proposed project will reduce hazardous fuel loads on approximately 50 acres of grass and shrub fuel types in the San Gabriel Mountains above Altadena in Los Angeles County, California. As shown in Figure 1 and Figure 2 below.

The proposed vegetation treatment types that would occur to reduce hazardous fuel loading are:

- Wildland-Urban Interface (WUI) fuel reduction
- Fuel Break

The proposed vegetation treatment activities used to conduct the treatment types are:

- Manual Treatments
- Mechanical Treatments
- Prescribed Burning
- Prescribed Herbivory
- Herbicide Application

The proposed project area is completely within the 1993 Kinneloa Fire burn scar. At the time, this was the 12th most destructive wildfire in California history and remains one of the most destructive in Los Angeles County history. This fire began from an escaped campfire on the Mt. Wilson Toll Road below Henninger Flats and was driven by strong Santa Ana winds, eventually consuming 5,485 acres and resulting in one fatality.

The LACFD owns and manages the Henninger Flats site providing access control and management of pedestrian traffic. Hazard fuel reduction treatment activities at the site will be conducted by LACFD and will result in a reduction of predominantly shrub and grass fuel loads while providing rare live fire training opportunities. The site includes campground infrastructure and several buildings.

The history of wildfire in the region, high public use, and proximity to densely populated areas present an increased risk of wildfire at the proposed project site. The primary objective of this project is the creation of a vegetative mosaic with heterogenous fuel continuity and age class to prevent the spread of wildfires and provide opportunity for wildland firefighting to slow the advance of a wildfire.

Species for which consultation is requested:

- Crotch's bumble bee (*Bombus crotchii*)

Project-specific measures in the PSA or PSA/Addendum to avoid mortality, injury, or disturbance of each species and measures to maintain habitat for each species under CDFW jurisdiction:

- Crotch's bumble bee – Compliance with MM BIO-2g will ensure that prescribed burning may only occur from October through February, or outside of the bumble bee flight season, and treatment would be designed to avoid impacts to all habitat treated in a single year. Therefore, mortality, injury, or disturbance of Crotch's bumblebee would be avoided and surveys for the species would not be required.

We are requesting that CDFW reviews the information and provides a response via email to confirm that consultation has been conducted and/or if any additional information is requested. If no additional information is requested, than we request that CDFW provide confirmation that consultation has been completed.

We look forward to your review of this information and your response.

Sincerely,
Rincon Consultants, Inc.

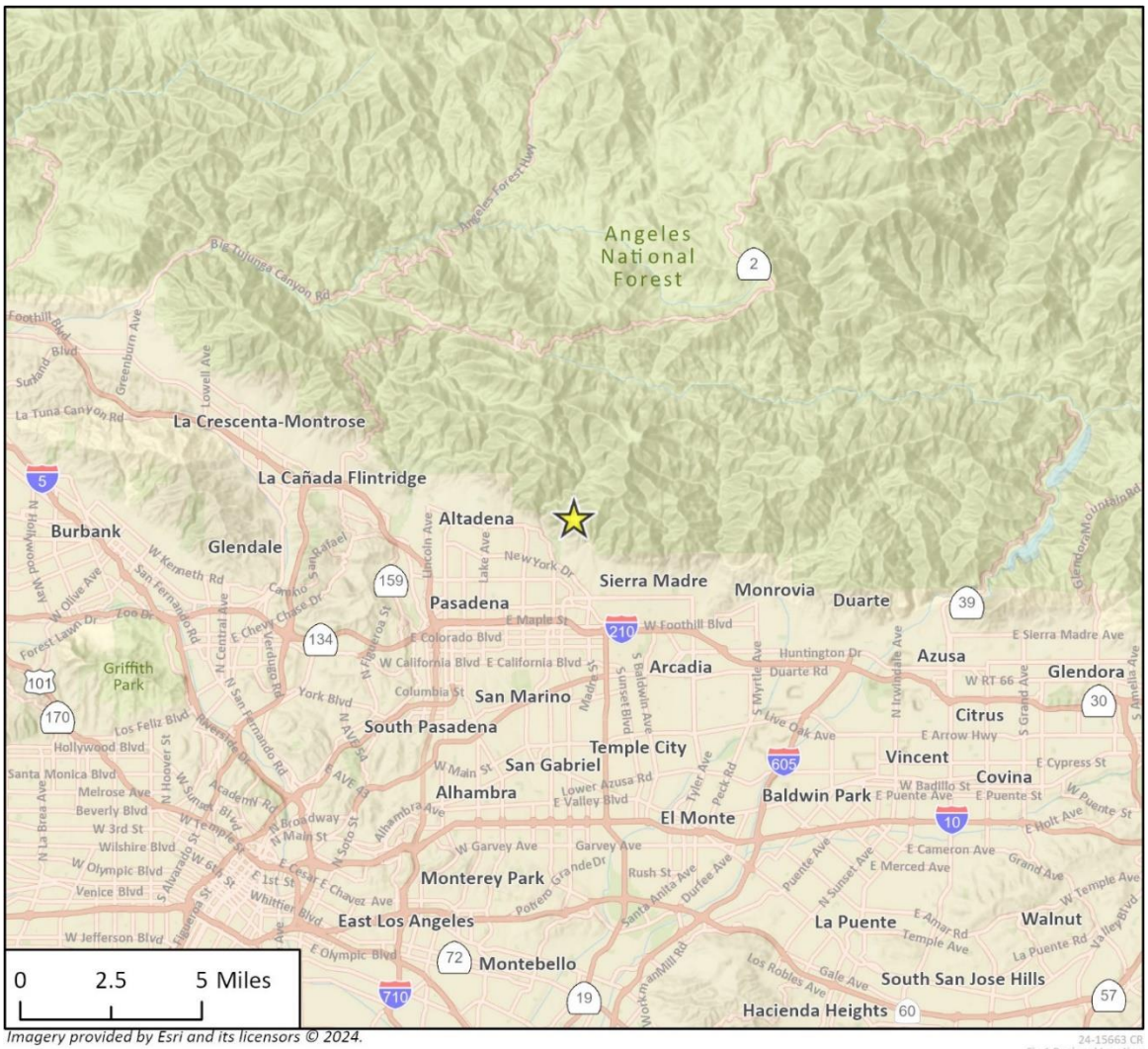
Lexi Journey, MESM
Natural and Working Lands Program Manager

Travis Belt
Director of Natural Resources

Attachments

Figure 1 Regional Location
Figure 2 Project Area

Figure 1 Regional Location



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24-15663 CR
Fig 1 Regional Location

Treament Areas

N

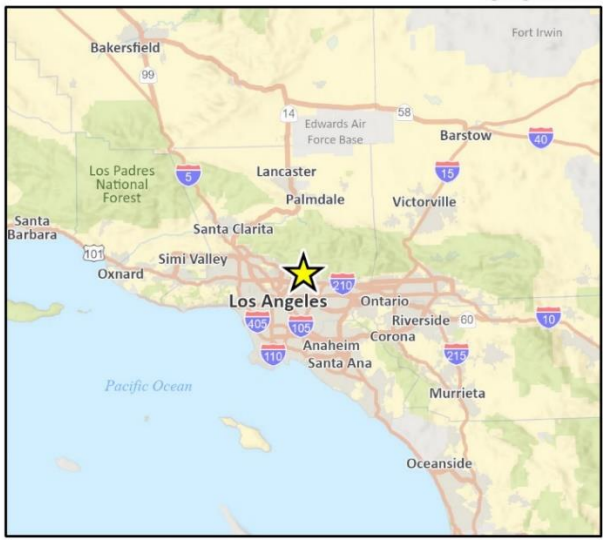
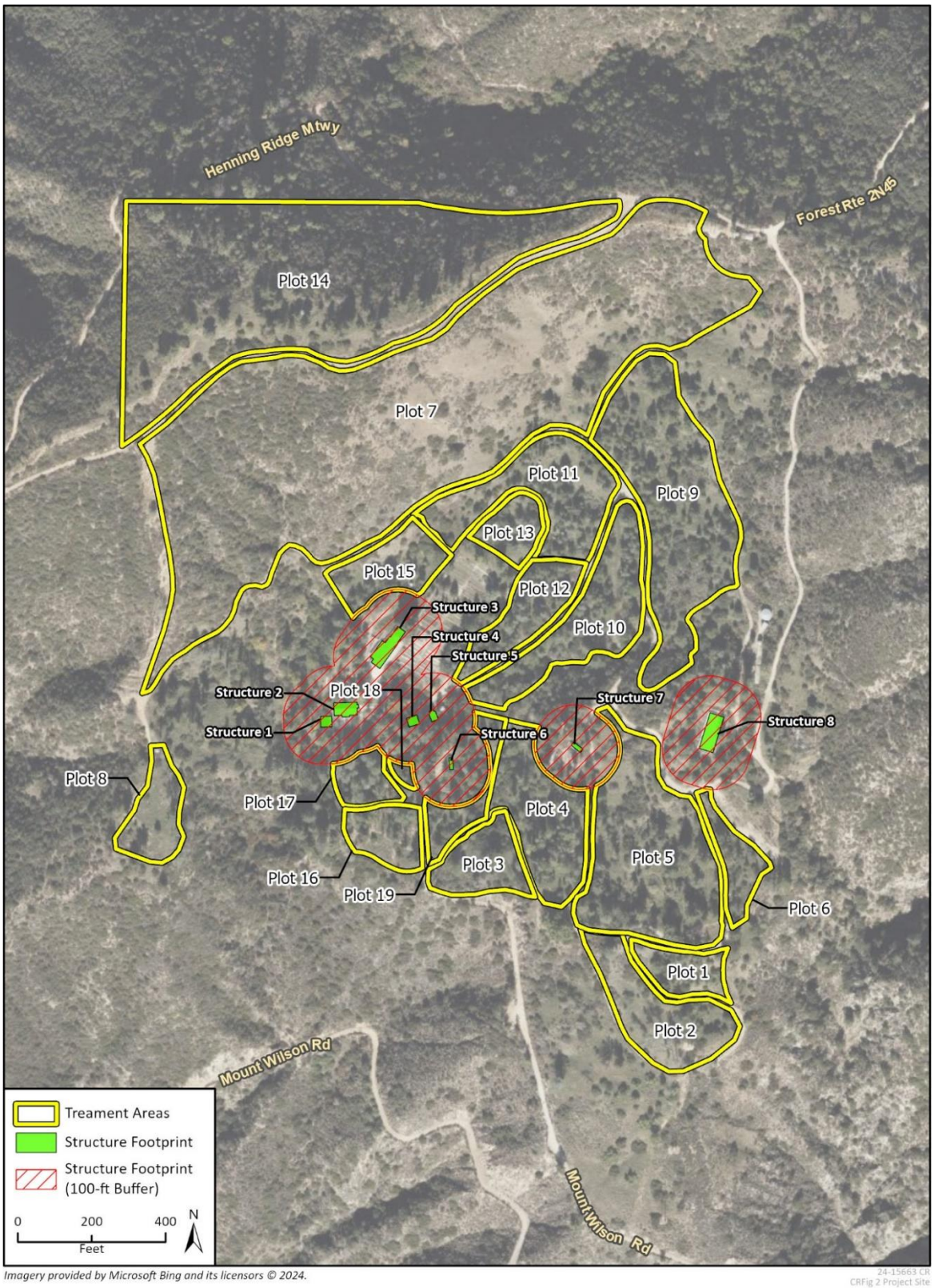


Figure 2 Project Area



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24-15663 CR
CRFig 2 Project Site