PROJECT–SPECIFIC ANALYSIS AND ADDENDUM TO THE CALVTP PROGRAM EIR
CALVTP PROJECT ID: 2025-14

Hayfork Valley VTP Project

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1 INTRODUCTION

1.1CALVTP OVERVIEW

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

1.2PROPOSED PROJECT

The proposed project consists of wildland urban interface fuel reduction, ecological restoration, and fuel break treatment types to address 3.5 The project includes implementation of vegetation treatments on up to 15,055 acres of private & County municipal service land in Trinity County (Figure 1). Approximately 1,282 acres of this project area have already received funding for implementation through a CalFire Forest Health grant. Protocol-level botany, wildlife, and archaeological surveys are planned for 2026; implementation will begin on the 1,282 acres after the PSA is approved and all required surveys are completed.

Over the past two decades, communities across California have become increasingly affected by wildfire. The community of Hayfork is situated entirely within the Wildland Urban Interface (WUI) as defined in the *Trinity County Community Wildfire Protection Plan 2020 update*. Within the last decade Hayfork has been continuously threatened by large wildfires. Together the 2021 Monument Fire, 2015 Peak & Rail Fires, and the 2012 Stafford Fire have impacted all sides of the Hayfork Valley and fringes of the community. As a result, various prevention and restoration projects have been accomplished in this area. It is the intent of this project to increase continuity between previous treatments, maintain existing treatments, and provide compliance ready project acres for new treatments.

The current climate of devastating wildfire in this region can be attributed to the ban of cultural burning since the late 1800s, fire exclusion over the last 150 years, a lack of vegetation management, climate change, successive periods of drought, and substantial development in the WUI. As a result, overstocked forests and high fuel loading are now characteristic of the landscapes of Trinity County, creating dangerous conditions for wildfire ignition and driving larger and more catastrophic wildfires. The severity of these wildfires has reduced overall biodiversity and is affecting the suitability of these habitats for special-status wildlife and plants. Local ecological systems have undergone unsustainable structural and compositional changes at the ecosystem level that require environmentally sensitive landscape-level treatments to redirect the effects of changing climatic and ecological conditions. Trinity County has prioritized these landscape-level treatments that will also protect Trinity County's communities and increase local capacity for integrated forest and wildfire management. Fuel break, wildland urban interface (WUI) fuel reduction, and ecological restoration treatment types and the treatment activities (prescribed burning, manual treatment, and mechanical

treatment) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

1.3AGENCY ROLES

This document is being prepared to comply with CEQA for the implementation of vegetation treatments that require a discretionary action by a state or local agency. The Trinity County Resource Conservation District (TCRCD) is the CEQA lead agency. In this PSA/Addendum, The Watershed Research and Training Center (WRTC) is referred to as "implementing entity" reflecting their role as lead implementer of treatments. As the CEQA lead agency, TCRCD has delegated responsibility to WRTC for the implementation of CalVTP standard project requirements (SPRs) and mitigation measures (MMs), and to confirm that implementation occurs in accordance with the mitigation monitoring and reporting program (MMRP), pursuant to Section 15097(a) of the State CEQA Guidelines. As defined in the CalVTP PEIR, the project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. The PEIR contemplated that the primary discretionary approval of the public agency project proponent would be implementing the treatments, as well as associated SPRs and MMs. However, for this proposed project, TCRCD's discretionary approval is to serve as CEQA lead; the implementing entities will be implementing treatments and associated SPRs and MMs. Therefore, as used in this PSA/Addendum, unless otherwise noted, WRTC is referred to as the project proponent.

1.4PURPOSE OF THIS PSA/ADDENDUM

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

Portions of the project area extend outside of the treatable landscape described in the CalVTP Program EIR. In total, these areas outside the treatable landscape encompass approximately 386 acres of the 15,055-acre project area; these areas represent the tarmac and buildings of the Hayfork Airport (45ac), Ewing Reservoir and its immediate shoreline (45ac), and a County Owned Parcel (40ac) that was excluded from the "Treatable Landscape" but is oak woodland and shrub covered. The remaining 256 acres are scattered areas within the "Treatable Landscape" that can be attributed to open grassy areas that were likely misclassified as "wet meadows" though biological surveys will confirm prior to any implementation of project activities. The scattered array of acres outside of the mapped CalVTP treatable landscape is due to the digital expression of the CalVTP treatable landscape that resulted in a pixelated mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., State Responsibility Area and Local Responsibility Area), the method resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld areas surrounded by the mapped treatable landscape. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions

as the adjacent areas within the treatable landscape, the environmental analysis in the Program EIR would be applicable to the adjacent areas.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the Program EIR, is the inclusion of areas outside of and adjacent to the CalVTP treatable landscape. The PSA checklist (refer to Section 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the addendum to the Program EIR.
This document serves as both a PSA and an Addendum to the CalVTP Program EIR for TCRCD review and analysis under CEQA regarding the proposed Hayfork Valley VTP Project within and outside the treatable landscape covered by the Program EIR. It provides environmental information supported by substantial evidence to TCRCD in its consideration of approving implementation of the work by WRTC, or its contractor(s). The project-specific MMRP, which identifies the CalVTP SPRs and mitigation measures applicable to the proposed project is presented in Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

1.5PROPOSED PROJECT REVISIONS

Project Area Outside the CalVTP Treatable Landscape
Among the criteria for determining if a treatment project is within the scope of the CalVTP PEIR is whether it is located in the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). While most of the project area would be inside, portions of the project area would extend outside of the treatable landscape described in the CalVTP PEIR. In total, the areas outside the treatable landscape encompass approximately 386 acres of the 15,055-acre project area; they are dispersed in small sections of the project area. 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.

Proposed Revision to CalVTP SPRs and MMs
While the proposed treatment types and treatment activities are consistent with the CalVTP, the project proponent has deemed that certain requirements of ten CalVTP SPRs and MMs are infeasible, are not warranted to maintain the impact significance conclusions in the Program EIR due to site-specific circumstances, and, if implemented as presented in the Program EIR, would prevent the project proponent from meeting treatment objectives. Because SPRs are part of the CalVTP and are incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP Program EIR's description of later project activities. The project proponent's proposed revisions to ten SPRs and MMs are described below. These proposed revisions would not result in any new or substantially more severe

significant impacts on any of the resources evaluated in the Program EIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as described below.

SPR AD-4 Public Notifications for Prescribed Burning

SPR AD-4, as presented in the Program EIR, requires that at least 3 days prior to prescribed burning the project proponent post signs along the closest public roadway to the treatment area, publish a public interest notification in a local newspaper or other widely distributed media source, and send a notification letter to the local county supervisor describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. The project proponent instead proposes to post signs along the closest public roadway to the treatment area on the day of the prescribed burning operations, and for as long as smoke is visible, to encourage greater visibility while mitigating for increased sign theft associated with posting length. In addition, the project proponent would implement other public notifications as appropriate, potentially including any of the following: publishing in the local newspaper, hosting public meetings; posting notices on local, public bulletin boards or social media pages; and/or contacting project neighbors at least one day prior to prescribed burning. The project proponent proposes these revisions to tailor SPR AD-4 to include public outreach mechanisms that are proven to be successful in their community. These revisions are consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatments. Potential impacts resulting from revisions to SPR AD-4 are discussed below in the relevant impact sections. As explained in these sections, the proposed revisions to SPR AD-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to SPR AD-4 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR AQ-3 Create Burn Plan

SPR AQ-3, as presented in the PEIR, requires preparation of a burn plan using the CAL FIRE burn plan template, or similar template, prior to prescribed burning treatment activities. Pursuant to SPR AQ-3, the burn plan will include fire behavior modeling performed by an experienced prescribed fire practitioner, certified State burn boss, or federally recognized burn boss, will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion, and will be created with input from an experienced prescribed fire practitioner, certified State burn boss, or federally recognized burn boss. The project proponent proposes to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or an equivalent template (California PBA 2022). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs. Potential impacts resulting from revisions to SPR AQ-3 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR AQ-3 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. The proposed revisions to SPR AQ-3 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR AQ-6 Prescribed Burn Safety Procedures

SPR AQ-6, as presented in the PEIR, requires non-CAL FIRE crews to implement all safety procedures required

of CAL FIRE crews. This includes implementation of an approved Incident Action Plan, and outlines the elements required in the Incident Action Plan. To maintain personnel and public safety, the project proponent proposes to prepare Incident Action Plans which may take on different forms, including a printout, white board use, and/or verbal briefing, that include elements appropriate for the size and scope of the burn. IAP elements may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives. Potential impacts resulting from revisions to SPR AQ-6 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR AQ-6 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. The proposed revisions to SPR AQ-6 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR CUL-4

As currently written in the Program EIR, SPR CUL-4 requires an archaeological and historical survey be conducted prior to implementation of any treatment activity, including treatments that do not result in ground disturbance or other risk to archaeological or historical resources (e.g., lop and scatter treatments). However, *Cultural Resource Review Procedures for CAL FIRE Projects* (CAL FIRE 2020), exempts from survey requirements vegetation treatment activities that are unlikely to impact cultural resources. The treatment of vegetation for timber stand improvement, shaded fuel breaks, and fire-safe projects using hand tools and non-ground disturbing equipment falls under this exemption, provided that woody material is chipped or lopped and removed or chipped or lopped and scattered. The project proponent is proposing to use CAL FIRE's Cultural Resource Review Procedures. The project proponent will still conduct archaeological surveys for all ground-disturbing treatments and prescribed fire treatments that have the potential to impact cultural resources, but the project proponent will not conduct archaeological surveys for treatments that do not disturb the ground such as chipping or lopping and scattering. Potential impacts resulting from revisions to SPR CUL-4 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR CUL-4 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. The proposed revisions to SPR CUL-4 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR HAZ-1 Maintain All Equipment

SPR HAZ-1, as presented in the Program EIR, requires that the project proponent inspect all equipment for leaks prior to the start of treatment activities and everyday thereafter until equipment is removed from the site, and any equipment found leaking be promptly removed from the treatment area. The project proponent proposes to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area. This gives the project proponent the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed. This would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use. Potential impacts resulting from revisions to SPR HAZ-1 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR HAZ-1 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. The proposed revisions to SPR HAZ-1 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR HAZ-3 Require Fire Extinguishers

SPR HAZ-3, as presented in the Program EIR, requires that tree cutting crews carry one fire extinguisher per chainsaw, and requires that each vehicle be equipped with the one long-handled shovel and one axe or Pulaski, consistent with Public Resources Code (PRC) Section 4428. The project proponent proposes to require tree cutting crews to carry one backpack pump type fire extinguisher filled with water and each vehicle to carry the required hand tools for firefighting, consistent with PRC Section 4428. This revision clarifies alignment of the measure with the requirements of PRC Section 4428 and is consistent with the purpose of SPR HAZ-3 to equip treatment crews with adequate firefighting tools to minimize the risk of wildfire during treatments. This revision would not reduce the effectiveness of the measure regarding addressing safety and wildfire. Potential impacts resulting from revisions to SPR HAZ-3 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR HAZ-3 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to SPR HAZ-3 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR GEO-1 Suspend Disturbance during Heavy Precipitation

SPR GEO-1, as presented in the Program EIR, requires that the project proponent suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. The project proponent proposes to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. Potential impacts resulting from revisions to SPR GEO-1 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR GEO-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to SPR GEO-1 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR TRAN-1 Implement Traffic Control During Treatments

SPR TRAN-1, as presented in the Program EIR, requires that prior to initiating vegetation treatments the project proponent works 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. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways.

The project proponent is proposing to edit SPR TRAN-1 to clarify that some prescribed fires may occur near

roadways whose agency(ies) with jurisdiction do not require a TMP for prescribed burns. For prescribed burns that do not require a TMP, the project proponent will address smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations within the Burn Plan, Smoke Management Plan, and/or TMP. The Burn Plan, Smoke Management Plan, and/or TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This revision would not reduce the effectiveness of the measure regarding traffic control. Potential impacts resulting from revisions to SPR TRAN-1 are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to SPR TRAN-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to SPR TRAN-1 are shown in underline and strikethrough in the MMRP (Attachment A).

MM BIO-2f Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails

Mitigation Measure BIO-2f, as written, precludes all treatment activities from Trinity bristle snail habitat. The project area overlaps Trinity bristle snail habitat and it is not feasible to eliminate all treatment activities from Trinity bristle snail habitat. Treatment activities within Trinity bristle snail habitat would maintain and improve their habitat. The potential for high-severity forest fire has been identified as one of the primary risk factors for conservation of endemic species of terrestrial gastropods (Sullivan, 2022b). Numerous studies have documented that fire exerts a major impact on terrestrial snail communities by strongly reducing plant diversity and species richness (Sullivan, 2022b). This is because wildfire-caused removal of vegetative cover and opening up the vegetation matrix fundamentally changes light and humidity levels, which are major threats to the survival of land snail populations (Sullivan, 2022b). Proposed treatments are focused on reducing the risk of high-severity wildfire through thinning of horizontally and vertically continuous ladder fuels. Sullivan's 2022 study also found that sites where Trinity bristle snails were sampled were strongly affiliated with mixed conifer stands containing medium to large sized trees, which provided abundant overstory cover shade (Sullivan, 2022a). Proposed treatment activities would focus on mainly removing ladder fuels less than 16 inches DBH. Thinning smaller trees has been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees across the project area will improve productive snail habitat.

The revised MM BIO-2f states that Trinity bristle snail critical and high suitable habitat determined by Robert Sullivan's 2022 macrohabitat suitability model will continue to fall under MM BIO-2f with no treatment unless an Incidental Take Permit (ITP) is acquired. Areas of low, low medium, medium and medium-high habitat may be treated with manual treatment and low intensity prescribed burns in a patchy pattern, avoiding rocky outcroppings to reduce impacts of mortality and injury and maintain habitat function. Habitat suitability is to be verified by a qualified biologist in coordination with CDFW. Potential impacts resulting from revisions to MM BIO-2f are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to MM BIO-2f would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to MM BIO-2f are shown in underline and strikethrough in the MMRP (Attachment A).

MM BIO-2g Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special- Status Bumble Bees

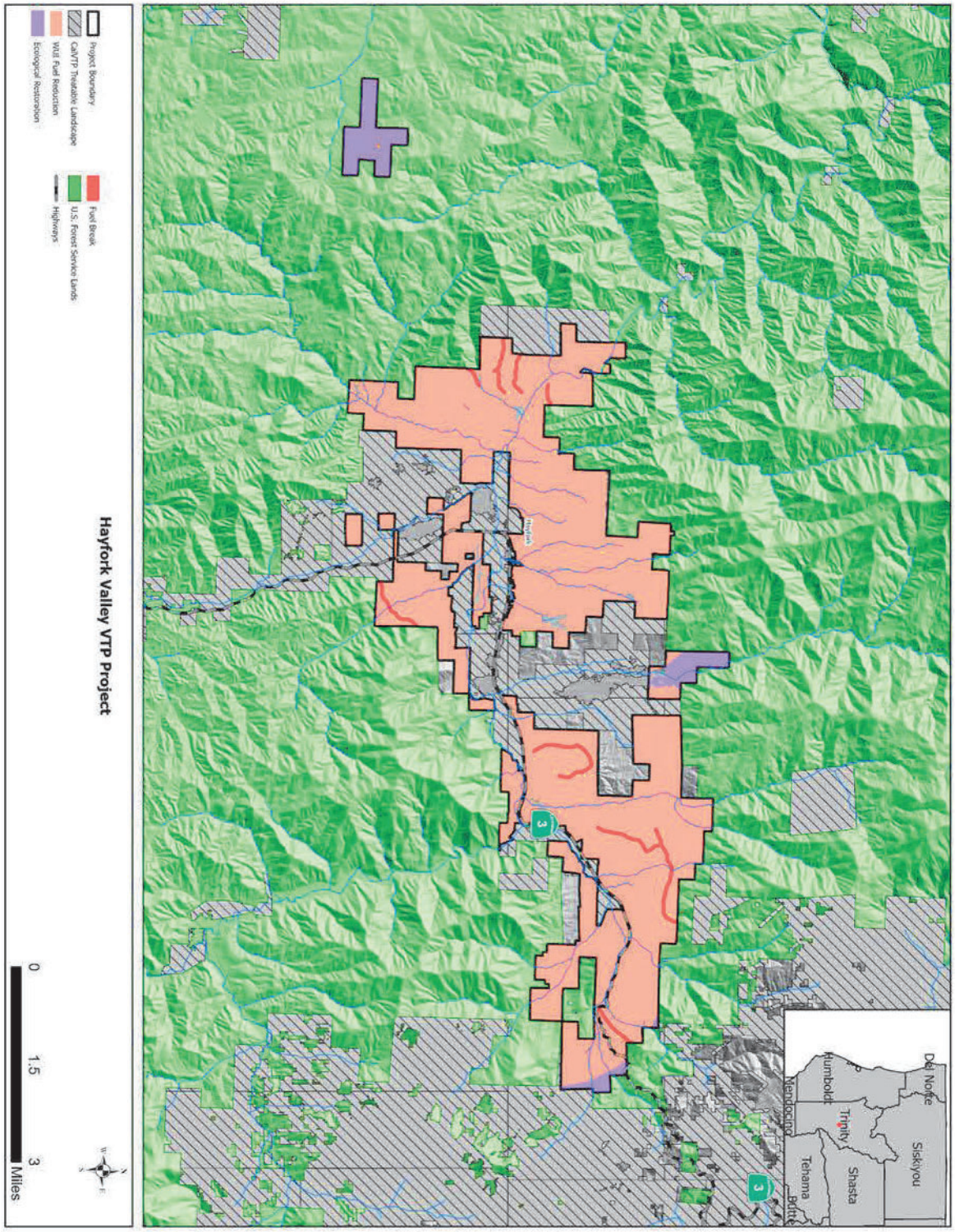
MM BIO-2g, as presented in the PEIR, requires that if special-status bumble bees are identified as occurring during reviews and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1, then the Project Proponent will implement measures including limiting prescribed burning to October - February, dividing treatment areas into multiple treatment units, conducting treatments in patchy patterns, and not

applying herbicides to flowering native plants during flight season (March through September). Two bumble bee species, Western bumble bee and Suckley's cuckoo bumble bee have the potential to occur within the Hayfork Valley project area. As written Mitigation Measure BIO-2g limiting prescribed burning to only October - February is not feasible. Fall burn windows could open up in September and there is a potential need for early summer burning to eliminate invasives such as medusahead grass and yellow starthistle. Research has shown that when exotic plants invade native communities, plant species diversity can decline due to intense competition for the available pollinators, which might lead to concomitant decreases in the abundance and diversity of native pollinators (Mciver et al., 2009). Medusahead and yellow starthistle can create a monoculture that alters the functioning of the ecosystem. The loss of native forbs and rapid spread of medusahead can impact native pollinators such as bees. Early summer burns will focus on targeting these invasive species and improving habitat for the native floral resources that Western bumble bees rely on. The project proponent proposes setting aside treatment areas with the highest densities of foraging bees as refugia; dividing treatment areas into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; conducting treatments 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; refraining from herbicide use across the entire project area, and monitoring post-burn areas and seeding post-burn areas as needed with a native grass and forb seed mix. Potential impacts resulting from revisions to MM BIO-2g are discussed below under the relevant impact sections. As explained in these sections, the proposed revisions to MM BIO-2g would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. The proposed revisions to MM BIO-2g are shown in underline and strikethrough in the MMRP (Attachment A).

1.6PROJECT SITE AND LOCATION

The Project is located on private and municipal services land in western Trinity County, surrounding the rural community of Hayfork (Figure 1), The project area falls fully within the South Fork Division as identified in the *Trinity County Community Wildfire Protection Plan* (CWPP) 2020 update, and occupies the Upper Hayfork, Lower Hayfork, and Middle South Fork Trinity River HUC-8 watersheds. The project area is within the Halfway Ridge, Hayfork, and Hayfork Summit USGS 7.5' quadrangles. The legal description is: township and ranges T2N R8E Sec. 29, 30, 32 HBM; T32N R12W Sec. 35 & 36; T32N R11W Sec. 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36; T32N R10W Sec. 31 & 32; T31N R12W Sec. 1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 21, 22, 23, 24; T31N R11W Sec. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 18; and T31N R10W Sec. 6, MDBM. The project elevation ranges between 2200' and 4700'. The total Project area evaluated in the PSA/Addendum encompasses 15,055 acres of private land. The project proponent has secured a CalFire Forest Health grant that will fund the immediate implementation of 1,282 acres of fuel breaks and manual treatment, mechanical treatment, and prescribed burning. As funding becomes available in the future, additional treatments will be completed across the project area.

Figure 1. Hayfork Valley VTP Project Map:



2 TREATMENT DESCRIPTION

The proposed project consists of vegetation treatments for wildfire risk reduction and forest health improvement on lands owned by private landowners and County or Special District municipal services lands in and around the Hayfork Valley. The project area encompasses approximately 15,055 acres. The project proponent does not anticipate that they would treat every acre within the project area. The purpose of a more expansive project area is to facilitate consideration of strategic treatment locations among adjacent large and small landowners in upcoming planning efforts such as updated Unit Fire Plans, Community Wildfire Prevention Plans, or other strategic planning efforts. The area encompassed in this PSA can act as a datum of permitted landscape from which adjacent project opportunities and collaborations can be created to increase the health and safety of the forest and the communities that surround it. In addition, the project area includes some areas that due to site-specific conditions, may not be treated because of operational considerations (e.g., steep slopes, road limitations), economic feasibility, or to avoid sensitive resources, including cultural sites and presence of special-status species or habitat.

Existing permanent staff, temporary seasonal staff, and contractors would implement project treatments. The CalVTP treatment types that would be implemented are WUI fuel reduction, ecological restoration, and fuel breaks. The proposed CalVTP treatment activities are manual treatments, mechanical treatments, and prescribed burning. Table 1 summarizes the proposed treatments.

Table 1. CalVTP Treatment Types and Activities

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activities	Equipment Used for Treatments	Typical Duration of Treatments	Treatment Size (Acres)
Ecological Restoration	Oak woodland restoration, meadow restoration, habitat improvement, fire resiliency treatments, enhancement of forest ecosystems	Manual (hand thin/hand pile, lop and scatter, pruning) Mechanical (mechanical thinning, mastication, chipping, machine piling), Prescribed Fire (Pile Burn), Prescribed Fire (Broadcast Burn)	Feller bunchers, chippers, skid steers, log loaders (shovels), log trucks, dump trucks, forwarders, skidders, yoders, tractors, excavators, masticators, hand tools, trucks, pole saws, weed-trimmers, water tenders, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, mowers, chainsaws, drip torches, propane torches, bulldozers	Prescribed burning: 1 – 8 weeks; Mechanical and Manual treatments: 1 – 7 months	816

Wildland Urban Interface (WUI) Fuel Reduction	Reducing hazardous fuels along ingress egress routes, development of fire-adapted communities, removal of vegetation to prevent or slow the spread of wildfire between wildlands and structures	Manual (hand thin/hand pile, lop and scatter, pruning) Mechanical (mechanical thinning, mastication, chipping, machine piling), Prescribed Fire (Pile Burn), Prescribed Fire (Broadcast Burn)	Feller bunchers, chippers, skid steers, log loaders (shovels), log trucks, dump trucks, forwarders, skidders, yoders, tractors, excavators, masticators, hand tools, trucks, pole saws, weed-trimmers, water tenders, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, mowers, chainsaws, drip torches, propane torches, bulldozers	Prescribed burning: 1 – 8 weeks; Mechanical and Manual treatments: 1 – 7 months	13,926
Fuel Breaks	Support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. Create and improve control lines for prescribed fire and managed wildfire.	Manual (hand thin/hand pile, lop and scatter, pruning) Mechanical (mechanical thinning, mastication, chipping, machine piling), Prescribed Fire (Pile Burn), Prescribed Fire (Broadcast Burn)	Feller bunchers, chippers, skid steers, log loaders (shovels), log trucks, dump trucks, forwarders, skidders, yoders, tractors, excavators, masticators, hand tools, trucks, pole saws, weed-trimmers, water tenders, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, mowers, chainsaws, drip torches, propane torches, bulldozers	Prescribed burning: 1 – 8 weeks; Mechanical and Manual treatments: 1 – 7 months	313
Total Acres					15,055

2.1TREATMENT TYPES

Each treatment type is described in more detail below and is consistent with the treatment types described in the CalVTP. Refer to Figure 1 for the location of each treatment type. Table 1 provides a summary of the proposed treatment types and associated activities.

Wildland Urban-Interface Fuel Reduction

The focus of WUI fuel reduction treatments is to strategically reduce vegetation density and remove fuel to protect communities and assets at risk from 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, WUI treatments would also help enhance habitat quality. The community of Hayfork has a population of approximately 2,500. Homes are often located far apart and interspersed throughout the wildlands. Hayfork and its neighboring community Hyampom have been identified as Priority Landscapes by CalFire on the Reducing Wildfire Threats to Communities mapper. According to the mapper, Hayfork and Hyampom are both ranked as a "4" (with 1 being the least risk and 5 the greatest risk). The Hayfork Valley is located in a fire adapted area. The vegetation types, combined with a pronounced annual dry period, result in conditions that favor fire. It is estimated that the natural regime in Trinity County is one of frequent mixed-severity fires (approximately every 5 to 15 years) (Trinity County CWPP, 2020). In some areas, in particular grasslands and oak woodlands, fire may have occurred on a much more frequent basis. Fire is now under-represented on the landscape, and it can be estimated that most of the county has missed at least 5 to 10 fires in the last 100 years (Trinity County CWPP, 2020). Some areas, in particular around grasslands that were intentionally burned by Native Americans and then ranchers, may have missed upward of 100 fires (Trinity County CWPP, 2020). To address this fire deficit WUI treatments within the Hayfork VTP will favor re-introduction of prescribed fire into the Oak woodlands and Grasslands that dominated or historically dominated a large proportion of the Valley. Hazardous fuel reduction in the WUI- designated area has the potential to benefit the local communities and will be implemented on up to 13,926 acres. WUI fuel reduction treatments will include mechanical, manual, and prescribed fire treatment activities.

Treatments will vary depending on the vegetation type and stand condition but in general will:

- Remove 80-100% of conifers less than 16" dbh and undesirable shrubs that are encroaching into meadows or oak woodlands.
- Individual trees >16" dbh may be targeted for girdling or removal if they are encroaching on meadows or oak woodlands or contributing to a significant hazardous fuels or public safety risk.
- Remove ladder fuels less than 16" dbh. Trees will be retained at a spacing of approximately 24'x24' from bole to bole. Preference for retention will be given to the largest trees.
- Individual trees >16" dbh may be targeted for girdling or removal if they are contributing to horizontal or vertical fuel continuity, encroaching on meadows or oak woodlands, or if removal is needed to achieve healthy stand densities.
- Preferentially remove trees with mistletoe infections, conks, or other signs of rot, broken tops, or other damage
- Approximately 75 trees per acre will be pruned to 8'.
- Understory shrubs may be cut, piled, and burned; islands of shrubs may be left if they do not contribute to horizontal or vertical fuel continuity in an effort to provide habitat for wildlife.
- Treated material less than 8" in diameter will be piled and burned or chipped. Bole wood greater than 8" in diameter can be piled, lopped and scattered, or chipped to a depth of less than 18".

- Hand and machine piles shall be compact. Piles will be constructed in areas where burning can be safely controlled.
- Remove up to 50 percent of downed logs within 300 feet of homes.
- Remove 60 to 80 percent of shrubs within 500 feet of homes.
- Remove 90–100 percent of snags within 500 feet of homes, fire control features, or ingress or egress roads to private lands.
- Manually or mechanically cut, pile, and pile burn jackpot fuels (i.e., snow-downed or wind-thrown trees of any diameter) within 1,000 feet of structures, fire control features, and ingress or egress roads into private property.
- Reduce non-native invasive plants.
- Reintroduce and maintain prescribed fire safely back into the community. Conduct all prescribed fire operations following state and local requirements.
- Within 1.3 miles of Northern spotted owl (*Strix occidentalis caurina*) Activity Centers, all treatments will meet NSO habitat requirements as defined in Attachment B.

Ecological Restoration

Within the Hayfork Valley CalVTP project area, forest stand conditions include riparian areas with uncharacteristic fuel loads, hazardous roadside snags, encroached black and white oak woodlands, encroached meadows, drought- induced tree mortality, and areas of dense manzanita and ceanothus species. In addition, some portions of the project area are actively maintained with fuels reduction and frequent fire, so treatments will continue to maintain those ecosystems in their proper fire regimes. Ecological restoration treatments will reduce hazardous vertically and horizontally contiguous fuels, return and maintain beneficial fire to the landscape, remove invasive plants, restore riparian areas, improve wildlife habitat, protect important watersheds, restore meadows and oak woodlands, and assist the recovery of areas that were burned during past wildfires. The goal of ecological restoration treatments is to create fire-adapted ecosystems that are more resilient to high intensity wildfires and future predicted climate scenarios. Ecological Restoration treatments will be conducted on 816 acres of the project area. Ecological Restoration treatments will include mechanical, manual, and prescribed fire treatment activities.

Treatments will vary depending on the vegetation type and stand condition but in general will:

- Remove 80 – 100% of conifers less than 16" dbh and undesirable shrubs that are encroaching into meadows or oak woodlands.
- Individual trees >16" dbh may be targeted for girdling or removal if they are encroaching on meadows or oak woodlands or contributing to a significant hazardous fuels risk.
- Remove small diameter trees less than 16" dbh where larger conifers and oaks exist. A sufficient number of small-diameter trees would be retained such that age class diversity would be maintained and to facilitate regeneration as determined.
- In areas where only small diameter trees are present, trees will be retained at a spacing of approximately 24'x24' from bole to bole. Preference for retention will be given to the largest trees.
- Preferentially remove trees with mistletoe infections, conks, or other signs of rot, broken tops, or other damage.
- Retain largest down logs up to three logs per acre and large snags up to two per acre unless the snags pose a hazard to implementation or personnel.
- Understory shrubs may be cut, piled, and burned; islands of shrubs may be left if they do not contribute to horizontal or vertical fuel continuity in an effort to provide habitat for wildlife.
- Treated material less than 8" in diameter will be piled and burned or chipped. Bole wood greater than 8" in diameter can be piled, lopped and scattered, or chipped to a depth of less than 18".

- Hand and machine piles shall be compact. Piles will be constructed in areas where burning can be safely controlled.
- Reduce non-native invasive plants.
- Reintroduce and maintain prescribed fire. Conduct all prescribed fire operations following state and local requirements.
- Within 1.3 miles of Northern spotted owl (*Strix occidentalis caurina*) Activity Centers, all treatments will meet NSO habitat requirements as defined in Attachment B.

Fuel Breaks

A fuel break is a strip of land on which the vegetation and fuels have been reduced or modified to decrease the risk of a fire crossing the fuel break. Fuel breaks are not designed to stop fire spread, but they can provide opportunities for firefighting success by creating areas of lower fire intensity, improved access for ground-based firefighters, and increased fireline construction rates. They can also provide safe emergency ingress-egress during wildfires and be used strategically to help delineate units during prescribed fires. Fuel breaks will be constructed at strategic locations such as expanding existing fire lines, adjacent to roads, and near high-use areas as shown in Figure 1. Fuel breaks would be implemented on up to 313 acres of the project area. The fuel breaks would vary in size and residual fuel levels. The proposed fuel breaks are generally located in previous burn scars of varying age. Treatments will seek to maintain and promote a diversity species: white oak, black oak, ponderosa pine, sugar pine, Douglas-fir, pacific madrone, golden chinquapin and canyon live oak. Fuel breaks would be established using varying combinations of manual, mechanical, and prescribed fire treatments and will require re-entry over time to maintain the desired fuel levels. Fuel break widths will range from 300 to 600 feet. The proposed actions also tie in directly with the needs of the people who live and work across this landscape-the Trinity County CWPP included a survey of community members who ranked roadside shaded fuel breaks as the project they most wanted to see more of in Trinity County (Trinity County CWPP, 2020). Treatments will vary depending on the vegetation type and stand condition but in general will:

- Remove roadside hazardous snags that pose an immediate threat along key ingress-egress routes to emergency responders and the public.
- Remove ladder fuels less than 16" dbh. Trees will be retained at a spacing of approximately 24'x24' from bole to bole. Preference for retention will be given to the largest trees.
- Individual trees >16" dbh may be targeted for removal if they are a significant hazardous fuel or public safety risk.
- Preferentially remove trees with mistletoe infections, conks, or other signs of rot, broken tops, or other damage
- Approximately 75 trees per acre will be pruned to 8'.
- Treated material less than 8" in diameter will be piled and burned or chipped. Bole wood greater than 8" in diameter can be piled, lopped and scattered, or chipped to a depth of less than 18".
- Understory shrubs may be cut, piled, and burned; islands of shrubs may be left if they do not contribute to horizontal or vertical fuel continuity in an effort to provide habitat for wildlife.
- Remove non-native invasive plants.
- Hand and machine piles shall be compact. Piles will be constructed in areas where burning can be safely controlled.
- Conduct all prescribed fire operations following state and local requirements.
- Within 1.3 miles of Northern spotted owl (*Strix occidentalis caurina*) Activity Centers, all treatments will meet NSO habitat requirements as defined in Attachment B.

2.2TREATMENT ACTIVITIES

The proposed vegetation treatment activities are manual treatments, mechanical treatments, and prescribed fire (see Table 1). Each of these treatment activities is described in more detail below and is consistent with the treatment activities described in the CalVTP. Treatment activities could occur during any time of year but will take any seasonal operating restrictions into account.

Prescribed Burning

Pile burning would occur on up to 14,552 acres and broadcast burning would occur on up to 15,055 acres of the Project area.

Pile burning

Pile burning treatments would pile biomass from mechanical and manual treatments using equipment (e.g., skid steer, tractor, bulldozer or excavator) or hand crews and burn the material using drip torches, propane torches, leaf blowers, water trucks, hand tools, etc. (Table 1). Pile burning will require between 1 and 50 crew members, depending on the number and size of piles burned. Pile burning would occur in areas with little to no live overstory or in "open canopy gaps". Completing each pile burn unit could take between 1 day to 2 weeks (though patrol could last longer). Pile burning will occur when burn windows permit.

Broadcast burning

Broadcast burning will be used to reduce fuels over larger areas. Broadcast burning will reintroduce ecologically appropriate fire regimes, reduce the continuity of dead, downed, and overly dense fuels, raise the canopy of mid and overstory trees to decrease vertical fuel continuity, reduce duff and litter depths, improve habitat for native perennial bunchgrass, and reduce conifer encroachment in oak woodlands and meadows.

Understory burns would be implemented according to the environmental prescription set out in the respective burn plan. A burn plan defines the desired objectives, fuel types, slopes, aspect, environmental prescription and expected fire behavior, staffing levels, and containment lines and strategies. The overall prescription is designed to safely contain the fire within the planned fire perimeter. Broadcast burns may occur in fall, winter, spring and early summer, but are most likely to occur in fall and late spring during conditions that are conducive to burning targeted fuels.

Broadcast burning may require the construction of new control lines or enhancement of existing control lines. This may include handlines, mow lines, and/or dozer lines.

Broadcast burning ignition will be conducted with handheld devices such as drip torches, fusees, propane torches, natural ignition devices, Vary pistols (i.e., flare guns), or other ignition devices. Equipment could include water trucks, fire engines, water pumps, dozers, ATVs, UTVs, hand tools, leaf blowers, weed trimmers, drip torches, and chainsaws (see Table 1). Broadcast burning would usually require between 5 and 50 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 day to 2 weeks. Broadcast burning will occur when burn windows permit.

Burning activities would include the following:

- As needed, author and complete smoke management plans, burn plans, and CAL FIRE burn permits.
- As needed, submit projects to the Prescribed Fire Claims Fund Pilot Program.
- Complete prescribed burning per burn plan and permit conditions.
- On-site presence of appropriate suppression tools

Mechanical Vegetation Treatment

Mechanical treatments would occur on up to 13,480 acres and would include masticating or feller-bunching target vegetation, chipping biomass from manual and mechanical treatment activities, and skidding and piling slash for burning. Excavators may be used to pull up root balls of sprouting shrubs or invasive weeds. Mechanical treatments would increase space between residual trees, reduce conifer encroachment into meadows or oak woodlands, and improve forest health. Equipment would include masticators, feller bunchers,

chippers, skid steers, tractors, excavators, and bulldozers (see Table 1). Mechanical treatments would typically require between 1 and 50 crew members, and up to four crews. Mechanical treatments could occur year-round, except if restrictions occur due to fire danger or if the project area is unreachable due to snow or rain conditions. Generally, mechanical treatments would include:

- Thinning, pruning, and piling trees with mechanical equipment.
- Removing undesired competing brush species to favor desirable species and spacing.
- Removing undesired invasive plants to prevent sprouting and regrowth.
- Masticate or chip biomass for disposal.
- Prepare stands for reintroduction of fire.

Manual Vegetation Treatment

Manual treatments would occur on up to 15,055 acres of the Project area. Manual treatments would primarily include hand thinning and pruning to reduce ladder fuels, increase space between residual trees, reduce conifer encroachment into meadows or oak woodlands, and improve forest health. Equipment would include chain saws, pole saws, weed-trimmers, and other hand-operated power tools to cut, clear, or prune herbaceous or woody species (Table 1). Manual treatments would usually require between 5 and 50 crew members, depending on size and site characteristics of the unit. Manual treatments could occur year-round but would take any seasonal operating restrictions (such as elevated fire danger) into account. Manual treatment activities could include the following:

- Thinning, pruning, and piling trees with chainsaws, loppers, or pruners.
- Cutting undesired competing brush species to favor desirable brush species and spacing.
- Pulling, grubbing, or digging out root systems of undesired invasive plants to prevent sprouting and regrowth.
- Prepare stands for reintroduction of fire.

2.3DURATION OF TREATMENTS AND MAINTENANCE

The project proponent has secured a CalFire Forest Health grant that will support the immediate implementation of approximately 1,282 acres of manual treatments, mechanical treatments, and prescribed fire. Initial treatments within the project area are estimated to begin in 2026. Additional treatments outlined in this PSA will be performed as funding and resources become available. Maintenance treatments are estimated to occur approximately every 3-10 years but may occur as needed, depending on vegetative regrowth and the availability of funding and resources to conduct treatment. If and when conditions change on the landscape, the PSA will be amended to reflect that change.

Maintenance, or retreatment, of the areas treated under the proposed project would be conducted to control vegetative regrowth, remove invasive species, and maintain fire in these fire-adapted ecosystems. Maintenance would use the same treatment activities as the initial treatments. Maintenance treatments would occur as needed and would generally treat smaller acreages and use less equipment than the initial treatments. The interval between initial treatments and subsequent maintenance would be based on site monitoring for the effectiveness of the initial treatment, available funding, and other factors. Maintenance cycles would be dependent on regrowth conditions and would differ by location. Maintenance prescriptions would be developed with consideration of the location's vegetation type and its natural fire return interval (i.e., time since last burn is greater than the average fire return interval for the habitat type). Retreatment activities would generally occur when the project area is outside of its natural fire return interval or the overall structure and density of the vegetation becomes contiguous vertically or horizontally across the treatment area. These intervals vary by vegetation type and disturbance intensity. Chaparral vegetation types generally require a minimum of 10 years to recover after fire or fire-replicating treatments, though chaparral vegetation types dominated by obligate seeders generally require a minimum of 15 years to recover (Syphard et al. 2019). Northern California mixed evergreen forest vegetation types require a minimum of 5 years to recover after a surface or low severity fire, 15 years minimum after a mixed severity fire, and 100 years minimum following a stand-replacing event (Tollefson 2008). California montane and subalpine grassland vegetation require zero to 20 years to recover, depending on conditions (USFS 2019). Manual or mechanical treatments such as hand pulling of invasive plants, hand thinning, or mastication could still occur within the natural fire return interval. Long-term maintenance objectives include the return of low-intensity prescribed fire and maintenance of vegetation at a natural fire return interval.

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

Environmental Checklist

VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title: Hayfork Valley VTP Project
2. Project Proponent Name and Address: Trinity County Resource Conservation District
   30 Horseshoe Ln
   Weaverville, CA 96093
3. Contact Person Information and Phone Number: Kelly Sheen, District Manager (530).623.6004
4. Project Location:

   The project is located in Trinity County, California. The center point is 40.54972N, -123.19419W. The Project is located on private land and County owned lands in western Trinity County, surrounding the rural community of Hayfork. The project area falls fully within the South Fork Division as identified in the Trinity County Community Wildfire Protection Plan (CWPP) 2020 update, and occupies the Upper Hayfork, Lower Hayfork, and Middle South Fork Trinity River HUC-8 watersheds. The legal description is: township and ranges T2N R8E HBM; T32N R12W, T32N R11W, T32N R10W, T31N R12W, T31N R11W, and T31N R10W MDBM. The project elevation ranges between 2200' and 4700'.
5. Total Area to be Treated (acres) Up to 15,550 acres
6. Description of Project:
   a. Initial Treatment
      Initial treatments would involve ecological restoration, fuel breaks, and WUI fuel reduction treatment types using mechanical, manual, and prescribed fire treatment activities. See Section 2, "Treatment Description", for additional details.

   Treatment Types:
   ☒ Wildland-Urban Interface Fuel Reduction
   ☒ Fuel Break
   ☒ Ecological Restoration

   Treatment Activities:
   ☒ Prescribed Burning (Broadcast), 15,550 acres
   ☒ Prescribed Burning (Pile Burning), 14,552 acres
   ☒ Mechanical Treatment, 13,480 acres
   ☒ Manual Treatment, 15,055 acres
   ☐ Prescribed Herbivory, 0 acres
   ☐ Herbicide Application, 0 acres

   Fuel Type:
   ☒ Grass Fuel Type
   ☒ Shrub Fuel Type
   ☒ Tree Fuel Type

   b. Treatment Maintenance

Maintenance treatments would involve the same treatment activities as the initial treatments (i.e. mechanical treatment, manual treatment, and prescribed burning). See Section 2.3, Duration of Treatments and Maintenance, above for additional details.

Treatment Types:

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

Treatment Activities:

☒ Prescribed Burning (Broadcast), 15,055 acres
☒ Prescribed Burning (Pile Burning), 14,552 acres
☒ Mechanical Treatment, 13,480 acres
☒ Manual Treatment, 15,055 acres
☐ Prescribed Herbivory, 0 acres
☐ Herbicide Application, 0 acres

Fuel Type:

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

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses:
   The project area is situated in central Trinity County, within and around the town of Hayfork. Surrounding land uses include national forest land, private timberland, recreation areas, grazing lands, residential neighborhoods, and open space.
8. Other Public Agencies Whose Approval is Required: (e.g., permits)
   North Coast Air Quality Management District smoke management plan when required
   North Coast Air Quality Management District burn permit, when required
   CALFIRE burn permits, when required
   Coastal Act Compliance
   ☒ The proposed project is NOT within the Coastal Zone
   ☐ The proposed project is within the Coastal Zone (*check one of the following boxes*)
   - ☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
   - ☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

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

   Pursuant to CalVTP SPR-CUL2, on December 19, 2025, notification letters were sent via mail to the eight Native American Tribes listed by the Native American Heritage Commission for the project area. No responses were received.

DETERMINATION (To be completed by the project proponent)

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

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

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

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

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

Kelly D. Sheen — Signature

6/1/2026 — Date

Kelly D. Sheen — Printed Name

Executive Director — Title

Trinity County RCD — Agency

3 EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the CalVTP PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any "new impacts".
3. The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:

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

4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. AND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.
6. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

3.1Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	SPR AES-2, SPR AQ-2,3	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from 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-1,3 SPR AD-4	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	NA	NA	No Impact	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs.

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

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

Discussion

Impact AES-1

Initial and maintenance treatments would include manual thinning, mechanical thinning, and prescribed burning treatment activities. The potential for these treatment activities to result in short-term, substantial degradation of scenic vistas or visual character of the landscape is examined in the PEIR (CalVTP PEIR Volume II Section 3.2.3, p. 16 - 19). The Project is located on private lands with no public access and County owned lands in western Trinity County, surrounding the rural community of Hayfork. Project activities would occur adjacent to the Tule Creek Trail Head (a USFS Trail) and within the parcels that contain Ewing Reservoir – a popular recreation area on County property. The nearest eligible state scenic highway is State Route (SR) 3, which runs through the project area. Proposed treatments including equipment and smoke from prescribed burning may be visible from various recreational areas and public roadways while the treatments are being implemented. Although the presence of large mechanical equipment could contrast with the natural environment within a viewshed if visible, the treatment and its visibility would be temporary and would not dominate a view or block any views from scenic vistas or state scenic highways. It also would not substantially degrade the existing visual character or quality of an area given that the activity would be limited in geographic extent. Furthermore, manual, mechanical, and prescribed burning treatments currently occur within the project landscape under existing projects; the increase in pace and scale of treatments under the proposed project would not introduce a new feature on the landscape. The potential for the proposed treatments to result in degradation of the visual character of an area and degradation of public viewpoints was examined in the Program EIR. The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities and types of visual effects are consistent with those analyzed in the Program EIR.

The project proponent revised requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by the project proponent would include smoke management plans that would meet the same standards as required under CAL FIRE burn plans. For these reasons, proposed revisions to SPR AQ-3 would not result in increased smoke emissions or smoke-related impacts. Therefore, revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect on aesthetics and visual resources than what was covered in the PEIR.

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

Impact AES-2

Initial and maintenance treatments would include shaded fuel breaks, WUI fuel reduction, and ecological restoration treatment types. The result for these treatment types to result in long-term degradation of the visual character of the landscape was examined in the PEIR (CalVTP PEIR Volume II Section 3.2.3, pages 20-22). The Project is located on private lands with no public access and County owned lands in western Trinity County, surrounding the rural community of Hayfork. Project activities would occur adjacent to the Tule Creek Trail Head (a USFS Trail) and within the parcels that contain Ewing Reservoir – a popular recreation area on County property. The nearest eligible state scenic highway is State Route (SR) 3, which runs through the project area. Treatment types may be visible from public roadways and recreational areas located near the project area.

Treatments would focus on mainly removing shrubs and trees smaller than 16 inches DBH, leaving overstory vegetation. Therefore, mature vegetation would remain to provide partial screening of treatment areas. The long-term visual character of the treatment areas after implementation of the proposed WUI fuel reduction, shaded fuel break, and ecological restoration treatments would remain consistent with the current natural, vegetated landscape and would not constitute a noticeable adverse change or degrade the current visual character of the landscape. Due to these factors, no degradation of public views or scenic resources would result from active implementation of vegetation treatment activities. The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR.

Revisions to SPR AD-4 are proposed to post signs along the closest public roadway to the treatment area on the day of the prescribed burn prior to the commencement of prescribed burning operations. The project proponent would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; post notices on local social media pages; and/or contacting project neighbors via telephone calls prior to prescribed burning. These revisions are consistent with the purpose of SPR AD - 4 to make a good faith effort to notify the local community in advance of prescribed burning treatments. For these reasons, proposed revisions to SPR AD-4 would not result in a substantially more severe significant effect related to short-term degradation of public views than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR

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

Impact AES-3

This impact does not apply to the project because no non-shaded fuel breaks are proposed.

New Aesthetic and Visual Resource Impacts

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

3.2Agriculture and Forestry Resources

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact AG-1

A majority of the project area is considered "forest land" as defined in Public Resources Code (PRC) Section 12220(g), which is land that can support 10 percent native tree cover of any species under natural conditions.
Vegetation treatment activities implemented within the project area would include mechanical, manual, and prescribed fire to conduct ecological restoration, WUI fuel reduction, and fuel break treatment types. Treatment activities would focus on mainly removing trees with DBH less than or equal to 16 inches and shrubs to reduce fuel continuity and to create healthier, more resilient forest lands in the project area.

The potential for these treatment types and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.3.3 page 7-8). 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), which defines "forest land" as land that can support 10 percent native tree cover of any species under natural conditions.

The inclusion of land in the 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 project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact to forest land is substantially the same as described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

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

3.3Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	SPR AD-1; SPR AQ-1,2,3,4,5,6	MM AQ-1	SU	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-4,5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	Yes	SPR AQ-4,5	NA	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	SPR AD-4, SPR AQ-2,6	NA	SU	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	SPR HAZ-1, SPR NOI-4,5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	SPR AD-4, SPR AQ-2,6	NA	SU	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AQ-1

Use of vehicles, mechanical equipment, and prescribed burning 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 is within the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD), and permits will be obtained from this agency prior to burning. NCUAQMD will not issue permits to burn if they believe there is a potential for significant smoke impacts to sensitive receptors in communities within the project area. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, pages 26-33). The proposed treatments, treatment equipment, and equipment use duration are consistent with the scope of the PEIR. The proposed treatment types include manual, mechanical, and prescribed burning. Based on the implementation of applicable SPRs and MMs, there would be a reduction in emissions and exposure to potential health effects. However, the amount of reduction resulting from the SPR's cannot be determined, therefore, the potential for impact remains potentially significant and unavoidable, as determined in the PEIR (CalVTP Final PEIR Volume II 3.4.3, page 26-33).

The project proponent revised requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by the project proponent would include smoke management plans that would meet the same standards as required under CAL FIRE burn plans. In addition, the project proponent proposes to revise SPR AD-4 to post signs along the closest public roadway to the treatment area on the day of prescribed burn prior to the commencement of prescribed burning operations. The project proponent would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; post notices on local social media pages; and/or contact project neighbors via telephone calls prior to prescribed burning. These revisions are consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatment. Finally, the project proponent proposes to revise requirements under SPR AQ-6 for prescribed burning activities such that Incident Action Plans would be prepared that include elements appropriate for the size and scope of the burn. IAP elements, which may take on different forms, including a print out, white board use, and/or verbal briefing. may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement an IAP and all required burn safety procedures. For the reasons described above, proposed revisions to SPR AQ-3, AQ-6, and AD-4 would not result in a substantially more severe significant effect related to emissions of criteria air pollutants than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the boundary of the project area that are within and outside of the treatable landscape are located within the same air basin and contain the same air quality conditions. Additionally, the area outside of the treatable landscape, 386 acres, is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles, prescribed fire, mechanical

equipment, and related emissions, would not be substantially greater than that analyzed in the PEIR (i.e., within the treatable landscape). Therefore, the air quality impact is not substantially greater than described in the PEIR. 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.

Impact AQ-2

The use of vehicles, prescribed fire, 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 (CalVTP32 Final PEIR Volume II Section 3.4.3, page 33-34). The proposed treatments would occur over a short duration and would not occur near the same people for an extended period of time. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR.
The project proponent proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does involve any changes to requirements regarding equipment maintenance that could affect diesel particulate emissions. Proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to emissions of diesel particulate matter than what was covered in the Program EIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are the same as those within the treatable landscape. Additionally, the area outside of the treatable landscape, 386 acres, is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles, prescribed fire, mechanical equipment, and related emissions, would not be substantially greater than that analyzed in the PEIR (i.e., within the treatable landscape).

Impact AQ-3

Use of vehicles and mechanical equipment during treatments could result in ground disturbance. The potential to expose people to naturally occurring asbestos (NOA)-containing fugitive dust emissions was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, pages 34-35). Most of the treatment areas are not located in areas identified as likely to contain naturally occurring asbestos per maps and guidance published by the California Geological Survey. However, there are some sites with ultramafic rocks within the project area. In accordance with SPR AQ-5, no treatments would occur in these areas unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the NCUAQMD. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the PEIR because the exposure potential is essentially the same within and outside the treatable landscape and avoidance of treatments in NOA-containing areas is consistent with the impacts 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 project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-4

The potential for prescribed burning to expose people to toxic air contaminants was examined in the Program EIR (CalVTP Final PEIR Volume II Section 3.4.3, pages 35- 37) and found to be significant and unavoidable after the application of all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of toxic air contaminants and associated levels of acute health risk with a Hazard Index greater than 1.0. The duration and parameters of prescribed burning are within the scope of activities analyzed in the PEIR and will be consistent with parameters imposed by the North Coast Air Quality Management District. The potential for exposure to toxic air contaminants is also within the scope of impacts covered in the Program EIR and this impact would remain significant and unavoidable, as explained in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, pages 35- 37).

The project proponent proposes to revise requirements under SPR AQ-6 for prescribed burning activities such that Incident Action Plans would be prepared that include elements appropriate for the size and scope of the burn. IAP elements, which may take on different forms, including a print out, white board use, and/or verbal briefing, may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement an IAP and all required burn safety procedures. In addition, the project proponent proposes to revise SPR AD-4 to post signs along the closest public roadway to the treatment area on the day of the prescribed burn prior to the commencement of prescribed burning operations. The project proponent would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; and/or contact project neighbors via telephone calls prior to prescribed burning. These revisions are consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatments. For the reasons described, proposed revisions to SPR AQ-6, and AD-4 would not result in a substantially more severe significant effect related to exposing people to toxic air contaminants than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

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

Impact AQ-5

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose human receptors to the objectionable odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the Program EIR (CalVTP Final PEIR Volume II Section 3.4.3, page 37-38). The release of objectionable odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR.
The project proponent proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does not involve any changes to requirements regarding equipment maintenance that would affect objectionable odors from diesel exhaust. Proposed revisions to SPR HAZ-1 would not

result in a substantially more severe significant effect related to emissions of diesel particulate matter than what was covered in the Program EIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact AQ-6

Pile burning and broadcast burn treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur (CalVTP Final PEIR Volume II 3.4.3, page 38-39). The duration and parameters of the prescribed burning treatments would be significant and are within the scope of the activities addressed in the Program EIR; therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the Program EIR.

The project proponent proposes to revise requirements under SPR AQ-6 for prescribed burning activities such that Incident Action Plans would be prepared that include elements appropriate for the size and scope of the burn. IAP elements, which may take on different forms, including a print out, white board use, and/or verbal briefing, may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement an IAP and all required burn safety procedures. In addition, the project proponent proposes to revise SPR AD-4 to post signs along the closest public roadway to the treatment area on the day of the prescribed burn prior to the commencement of prescribed burning operations. The project proponent would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; and/or contact project neighbors via telephone calls prior to prescribed burning. These revisions are consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatments. For the reasons described, proposed revisions to SPR AQ-6, and AD-4 would not result in a substantially more severe significant effect related to exposing people to objectionable odors than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

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

New Air Quality Impacts

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

3.4Archaeological, Historical, and Tribal Cultural Resources

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Consistent with SPR CUL-1, a record search of the approximately 15,055-acre project area was conducted at the Northeast Information Center (NEIW) on December 2, 2025 (NEIC File No.: 25-525). That record search identified three precontact sites, nine historic sites, two multicomponent sites, five built environment resources, one wagon trail and one historic trail, two historic electrical utility lines, and eight historic ditches/water transmission lines. The record search provided six resource points. In adherence with SPR CUL-2, the RPF contacted the Native American Heritage Commission (NAHC) on September 9, 2025 to obtain the latest NAHC provided Native American Contact List and a review of their Sacred Lands File. NAHC responded on September 9, 2025 with a current list of nine Tribes for contact and to report negative results on their Sacred File search. On December 19, 2025, letters inviting Tribes to consult

were mailed to the contacts listed for the nine Tribes indicated by NAHC. No responses were received during the 30-day consultation request period. No responses have been received to date.

Impact CUL-1

Proposed treatment activities include manual treatments, mechanical treatments, and prescribed burning, which could damage historical built environment resources. The record search generated three locations/properties that could contain one or more historic built environment resources and discussed two other built environment resources that have been evaluated as ineligible. It is not known whether the remaining historic built environment structures at three properties are considered resources under CEQA. Some structures at these properties were known to not meet eligibility criteria. Structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area; these structures will be identified and avoided pursuant to SPR CUL-7. The potential for treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR, because treatment activities and the intensity of ground disturbance of the treatment project 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 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 significant impact than what was covered in the PEIR.

Impact CUL-2

Vegetation treatments would include prescribed burning and mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; these activities may result in damage to known or previously unknown archaeological resources. This could result in damage to known or previously unknown archaeological resources, as described in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, pages 15-16). Per the PEIR, a record search was conducted for the project area (SPR CUL-1) and all geographically affiliated Native American Tribes were contacted and notified of treatment activities (SPR CUL-2). Pre-field research (SPR CUL-3) and archeological surveys (SPR CUL-4) will be conducted prior to implementation and a survey report prepared (SPR CUL-4). A qualified archaeologist will conduct pre-field research, surveys, and complete survey reports. The NEIC record search identified two precontact sites that are unevaluated, one precontact site deemed ineligible, five historic sites that are unevaluated, four historic sites deemed ineligible, two multicomponent sites that are unevaluated, three sites with built environment resources, one wagon trail and one historic trail, two historic electrical utility lines, and eight historic ditches/water transmission lines. Two final resources discussed in NEIC data were the Butcher Creek Bridge abutments and the Hayfork Bridge, which were historic built environment resources that were evaluated as ineligible. The record search provided six resource points that are unevaluated and one of these points is an isolated find. Surveys will be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archaeological resources and all identified resources would be avoided according to provisions of SPR CUL-5. Additionally, all crew members and contractors will be trained prior to treatment activities, pursuant to SPR CUL-8.

The potential for these treatment activities to result in an inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the PEIR. This impact was identified as significant and unavoidable in the PEIR because of the large geographic extent of the treatable landscape and the possibility that there could be inadvertent damage of unknown resources. For this project, Mitigation Measure CUL-2 will require that if a prehistoric or historic-era subsurface archaeological feature or

deposit is discovered, all ground disturbing activities within 100 feet of the resource will be halted, and every reasonable effort to identify and protect the resource would be applied. The implementation of the applicable SPR's and Mitigation Measure CUL-2 would reduce impacts to inadvertent discoveries, however, it is uncertain if these measures would avoid substantial adverse change to the resource. Therefore, this impact would be significant and unavoidable, as determined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, pages 15-16).

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources 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 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 significant impact than what was covered in the PEIR.

Impact CUL-3

On December 19, 2025, letters inviting Tribes to consult were mailed to the contacts listed for the nine Tribes indicated by NAHC. No responses were received during the 30-day consultation request period. No responses have been received to date.

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 17). This impact is within the scope of the PEIR because the intensity of ground disturbance of the 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 would avoid any substantial adverse change to any tribal cultural resource. Based on the implementation of applicable SPR's and consistency with the scope of the PEIR, this impact remains less than significant.

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

Impact CUL-4

Vegetation treatments would include mechanical treatments and prescribed burning that could involve the use of heavy equipment, which could uncover human remains. The NEIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 18). Additionally, consistent with the PEIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 which specify the procedures to be followed in the event of the unexpected discovery of human remains. No SPRs are applicable to this impact. Based on the compliance with the above Health and Safety Code and Public Resource Code and consistency with the scope of the PEIR, this impact would remain less than significant.

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined 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 project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

3.5Biological Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR BIO-1,2,7,9 SPR AQ-3,4 SPR GEO-1,3,4,5,7	MM BIO-1a, 1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO-1,2,3,4,5,10 SPR HYD-1,4	MM BIO-2a, 2b, 2g, 3a, 4	LTSM for bumble bee habitat function; TSE for direct harm to bumble bee species; LTSM for other species	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO-1,2,3,4,5,6,9 SPR HYD-4	MM BIO-3a	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191–3.6-192	Yes	SPR BIO-1 SPR HYD-1,4	MM BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO-1,4,5,10 SPR HYD-1,4	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-1,2,3,4,5,12	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	NA	No Impact	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on the 25 special status plant species with suitable habitat in the project area. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments, because the same treatment activities would occur. However, treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatment that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for some special-status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special-status plants. The project proponent has funding through a CalFire Forest Health grant to immediately implement 1,282 acres of manual, mechanical, and prescribed burning treatments. In accordance with SPR BIO-7, protocol level surveys will be conducted prior to implementation. Results of the protocol-level surveys will be good for five years. Following review of occurrence data, species ranges, habitat requirements for each species, results of the reconnaissance-level survey, habitat present within the project area as assessed during reconnaissance surveys, it was determined that only one special status plant listed under ESA or CESA is *Known to Occur* within the project area—Tracy's Eriastrum (*Eriastrum tracyi*). Pursuant to Mitigation Measure BIO-1b, impacts on non-listed special-status plants must be avoided unless it is determined that the plants would benefit from treatment and that habitat function would improve with implementation of the treatment. Fire and thinning effects for special-status plant species were researched for the project area to determine benefit from prescribed fire and thinning treatments. Two of the special- status plant species that have potential to occur in the project area could benefit from implementation of treatments.

California globe mallow *(Iliamna latibracteata*; ILLA2): California globe mallow is a large perennial herb that is endemic to the coniferous forests of the Klamath Mountains, in northwestern California and southwestern Oregon. It is known to occupy montane chaparral, upper and lower montane coniferous forest, mesic conditions in North coast coniferous forest, and riparian scrub habitat along streambanks. Plants are often associated with burned areas (Serkanic and Sims, 2018). Occurrences are documented in association with alder thickets, burned clear-cuts in conifer forests, shrub-fields, roadsides in conifer forests, seepage areas, openings in a redwood forest, south-facing slopes, shaded north-facing slopes, and a coastal prairie oak stand. Occurrences are often associated with forest openings (Serkanic and Sims, 2018). Fire suppression impacts forested habitat of this kind. Forest openings behave as microsites for species requiring varying intensities of light. Significant changes to the size and spatial characteristics of openings within forests of the Klamath Mountains of California have taken place during the last one-hundred years (Serkanic and Sims, 2018). In one study, loss of open space between trees was consistent with a drop-in shrub cover and diversity. Researchers documented spatial and structural homogenization and a resulting decline in complex habitat features within the study forest. Such features are linked to forest resilience to disturbance and stressors such as fire, insects, and drought (Serkanic and Sims, 2018). According to Hoover et al., *Iliamna latibracteata* is threatened by fire suppression and vegetation encroachment, fire suppression activities (including population being brushed for fire suppression). The CNPS (2018) Inventory, indicates fire suppression and grazing as possible threats to *Iliamna latibractea*. Due to California globe mallow's demonstrated positive response to canopy openings and its negative

response to vegetation encroachment, the treatments of thinning and prescribed fire are expected to benefit the species.

Yolla Bolly Mtns. Bird's-Foot Trefoil (*Hosackia yollabolliensis*; LOYO): Yolla Bolly Mtns. Bird's-Foot Trefoil is a perennial herb and California endemic species, known only from South Fork Mountain, a long northwest ridgeline extension of the High North Coast Ranges into Humboldt County, from the Yolla Bolly mountains of southern Trinity County. It occurs between 1,700 and 2,100 meters in elevation, favoring dry, exposed slopes, edges of meadows and seeps, and open areas of upper montane coniferous forests. Along South Fork Mountain, *H. yollabolliensis* occurs in dry montane meadows that are right along the edges of snowmelt. As outlined in Trefoil's Plant Species Evaluation Form, it is threatened by off-highway vehicle use, conifer encroachment, and competition from non-native plants (Kauppinen et al., 2022). While wildfire or prescribed fire may be less of a danger to this species, intense road use, blading, and creation of dozer lines due to wildfire suppression efforts could be a significant threat (Kauppinen et al., 2022). Due to *H. yollabolliensis's* preference for open areas and its negative response to vegetation encroachment, the treatments of thinning and prescribed fire are expected to benefit the species.

For the remaining 23 non-listed special status species, the project proponent will implement the buffers as described in Mitigation Measure BIO-1b if non-listed special status species are detected during protocol-level botany surveys. Initial and maintenance treatment activities (prescribed burning, mechanical treatments, and manual treatments) could adversely affect special-status plant species (see Attachment B for detailed information). The potential for treatment activities to result in adverse effects on special-status plant species was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR because the proposed treatment types and activities and the intensity of disturbance that would result from implementing the proposed treatment activities are consistent with those analyzed in the Program EIR.

The project proponent proposes to revise SPR GEO-1 to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. The project proponent revised SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State- Certified Burn Boss curriculum development committee, or equivalent). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. Therefore, due to a continued focus on minimizing soil burn severity, revisions to SPR AQ-3, would not result in a substantially more significant effect on special-status plants than what was covered 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 project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special status plants is also the same, as described above.

Impact BIO-2

Initial and maintenance treatment activities (mechanical treatments, manual treatments, and prescribed fire) could result in adverse effects on special-status wildlife. The potential for treatment activities to adversely affect special-status wildlife was examined in the Program EIR. According to the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (USFWS 2025); the California Department of Fish and Wildlife's Area of Conservation Emphasis (ACE) Viewer (CDFW 2025); Appendix BIO-3 in the Program EIR (Volume II), the California Natural Diversity Database, and reconnaissance-level surveys, there are 36 special-status wildlife species with the potential to occur. The project proponent sent a consultation request to CDFW on November 5, 2025 and a Technical Assistance Request to USFWS on April 20, 2026. CDFW responded to the request for consultation on December 9, 2025 and the project proponent has incorporated feedback from CDFW into the following recommendations. USFWS responded to the request for Technical Assistance on May 8, 2026. The project proponent has also incorporated the USFWS recommendations into this section.

Golden Eagle

Golden eagles inhabit a variety of habitats including forests, canyons, shrub lands, grasslands, and oak woodlands. Nests are constructed on platforms on steep cliffs or in large trees. Golden Eagles nest in open and semi-open habitat, but also may nest at lower densities in coniferous habitat when open space is available, (e. g. fire breaks, clear-cuts, burned areas, pasture-land, etc.). Golden Eagles avoid nesting near urban habitat and do not generally nest in densely forested habitat. There is 1 recorded CNDDB occurrence for a golden eagle nest just outside of the town of Hayfork. Golden eagles may nest and forage within portions of the project area with large open grasslands and meadows; however, suitable nesting habitat for this species is generally lacking within the forested areas of the project area.

Measures to Avoid and Reduce Impacts

Focused nest tree surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day, as golden eagles are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for nests and eagles exhibiting behavior that is typical of breeding (e.g. delivering food). The surveyor will pay particular attention to cliffs and large trees near open areas, as these areas are the preferred nesting sites of golden eagles. A golden eagle nest is a large platform nest that is often ten feet across by three feet high of sticks, twigs, and greenery. If a golden eagle nest is detected during focused surveys, the project proponent will establish a buffer zone that is a minimum of eight acres in size. Occupied nests will receive a 1-mile No Disturbance buffer zone. During the critical period for golden eagles (January 15 through April 15 for active nests; and extended from April 15 through September 1 or until the birds have fledged for occupied nests) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

Maintenance of Habitat Function

Maintenance of habitat function for golden eagles would require open terrain for hunting including grasslands and early successional stages of forest and shrub habitats. Dense forest stands reduce prey visibility and opportunities for low level hunting flights, the eagle's dominant foraging mode (Hunt, 1995). Golden eagles also frequent large trees on edges of open areas for cover and as a perch where they may occasionally search from and fly directly to prey (Carnie, 1954). Habitat function for golden eagles would be maintained and improved because thinning and burning meadows in the project area will reduce conifer encroachment and promote an open, grassland habitat that allows for hunting. Treatment activities will focus on mainly removing trees less than 16 inches DBH. Trees greater than 16

inches DBH are most likely to be used by golden eagles for high hunting perches. Thinning smaller trees has also been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees across the project area will increase the number of viable nesting trees. Treatments have been designed to promote the late successional forest habitat that Golden Eagles rely on.

American Peregrine Falcon

In Trinity County habitat for American peregrine falcons include montane hardwood woodlands, perennial grasslands, annual grasslands, and oak woodlands, and Douglas-fir hardwood forests. Coastal cliffs, riverine bluffs and other rocky outcroppings, as well as large, old growth trees provide nesting habitat for peregrine falcons (Buchanan et al. 2014). Nest sites are frequently located near areas containing prey, including rivers, tidal mud flats, beaches and open water (Morata, 2018). Shorebirds and waterfowl are an important component of peregrine falcon diet, and peregrine falcons prefer open hunting areas (Morata, 2018). This species may forage within the project area in open grasslands or oak woodlands. There is 1 recorded CNDDB occurrence for a peregrine falcon nest within a 9-quad query of the project area, southwest of the project area. Potentially suitable nesting habitat is scarce within the project area. Peregrines usually nest 0.5 to 1 mile from water.

Measures to Avoid and Reduce Impacts

Focused surveys for occupied sites will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day, as American peregrine falcons are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for occupied sites and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to any cliffs near watercourses or other open sites. The surveyor will also pay particular attention to any old nests of other raptors in the project area. Peregrine falcons do not build nests like most other birds, instead they lay their eggs in a "scrape" or shallow indentations high on a cliff side or use the old nest of another bird. If an American peregrine falcon nest is detected during focused surveys, the project proponent will establish a no disturbance buffer zone around a peregrine occupied site. The buffer zone shall be a minimum of 10 acres in size. During the critical period for peregrine (February 1 through April 1 for active nests and is extended until July 15 for occupied nests) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

Maintenance of Habitat Function

Because the project area is outside the coastal zone, treatments will not impact shorebird populations or shorebird habitat—an important prey of the peregrine falcon. Thinning and burning treatments will maintain and improve potential inland hunting habitat for this species by removing encroaching Douglas fir from meadow edges and open grasslands. Treatments are focused on removing small (<16" DBH) conifers. Thinning smaller trees has been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees and promoting late successional forest characteristics will increase the number of viable peregrine falcon nesting trees.

Bald Eagle

Bald eagles' preferred habitat includes ocean shore, lake margins, and rivers for both nesting and wintering. Most nests are within one mile of water. This species nests in large, old-growth, or dominant trees with open branches. There are 4 CNDDB occurrences for bald eagles within a 9-quad search of the project area. All 4 observations are located immediately adjacent to the South Fork Trinity River. There is potential nesting and foraging habitat adjacent to fish-bearing rivers & creeks, though this species is not expected to occur where Class 1 watercourses are absent from the treatment area.

Measures to Avoid and Reduce Impacts

Focused surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day, as bald eagles are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for occupied sites and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to areas within 1 mile of water that have large, old-growth, or dominant live trees with open branches. Bald eagle nests are typically 5 to 6 feet in diameter and 2 to 4 feet tall, and ranging in shape from cylindrical to conical to flat, depending on the supporting tree. If a bald eagle nest is detected during focused surveys, the project proponent will establish a buffer zone that is at least 10 acres in size. Occupied nests will receive a 660 foot No Disturbance Buffer. During the critical period for bald eagles (January 15 until either August 15 or four weeks after young have fledged) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

Maintenance of Habitat Function

The bald eagle is an opportunistic, generalized predator and scavenger adapted to aquatic habitats (Buehler 2000). Breeding bald eagles require relatively large bodies of water containing resident populations of suitable-sized fish, generally larger than 200 mm total length (Jackman, et al. 1999). The majority of bald eagles in California breed near reservoirs (Detrich 1986). Waterfowl can supplement the diet of bald eagles, especially in the winter and early nesting season (Jackman and Jenkins, 2004). In general, bald eagles require a large tree (or cliff or rock outcrop) to accommodate a large nest in a relatively secluded location. The species typically chooses a tree in the overstory, often the largest in the stand. In a study of 95 bald eagle nesting sites in California, most nest trees (81%) were over 100 feet tall and nest trees had a mean DBH of 43 inches (Jackman and Jenkins, 2004). Most nests (87%) were located within one mile of a waterfront (Jackman and Jenkins, 2004). One third was within 0.1 mi of water, and none was greater than two miles from water (Jackman and Jenkins, 2004). Notably, total canopy closure of the adjacent forest stand, as estimated from aerial photography, was below forty percent for most (75%) sites, indicating that "dense forest is not a prime requirement for nesting bald eagles in California" (Lehman, 1979). Due to these habitat preferences, maintenance of habitat function for eagles would require the retention and promotion of large trees near ocean shores, lakes, reservoirs, or rivers. Habitat function for bald eagles would be maintained and improved throughout the duration of the project. The project area does overlap with Ewing Reservoir, Hayfork Creek, and numerous tributaries. Implementation of SPR HYD-4 will protect watercourses and ensure that the bald eagle's prey base is protected. Treatment activities would focus on mainly removing ladder fuels less than 16 inches DBH. Trees greater than 16 inches DBH are the most likely features to be used by bald eagles as a high hunting perch or as a nest site. Thinning smaller trees has also been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees across the project area will increase the number of viable nesting trees.

<u>Listed Salmonids</u>

Listed salmonids that could potentially occur in the project area include the summer-run steelhead (Northern California DPS), chinook salmon (upper Klamath and Trinity Rivers ESU), and winter-run steelhead (Northern California DPS). All three species were detected during a 9-quad search on CNDDB of the project area. Salmonids require cool, clean water, and beds of loose, silt-free, coarse gravel for spawning. The species also needs adequate cover and sufficient dissolved oxygen. Habitat exists for all three species in Hayfork Creek and its fish-bearing tributaries that intersect the project area.

Measures to Avoid and Reduce Impacts

No surveys or additional protection measures are warranted. Habitat for listed salmonids will be protected by SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones and SPR-BIO-4 Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. The project proponent will establish Watercourse and Lake Protection Zones on either side of watercourses as defined by SPR HYD-4.

Maintenance of Habitat Function
Habitat function for listed salmonids will be maintained because treatments would not occur within the stream bed or bank and treatments within WLPZs would be limited pursuant to *SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones* and *SPR BIO-4: Design treatment to Avoid Loss or Degradation of Riparian Habitat Function.* Fuel treatments will aid in reducing habitat loss by avoiding high- severity megafires.

Western Bumble Bee
The western bumble bee (*Bombus occidentalis occidentalis*) was designated a candidate for listing as endangered under the California Endangered Species Act by the California Fish and Game Commission on September 30, 2022. Bumble bees, including the western bumble bee, require habitats rich with floral resources. Since bumble bee colonies obtain all of their nutrition from pollen and nectar, they need a continuous supply of flowers during the entirety of the colony's life (spring through fall). Suitable habitat is characterized by open meadows with continuous availability of floral resources and nesting/overwintering sites in abandoned rodent burrows. As generalist foragers, bumble bees do not depend on any one flower type, but perennial flowering plants and native bunch grasses provide higher quality habitat than annual plants. The annual cycle for this species includes an overwintering and nesting/flight period. In California, the nesting/flight period (the time when bumble bees actively forage) for the western bumble bee is from February to late November. Western bumble bees mainly nest underground in abandoned rodent nests just below the surface. Therefore, viable nesting sites depend on the habitat's rodent abundance (Xerces Society Listing Petition, 2018). Solitary queens may overwinter under leaf litter or in small cavities a few centimeters into loose soil.

The project area is within the historic range of the western bumble bee. There are no recorded CNDDB observations for the western bumble bee in a 9-quad search of the project area. There are no recorded CNDDB observations within the project area. The western bumble bee has the potential to occur within portions of the project area that are dominated by large grasslands and meadows with an abundance of flowering resources. These habitats exist in the lower elevations in and around the community of Hayfork. However, some of these areas are dominated by non-native grass species – likely the result of fire suppression and intensive grazing over the last 100 years – that have replaced many of the native flowering forbs that would have provided the forage necessary to support these bumble bee species. These non-native annuals do not currently provide continuous floral resources, but suitable habitat is potentially restorable. The project area may also contain suitable overwintering habitat (overwintering habitat for the western bumble bee is poorly understood, as discussed in more detail below).

Treatment activities within suitable habitat, including manual treatments, mechanical treatments, and prescribed burning could result in temporary removal of floral resources, as well as injury and mortality through inadvertent destruction of bumble bee nests or overwintering sites through trampling (if present), crushing, or removal of nesting or overwintering substrate (e.g., downed woody debris). The potential for treatment activities to result in adverse effects on special-status bumble bees was examined in the Program EIR. In the Program EIR, Mitigation Measure BIO-2g was proposed as a feasible set of actions to reduce potentially significant impacts on special-status bumble bees by requiring avoidance of prescribed burning and targeted ground application of herbicide treatment during the flight/nesting season and retention of suitable habitat in the range of these species, or compensation for unavoidable loss of special-status bumble bees or habitat function. Recognizing the difficulty in detecting overwintering and

nesting bumble bees and determining the occurrence and severity of impacts, very limited information about nesting and overwintering behaviors, and the statewide scope of potential effects analyzed, for purposes of good faith and full disclosure under CEQA, this impact was designated in the Program EIR as potentially significant and unavoidable. However, addressing this potential effect at a project-specific level may result in a different significance conclusion if evidence supports it.

Per SPR BIO-1, if it is determined that adverse effects on western bumble bees can be clearly avoided by conducting treatments outside of a season of sensitivity (e.g., colony flight season; April through September) or physically avoiding habitat for these species, then mitigation would not be required. However, because western bumble bees may use habitat in the project area year-round, surveys would be required before treatment activities. Areas identified during surveys with the highest density of foraging bees shall be set aside as refugia to avoid significant impacts and maintain and improve habitat function. The Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023b) does not provide survey methods for determining the presence of overwintering bumble bees because overwintering habitat is not well understood (CDFW 2023b). If no suitable habitat for western bumble bees is found during pretreatment surveys, no further measures would be required. However, if suitable habitat for western bumble bees and/or bumble bees are detected during the focused survey, or presence within suitable habitat is assumed, Mitigation Measure BIO-2g as described below would apply. Additionally, impacts to habitat for western bumble bee would be avoided or minimized through implementation of Mitigation Measure BIO-3a.

Pursuant to Mitigation Measure BIO-2g, and because this species is a candidate for listing under CESA and is likely to be present year-round in the treatment area (i.e., habitat cannot be avoided), the project proponent consulted with CDFW about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained. Habitat function for western bumble bee would be maintained because treatment activities and maintenance treatments would be implemented in a patchy pattern in occupied or suitable habitat, such that the entirety of the habitat would not be burned or removed and untreated portions of occupied or suitable habitat would be retained so floral resources are available during project implementation. In addition, no herbicides will be used on this project and the project proponent will monitor post-burn areas and identify burn areas that are in need of supplemental native seed. These areas will be seeded, as needed, with a native grass and forb seed mix in the fall or spring following grassland burning when adequate soil moisture is available for germination. Further, SPR BIO-9 would be implemented, which would prevent the spread of invasive plants and noxious weeds through application of best management practices before, during, and after treatments. For the reasons summarized in the above discussion, habitat function for western bumble bee would be maintained after implementation of treatments.

For CESA compliance purposes, the mitigation actions for the species are appropriate measures to maintain suitable refuge and habitat function of floral resources for western bumble bee. Refinements to measures in the MMRP include requiring the project proponent to identify areas with the highest density of foraging bees and set aside these areas as refugia to avoid significant impacts and maintain and improve habitat function. In addition, no herbicides will be used on the project, 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; and 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. For these reasons, the project is not expected to restrict the range of the western bumble bee. Therefore, the impact to western bumble bee habitat would be less than significant with mitigation.

There is limited published information on the abundance of western bumble bee in California or on colony size of the species (Xerces Society 2018) and a current lack of published information on the potential magnitude of effects from the loss of individual western bumble bees, the loss of overwintering queens or the loss of nests, on populations of the species. Since the Program EIR was certified, CDFW released new survey guidance in June 2023, which highlights that overwintering habitat for the majority of bumble bee species in North America is poorly understood (CDFW 2023b). Due to this lack of understanding, CDFW is not recommending surveys for the overwintering period (CDFW 2023b). Therefore, assessing the impact on the species under CEQA due to the potential loss of individuals and populations (including overwintering queens and nesting bees) from this project would be too speculative to evaluate, because, for the reasons listed above, the analysis herein would need to speculate potential for presence, possibility of impacts, and severity of possible population effects, if impacts were assumed to occur. Information about this species is evolving and the project will implement the best available measures to protect the species that are currently available; however, the current state of knowledge is not sufficient to evaluate the significance of the CEQA impact. Therefore, further analysis of this issue is not included in accordance with CEQA Guidelines Section 15145. CEQA Guidelines indicate that after thorough investigation, if an impact is too speculative for meaningful evaluation, this finding should be noted, and further discussion can be concluded (CEQA Guidelines Section 15145).

Maintenance and Improvement of Habitat Function for Western Bumble Bee

The habitat function for these species would be enhanced and maintained because treatment activities will create a more open understory in the forested area, making it more suitable for recruitment of flowering plants. The proposed non-commercial fuels reduction and the reintroduction of a natural fire regime is expected to result in a net benefit to vulnerable populations of bumble bees. Prescribed burns have been shown to reduce negative impacts from exotic plant species and increase native plant establishment and performance (Alba et al., 2015). Research results support the use of low-intensity prescribed fire for enriching floral resources for bumble bees and suggest that prescribed fire has net neutral or positive short- term effect on bumble bees (Gelles et al. 2023, Tai et al. 2022). Research has shown that when exotic plants invade native communities, plant species diversity can decline due to intense competition for the available pollinators, which might lead to concomitant decreases in the abundance and diversity of native pollinators (Mciver et al., 2009). Medusahead and yellow starthistle occur across the project area and can create a monoculture that alters the functioning of the ecosystem. The loss of native forbs and rapid spread of medusahead can impact native pollinators such as bees. Early summer burns will focus on targeting these invasive species and improving habitat for the native floral resources that western bumble bees rely on. Without treatment, conifer encroachment of oak woodlands and annual grasslands will continue unchecked. Continued fire suppression would not only result in habitat degradation, but also render the habitat susceptible to catastrophic, large scale, and high intensity fires due to increases in fuel loads, invasive highly flammable species such as medusahead, tree density, and fire intolerant species (Huntzinger, 2003). Catastrophic, large scale, and high intensity fires may be particularly harmful to already vulnerable populations of bumble bees (Xerces Society Listing Petition, 2018).

Measures to Avoid and Reduce Impacts - Western Bumble Bee

To improve the habitat for western bumble bees or other vulnerable bumble bees that may occupy the project area, the project proponent has rewritten Mitigation Measure BIO-2g as follows:

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:

1. Areas identified during surveys with the highest density of foraging bees shall be set aside as refugia to avoid significant impacts and maintain and improve habitat function.
2. No herbicides will be used on the project.

3. 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.
4. 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).
5. The project proponent will monitor post-burn areas and identify burn areas that are in need of supplemental native seed. These areas will be seeded, as needed, with a native grass and forb seed mix in the fall or spring following grassland burning when adequate soil moisture is available for germination. Seeding specifications can be found in Tables 1 and 2.

Prescribed Fire (Broadcast Burn)

Broadcast burn treatments will generally occur in fall and winter as weather conditions allow. Invasive medusahead grass and yellow starthistle areas will require early summer burning. Broadcast burn areas will be monitored and if seeding is determined to be needed by the project proponent, broadcast burn areas will be seeded with a native seed mix detailed in Table 2 (grassland broadcast burn). Seeding should take place in the fall or spring following broadcast burning.

Table 2. Post grassland broadcast burn native seed mix and application rates.

TREATMENT	SPECIFICATIONS	APPLICATION RATE
Native Grass Seed Mix	Install seed on bare soils using the following ratios: Elymus glaucus (30%), Festuca californica (20%) Bromus sitchensis (10%), Carex multicaulis (10%), Deschampsia cespetosa (10%) Festuca idahoensis (10%) Danthonia california (10%), or similar mix, as supply allows. Broadcast by hand or ATV spreader, rake or harrow in.	30 lbs./acre
Native Forb Seed Mix	Install seed on bare soils using the following ratios: Achillea millefolium (5%), Acmispon americanus var. americanus (5%), Clarkia gracilis ssp. Gracilis (10%), Escholzia caespitosa (20%), Lupinus bicolor (20%), Ranunculus occidentalis (10%) Sysyrinchium bellum (10%), Trifolium willdenovii (20%); or similar mix, as supply allows. Broadcast by hand or ATV spreader, rake or harrow in.	15 lbs./acre

Northern Spotted Owl

Northern Spotted Owls have been found in a wide variety of forest types, and generally use older structurally complex forest types for nesting, roosting and foraging activities. Throughout their range and across all seasons,

spotted owls consistently concentrated their foraging and roosting in old-growth or mixed-age stands of mature and old-growth trees. Exceptions were found, but even they tend to support the usual observations that spotted owls nest in stands with structures characteristic of older forests. Structural components that distinguish superior spotted owl habitat include: a multilayered, multispecies canopy dominated by large (>30 inches dbh) conifer overstory trees, and an understory of shade-tolerant conifers or hardwoods; a moderate to high (60-80 percent) canopy closure; substantial decadence in the form of large, live coniferous trees with deformities such as cavities, broken tops, and dwarf mistletoe infections; numerous large snags; ground cover characterized by large accumulations of logs and other woody debris; and a canopy that is open enough to allow owls to fly within and beneath it. Foraging habitat may contain the typical older forest components of nesting and roosting habitat, but may also include younger forests and hardwood stands, as well as more open areas. Overall, foraging habitat consists of areas where prey species occur and are available for capture by owls. Northern spotted owls often forage near transitions between early- and late-seral stage forest stands in northern California, likely where prey species are more abundant or more readily available. There are no recorded activity centers (ACs) in the CNDDB Spotted Owl Database in the project area and twelve (12) ACs within the 1.3-mile NSO Assessment Area.

Measures to Avoid and Reduce Impacts

As described for SPR BIO-10 below, the project proponent is proposing a modified survey consisting of a single year of 6 visits of suitable NSO habitat within the proposed project area/s and out to 0.25 miles. If surveys determine that a site is occupied by NSO, a 1000-foot seasonal restriction on treatments (except for road use after July 9th) will apply to every NSO activity center during the breeding season (February 1 through August 31), unless it is determined via a site monitoring visit "activity center search" (Revised 2011 NSO Survey Protocol), that NSO are not nesting, or nesting failure has occurred. If it cannot be determined whether NSO are nesting, or nesting failure cannot be determined, the 1000-foot seasonal restriction will stay in effect for treatments until after August 31st. For additional protection measures, refer to USFWS 2019 Northern Spotted Owl Take Avoidance Analysis and Guidance for Private Lands in California – Attachment B: Take Avoidance Analysis - Interior.

Treatments will follow the habitat protection requirements as also stated in the USFWS 2019 NSO Take Avoidance Analysis - Attachment B. Interior Habitat Definitions are as follows:

1. Nesting/roosting

i. <u>High quality nesting/roosting habitat</u>
   a. Basal area = 210+ ft^2, and
   b. 15" quadratic mean diameter (QMD). And
   c. >8 trees/acre (TPA) of trees > 26" in diameter at breast height (DBH), and
   d. > 60% canopy closure
   e. Fairly open understory through which owls can fly in a multi-layered, multi-species forest structure

ii. <u>Nesting/roosting habitat</u>
   a. A mix of basal areas ranging from 150-180+ ft^2, and
   b. 15" QMD, and
   c. > 8 TPA of trees > 26" DBH, and
   d. >60% canopy closure
   e. Fairly open understory through which owls can fly in a multi-layered, multi-species forest structure

2. Foraging

i. <u>Foraging habitat</u> (owls can forage in high quality nesting and nesting/roosting described above. Foraging habitat just lacks the mature forest conditions (nest sites) found in these higher quality types)
   a. A mix of basal areas ranging from 120-180+ ft^2, and
   b. > 13" QMD, and

c. ≥5 TPA of trees > 26" DBH, and
d. A mix of 40% - 100% canopy closure
e. Foraging habitat must generally have some higher quality habitat nearby (within 0.5 miles)

ii. Low quality foraging habitat

a. A mix of basal areas ranging from 80-120+ ft^2, and
b. 11" QMD, and
c. 40% canopy closure

Potential spotted owl nest trees e.g., large trees with blown out tops or cavities, will not be targeted by treatments. If present, these trees will be identified and protected pursuant to Mitigation Measure BIO-2a (Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species), which requires that these habitat features are marked and that treatments are designed to minimize or avoid their loss or degradation during treatments.

Prescribed Fire

For smoke-producing activities within 0.25 miles of active nests and unsurveyed NRF habitat, employ firing techniques that provide good smoke dispersion and ventilation aloft and/or away from active nests and unsurveyed NRF habitat.

i) If effects of smoke cannot be avoided or minimized to a discountable level, a February 1st through July 9th Seasonal Restriction (SR) will apply, and prescribed burning will be conducted outside the seasonal restriction period for the NSO.
ii) Four areas within the Hayfork VTP Project area have been identified as having continuity of NRF habitat that may support nesting pairs and young. Within these areas, adhering to the February 1 through July 9 limited operating period and not conducting prescribed fire activities during this time will be required. Unless stand searches or surveys conducted per the 2012 NSO survey protocol (or other agreed-to methods with the Service and CDFW) demonstrate owls are not nesting, the seasonal restriction in these areas may be lifted. Areas are identified in Appendix B.

Maintenance of Habitat Function

Habitat function for northern spotted owl will be maintained through the retention of forest structural attributes (e.g., high canopy cover, understory structure, high average tree DBH, downed woody debris) required for spotted owl foraging, nesting, and roosting activities. The proposed treatments – reducing ladder fuels and applying low-intensity prescribed fire- are designed to result in conditions that northern spotted owl evolved with before fire suppression and logging – dynamic ecological processes, complex, mature forests, and ecotone foraging habitats. Large scale, high severity fire is a major threat to northern spotted owls (Wan et al. 2018). Low-intensity prescribed fire treatments are intended to restore natural fire regimes and reduce the probability of uncharacteristically severe fire effects.

Trinity Bristle Snail

The Trinity bristle snail is a rare terrestrial gastropod endemic to northern California. Populations of Trinity bristle snails are thought to be relics of the late Pleistocene epoch when the local climate was much cooler and more mesic than current conditions (Sullivan, 2022a). Populations of this species occur in isolated and fragmented locations along both sides of the western most segment of the Trinity River, New River, South Fork of the Trinity River, Hayfork Creek, and along the east slope of South Fork Mountain along the Trinity Humboldt County divide. Characteristic habitat consists of cool, wet and shady riparian zones frequently associated with older growing late successional forest containing both conifer and hardwood elements (Sullivan, 2008). The snails have been found in predominantly two general "microhabitat" types: 1) moist but generally well-drained, somewhat stable, leaf mold-covered talus slopes in

mixed-deciduous-coniferous forest; and 2) stabilized, forested, riparian benches generally consisting of talus accumulations behind berms of bedrock and having at least a four-inch-thick accumulation of leaf mold resting on the talus. The snails are confined to habitats where there is shade, fairly low temp, and fairly high humidity. Depending on weather conditions, the snail is most active in May and October and is most likely to be seen between dusk and dawn, when the air tends to be more humid (Sullivan, 2008). During these relatively warm wet periods, this species can be found foraging among the duff, or even climbing to feed upon lichens growing on trees and stalks of other green plants. In summer months, the snails retreat into deep and moist underground/vegetation chambers and retract into their shells to avoid desiccation (Sullivan, 2008). This species falls within the terrestrial land snail habitat/habitat class (a) of Cain (1977): "Nocturnal and buried during the day or in very shaded habitats". Excavations of rocky habitat within mesic forest conditions found estivating snails and accumulations of empty shells as deep as 1-meter underground (Sullivan, 2022b). *M. setosa* has been described as having a subsurface rock-dwelling life history (Sullivan, 2022b). There are 36 CNDDB occurrences for Trinity bristle snails within a 9-quad search of the project area. All of these occurrences are located North and West of the project area.

Measures to Avoid and Reduce Impacts

The project proponent will use the Robert Sullivan's 2022 macrohabitat model to determine areas of critical, high, medium-high, medium, low-medium, and low suitable habitat in conjunction with verifying habitat suitability with a qualified biologist in coordination with CDFW. The critical and high suitable habitat determined by Robert Sullivan's 2022 macrohabitat suitability model will continue to fall under MM BIO-2f with no treatment unless an Incidental Take Permit is acquired. Areas of low, low medium, medium and medium-high habitat may be treated with the proposed alterations of manual treatment and low intensity prescribed burns in a patchy pattern, avoiding rocky outcroppings to reduce impacts of mortality and injury and maintain habitat function. The habitat for Trinity bristle snails will also be protected by SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones and SPR-BIO-4 Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. The project proponent will establish Watercourse and Lake Protection Zones on either side of watercourses. SPR HYD-4 and SPR BIO-4 will apply to all treatments.

Maintenance of Habitat Function

Habitat function for Trinity bristle snails would be maintained and improved throughout the duration of the project. The potential for high-severity forest fire has been identified as one of the primary risk factors for conservation of endemic species of terrestrial gastropods (Sullivan, 2022b). Numerous studies have documented that fire exerts a major impact on terrestrial snail communities by strongly reducing plant diversity and species richness (Sullivan, 2022b). This is because wildfire-caused removal of vegetative cover and opening up the vegetation matrix fundamentally changes light and humidity levels, which are major threats to the survival of land snail populations (Sullivan, 2022b). Proposed treatments are focused on reducing the risk of high-severity wildfire through thinning of horizontally and vertically continuous ladder fuels. Sullivan's 2022 study also found that sites where Trinity bristle snails were sampled were strongly affiliated with mixed conifer stands containing medium to large sized trees, which provided abundant overstory cover shade (Sullivan, 2022a). Proposed treatment activities would focus on mainly removing ladder fuels less than 16 inches DBH. Thinning smaller trees has been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees across the project area will improve productive snail habitat.

Vernal pool fairy shrimp

The vernal pool fairy shrimp were historically found in California and Oregon. Their current habitat is from Redding to San Diego and from the Klamath Mountains north into Oregon. The shrimp inhabit small, clear- water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools. Potential habitat is present in the

project area in the form of vernal pools in the grasslands around Hayfork and occurrences of shrimp were generated during the IPac query of the project area.

Measures to Avoid and Reduce Impacts
No surveys or additional protection measures are warranted. Habitat for vernal pool fairy shrimp will be protected by SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones and SPR-BIO-4 Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. The project proponent will establish Watercourse and Lake Protection Zones on either side of watercourses. SPR HYD-4 and SPR BIO-4 will apply to all treatments.

Maintenance of Habitat Function
Habitat function for vernal pool fairy shrimp will be maintained because treatments within WLPZs would be limited pursuant to SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones and SPR BIO-4: Design treatment to Avoid Loss or Degradation of Riparian Habitat Function. Fuel treatments will aid in reducing habitat loss by avoiding high-severity megafires.

Vernal pool tadpole shrimp
The vernal pool tadpole shrimp has a patchy distribution in the California Central Valley from Visalia north to the Oregon border. The western edge of its range overlaps the project area. These shrimps are found only in ephemeral freshwater habitats, including alkaline pools, clay flats, vernal lakes, vernal swales, and other seasonal wetlands in California. Potential habitat is present in the project area in the form of freshwater habitats and occurrences of shrimp were generated during the IPac query of the project area.

Measures to Avoid and Reduce Impacts
No surveys or additional protection measures are warranted. Habitat for vernal pool tadpole shrimp will be protected by SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones and SPR-BIO-4 Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. The project proponent will establish Watercourse and Lake Protection Zones on either side of watercourses. SPR HYD-4 and SPR BIO-4 will apply to all treatments.

Maintenance of Habitat Function
Habitat function for vernal pool tadpole shrimp will be maintained because treatments within WLPZs would be limited pursuant to SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones and SPR BIO- 4: Design treatment to Avoid Loss or Degradation of Riparian Habitat Function. Fuel treatments will aid in reducing habitat loss by avoiding high-severity megafires.

Conservancy fairy shrimp
The Conservancy fairy shrimp's known range is the Central Valley from Tehama County to Merced County. Occurrences of shrimp were generated during the IPac query outside of the project area. No surveys are warranted as the project area is outside of its current range and it is not expected to occur.

Gray wolf
Gray wolves began natural recolonization of California beginning in 2011; the first pack was the Shasta Pack in 2015 (no longer active). Today there are seven confirmed packs in northern California: Beckwourth pack (Plumas and Sierra counties), Beyem Seyo pack (Plumas County), Harvey pack (Lassen County), Lassen Pack (southern Lassen/northern Plumas counties), Whaleback Pack (Siskiyou County), Yowlumni pack (Tulare County), and an unnamed pack in Sierra and Nevada counties. The wolf was generated in an IPac query of the project area. No surveys are warranted as the project area is outside of its current range and it is not expected to occur.

Wolverine

In 2023, CDFW confirmed three sightings of a wolverine in the Eastern Sierra Nevada mountains–all were believed to be of the same wolverine. Prior to 2023, scientists had documented a single wolverine in California from 2008 to 2018. That wolverine was first discovered in February 2008 in the Truckee region of the Tahoe National Forest. Before the 2000s, the last confirmed wolverine sightings in California were in the 1970s. In north coastal areas, wolverines have been observed in Douglas-fir and mixed conifer habitats, and probably use red fir, lodgepole, wet meadow, and montane riparian habitats. Most sightings in this region range from 1600-4800 ft. In the northern Sierra Nevada, wolverines have been found in mixed conifer, red fir, and lodgepole habitats, and probably use subalpine conifer, alpine dwarf-shrub, wet meadow, and montane riparian habitats. Elevations in the northern Sierra Nevada mostly fall in the range of 4300-7300 ft. Habitats used in the southern Sierra Nevada include red fir, mixed conifer, lodgepole, subalpine conifer, alpine dwarf- shrub, barren, and probably wet meadows, montane chaparral, and Jeffrey pine. Elevations in the southern Sierra Nevada mostly are from 2,400-10,800 ft. Wolverines forage in open to sparse tree habitats on ground, in trees, burrows, among rocks, in or under snow, and sometimes in shallow water. Wolverines use caves, logs, and burrows for cover and den area and tend to hunt in more open areas. They prefer areas with low human disturbance. There are two (2) occurrence for this species recorded from a CNDDB 9-quad search of the project area.

No surveys are warranted for wolverines as they are believed to be currently extirpated from west of Highway 5. The project area is outside of its current range and wolverines are not expected to occur. In addition, the project area lacks the required persistent spring snowpack to support denning behavior and reproductive success for North American wolverine (*Gulo gulo luscus*). While individuals may disperse or travel through or close to the project area, the moderate level of human disturbance and development in and around the Hayfork valley make this unlikely. Critical habitat is not designated for any listed species, nor is it proposed in the project area, and it will not be affected.

Northwestern pond turtle

Northwestern pond turtles (*Actinemys marmorata*) are semi-aquatic, having both terrestrial and aquatic life history phases. Northwestern pond turtles have been found at sites from brackish estuarine waters at sea level up to 6,719′ in elevation but mostly occur below 4,980′ (USFWS, 2023). Eggs are laid underground in upland terrestrial habitat, and hatchlings, juveniles, and adults use both terrestrial and aquatic habitat. The amount of time spent on land varies by location and aquatic habitat type. Terrestrial environments are required for nesting, overwintering and aestivation, basking, and movement/dispersal. Aquatic environments are required for breeding, feeding, overwintering, sheltering, basking, and movement/dispersal. In northern California, turtle mating has been observed in the spring—with oviposition usually occurring from May 15 through July 31 (Davidson and Alvelez, 2020; USFWS, 2023). Incubation time is approximately 80 to 126 days (USFWS, 2023). Hatchlings will overwinter in the nest and may emerge from the terrestrial nest chamber to move to aquatic habitat in the spring. Variable amounts of time may be spent overwintering and/or aestivating. Generally, overwintering is a state of little to no activity (e.g., brumation) that occurs during the cooler months of the year (October 1–April 30 in northern California for elevations <3,500 ft) and can occur in either upland or aquatic environment (Reese and Welsh 1997). Aestivation is a period of inactivity, usually in response to the hottest time of year or dry conditions in terrestrial habitat.

As habitat generalists, northwestern pond turtles occur in a broad range of permanent and ephemeral aquatic water bodies from remote to urban landscapes, including flowing rivers and streams, lakes, ponds, reservoirs, settling ponds, marshes, vernal pools irrigation ditches, and other wetlands, including some with estuaries with tidal influence (USFWS, 2023). Preferred aquatic conditions are those with abundant basking sites, deep pools, underwater shelter

sites (undercut banks, submerged vegetation, mud, rocks, and logs), and standing or slow-moving water (USFWS, 2023). Emergent basking usually takes place on logs, rocks, emergent vegetation, shorelines, and essentially any other substrate located within and adjacent to aquatic habitat. The location of basking sites above or adjacent to aquatic features allows for quick retreat into the water if there is perceived danger. Preferred upland habitat is in close proximity to aquatic habitat, typically within 500 meters of water. Suitable upland habitat will have a mosaic of vegetation composition including shaded and non-shaded areas, moist forest/shrubs, leaf litter, and duff for aestivating and overwintering adults. Suitable upland nesting habitat contains a mixture of sparse vegetation with short grasses and forbs and little or no canopy cover to allow for nest exposure to direct sunlight. Eggs are laid in excavated nests beneath leaves or soil 3 to 500 meters from water, with an average linear distance of 50 meters (USFWS, 2023). Nests are shallow and generally between 9 to 12 cm below the surface (Holland, 1994). After the nest is excavated and eggs deposited, females pack the chamber using surrounding material such as mud, dry soil, and vegetation to form a plug that closes off the neck of the nest chamber (Holland, 1994). There are eleven (11) CNDDB occurrences for this species with a 9-quad query of the project area. This includes a 1988 record of thirty-six (36) northwestern pond turtles captured and released in a section of Hayfork Creek that overlaps the project area. Preferred aquatic habitat for this species in this area can be found in the larger watercourses (lotic habitat i.e. Hayfork Creek) and standing water/ponds (lentic habitat).

Measures to Avoid and Reduce Impacts

Pursuant to SPR HYD-4, a Watercourse and Lake Protection Zone (WLPZ) of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) streams. However, these measures may not avoid impacts on northwestern pond turtles if turtles are present further than 150 feet from stream or lake habitat, are present within ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), or if manual activities or prescribed burning implemented within the WLPZ result in injury or mortality of turtles. The potential for treatment activities and maintenance treatments to result in adverse effects on northwestern pond turtle was examined in the CalVTP Program Environmental Impact Report.

Per SPR BIO-1, if it is determined that adverse effects on northwestern pond turtles can be clearly avoided by physically avoiding their habitat, then no mitigation would be required. However, because northwestern pond turtles may be present relatively large distances (i.e., up to approximately 500 meters) from aquatic habitat in the treatment area, it is unlikely that all habitat can be avoided. For all aquatic habitat that is determined by the qualified RPF or biologist to be suitable for northwestern pond turtles, a 500-meter no-disturbance buffer around the suitable aquatic habitat will be implemented during the nesting season from May 15th – July 31st. If implementing the 500-meter buffer is not feasible, the project proponent will maintain a buffer of at least 105 meters from suitable aquatic habitat during the nesting season. For all pile burning within at least a 105-meter buffer from suitable aquatic habitat, burn piles will be ignited from the side to improve the likelihood of escape for pond turtles within the piles. For all broadcast burning within at least a 105-meter buffer from suitable aquatic habitat, the project proponent will leave unburned units interspersed within the larger burn area to provide a refuge for northwestern pond turtles.
For treatments outside of the nesting season of May 15th – July 31st, focused visual encounter surveys will occur up to three weeks before treatment utilizing the USGS Western Pond Turtle Visual Survey Protocol provided on CFDW's Survey Protocols page for treatments that overlap with suitable aquatic habitat. If pond turtles are identified during focused surveys, Mitigation Measure BIO-2b would be implemented.

Maintenance of Habitat Function

Habitat function for northwestern pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4 treatments within stream WLPZs

adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Upland habitat types including overwintering and aestivation habitats will also be maintained and improved as hazardous fuel reduction and forest health treatments are also expected to benefit northwestern pond turtles in the long term. A study in Puget Sound, Washington showed that fire suppression activities and a lack of active vegetation management contributed to an increased distribution of coniferous trees with less than 10 percent of the historical grassland habitat remaining (Lang, 1961; Crawford and Hall, 1998). The increased shade cover that resulted in the reduction of available nesting habitat may have contributed to the decline of northwestern pond turtles in Washington (Hays et al., 1999). Lower intensity fire (such as prescribed fire) combined with small diameter vegetation thinning most likely benefits northwestern pond turtles by maintaining nesting habitat by decreasing canopy cover and increasing habitat heterogeneity (Hays et al., 1999). Severe wildfire on the other hand, has the potential to affect northwestern pond turtles through direct mortality, injury, and/or loss and degradation of aquatic and upland habitat. Northwestern pond turtles that do survive fire may be challenged to find suitable aquatic and/or upland habitat, which could contribute to reduced survival, reproduction/recruitment, and abundance.

Humboldt marten

Humboldt marten habitat includes North coast coniferous forest, old growth, and redwood. They are associated with late-successional coniferous forests and prefer forests with low, overhead cover. Humboldt marten occur only in the coastal redwood zone from the Oregon border south to Sonoma County. Two occurrences of this species were generated from a CNDDB 9-quad search of the project area. Both occurrences are from 1971 observations to the northeast in the Shasta-Trinity National Forest. No surveys are warranted as marten are believed to be extirpated from the proposed project area. If the CalVTP is to be used ten years or more after its signature date the project proponent will check the range of the Humboldt marten and consult with CDFW for any updates or changes needed in the project.

American goshawk

Goshawks can be found within, and in vicinity of, north coast coniferous forests, subalpine coniferous forests, and upper montane coniferous forests. Goshawks hunt in wooded areas, using snags and dead-topped trees for observation and prey-plucking perches. They feed mostly on birds, from robin to grouse in size as well as small mammals, of squirrel and rabbit size. Goshawks catch their prey in the air, on ground, or in vegetation, using fast, searching flight, or a rapid dash from a perch. Within their breeding home ranges, they tend to select mature to old-growth forest stands, or forested areas that have large diameter trees and dense canopy (Greenwald et al., 2005). American goshawks nest in areas with larger diameter trees, higher canopy closure, with an open understory (Squires and Ruggiero 1996, Squires and Reynolds 1997). There are no CNDDB occurrences for goshawk within a 9-quad search of the project area.

Focused surveys will occur up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting goshawks, typically one day for most proposed treatment activities. The survey will be conducted during the day, as goshawk are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to large, mature coniferous trees, as these are the preferred nesting sites for goshawks. Nests are constructed often just below the forest canopy, with nest heights varying with tree species and regional tree-height characteristics. If an active nest is found, a buffer zone of at least 5 acres in size around the nest tree shall be established. All nest trees containing active nests, and all designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the American goshawk is March 15 - August 15. For prescribed burning the project proponent WILL implement a 5-acre buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for American goshawk is reasonably expected to improve with implementation of the treatment.

Treatments will improve habitat for American goshawks as treatments are designed to reduce ladder fuels and promote the retention and recruitment of large trees, which are important for goshawk nesting habitat. The proposed treatment activities will focus on thinning trees less than 16" DBH, which has been shown in studies to promote residual tree growth (Zald et al, 2022). In addition, while high intensity wildfire appears to have a negative influence, lower intensity burning could be beneficial to goshawks by reducing colonization of understory by shade tolerant trees, and maintaining the open understory conditions that American goshawks prefer (Squires and Kennedy, 2006).

Pallid bat

The pallid bat is a locally common species of low elevations in California. A wide variety of habitats is occupied, including grasslands, shrublands, woodlands, and forests from sea level up through mixed conifer forests. The species is most common in open, dry habitats with rocky areas for roosting. Pallid bats may also roost in caves, mines, bridges, barns, and porches. These bats are susceptible to disturbances that cause them to abandon their roosting sites. The pallid bat was detected during the ACE list query but there are no known observations for pallid bats within the project area. There is potential habitat for this species in the general area in the form of human structures, shrubs, and woodlands present within the project area. Bats are highly mobile and very capable of moving away from a source of disturbance when they are roosting individually, as opposed to during the maternity season or during hibernation. Per CNDDB records there are two known caves adjacent to the project area.

For treatments that will occur during the bat maternity season (April 1– August 31), focused surveys for special-status bat maternity roost activity will be conducted within known caves. If surveys result in signs of active maternity roosts (e.g. guano accumulation), sites will receive a 100' buffer. No fuels reduction treatments will occur within this buffer during the bat maternity season. In addition, all trees >36" DBH with basal hollows will be flagged and protected during all treatments, regardless of bat occupancy.

For prescribed burning, the project proponent is proposing to not limit treatments to exclusively outside the sensitive period of the species' life history, which occurs April 1 – August 31. For prescribed burning the project proponent will implement a 100' buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside these sensitive periods. Not limiting prescribed fire treatments to outside the sensitive period is justified because habitat function for bats is reasonably expected to improve with implementation of the treatment. Researchers who studied bat response to various levels of fire severity in the Sierra Nevada concluded that restoring fire as a process to fire-prone forests may be important to the proper management of forest bat communities. Results suggest that bats are resilient to landscape-scale fire and that some species are preferentially selecting burned areas for foraging, perhaps facilitated by reduced clutter (vegetation) and increased post-fire availability of prey and roosts (Buchalski et al. 2013).

Pacific Tailed frog

In California, tailed frogs occur in permanent streams of low temperatures in conifer-dominated habitats. Tailed frogs occur more frequently in mature or late-successional stands than in younger stands. Permanent water is critical because the aquatic larvae require 2 to 3 years to transform and tadpoles require water below 15° C (59°F). Adults forage along stream banks and occasionally underwater. Tailed frogs are primarily nocturnal. During the day adults seek cover under submerged rocks and logs in the stream or close to the stream.
There are eighteen (18) recorded CNDDB occurrences within a 9-quad query of the project area. There is suitable habitat for this species where cool, year-round streamflow is present within the project area.

Fuels reduction and prescribed burning will reduce the probability of high-intensity, high-severity wildfires that would 1) greatly reduce riparian canopy closure and raise water temperatures, and 2) increase sediment deposition from debris torrents (Ice et al., 2004). Research has shown that thinning and prescribed fire treatments can have no effect or mildly increase water quantity and quality, benefiting aquatic species (Roche et al., 2020, Robles et al., 20 14).
No surveys are warranted as habitat for this species is protected by existing watercourse protection rules (SPR HYD-4 and SPR BIO-4). Habitat function will be improved because treatments will aid in protecting aquatic habitat against stand-replacing fires while restoring an essential ecological process.

Long-eared owl

Long-eared owls can be found in cismontane woodlands, Great Basin scrub, riparian forest, and riparian woodland. Riparian habitat is generally required, though they also can use live oak thickets and other dense stands of trees. Long-eared owls usually hunt in open areas, occasionally in woodland and forested habitats. The owls use old crow, magpie, hawk, heron, and squirrel nests in a variety of trees with dense canopy. Their nests are usually 10 - 50 ft above ground. The long-eared owl was included in the project area during a review of the ACE list and suitable habitat exists for the owl within riparian zones across the project area.

Focused nest tree surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. If an active nest is found, a buffer zone with a radius no less than 300′ around the nest tree shall be established. All nest trees containing active nests, and all designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed. For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the long-eared owl is March 1 to July 31 for active nests. For prescribed burning the project proponent WILL implement a 300′ radius buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for long-eared owls is reasonably expected to improve with implementation of the treatment.

Treatments will improve habitat for long-eared owls as treatments are designed to protect riparian areas and reduce the risk of high-severity wildfire to these sensitive riparian areas. In addition, long-eared owls prefer open areas for hunting and treatments are designed to protect open meadows and grasslands from conifer encroachment through thinning and prescribed burning. Data from a 1997 study showed that densely forested areas may cause long-eared owls to leave an area, while patches of open areas within or near forest edges may benefit them (Holt, 1997). With many areas in California now six to seven times more densely forested that they were a century ago (Taylor et al., 2022), it is imperative to implement ecological thinning and return beneficial fire to the landscape for long-eared owls and other fire adapted species.

Vaux's Swift

Vaux's swift is a summer resident of northern California and breeds fairly commonly in the Coast Ranges from Sonoma County north and very locally south to Santa Cruz; in the Sierra Nevada; and possibly in the Cascade Range. They feed exclusively on flying insects taken in long, continuous foraging flights. They feed high in the air over most terrains and habitats; also feed commonly at lower levels in forest openings, above burns, and especially above rivers (Grinnell and Miller 1944) and lakes (Terres 1980). The swift prefers redwood and Douglas-fir habitats with nest sites in large hollow trees and snags, especially tall, burned-out stubs. They can also be found roosting in chimneys and buildings, often in large flocks. Nests are typically built on the vertical inner wall of a large, hollow tree or snag. The swift enters the nesting tree from the top or through cracks in the side, and almost always locates the nest near the bottom of a cavity, regardless of the height of the entrance.

Focused nest tree surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day, as Vaux's swift are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for nests and swifts exhibiting behavior that is typical of breeding (e.g. delivering food). The surveyor will pay particular attention to large, hollow trees. If a Vaux's swift nest is detected during focused surveys, the project proponent will establish a 75' radius buffer zone around the nest tree. During the critical period for Vaux's swift (May 1 through August 31 for active nests) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed. In addition, all snags/trees >36" DBH with basal hollows will be flagged and protected during all treatments, regardless of Vaux occupancy.
For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for Vaux's swift is May 1 to August 31 for active nests. For prescribed burning the project proponent WILL implement a 75' radius buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for Vaux's swift is reasonably expected to improve with implementation of the treatment. Treatments will improve habitat for Vaux's swift as broadcast burns will create prime feeding sites (Grinnell and Merrill, 1944; Terres, 1980). The swift feeds exclusively on flying insects taken in long, continuous foraging flights. They feed high in the air over most terrains and habitats; also feed commonly at lower levels in forest openings, above burns. All proposed treatment activities will protect and promote snag retention.

Olive-sided flycatcher

Olive-sided flycatchers inhabit lower montane coniferous forests, redwoods, and upper montane coniferous forests. Flycatchers feed on flying insects by flying over forest canopy or adjacent meadows, clearings, or shrub-covered slopes in wide-ranging flights from high, conspicuous perches. They require large, tall trees, usually conifers for nesting and roosting sites. Nests are often made in Douglas-fire, redwood, red fir, or lodgepole pine. Nests are an open cup of grasses, mosses, lichens, rootlets, or pine needles and are usually placed in a conifer 5 - 70' above ground, well out on horizontal limb. They tend to nest close to water sources. Flycatchers were detected during a query of the ACE list for the project area and potential habitat is present within the project area.
Focused nest tree surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day, as Olive-sided flycatchers are diurnal. The survey will include walking throughout the

proposed treatment area and visually searching for nests and flycatchers exhibiting behavior that is typical of breeding (e.g. delivering food). If an Olive-sided flycatcher's nest is detected during focused surveys, the project proponent will establish a 75' radius buffer zone around the nest tree. During the critical period for Olive-sided flycatcher (May 15 - July 31) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for Olive-sided flycatcher is May 15 - July 31 for active nests. For prescribed burning the project proponent WILL implement a 75' radius buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for Olive-sided flycatcher is reasonably expected to improve with implementation of the treatment.

Treatments of ecological thinning and prescribed fire will improve habitat for Olive-sided flycatcher as studies have shown that Olive-sided flycatchers site occupancy increased as canopy cover decreased relative to mean tree diameter, which is consistent with their preference for mature, open forests (Hack et al., 2023). The study noted that conservation strategies for Olive-sided Flycatcher breeding habitat should prioritize the protection and generation of open canopies in areas with large trees and that prescribed fire, mechanical thinning, and a return of Indigenous forest management practices could help to restore historical forest and fire conditions beneficial to this and other species with similar habitat requirements (Hack et al., 2023).

Townsend's big-eared bat

Townsend's big-eared bat is found throughout California in a wide variety of habitats, though they are most common in mesic sites. They roost in the open, hanging from walls and ceilings; infrequently have been found roosting in mature/old-growth trees with large basal hollows. They prefer roosting in caves or other similar open spaces. There are five (5) recorded CNDDB occurrences within a 9-quad query of the project area. One observation from 1997 of a maternity colony occurs adjacent to the southern border of the Hayfork Valley (Hayfork Cave 1 and Hayfork Cave 2). Large trees with basal hollows are generally lacking from the project area, so likely roosting habitat would be in the form of caves and human-made structures.

For treatments that will occur during the bat maternity season (April 1 – August 31), focused surveys for special-status bat maternity roosts will be conducted within known caves. Surveys that result in signs of active maternity roosts (e.g. guano accumulation) will receive a 100' buffer. No treatment activities will occur within this buffer during the bat maternity season. In addition, all trees >36" DBH with basal hollows will be flagged and protected during all treatments, regardless of bat occupancy.

For prescribed burning, the project proponent is proposing to not limit treatments to exclusively outside the sensitive period of the species' life history, which occurs April 1 – August 31. For prescribed burning the project proponent will implement a 100' buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside these sensitive periods. Not limiting prescribed fire treatments to outside the sensitive period is justified because habitat function for bats is reasonably expected to improve with implementation of the treatment. Researchers who studied bat response to various levels of fire severity

in the Sierra Nevada concluded that restoring fire as a process to fire-prone forests may be important to the proper management of forest bat communities. Results suggest that bats are resilient to landscape-scale fire and that some species are preferentially selecting burned areas for foraging, perhaps facilitated by reduced clutter (vegetation) and increased post-fire availability of prey and roosts (Buchalski et al. 2013).

Yellow-breasted chat

Yellow-breasted chat require riparian thickets of willow and other brushy tangles near watercourses for covers. Their nests are usually 2 - 8' above ground in dense shrubs along a stream or river. Chats feed on insects, spiders, berries, and other fruits. The chat mostly gleans from foliage of shrubs and low trees, Loss and degradation of riparian habitat have caused a marked decline in the breeding population in recent decades in California. Yellow-breasted chat were detected during a query of the ACE list for the project area and potential habitat is present within the project area. Focused nest tree surveys will be conducted up to three weeks prior to treatments. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, typically one day. The survey will be conducted during the day. Chats are active both during the day and at night. They have yearlong diurnal activity, but they also will migrate at night. The survey will include walking throughout the proposed treatment area and visually searching for nests and chats exhibiting behavior that is typical of breeding (e.g. delivering food). The surveyor will focus these surveys around watercourses and pay particular attention to riparian thickets of willow. If a chat's nest is detected during focused surveys, the project proponent will establish a 75' radius buffer zone around the nest tree. During the critical period for yellow-breasted chat (May 1 - August 31) no treatment activities will occur within the buffer zone. Outside of this critical period, treatment activities will be permitted except that all nest trees, designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for Yellow-breasted chat is May 1 - August 31 for active nests. For prescribed burning the project proponent WILL implement a 75' radius buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for Yellow-breasted chat is reasonably expected to improve with implementation of the treatment.

All treatments will follow SPR BIO-4 and SPR HYD-4 and protect watercourse buffers and riparian areas. Furthermore, a recent study highlighted how fire suppression and land use changes have degraded quality chat habitat and how prescribed fire can achieve restoration (Comer et al., 2011). This study examined breeding bird species composition and vegetation community composition on three glade sites undergoing restoration with prescribed fire and compared them to three unburned glade sites and three unburned forest sites. Although the study documented subtle changes in vegetation characteristics in response to prescribed fire, bird community structure shifted towards grass-shrubland (glade) birds such as yellow-breasted chat in glades that had been managed with prescribed fire. Another study showed that yellow-breasted chat was more abundant in stands under increased habitat management (mechanical removal of trees, shorter fire rotations (2-3 years, and greater use of growing season burns) as opposed to stands under traditional management (fewer prescribed burns, exclusively during dormant season) (Burger et al., 1998).

Osprey

Osprey can be found along ocean shores, bays, freshwater lakes, and larger streams. They build large nests in tree-tops or human-made structures (e.g., power poles, radio towers, etc.) within 15 miles of good fish-producing bodies

of water. There is one (1) CNDDB occurrence for osprey within a 9-quad search of the project area. Potential habitat for this species is present near Ewing Reservoir, Hayfork creek and its fish-bearing tributaries.
Focused surveys will occur up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting ospreys, typically one day for most proposed treatment activities. The survey will be conducted during the day, as osprey are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to large snags and dead-topped trees, as these are the preferred nesting sites for osprey. Osprey nests are large, exposed nests made of sticks and lined with bark, sod, grasses, vines, and/or algae. If an active nest is found, for all treatment activities, a buffer zone of at least 5 acres in size around the nest tree shall be established. All nest trees containing active nests, and all designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the osprey is March 1 to April 15 for active nests. This period is extended from April 15 until August 1 for occupied nests. For prescribed burning the project proponent WILL implement a 5-acre buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 18 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 18 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for ospreys is reasonably expected to improve with implementation of the treatment. Treatments will improve habitat for ospreys as treatments are designed to reduce ladder fuels and promote the retention and recruitment of large trees, which are critical for osprey nesting habitat. The proposed treatment activities will focus on thinning trees less than 16" DBH, which has been shown in studies to promote residual tree growth (Zald et al, 2022). In northern California, osprey nest trees ranged from 30 to 81 inches DBH and nest heights averaged 135 feet (Airola and Shubert, 1981). In addition, ospreys also need tall, open-branched "pilot trees" nearby for landing before approaching the nest, and for use by young for flight practice (Airola and Shubert, 1981). Promoting forest stands capable of large tree growth will improve osprey habitat over time.

Pacific fisher

Suitable Pacific fisher habitat is found in intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percentage canopy cover. They need large areas of mature, dense forest and will use cavities, snags, logs and rocky areas for cover and denning. There are forty-six (46) recorded CNDDB occurrences for Pacific fishers within a 9-quad query and preferred habitat for this species can be found throughout the project area. Focused surveys for fisher will be conducted up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect occupied sites (dens), typically one day for most proposed treatment activities. The survey for dens will be conducted during the day. The survey will include walking throughout the proposed treatment area and visually searching for fisher dens. The surveyor will pay particular attention to live tree cavities, hollow logs, hollow snags, brush piles, and upturned trees as these are the preferred denning sites for fishers. A study in northwestern California of 406 reproductive dens and 154 cavity rest sites found that most reproductive dens (47%) and cavity nest sites (37%) were in live tanoak trees (Matthews et al., 2019). Other species used included California black oak (11%), giant chinquapin (7%), and Douglas-fir (24%) (Matthews et al., 2019). If an active den is found, for all treatment activities, a buffer zone of 100' around the occupied site shall be established. For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the Pacific fisher is February through late autumn. Pacific fisher kits are born February through May, and kits remain with the female until late autumn. For prescribed burning the project proponent WILL implement a 100' buffer around occupied sites and utilize all available ignition

and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 16 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 16 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period due to the justification that habitat function for Pacific fishers is reasonably expected to improve with implementation of the treatment.
Treatments will improve habitat for Pacific fishers as treatments are designed to reduce ladder fuels and promote the retention and recruitment of large conifers and hardwoods, which are critical for fisher denning habitat. The proposed treatment activities will focus on thinning conifers less than 16" DBH and promoting oak woodland habitat. In the study from northwestern California, fishers preferred reproductive dens in oaks over conifers (Matthews et al., 2019). In addition, the DBH of trees used averaged 45" for reproductive dens and 32" for cavity rest sites (Matthews et al., 2019). Promoting forest stands capable of large tree growth will improve Pacific fisher habitat over time.

Purple Martin
The Purple martin uses valley foothill and montane hardwood, valley foothill and montane hardwood-conifer, and riparian habitats. It also occurs in coniferous habitats, including closed-cone pine-cypress, ponderosa pine, Douglas-fir, and redwood. The martin is absent from higher slopes of the Sierra Nevada. During breeding season, it inhabits open forests, woodlands, and riparian areas. It can be found in a variety of open habitats during migration, including grassland, wet meadow, and fresh emergent wetland, usually near water. The Purple martin hawks insects on long, gliding flights 100 - 200 feet above the ground for ants and other insects. The martin will often nest in tall, old trees near a body of water. It will also nest occasionally in residential areas. They will often nest in old woodpecker cavities, sometimes in human-made structures such as a nesting box, under a bridge, or in a culvert. Purple martin were detected during a query of the ACE list and their habitat is present within our project area.

Focused surveys will occur up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting martins, typically one day for most proposed treatment activities. The survey will be conducted during the day, as martins are diurnal. The survey will include walking throughout the proposed treatment area and visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to tall, old trees near a body of water, bridges, nesting boxes, culverts, and woodpecker cavities as these are the preferred nesting sites for Purple martin. If an active nest is found, for all treatment activities, the project proponent will establish a 75' radius buffer zone around the nest tree. All nest trees containing active nests, and all designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the martin is from April 1 - September 30 for active nests. For prescribed burning the project proponent WILL implement a 75' radius buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 16 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 16 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for Purple martins is reasonably expected to improve with implementation of the treatment.

Treatments will improve habitat for martins as treatments are designed to reduce ladder fuels and promote the retention and recruitment of tall, old conifers and hardwoods, which are Purple martin nesting sites. As cavity nesters and aerial insectivores, purple martins require nesting structures in open habitat where legacy trees and snags provide nesting substrate (Sherman & Hagar, 2021). Promoting forest stands capable of large tree growth and

implementing prescribed burns that will create early seral conditions and open habitat will improve Purple martin habitat over time.

Northern red-legged frog

Suitable habitat for the northern red-legged frog includes humid forests, woodlands, grasslands, and streamsides in northwestern California, usually near dense riparian cover. This species is generally found near permanent water, but can also be found far from water, in damp woods and meadows. Adult frogs' radio- tracked from March to July in the neighboring Humboldt County were detected on land 90% of the time and usually within 5 meters of water, though animals were found up to 80 m away from water. Individuals have been found considerable distances from breeding sites on rainy nights (Thomson, 2016). Eggs are deposited in permanent pools attached to emergent vegetation. Reproduction occurs from late November to early April. Eggs hatch between July and September.
There are no CNDDB occurrences for this species within a 9-quad query and suitable habitat for the northern red-legged frog is present within the project area. Preferred habitat for this species is found in and around riparian corridors, meadows and wet areas within the project area.

No surveys are warranted as habitat where this species primarily lives and reproduces is protected by watercourse protection rules (SPR HYD-4 and SPR BIO-4). Broadcast burning is unlikely to occur during the conditions when red-legged frogs are most likely to be dispersing outside the riparian areas (at night and during rainy conditions) therefore, no seasonal restrictions are warranted. Habitat function for special-status amphibians will be improved because treatments will aid in protecting aquatic habitat against stand- replacing fires while restoring an essential ecological process.

Foothill yellow-legged frog - north coast DPS

The foothill yellow-legged frog occurs in the Coast Ranges from the Oregon border south to the Transverse Mountains in Los Angeles Co. The foothill yellow-legged frog is found in or near rocky streams in a variety of habitats, including partly-shaded, shallow streams & riffles with a rocky substrate. In all habitats, the species is seldom found far from permanent streams with banks that can provide sunning sites. Normal home ranges are less than 33 feet in the longest dimension (Thomson, 2016). Occasional long-distance movements of 165 feet may occur during periods with high water conditions.

There are seventy-two (72) CNDDB occurrences for this species within a 9-quad search. Multiple occurrences have been recorded within the project area, primarily where it intersects Hayfork Creek and other perennial watercourses. No surveys are warranted as the aquatic habitat where this species primarily lives and reproduces is protected by watercourse protection rules (SPR BIO-4 and SPR HYD-4). Broadcast burning is unlikely to occur during the conditions when yellow-legged frogs are dispersing outside the riparian areas (high water conditions) therefore, no seasonal restrictions are warranted. Habitat function for special-status amphibians will be improved because treatments will aid in protecting aquatic habitat against stand-replacing fires while restoring an essential ecological process.

Southern torrent salamander

The southern torrent salamander occurs in coastal forests of northwestern California south to Mendocino County. This species can be found in cold, clear headwaters to low-order streams with loose, course substrates (low sedimentation), in humid forest habitats with large conifers, abundant moss, and >80% canopy closure. This species does not have seasonal movements or migration and does not leave the splash zone of the watercourse.

There are four (4) CNDDB occurrences for the southern torrent salamanders within a 9-quad search, including one (1) observation for within the project area. Reconnaissance surveys indicated that suitable habitat for this species exists within the project area.

No surveys are warranted as the aquatic habitat where this species primarily lives and reproduces is protected by watercourse protection rules (SPR BIO-4 and SPR HYD-4). Habitat function for special-status amphibians will be improved because treatments will aid in protecting aquatic habitat against stand- replacing fires while restoring an essential ecological process.

Yellow Warbler

Yellow warblers are usually found in riparian deciduous habitats in summer: cottonwoods, willows, alders, and other small trees and shrubs typical of low, open-canopy riparian woodland. Warblers also breed in montane shrubbery in open conifer forests. In migration, they visit woodland, forest, and shrub habitats. Warblers mostly eat insects and spiders. They will glean and hover in the upper canopy of deciduous trees and shrubs. Occasionally they will hawk insects from the air or eat berries. Yellow warblers' nest in an open cup placed 2-16 ft above ground in a deciduous sapling or shrub. Yellow warblers were detected during a query of the ACE list. Their habitat is present within the project area.

Focused surveys will occur up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting yellow warblers, typically one day for most proposed treatment activities. The survey will be conducted during the day, as warblers have yearlong diurnal activity. The survey will include walking throughout the proposed treatment area and visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). The surveyor will pay particular attention to deciduous saplings and shrubs as these are their preferred nesting habitats. If an active nest is found, for all treatment activities, the project proponent will establish a 75' radius buffer zone around the nest tree. All nest trees containing active nests, and all designated perch trees, screening trees, and replacement trees, shall be left standing and unharmed. For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the warbler is from April 15 - September 15 for active nests. For prescribed burning the project proponent WILL implement a 75' buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 16 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 16 non-listed special status species. The project proponent is proposing to NOT limit prescribed fire treatments to outside the sensitive period because habitat function for Yellow warblers is reasonably expected to improve with implementation of the treatment.

Treatments will benefit Yellow warblers as they will protect riparian areas from high severity wildfire. In the past several decades, riparian areas have often not been treated by the U.S. Forest Service or under the California Forest Practice Rules due to watercourse protection measures. While designed in good faith, this restriction has resulted in riparian areas now having uncharacteristically dense fuel loads that can contribute to increased wildfire behavior. The CalVTP allows for treatments in riparian areas "limited to the removal of uncharacteristic fuel loads, trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristics of healthy stands of 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." Reducing uncharacteristic fuel loads in riparian areas will improve warbler habitat.

American badger

American badger habitat is most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. There is one (1) CNDDBB occurrence for this species within the 9-quad search of the project area. The project area contains potential suitable habitat for this species in the meadow/grasslands in the lower elevations around Hayfork. Focused surveys for badgers will be conducted up to three weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect occupied sites (dens), typically one day for most proposed treatment activities. The survey for dens will be conducted during the day. The survey will include walking throughout the proposed treatment area and visually searching for badger dens. The surveyor will pay particular attention to the ground in open grassland areas, as badger reproductive dens are found on the ground, typically in dry, often sandy, soil, and usually in an area with sparse overstory cover. If an active den is found, for all treatment activities, a buffer zone of at least 100' around the occupied site shall be established.

For prescribed burning, the project proponent is proposing to NOT limit treatments to exclusively outside the sensitive period of the species' life history. The sensitive period for the American badger is March to September. Badger young are born in March or April, and the young stay with the female for five to six months. For prescribed burning the project proponent will implement a 100' buffer around occupied sites and utilize all available ignition and holding techniques to draw fire away from the occupied site, but due to the extensive sensitive period of all 16 non-listed special status species it is not feasible to limit prescribed fire to exclusively outside the sensitive period for all 16 non-listed special status species. These modified disturbance mitigation measures are justified because habitat function for American badgers is reasonably expected to improve with implementation of the treatment.

Treatments will improve habitat for American badgers because treatments are designed to improve native grassland and oak woodland habitats. Badgers prefer to burrow and den in open grasslands and are less likely to burrow and den in overly dense forests (Huck, 2010; Quinn, 2008). The proposed treatment activities will focus on protecting and restoring oak woodlands and grasslands. Maintaining open, xeric, grassland habitat across California will be critical to maintaining habitat for this special status species.

Conclusion

Initial and maintenance treatment activities (mechanical treatments, manual treatments, and prescribed fire) could result in adverse effects on special status wildlife. The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the proposed treatment types and activities and the intensity of disturbance that would result from implementing the proposed treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status wildlife species to occur within the project area is essentially the same within and outside the treatable landscape; therefore, the potential impact related to special-status wildlife species is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR

Impact BIO-3

Initial and maintenance treatments include manual, mechanical, prescribed broadcast, and pile burning treatments, which have the potential to result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities. The potential for treatment activities to result in adverse effects to sensitive habitats was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 187-192). Based on the results of the reconnaissance-level biological surveys conducted pursuant to SPR BIO-1, as well as local vegetation mapping, aerial photos, species ranges, and occurrence data, 13 sensitive habitats (i.e., natural communities with a rarity rank of S1,

S2, or S3) may be present within the treatment area. The sensitive natural communities, the associated rarity rank, and the habitat type within which the communities may occur are presented in Table 3. In addition, several oak woodland and forest types (I.e., Oregon White oak, California black oak, and mixed oak forest) may be present in the project area. During the reconnaissance-level survey, Oregon white oak woodland was observed in the project area.

Table 3. Sensitive Natural Communities Documented or with Potential to Occur in the Project Area

Sensitive Natural Community	Rarity Rank	Habitat Type
Bigleaf maple forest	S3	Douglas Fir, Montane Hardwood-Conifer, Montane Hardwood,
Douglas fir - incense cedar forest	S3	Douglas Fir, Sierra Mixed Conifer
Oregon white oak woodland	S3	Montane Hardwood
Incense cedar forest	S3	Sierra Mixed Conifer
Hoary, common, and Stanford manzanita chaparral	S3	Mixed Chaparral
Sadler oak or deer oak brush fields	S3	Mixed Chaparral, Montane Chaparral
Bush chinquapin chaparral	S3.3	Montane Chaparral
Water sedge and lakeshore sedge meadow	S3	Wet Meadow
Mountain alder thicket	S3	Montane Riparian
Torrent sedge patch	S3	Montane Riparian
Fremont cottonwood forest and woodland	S3.2	Montane Riparian
Black cottonwood forest	S3	Montane Riparian
Wild grape shrubland	S3	Montane Riparian

Sensitive Habitats

Oak woodlands

Oregon white oak woodlands and sadler oak have been identified (see Table 3) as potentially present in the project area. During the reconnaissance-level survey on August 18, 21 and 22, 2025, several oak species were observed including Oregon white oak (Quercus garryana) and black oak (Quercus kelloggii). Mitigation Measure BIO-3a requires treatments be designed to replicate the fire regime attributes for the affected oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fire line intensity, severity, and fire type as described in Fire in California's Ecosystems (Van Wagtendonk, 2018) and the Manual of California Vegetation (Sawyer et al. 2009). If treatment activities within identified oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas.

Riparian Habitat

Riparian habitat is present across the larger project area adjacent to streams, rivers, lakes, and ponds. SPR HYD-4 and SPR BIO-4 would limit the extent of treatment activities within riparian habitat. While these SPRs would reduce

potential impacts on riparian habitat, the full extent of riparian habitat within the project area has not been mapped and riparian habitat may be present outside of the areas encompassed within WLPZs. As a result, before implementation of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat within a treatment area.

Wetlands

During the reconnaissance-level surveys conducted pursuant to SPR BIO-1, multiple wetlands that meet the State definition of wetland were observed. The National Wetlands Inventory classifies the project area as having 227.1 acres riverine, 26.5 acres freshwater pond, 3.4 acres freshwater forested/shrub wetland, and 15.5 acres freshwater emergent wetland (NWI, 2025). Mitigation measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of wetlands prior to treatment implementation.

Chaparral

Chaparral habitat is present within the project area. As required by SPR BIO-5, treatments implemented in chaparral will be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function. This will include identifying the chaparral vegetation types to the alliance level, determining appropriate treatment prescriptions based on current fire return interval departure and condition class of the chaparral vegetation alliances onsite, retaining at least 35 percent relative final density of mature chaparral vegetation, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. The project proponent will demonstrate with substantial evidence that the habitat function of the specific chaparral vegetation types (i.e., alliances) present would be maintained or enhanced by the treatments applied.

The project proponent would avoid impacts on sensitive natural communities and oak woodlands by avoiding treatments in these communities. However, if avoiding treatment activities within identified sensitive natural communities or oak woodlands would preclude achieving treatment objectives, then Mitigation Measure BIO-3a would apply in these areas to ensure that the characteristics which qualify the communities as sensitive (e.g., dominant canopy species, canopy relative percentage of dominant species, species composition) are retained post-treatment to the extent feasible. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. This impact on sensitive habitats is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape, and the treatment activities and intensity of disturbance as a result of implementing treatment activities would be 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, the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same.

Impact BIO-4

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on federally protected wetlands or 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 (see California Water Boards 2019 for definition).

Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR (CalVTP Final PEIR Volume Section 3.6, pages 191 – 192. During the reconnaissance-level survey conducted pursuant to SPR BIO-1, several wetlands that meet the state definition were observed. The National Wetlands Inventory classifies the project area as having 227.1 acres riverine, 26.5 acres freshwater pond, 3.4 acres freshwater forested/shrub wetland, and 15.5 acres freshwater emergent wetland (NWI, 2025).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams within the project area for manual, mechanical, and prescribed burning treatments.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, and seeps. Mitigation Measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of these features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, and seeps; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities would be 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, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, the potential impact on wetlands is also the same.

Impact BIO-5

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6, pages 193 – 197). The project area is located outside of CDFW mapped essential connectivity areas (ACE Rank 5) (CDFW 2025). However, the project area does have Conservation Planning Linkages (ACE Rank 4) and Connections with implementation flexibility (ACE Rank 3). Wildlife movements likely occur across the project area. The implementation of manual treatments, mechanical treatments, and prescribed fire treatments would not result in landscape level conversion of existing habitat types in the project area. Therefore, treatments would not cause substantial loss of existing movement habitat or result in the construction of any permanent barrier to wildlife movement. Treatment activities may temporarily interrupt wildlife movement in the portions of the project area where activities are occurring; however, the proposed treatments would not be implemented throughout the entire project area in any given year; therefore, land would remain available within the project area to facilitate wildlife movement and a substantial adverse effect on movement would not occur. In addition, pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II watercourses applies,

which would limit the extent of treatment activities within riparian habitat (e.g., retention of at least 75 percent surface cover) that would likely function as a wildlife movement corridor. Most live trees larger than 16 inches would also be retained and pursuant to SPR BIO-3 and SPR BIO-4 treatments in sensitive natural communities and riparian habitats, would be designed to maintain habitat function of these communities. With implementation of these and other SPRs and MMs, habitat function within the project area is expected to be maintained or improved and there would not be a substantial change in the existing conditions that facilitate wildlife movement in the project area. If during pre-implementation surveys conducted pursuant to SPR BIO-10 wildlife nursery sites are detected, Mitigation Measure BIO-5 would apply to all treatment activities and a no disturbance buffer would be established around these features, the size of which would be determined by a qualified biologist or RPF. SPR BIO-12 would be implemented for treatments that would occur during the nesting bird season and would result in identification and avoidance of any common bird nursery sites.

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 wildlife movement corridors and wildlife nurseries within the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to wildlife movement corridors and wildlife nurseries is also the same, as described above. This impact on wildlife movement corridors and nursery sites is within the scope of the PEIR because effects on wildlife movement corridors and nursery sites was covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-6

The proposed treatment activities of manual treatments, mechanical treatments, and prescribed fire could result in adverse effects on the habitat or abundance of common wildlife. The potential for treatment activities to adversely affect the habitat or abundance of common wildlife was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 197-199). The vegetation communities (see Table 4 in Attachment B) within the project area provide nesting habitat for common ground nesting and shrub nesting birds as well as common tree and cavity nesting species. The implementation of treatments in grassland, forest, and woodland habitat would result in temporary disturbance of nesting habitat but would not result in substantial permanent habitat removal or landscape level type conversion. SPR BIO-12 would apply, and for treatments implemented during the nesting bird season (February 1 - August 31), a survey for common nesting birds will be conducted within the project area by a qualified RPF or biologist before treatment activities. If no active bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests will be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist. Therefore, the adverse effects of the treatments on habitat for common nesting birds or wildlife would be less than significant and habitat function would be maintained.

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 project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to the reduction of common wildlife habitat and common wildlife abundance is also the same, as described above. This impact on habitat or abundance of common wildlife, including nesting birds, is within the scope of the PEIR because effects on habitat or abundance of common wildlife were covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the

PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-7

The potential for initial and maintenance treatment activities to result in conflict with local policies or ordinances was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 199). The potential for the proposed project to conflict with local policies or ordinances is within the scope of the activities and impacts addressed in the PEIR because the treatment projects implemented under the CalVTP are required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures (SPR AD-3) and are consistent with those analyzed in the PEIR. The project proponent reached out to the County for consultation. The County responded and stated that 1) The County has a complaint-based system for noise issues, which in practice just suggests courtesy when noise-generating projects could impact residents. If A complaint is triggered, then mitigations can be implemented. 2) Any new encroachments onto a county road, or new road construction would require an encroachment permit, or grading permit, respectively and 3) An encroachment permit would be required if any vegetation treatments or equipment were to block traffic. There are no other applicable local ordinances.

The potential for the proposed 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. 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 project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-8

The project area is not located within a habitat conservation plan (HCP), a natural community conservation plan (NCCP), or other approved habitat plan area. 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 areas outside the CalVTP treatable landscape are also not located within a HCP, NCCP, or other approved habitat plan area. This impact is within the scope of the PEIR because conflict with an HCP or NCCP was covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Biological Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. In addition, proposed revisions to SPRs and mitigation measures do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape,

revised SPRs, and revised mitigation measures would not give rise to any new significant impact. Therefore, no new impact related to biological resources would occur.

3.6Geology, Soils, Paleontology, and Mineral Resources

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

According to geologic mapping by USGS (USGS, 2012), the 15,055-acre Project Area is underlain mostly by the Weaverville Formation and Hayfork Bally Meta-andesite with superficial deposits of Alluvium and Colluvium, and Terrace Deposits. The five most common soil types by area within the project are: CREFORK CLAY LOAM, 15-30% SLOPES; JAFA GRAVELLY LOAM, 0-2% SLOPES; CARRCREEK GRAVELLY LOAM, 0-2% SLOPES; CREFORK-MUSSERHILL COMPLEX, 30-50% SLOPES; and HOOSIMBIM-GOULDING COMPLEX, 50-75% SLOPES. The erosion "K" factors for these soil types are: 0.32 MODERATE; 0.17 LOW; 0.15 LOW; 0.37 MODERATE; and 0.05 LOW, respectively. Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity. K values range from 0.02 – 0.69. Other factors being equal, the greater the value, the more susceptible the soil is to sheet and rill erosion by water. (NRCS, 2025). The average annual precipitation in Hayfork is 33 inches (Western Regional Climate Center, 1914-2006).

Impact GEO-1

Vegetation treatments would include ecological restoration, WUI fuel reduction, and fuel breaks through use of pile burning, broadcast burning, mechanical treatment, and manual treatment. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, pages 26-29). Mechanical treatments using heavy machinery are the most likely to cause soil

disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire.

The project proponent proposes to revise SPR GEO-1 to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. The project proponent revised requirements under SPR AQ-3 for prescribed burning activities to allow for the use of burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or an equivalent template (California PBA 2022). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs. For these reasons, proposed revisions to SPR GEO-1 and AQ-3 would not result in greater soil erosion, and revisions to SPR AQ- 3 and GEO-1, would not result in a substantially more significant effect related to soil erosion than what was covered 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 project area, the existing environmental conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur.

Impact GEO-2

Initial and maintenance treatments include manual, mechanical, and prescribed burning treatment activities in areas with steep slopes, which could decrease the stability of slopes and increase the risk of landslides. Given the variable topography in some of the treatment areas, the remoteness of the area, steep terrain, and wet winter conditions, there is the potential for landslides in the project area. Soil stabilization, erosion monitoring, and slope restrictions for heavy machinery will be implemented in the treatment activities to minimize landslide potential. The potential for treatment activities to increase landslide risk was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, pages 29-30).

The project proponent revised SPR AQ-3 to use the burn plan template developed by the California State-Certified Burn Boss program or equivalent. The revision does not modify the SPR AQ-3 requirement to minimize soil burn severity and to reduce the potential for runoff and soil erosion and will not result in a substantially more significant effect related to landslide risk than what was 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 project area, the existing environmental conditions present in the areas outside of the treatable landscape are essentially the same within and

outside the treatable landscape; therefore, the potential impact related to landscape risk is also the same, as described above. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to increased risk of landslide would occur.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to geology, soils, paleontology, and mineral resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. In addition, proposed revisions to SPRs and mitigation measures do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, revised SPRs, and revised mitigation measures would not give rise to any new significant impact. Therefore, no new impact related to geology, soils, paleontology, and mineral resources would occur.

3.7Greenhouse Gas Emissions

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	SPR GHG-1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	SPR AQ-3	MM GHG-2	SU	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact GHG-1

The use of vehicles, mechanical equipment, and prescribed fire would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3). Consistent with the PEIR, although GHG emissions would occur from equipment, prescribed fire, and vehicles, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, treatments, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PIER.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape. Additionally, the area outside of the treatable landscape, 386 acres, is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles and mechanical equipment, and related emissions, would not be substantially greater than that analyzed in the PEIR (i.e., within the treatable landscape). Therefore, the GHG impact is substantially similar to as described in the PEIR.

This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR (CalVTP Final PEIR volume II Section 3.8.3, pages 11-17). This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use are consistent with those analyzed in the PEIR. In the long term, treatment activities are expected to have carbon sequestration benefits and are intended to reduce the risk of wildfire, which would decrease projected GHG emissions. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. However, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the PEIR.

The project proponent proposes to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by the project proponent would include smoke management plans and other elements that would meet the same standards as required under CAL FIRE burn plans. For these reasons, proposed revisions to SPR AQ-3 would not result in greater generation of GHG emissions, and revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect on GHG emissions than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Additionally, the area outside of the treatable landscape, 386 acres, is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles, mechanical equipment, prescribed fire, and related emissions would not be substantially greater than that analyzed in the PEIR (i.e., within the treatable landscape). Therefore, the GHG impact is substantially similar to as described in the PEIR. 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.

New Impacts Related to GHG Emissions

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to GHG emissions that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to GHG emissions would occur.

3.8Energy Resources

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact ENG-1

The use of vehicles and equipment during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.9.3, pages 7-8). The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. No SPRs or Mitigation Measures are applicable to this impact. Based on the nature of the proposed treatments and consistency with the scope of the PEIR, this impact remains less than significant.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is substantially similar to that described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Energy Resource Impacts

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the

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

3.9Hazardous Materials, Public Health and Safety

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact HAZ-1

Initial and maintenance treatments would include mechanical, manual and prescribed fire treatments. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, pages 14-15). This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. Any hazardous materials and emissions would result from the use of diesel fuel, gasoline fuel, chainsaw and mechanized hand tool fuel, and chainsaw bar oil; these materials will be transported and stored in appropriate containers. Prescribed fire operations may utilize drip torches, fusees, and other commonly used forms of ignition starts for prescribed fire. Drip torches and other ignition equipment will be inspected for leaks and put out of service or repaired as needed. All personnel will wear personal protective equipment (PPE) and will be properly trained in the usage of equipment. All equipment associated with the proposed project will comply with SPR HAZ-1 to ensure proper maintenance and to minimize leaks. Additionally, all mechanized

tools will have spark arrestors and will be implemented to minimize the risk of potential ignitions, per SPR HAZ-2. Based on the implementation of the applicable SPR's and consistency with the scope of the PEIR, this impact would remain less than significant. In addition, the project proponent proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the original purpose and intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use and would allow the project proponent to stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. The proposed revision to SPR HAZ-1 would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials than what was covered in the Program EIR.

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

Impact HAZ-2

This impact does not apply to the project because no herbicide use is proposed.

Impact HAZ-3

The proposed project would include prescribed burning, mechanical treatments, and manual treatments, which would result in soil disturbance and could expose workers or the environment to hazards from hazardous materials site, if present within the project area. The potential for the proposed treatment activities to encounter contamination that could expose workers or the environment to hazardous materials was examined in the Program EIR (CalVTP Final PEIR Volume II Section 3.10.3, page 18-19). This impact was identified as potentially significant in the Program EIR 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 Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. One site is located within the project area; however, it is currently enrolled in a cleanup program. (DTSC 2025; CalEPA 2025; SWRCB 2025) (Attachment C). In addition, these areas will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. Due to these actions, it was determined that no hazardous materials sites would be disturbed by treatments and this impact would be less than significant.

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

New Hazardous Materials, Public Health and Safety Impacts

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to Hazardous Materials, Public Health, and Safety that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to hazardous materials, public health, and safety would occur.

3.10 Hydrology and Water Quality

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

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact HYD-1

Initial and maintenance treatments would include the use of prescribed fire in the form of pile and broadcast burning. Ash and debris from treatment areas has the potential to be washed out by runoff into adjacent drainages and streams. Broadcast burning implemented under the proposed project would be conducted when fuel moisture environmental conditions allow for effective understory and ladder fuel control, while reducing the risk of high severity burns. Additionally, per SPR HYD-4, no ignition points would be located within WLPZs. 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, pages 25-27). This impact is within the scope of the PEIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR. Based on the implementation of the applicable SPR's and consistency with the scope of the PEIR, this impact would remain less than significant.

The project proponent proposes to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to

design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. For these reasons, proposed revisions to SPR AQ-3 would not 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. Therefore, revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect on hydrology and water quality than what was covered in the PEIR.

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

Impact HYD-2

Initial and maintenance treatments would include manual and mechanical treatments. WLPZs ranging from 50 to 150 feet will be implemented and flagged for any Class I and Class II watercourses that are within treatment areas pursuant to SPR HYD-4. The centerline of Class III watercourses will also be flagged. The potential for manual and mechanical treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, pages 27-28). This impact is within the scope of the PEIR because the use of heavy equipment and hand tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the PEIR.

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

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 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 significant impact than what was covered in the PEIR.

Impact HYD-3

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

Impact HYD-4

This impact does not apply to the proposed project because the use of herbicides is not a proposed treatment activity.

Impact HYD-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 31). This impact to site drainage is within the scope of the PEIR because the types of treatments and treatment intensity are consistent with those analyzed in the PEIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the watershed associated with the project area is the same in areas within and outside of the treatable landscape, and the project application type is consistent with those included in the PEIR, and the treatment types and activities proposed for the project are consistent with those included in the PEIR. Therefore, the potential to alter existing drainage patterns of a treatment site or area is also the same, as described above, and would not be substantially greater than described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Hydrology and Water Quality Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined 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 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 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. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to hydrology and water quality would occur.

3.11 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	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	SPR AD-3	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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact LU-1

The project area is entirely located on Private or County owned property. Treatment activities on lands owned or managed by private owners, Counties, and special districts are generally required to comply with applicable city and county general plans and other local policies and ordinances. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, pages 13-14). The project proponent reviewed the Trinity County General Plan which states that 1) The County has a complaint-based system for noise issues, which in practice just suggests courtesy when noise-generating projects could impact residents. If A complaint is triggered, then mitigations can be implemented. 2) Any new encroachments onto a county road, or new road construction would require an encroachment permit, or grading permit, respectively and 3) An encroachment permit would be required if any vegetation treatments or equipment were to block traffic. There are no other applicable local ordinances. This impact is within the scope of the PEIR because the treatment types and activities are consistent with those analyzed in the PEIR. Based on the implementation of SPR AD-3 and consistency with the Trinity County General Plan and scope of the PEIR, this impact would remain less than significant.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, all land in the project area is private property, within and outside

the treatable landscape. Treatment types would be consistent with those described in the PEIR. Therefore, the potential to conflict with a land use plan, policy or regulation is not substantially greater than described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact LU-2

The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, pages 14-15). Impacts associated with short-term increases in the demand for workers during implementation of the treatments is consistent with the crew size analyzed in the PEIR for the types of treatments proposed. Prescribed burning treatment activities would require between 5 and 50 crew members, depending on the size of the burn unit or burn piles. Manual treatments would be implemented by crews of approximately 5 to 50 crew members. Mechanical treatment activities would require between 1 to 50 crew members and up to 4 crews. Employing local contractors will be encouraged where feasible to minimize the risk of impacting population and housing resources. No SPRs are applicable to this impact. Based on the consistency with the scope of the PEIR, this impact would remain less than significant.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape. Therefore, the potential to induce unplanned population growth is also the same, as described above, and would not be substantially greater than described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to New Land Use and Planning, Population, and Housing Impacts that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to New Land Use and Planning, Population, and Housing Impacts would occur.

3.12 Noise

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact NOI-1

Initial and maintenance treatments would require heavy, noise-generating equipment. Manual treatments, mechanical treatments, and prescribed burning could temporarily expose receptors to noise. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, pages 9-12). This impact is within the scope of the PEIR because the number and types of equipment proposed, and equipment use being temporary and sporadic, are consistent with the assumptions analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the PEIR.

Trinity County has a complaint-based system for noise issues, which in practice just suggests courtesy when noise-generating projects could impact residents. If a complaint is triggered, then mitigations can be implemented. As discussed in the PEIR, noise levels generated by individual equipment range from 77 to 87.9 dB at 50 feet from the noise source. Though multiple pieces of equipment would be operated simultaneously to implement a treatment they would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment. Although operation of equipment would temporarily and intermittently generate elevated noise, since all landowners will be giving their permission for

treatments to occur and are working collaboratively with the project proponent, it is reasonably expected that noise generated during treatments would not result in complaints. In addition, treatments would primarily occur outside of the 100-foot defensible space requirement described in PRC 4291 and therefore, most treatments would not occur within 100 feet of sensitive receptors. The equipment noise levels discussed above are at 50 feet. Therefore, there would typically be additional attenuation for distance, vegetation, and building materials that would result in interior noise levels for sensitive receptors being lower than the 77 to 87.9 dB levels estimated for equipment. Treatments would also be dispersed throughout the 15,055-acre project area so that short-term noise increases at any one sensitive receptor would be limited. SPRs AD-3 and NOI-1 through NOI-5 are applicable to this treatment. For any sensitive receptors that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. Noise-sensitive receptors as identified by the Trinity County General Plan – Noise Element include residential development, schools, hospitals, nursing homes, churches, and libraries (Trinity County General Plan Noise Element, 2003). There are schools, a medical clinic, nursing homes, churches, and a library within 1,500 feet of the project area. There are numerous residences within the project area and within 1,500 feet of the project area. Chainsaw and heavy equipment noises are not uncommon for the area and noise from the project wouldn't be anomalous from normal daily occurrences within Hayfork Valley.

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 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 significant impact than what was covered in the PEIR.

Impact NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area. This project has limited potential for commercial timber harvest, reducing additional heavy truck traffic associated with the project. Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the single event noise levels. The potential for a substantial short-term increase in single event noise levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 is applicable to this treatment. 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 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 significant impact than what was covered in the PEIR.

New Noise Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental 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 project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those

within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the 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.

3.13 Recreation

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

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact REC-1

The majority of the project area is located on Private property and is not subject to public access and recreation. However, portions of the project area are owned by Trinity County or Special Districts therein, some of these parcels are subject to public recreation. Ewing Reservoir is the most popular outdoor community space in the Hayfork Valley and hosts a suite of mixed-use trails. Treatment activities within this parcel would include Mechanical, Manual, and Prescribed Fire. These treatments and their effects on recreation are not dissimilar from trail building and maintenance activities in regards to noise and temporary restrictions on recreation. Equipment and smoke from prescribed burning may be visible from the various recreational areas and public roadways while the treatments are being implemented. Decreased air quality (e.g. smoke, dust) due to prescribed burning and the use of heavy equipment along unpaved roadways/in the treatment area could impact the recreation experience for individual's recreation on nearby USFS land. Traffic as a result of ingress/egress of heavy equipment along public roads may limit, restrict, or delay access to recreation areas. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. The potential for the proposed treatment project to impact recreation is within the scope of the Program EIR because the treatment activities and intensity are consistent with those analyzed in the Program EIR.

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

New Recreation Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental 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 project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; 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 would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not analyzed in the PEIR.

3.14 Transportation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	SPR TRAN-1 SPR AD-3	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	SPR TRAN-1 SPR HYD-2 SPR AD-3	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	MM AQ-1	SU	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including various public and private roadways. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, pages 9-10). The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the PEIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the PEIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The project proponent reached out to the Trinity County Department of Transportation (TCDOT) about the Hayfork Valley project and were told by TCDOT staff that encroachment permits would be required if any of the treatments or equipment were to block traffic. The project proponent will obtain an encroachment permit if needed.

The project proponent proposes to revise requirements under SPR TRAN-1 for prescribed burning activities to clarify that some prescribed fires may occur near roadways whose agency(ies) with jurisdiction do not require a TMP for prescribed burns. For prescribed burns that do not require a TMP, the project proponent will address smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations within the Burn Plan, Smoke Management Plan, and/or TMP. The Burn Plan, Smoke Management Plan, and/or TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This revision would not reduce the effectiveness of the measure regarding traffic control. As explained in these sections, the proposed revisions to SPR TRAN-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR.

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

Impact TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the PEIR (CalVTP Final PEIR volume II Section 3.15.3, pages 10-11). This impact is within the scope of the activities and impacts addressed in the PEIR because the burn duration is consistent with that analyzed in the PEIR. The project proponent proposes to revise requirements under SPR TRAN-1 for prescribed burning activities to clarify that some prescribed fires may occur near roadways whose agency(ies) with jurisdiction do not require a TMP for prescribed burns. For prescribed burns that do not require a TMP, the project proponent will address smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations within the Burn Plan, Smoke Management Plan, and/or TMP. The Burn Plan, Smoke Management Plan, and/or TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This revision would not reduce the effectiveness of the measure regarding traffic control. As explained in these sections, the proposed revisions to SPR TRAN-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR.

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

Impact TRAN-3

Initial and maintenance treatments have the potential to increase vehicle miles traveled (VMT) above baseline conditions because the project area is in a remote location and would require vehicle trips to access treatment areas. While trips by crew members to implement the proposed treatments would increase VMT, there could be a net reduction in VMT in the long term because travel for wildfire response could be reduced. As noted under Impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate

fewer than 110 trips per day. Specifically, the PEIR assumed that individual vegetation treatment projects would accommodate up to 50 vehicles bringing crews and equipment to a treatment site in a day (i.e., 100 trips commuting to and from a treatment site each day, plus a few additional incidental trips during the day). Although the PEIR determined that individual vegetation treatments would likely be less than significant, the overall impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT attributable to the program as a whole (CalVTP Final PEIR Volume II Section 3.15.3, pages 11 - 13). The proposed treatments are expected to require up to 50 workers for prescribed burning treatments, up to 50 workers for mechanical treatments, and up to 50 workers for manual treatments. Because not all treatments would be occurring at the same time, this project is expected to remain below the threshold of 110 trips per day, which is generally assumed to cause less-than-significant transportation impacts, as discussed in the PEIR and the Technical Advisory on Evaluation Transportation Impacts (OPR, 2018). The highest VMT would likely occur on days where broadcast burning is likely to occur. Maximum daily VMT would consist of transportation of fire suppression equipment, hand crews, and heavy machinery to and from the project site. However, it is expected that the number of trips would remain below 110. Furthermore, hiring local contractors will be encouraged where feasible to reduce the amount of VMT. While carpooling would be encouraged under Mitigation Measure AQ-1, crew sizes would be small and may not all be employed with the same company. Therefore, carpooling may not be feasible to implement for most of the workers. Temporary increases in VMT are within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips is consistent with those analyzed in the PEIR. Because the project would generate VMT during project implementation, it would contribute to the environmental significance conclusion in the PEIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable.

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

New Transportation Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined 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 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 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. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to transportation would occur.

3.15 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	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	NA	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 - 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	NA	NA	No Impact	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	No	NA	NA	No Impact	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact UTIL-1

Initial and maintenance treatments would include prescribed burning, mechanical treatments, and manual treatments. Prescribed burning would require an on-site water supply to be available. A minimal amount of water could be used for dust control during mechanical treatments. Water could also be used in the event of a wildfire started by an escaped prescribed burn or equipment fire during manual or mechanical treatments. The potential increased demand for water was examined in the PEIR (CalVTP Final EIR Volume II Section 3.16.1, page 9). This impact is within the scope of the activities and impacts addressed in the PEIR because the type of treatments and water source type are consistent with those analyzed in the PEIR.

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

Impact UTIL-2

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

Impact UTIL-3

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

New Impacts to Public Services, Utilities and Service Systems

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to 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. 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 public services, utilities, and service systems would occur.

3.16 Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	SPR HAZ-2,3,4	None	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-3,4,5,8	None	LTS	No	Yes

1Notes: LTS = less than significant; LTSM = less than significant with mitigation; SU = significant and unavoidable; TSE = too speculative to evaluate; NA = There are no applicable SPRs or MMs

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

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

Discussion

Impact WIL-1

Proposed vegetation treatment activities are mechanical, manual, and prescribed burn treatments. Vegetation treatment involving mechanical equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final PEIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a broadcast burn, fire containment lines would be established to help prevent the accidental escape of fire. Water and safety equipment would be staged on site as necessary. The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, pages 13-14). Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is within the scope of the PEIR because the types of equipment and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the PEIR. Treatments are also designed to reduce wildfire risk and thus decrease the risk of exposing people to the uncontrolled spread of wildfire over time.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the

project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR. In addition, the project proponent proposes to revise SPR HAZ-3 to require tree cutting crews to carry one backpack pump-type fire extinguisher filled with water and each vehicle to carry the required hand tools for firefighting, consistent with PRC Section 4428. This revision is consistent with the purpose of SPR HAZ-3 to equip treatment crews with adequate firefighting tools to minimize the risk of wildfire during treatments. For this reason, proposed revisions to SPR HAZ-3 would not result in a substantially more severe significant effect related to exacerbating fire risk than what was covered in the Program EIR.

Impact WIL-2

Vegetation treatment types would include manual, mechanical, and prescribed burning treatments, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, pages 14-15). The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration of treatments, and methods of implementation are consistent with those analyzed in the PEIR. In addition, the project does not include new housing and would not result in substantial unplanned population growth and would therefore not place new people or structures in an area with risks related to post-wildfire flooding or landslides from the project treatments. Treatments are also designed to reduce wildfire risk, and thus decrease the risk of landslides and flooding in areas that could otherwise burn in a high severity wildfire without treatment

The project proponent proposes to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State- Certified Burn Boss curriculum development committee, or equivalent). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. For these reasons, proposed revisions to SPR AQ-3 would not result in an increased risk of post-fire landslides and flooding, and revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect related to post-fire landslide and flooding risk than what was covered in the PEIR.

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

New Impacts to Wildfire

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined 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 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 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. In addition, proposed revisions to SPRs do not result in substantially more severe significant impacts than what was identified in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revised SPRs would not give rise to any new significant impact. Therefore, no new impact related to wildfire would occur.

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Attachment A – Standard Project Requirements and Mitigation Measures Checklist

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
SPR AD-4 Public Notifications for Prescribed Burning: ~~At least three days~~ On the day of the prescribed burn 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~~ At least one day prior to the commencement of prescribed burning operations, the project proponent will implement other public notifications as appropriate, 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, potentially including any of the following: publishing in the local newspaper; hosting a public meetings; posting notices on local, public bulletins boards or social media pages; and/or contacting project neighbors.~~,~~ ~~; 2) publish a public interest notification in a local newspapers or other widely distributed media source~~	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
~~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~~ <u>During this outreach the project proponent will describe</u> 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.				
Project Specific Implementation: SPR AD-4, as presented in the Program EIR, requires that at least 3 days prior to prescribed burning the project proponent post signs along the closest public roadway to the treatment area, publish a public interest notification in a local newspaper or other widely distributed media source, and send a notification letter to the local county supervisor describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. The project proponent instead proposes to post signs along the closest public roadway to the treatment area on the day of the prescribed burning operations, and for as long as smoke is visible, to encourage greater visibility while mitigating for increased sign theft associated with posting length. In addition, the project proponent would implement other public notifications as appropriate, potentially including any of the following: publishing in the local newspaper, hosting public meetings; posting notices on local, public bulletin boards or social media pages; and/or contacting project neighbors at least one day prior to prescribed burning. The project proponent proposes these revisions to tailor SPR AD-4 to include public outreach mechanisms that are proven to be successful in their community.				
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
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);	Initial Treatment: Y Treatment Maintenance: Y	Prior, During, Post	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Project Specific Implementation: SPR AD-8 is not applicable as this is not a CAL FIRE project.				
SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions: i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
Project Specific Implementation: SPR AD-9 is not applicable as all proposed treatment is outside the coastal zone.				
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
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	Initial Treatment: Y	During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Air Quality Standard Project Requirements				
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan ~~using the CAL FIRE burn plan template~~ for broadcast burns using a template developed by the California State-Certified Burn Boss curriculum development committee, or equivalent template, that includes elements required to obtain burn permits, and any additional elements that are needed to design a burn ~~all prescribed burn. 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~~ That will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs. The burn plan will be created with input from an experienced prescribed fire practitioner, ~~qualified technician or~~ certified State	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
burn boss, or federally recognized burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.				
Project Specific Implementation: SPR AQ-3, as presented in the PEIR, requires preparation of a burn plan using the CAL FIRE burn plan template, or similar template, prior to prescribed burning treatment activities. Pursuant to SPR AQ-3, the burn plan will include fire behavior modeling performed by an experienced prescribed fire practitioner, certified State burn boss, or federally recognized burn boss, will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion, and will be created with input from an experienced prescribed fire practitioner, certified State burn boss, or federally recognized burn boss. The project proponent proposes to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or an equivalent template (California PBA 2022). The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates proposed to be used by the project proponent contain all of these elements. In addition to these elements, the project proponent proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs.				
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: Y Treatment Maintenance: Y	During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
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).~~ An Incident Action Plan (IAP), which may take on different forms, including a print out, white board use, and/or verbal briefing, will be prepared that includes elements that are appropriate for the size and scope of the burn as necessary to ensure personnel and public safety. IAP and day-of-burn briefing elements may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. A safety briefing will be conducted with all resources on site for each operational period for all prescribed burning treatments to ensure personnel safety considerations and prescribed fire objectives. ~~The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations.~~ This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, During	WRTC	WRTC
Project Specific Implementation: SPR AQ-6, as presented in the PEIR, requires non-CAL FIRE crews to implement all safety procedures required of CAL FIRE crews. This includes implementation of an approved Incident Action Plan, and outlines the elements required in the Incident Action Plan. To maintain personnel and public safety, the project proponent proposes to prepare Incident Action Plans that include elements appropriate for the size and scope of the burn. IAP elements may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives.				
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
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,	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to mechanical and prescribed burning ~~all~~ treatment activities and manual treatment activities when woody material is not chipped or lopped and removed or scattered ~~treatment types~~, including treatment maintenance.				
Project Specific Implementation: As currently written in the Program EIR, Standard Project Requirement (SPR) CUL-4 requires an archaeological and historical survey be conducted prior to implementation of any treatment activity, including treatments that do not result in ground disturbance or other risk to archaeological or historical resources (e.g., lop and scatter treatments). However, Cultural Resource Review Procedures for CAL FIRE Projects (CAL FIRE 2020), exempts from survey requirements vegetation treatment activities that are unlikely to impact cultural resources. The treatment of vegetation for timber stand improvement, shaded fuel breaks, and fire-safe projects using hand tools and non-ground disturbing equipment falls under this exemption, provided that woody material is chipped or lopped and removed, or chipped or lopped and scattered. The project proponent is proposing to use CAL FIRE's Cultural Resource Review Procedures. The project proponent will still conduct archaeological surveys for all ground-disturbing treatments and prescribed fire treatments that have the potential to impact cultural resources, but the project proponent will not conduct archaeological surveys for treatments that do not disturb the ground such as chipping or lopping and scattering.				
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
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,	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities' data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ 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: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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).	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. 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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. Additional measures will be applied to ecological restoration treatment types: ▶ For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ▶ Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ▶ A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ▶ If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle):	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Environmentally Sensitive Habitat Areas				
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts: ▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA. ▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Project Specific Implementation: SPR BIO-8 is not applicable as it is not within the coastal zone.				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ 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: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	No more than 14 days prior to all treatment activities.	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur 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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/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. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During and Post	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Greenhouse Gas Emissions Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior, During, Post	WRTC	WRTC
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 stabilized and fixed or ~~promptly~~ removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Project Specific Implementation: SPR HAZ-1, as presented in the Program EIR, requires that the project proponent inspect all equipment for leaks prior to the start of treatment activities and everyday thereafter until equipment is removed from the site, and any equipment found leaking be promptly removed from the treatment area. The project proponent proposes to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area. This gives the project proponent the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed. This would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use.				
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y	During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
	Treatment Maintenance: Y			
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one backpack pump-style fire extinguisher filled with water ~~per chainsaw~~. Each vehicle would be equipped with the required hand tools for firefighting ~~one long-handled shovel and one axe or Pulaski~~ consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Project Specific Implementation: SPR HAZ-3, as presented in the Program EIR, requires that tree cutting crews carry one fire extinguisher per chainsaw, and requires that each vehicle be equipped with the one long-handled shovel and one axe or Pulaski, consistent with Public Resources Code (PRC) Section 4428. The project proponent proposes to require tree cutting crews to carry one backpack pump type fire extinguisher filled with water and each vehicle to carry the required hand tools for firefighting, consistent with PRC Section 4428. This revision clarifies alignment of the measure with the requirements of PRC Section 4428 and is consistent with the purpose of SPR HAZ-3 to equip treatment crews with adequate firefighting tools to minimize the risk of wildfire during treatments. This revision would not reduce the effectiveness of the measure regarding addressing safety and wildfire.				
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA
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:	Initial Treatment: N	NA	NA	NA

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: N			
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments:	Initial Treatment: N	NA	NA	NA

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/Monitoring Entity</th></tr>
<tr><td>

Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.
Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas.
Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.

This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.
</td><td>Treatment Maintenance: N</td><td></td><td></td><td></td></tr>
<tr><td>
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>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.</td><td>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.</td><td>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.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</td></tr>
</table>
</td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Prior and During</td><td>WRTC</td><td>WRTC</td></tr>
</table>

Standard Project Requirements				Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.				
30-50 % Slope	100	75					
>50 % Slope	150	100					

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

The following WLPZ protections will be applied for all treatments:

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HYD-6 Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
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	Initial Treatment: Y	Prior and During	WRTC	WRTC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Treatment Maintenance: Y			
SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses: The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC
Recreation Standard Project Requirements				
SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent to will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: N			
Project Specific Implementation: SPR UTIL-1 is not applicable as no biomass will be disposed off site.				

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Initial Treatment: Y Treatment Maintenance: Y	During	WRTC	WRTC
Biological Resources				
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.				
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment 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-				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation:	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activity would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.				

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

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

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. ▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities) If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle: ▶ If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required. ▶ If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented: ▪ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g.,	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
damage to root system) that could damage or kill the plant, with the exception of the following activities: - Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle. - Manual or mechanical vegetation treatment within the drip-line of any elderberry shrub will be limited to the season when adults are not active (August - February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry. ▪ A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.				
Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: ▶ Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). ▶ Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. ▶ Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. ▶ Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c. CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.				

<table>
<tr><th>Mitigation Measures</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/Monitoring Entity</th></tr>
<tr><td>Table 3.6-34 Special-status Butterflies and Associated Host Plants
<table>
<tr><th>Butterfly Species</th><th>Host Plants</th></tr>
<tr><td>bay checkerspot butterfly</td><td>dwarf plantain (Plantago virginica), purple owl's clover (Castilleja exserta)</td></tr>
<tr><td>Behren's silverspot butterfly</td><td>blue violet (Viola adunca)</td></tr>
<tr><td>callippe silverspot butterfly</td><td>California golden violet (Viola pedunculata)</td></tr>
<tr><td>Carson wandering skipper</td><td>salt grass (Distichlis spicata)</td></tr>
<tr><td>El Segundo blue butterfly</td><td>seacliff buckwheat (Eriogonum parvifolium)</td></tr>
<tr><td>Hermes copper butterfly</td><td>spiny redberry (Rhamnus crocea)</td></tr>
<tr><td>Kern primrose sphinx moth</td><td>plains evening-primrose (Camissonia contorta), field primrose (Camissonia campestris)</td></tr>
<tr><td>Laguna Mountains skipper</td><td>Cleveland's horkelia (Horkelia clevelandii), sticky cinquefoil (Drymocallis glandulosa)</td></tr>
<tr><td>Lange's metalmark butterfly</td><td>naked-stemmed buckwheat (Eriogonum nudum)</td></tr>
<tr><td>lotis blue butterfly</td><td>seaside bird's foot trefoil (Hosackia gracilis)</td></tr>
<tr><td>Mission blue butterfly</td><td>lupine (Lupinus spp.)</td></tr>
<tr><td>Myrtle's silverspot butterfly</td><td>blue violet</td></tr>
<tr><td>Oregon silverspot butterfly</td><td>blue violet</td></tr>
<tr><td>Palos Verdes blue butterfly</td><td>Santa Barbara milkvetch (Astragalus trichopodus), common deerweed (Acmispon glaber)</td></tr>
<tr><td>San Bruno elfin butterfly</td><td>broadleaf stonecrop (Sedum spathulifolium), manzanita (Arctostaphylos spp.), huckleberry (Vaccinuum spp.)</td></tr>
<tr><td>Smith's blue butterfly</td><td>seacliff buckwheat, seaside buckwheat (Eriogonum latifolium)</td></tr>
<tr><td>Quino checkerspot butterfly</td><td>dwarf plantain, purple owl's clover</td></tr>
</table></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)
If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and</td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Prior and During</td><td>WRTC</td><td>WRTC</td></tr>
</table>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within" Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail, Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle snail, ~~treatment activities will not occur within habitat in the range of these species that is deemed suitable~~ by a qualified RPF or biologist with familiarity of the species. ▶ To avoid and minimize impacts to Trinity bristle snail the critical and high suitable habitat determined by Robert Sullivan's 2022 macrohabitat suitability model will continue to fall under MM BIO-2f with no treatment unless an Incidental Take Permit (ITP) is acquired. Areas of low, low medium, medium and medium-high habitat may be treated with manual treatment and low intensity prescribed burns in a patchy pattern, avoiding rocky outcroppings to reduce impacts of mortality and injury and maintain habitat function. Habitat suitability is to be verified by a qualified biologist in coordination with CDFW. If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.				
Project Specific Implementation: Mitigation Measure BIO-2f, as written in the PEIR, precludes all treatment activities from Trinity bristle snail habitat. The Hayfork Valley CalVTP project area overlaps extensive Trinity bristle snail habitat and it is not feasible to eliminate all treatment activities from Trinity bristle snail habitat. Treatment activities within Trinity bristle snail habitat would maintain and improve their habitat. The potential for high-severity forest fire has been identified as one of the primary risk factors for conservation of endemic species of terrestrial gastropods (Sullivan, 2022b). Numerous studies have documented that fire exerts a major impact on terrestrial snail communities by strongly reducing plant diversity and species richness (Sullivan, 2022b). This is because wildfire-caused removal of vegetative cover and opening up the vegetation matrix fundamentally changes light and humidity levels, which are major threats to the survival of land snail populations (Sullivan, 2022b). Proposed treatments are focused on reducing the risk of high-severity wildfire through thinning of horizontally and vertically continuous ladder fuels. Sullivan's 2022 study also found that sites where Trinity bristle snails were sampled were strongly affiliated with mixed conifer stands containing medium to large sized trees, which provided abundant overstory cover shade (Sullivan, 2022a). Proposed treatment activities would focus on mainly removing ladder fuels less than 16 inches DBH. Thinning smaller trees has been shown to promote residual tree growth (Zald et al, 2022), and encouraging the growth of larger trees across the project area will improve productive snail habitat.				
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) ~~If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or~~ if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species) conducted	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
within two weeks prior to treatment, 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 with the highest densities of foraging bees will be set aside as refugia to avoid significant impacts and maintain and improve habitat function. ▶ 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).~~ ▶ The project proponent will monitor post-burn areas and identify burn areas that are in need of supplemental native seed. These areas will be seeded, as needed, with a native grass and forb seed mix in the fall or spring following grassland burning when adequate soil moisture is available for germination. Seeding specifications can be found in Tables 1 and 2. ▶ Broadcast burn treatments will generally occur in fall and winter as weather conditions allow. Invasive medusa head grass and yellow star thistle areas will require early summer burning. Broadcast burn areas will be monitored and if seeding is determined to be needed by the project proponent, broadcast burn areas will be seeded with a native seed mix. 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.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
Project Specific Implementation: MM BIO-2g, as presented in the PEIR, requires that if special-status bumble bees are identified as occurring during reviews and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1, then the Project Proponent will implement measures including limiting prescribed burning to October -February, dividing treatment areas into multiple treatment units, conducting treatments in patchy patterns, and not applying herbicides to flowering native plants during flight season (March through September). One bumble bee species, Western bumble bee, has the potential to occur within the Hayfork Valley project area. Fall burn windows could open up in September and there is a potential need for early summer burning to eliminate invasive plants such as medusa head grass and yellow star thistle. Research has shown that when exotic plants invade native communities, plant species diversity can decline due to intense competition for the available pollinators, which might lead to concomitant decreases in the abundance and diversity of native pollinators (Mciver et al., 2009). Medusa head and yellow star thistle can create a monoculture that alters the functioning of the ecosystem. The loss of native forbs and rapid spread of medusa head can impact native pollinators such as bees. Early summer burns will focus on targeting these invasive species and improving habitat for the native floral resources that Western bumble bees rely on. The project proponent provided evidence regarding how proposed treatments would maintain and improve Western bumble bee habitat and based on the evidence provided, revised mitigation measures provided above.				
Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)	Initial Treatment: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: ▶ Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007). ▶ Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).	Treatment Maintenance: N			
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 community's data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fire line 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 community's 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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the 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-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				
Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: ▪ restoring riparian habitat functions and acreage within the treatment area; ▪ restoring degraded riparian habitat outside of the treatment area; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.	Initial Treatment: N Treatment Maintenance: N	NA	NA	NA

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
Project Specific Implementation: MM BIO-3c does not apply as this project proposes mechanical treatments outside of the WLPZ and will comply with overstory cover requirements in riparian areas				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures).	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
▶ 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.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ■ No special-status species are present in the wetland habitat ■ The wetland habitat function would be maintained. ■ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ■ Fire containment lines and pile burning are prohibited within the buffer ■ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				
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: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
Greenhouse Gas Emissions				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. 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.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	WRTC	WRTC
Hazardous Materials, Public Health and Safety				
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing	Initial Treatment: Y Treatment Maintenance: Y	Prior	WRTC	WRTC

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

ATTACHMENT B – Biological Resources

Vegetation and Habitat

The project area is located within the Klamath Mountains ecoregion with the majority of the project area within the Trinity Mountain-Hayfork subregion and minor area within the Rattlesnake Creek subregion. The project is in central Trinity County within the Hayfork Creek Watershed a major tributary to the South Fork Trinity River. The project elevation ranges between 2200' and 4700'. Pursuant to SPR BIO-1, RPF and biologists conducted a data review of project- specific biological resources, including habitat and vegetation types, special-status plants, special-status wildlife, sensitive natural communities, and sensitive habitats with potential to occur in the project area. Site visits in 2025, aerial imagery, the USDA Forest Service CALVEG: A Classification of California Vegetation (USDA 1981, USDA 2018), and the Manual of California Vegetation (Sawyer et al. 2009) were used to identify vegetation and habitat types.

Table 1. Vegetation and Habitat Types in the Project Area

CWHR Classification	Acres	Percent of Project Area	MCV Alliances
Woodland and Forest Habitats			
Douglas Fir (DFR)	1,974	13.1%	White fir - Douglas fir forest Bigleaf maple forest[1] Ponderosa pine - Incense Cedar - Douglas fir forest Douglas fir forest Douglas fir - incense cedar forest[1] Douglas fir - tanoak forest - madrone forest and woodland
Klamath Mixed Conifer (KMC)	15	< 1.0%	None
Montane Hardwood-Conifer (MHC)	2,168	14.4%	Mixed oak forest and woodland Oregon white oak woodland and forest[1] California black oak forest and woodland
Montane Hardwood (MHW)	804	5.3%	Bigleaf maple forest[1] Mixed oak forest Canyon live oak forest Oregon white oak woodland[1] Interior live oak woodland California black oak forest and woodland
Ponderosa Pine (PPN)	1,003	6.7%	Ponderosa pine forest Ponderosa pine – Incense Cedar - Douglas fir forest Ponderosa pine/shrub understory woodland

Sierra Mixed Conifer (SMC)	5,367	35.7%	Incense cedar forest[1] Mixed oak forest Ponderosa pine - Douglas fir forest Douglas fir - incense cedar forest[1]
Closed Cone Pine – Cypress (CPC)	5	< 1.0%	Knobcone pine forest and woodland
Blue Oak – Foothill Pine (BOP)	2	< 1.0%	Blue oak woodland and forest Mixed oak forest and woodland
Shrub and Scrub			
Mixed Chaparral (MCH)	719	4.8%	Hoary, common, and Stanford manzanita chaparral[1] Whiteleaf manzanita chaparral Mountain whitethorn chaparral Deer brush chaparral Birch leaf mountain mahogany chaparral Deerweed - silver lupine - yerba santa scrub Bitter cherry - Ocean spray brush Sadler oak or deer oak brush fields[1] Huckleberry oak chaparral
Montane Chaparral (MCP)	30	< 1.0%	Green leaf manzanita - pinemat manzanita chaparral Whiteleaf manzanita chaparral Mountain whitethorn chaparral Deer brush chaparral Birch leaf mountain mahogany chaparral Bush chinquapin chaparral[1] Bitter cherry thicket Bitter cherry - Ocean spray brush Brewer oak scrub Sadler oak or deer oak brush fields[1] Huckleberry oak chaparral
Herbaceous			
Perennial Grassland (PGS)	1	< 1.0%	Knapweed and purple-flowered star-thistle fields[N] Oatgrass - tufted hairgrass - camas wet meadow Idaho fescue - California oatgrass grassland Needle

			grass - melic grass grassland Kentucky bluegrass - redtop - creeping bentgrass meadow Upland mustard and other ruderal forbes Harding grass - Reed Canary grass swards[N]
Wet Meadow (WTM)	53	< 1.0%	Water sedge and lakeshore sedge meadow[1] Beaked sedge and blister sedge meadow Oatgrass - tufted hairgrass - camas wet meadow Kentucky bluegrass - redtop - creeping bentgrass meadow Herb-rich meadow
Wetland/Riparian			
Lacustrine (LAC)	53	< 1.0%	None
Montane Riparian (MRI)	118	< 1.0%	Mountain alder thicket[1] White alder groves Torrent sedge patch[1] Fremont cottonwood forest and woodland[1] Black cottonwood forest[1] Sandbar willow thicket Wild grape shrubland[1]
Riverine (RIV)	1	< 1.0%	None
Agriculture			
Annual Grassland (AGS)	2654	17.6%	Barbed goatgrass patch[N] Wild oats grassland Annual brome grasslands[N] Red brome or mediterranean grass grasslands[N] Cheatgrass - medusahead grasslands[N] Upland mustards or yellow star-thistle fields[N] Knapweed and purple-flowered star-thistle fields[N] Annual dogtail and tall oatgrass grasslands[N]
Pasture (PAS)	11	< 1.0%	See Annual Grassland above.
Developed/Disturbed/Barren			
Barren (BAR)	62	< 1.0%	None
Urban (URB)	15	< 1.0%	None

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

Sensitive Natural Communities

WRTC Registered Professional Forester and Botanist conducted reconnaissance surveys for rare plants and sensitive natural communities across the project area. The survey determined that sensitive natural communities located within the initial treatment boundaries currently include Oregon white oak woodland as defined in the Manual of California Vegetation (MCV). All parts of the project area were not observed during the initial reconnaissance surveys, so additional sensitive natural communities may be present (including those identified in Table 2). Implementation of SPR BIO-3 is required to map sensitive natural communities prior to treatment. Based on review of species ranges, occurrence data, vegetation mapping, aerial photos, habitat present, reconnaissance-level surveys, and protocol-level surveys there are 13 sensitive natural communities with potential to occur in the CWHR habitat types present in the project area.

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

Sensitive Natural Community	Rarity Rank	Habitat Type
Bigleaf maple forest	S3	Douglas Fir, Montane Hardwood-Conifer, Montane Hardwood,
Douglas fir - incense cedar forest	S3	Douglas Fir, Sierra Mixed Conifer
Oregon white oak woodland	S3	Montane Hardwood
Incense cedar forest	S3	Sierra Mixed Conifer
Hoary, common, and Stanford manzanita chaparral	S3	Mixed Chaparral
Sadler oak or deer oak brush fields	S3	Mixed Chaparral, Montane Chaparral
Bush chinquapin chaparral	S3.3	Montane Chaparral
Water sedge and lakeshore sedge meadow	S3	Wet Meadow
Mountain alder thicket	S3	Montane Riparian
Torrent sedge patch	S3	Montane Riparian
Fremont cottonwood forest and woodland	S3.2	Montane Riparian
Black cottonwood forest	S3	Montane Riparian
Wild grape shrubland	S3	Montane Riparian

Sensitive Habitats

Riparian Habitat

The project area contains numerous Class I (e.g. Hayfork Creek, Salt Creek, and Tule Creek), Class II, and Class III watercourses. Riparian habitat is present adjacent to segments of some Class I, Class II, and Class III watercourses. WLPZs ranging from 50 to 100 feet will be established adjacent to all Class I and II watercourses within the project area per SPR HYD-4. SPR BIO-4 will also apply to avoid loss or degradation of riparian habitat function.

Oak woodlands

Oregon white oak woodlands and sadler oak have been identified (see Table 2) as potentially present in the project area. During the reconnaissance-level surveys conducted on August 18, 21, & 22, several oak species were observed including Oregon white oak (Quercus garryana), black oak (Quercus kelloggii), blue oak (Quercus douglasii) and canyon live oak (Quercus chrysolepis). Mitigation Measure BIO-3a requires treatments be designed to replicate the fire regime attributes for the affected oak woodland type including seasonality, fire return interval, fire size, spatial

complexity, fire line intensity, severity, and fire type as described in Fire in California's Ecosystems (Wagtendonk et al. 2018) and the Manual of California Vegetation (Sawyer et al. 2009). If treatment activities within identified oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas.

Wetlands

During the reconnaissance-level surveys conducted pursuant to SPR BIO-1, multiple wetlands that meet the State definition of wetland were observed. The National Wetlands Inventory classifies the project area as having 227.1 acres riverine, 26.5 acres freshwater pond, 3.4 acres freshwater forested/shrub wetland, and 15.5 acres freshwater emergent wetland (NWI, 2025). Mitigation measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of wetlands prior to treatment implementation.

Chaparral

Chaparral habitat is present within the project area. As required by SPR BIO-5, treatments implemented in chaparral will be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function. This will include identifying the chaparral vegetation types to the alliance level, determining appropriate treatment prescriptions based on current fire return interval departure and condition class of the chaparral vegetation alliances onsite, retaining at least 35 percent relative final density of mature chaparral vegetation, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. The project proponent will demonstrate with substantial evidence that the habitat function of the specific chaparral vegetation types (i.e., alliances) present would be maintained or enhanced by the treatments applied.

Special-Status Plant and Wildlife Species

Pursuant to SPR BIO-1, RPF and biologists conducted data review of project-specific biological resources, including habitat and vegetation types, special-status plants, and special-status wildlife. Reconnaissance-level surveys were conducted. The U.S. Forest Service Existing Vegetation (EVeg) Classification, Mapping & Inventory (USDA 1981, USDA 2018) was used to identify the CWHR habitat types within the entire project area. These habitats were then cross walked to the Manual of California Vegetation (Sawyer et al. 2009) vegetation alliances using the Vegetation and Habitat Types within the Treatable Landscape for the Klamath Mountains and Northern California Coast Ecological Section tables (3.6-11 and 3.6-18) provided by the CalVTP PEIR.

A list of special-status plant and wildlife species with potential to occur in the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the US Geological Survey (USGS) quadrangles containing and surrounding the project area (15 quadrangles total; CNDDB 2025; CNPS 2025a); the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (USFWS 2025); the California Department of Fish and Wildlife's Area of Conservation Emphasis (ACE) Viewer (CDFW 2025); and Appendix BIO-3 (Table 5a, Table 5b, Table 10a, Table 10b, and Table 19) in the Program EIR (Volume II) for special-status plants and wildlife that could occur in the Northern California Coast and the Klamath Mountains ecoregions.

Table 3. Special-Status Plant Species Known to Occur in the Vicinity of the Project Area and their Potential for Occurrence in the Project Area

Species	Listing Status[1] Federal	listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Serpentine rockcress *Boechera serpenticola*	-	-	1B.2	Lower montane coniferous forest, Upper montane coniferous forest; Serpentine, Talus; Blooming period: March-June; Elevation: 2590-6890 feet; Perennial herb.	*Not expected to occur*. No serpentine-derived talus, gravel, or outcrops present.

Green shield-moss *Buxbaumia viridis*	-	-	2B.2	Lower montane coniferous forest, subalpine coniferous forest, upper montane coniferous forest. Fallen, decorticated wood or humus. 3,200-7,220 feet in elevation. Blooms n/a. Moss (cryptogam).	*May occur*. Lower montane coniferous forest habitats present within the plan area.
Small-flowered calycadenia *Calycadenia micrantha*	-	-	1B.2	Chaparral, meadows & seeps (volcanic), valley and foothill grasslands. Roadsides, rocky, scree, serpentine (sometimes), and talus - sparsely vegetated areas. 15-4,920 feet in elevation. Blooms June - September. Annual.	*May occur.* Sparsely vegetated chaparral, meadows & seeps (volcanic), valley and foothill grasslands habitats along roadsides or among rocky, scree, serpentine (sometimes), and talus present within the project area.
Shasta chaenactis *Chaenactis suffrutescens*	-	-	1B.3	Lower montane coniferous forest, Upper montane coniferous forest; Sandy, Serpentine; Blooming period: May-September; Elevation: 2460-9185 feet; Perennial herb.	*May occur.* Lower montane coniferous forest habitats present within the plan area.
Jepson's dodder *Cuscuta jepsonii*	-	-	1B.2	Lower montane coniferous forest and North Coast coniferous forest; streambanks. Host species include *Ceanothus diversifolius* and *C. prostratus*. 3935-7545 feet in elevation. Blooms July - September. Annual herb or vine.	*May occur.* Lower montane coniferous forest habitats present within the project area.
Oregon fireweed *epilobium oreganum*	-	-	1B.2	Bogs & fens, lower montane coniferous forest, meadows & seeps, upper montane coniferous forest; mesic. 1640-7350 feet in elevation. Blooms June - September. Perennial.	*May occur.* Lower montane coniferous forest, meadows & seeps habitat present within the project area.
Tracy's eriastrum *Eriastrum tracyi*	-	CR	3.2	Chaparral, Cismontane woodland, Valley and Foothill grassland; Blooming period: May-July; Elevation: 1035-5840 feet; Annual herb.	*Known to occur.* There are 18 CNDDB observations within the project area.
Pink-margined monkeyflower *Erythranthe trinitiensis*	-	-	1B.3	Cismontane woodland, lower montane coniferous forest, meadows & seeps, upper montane coniferous forest; roadsides (often), serpentine (often). 1310-7495 feet in elevation. Blooms June - July (August). Annual.	*May Occur.* Bogs & fens, lower montane coniferous forest, meadows & seeps, and upper montane coniferous forest habitats present within the project area
Coast fawn lily *Erythronium revolutum*	-	-	2B.3	Bogs and fens, Broadleafed upland forest, North Coast coniferous forest; Mesic, Streambanks; Blooming period: March-July(August); Elevation: 0-5250 feet; Perennial bulbiferous herb.	*May occur.* Bogs & fens, broadleaf upland forest habitats with mesic and streambank microhabitats present within the project area.
Niles' harmonia *Harmonia doris- nilesaie*	-	-	1B.1	Chaparral, cismontane woodland, lower montane coniferous forest, ultramafic; serpentine barrens. 2133-5446 feet in elevation. Blooms May - July. Annual.	*May occur.* Chaparral, cismontane woodland, lower montane coniferous forest and ultramafic habitats with serpentine barrens present within the plan area.

Stebbins' harmonia *Harmonia stebbinsii*	-	-	1B.2	Chaparral, Lower montane coniferous forest; Serpentine; Blooming period: May-June; Elevation: 1310-5185 feet; Annual herb.	*May occur.* Chaparral, lower montane forest and serpentine present within the project area.
Yolla Bolly Mtns. bird's-foot trefoil *Hosackia Yollabolliensis*	-	-	1B.2	Meadows & seeps, upper montane coniferous forest (openings); dry barren exposed slopes; dry, gravelly (often), slopes. 5395-7005 feet in elevation. Blooms June - August. Perennial.	*May occur.* Meadows & seeps, upper montane coniferous forest (openings) habitats with dry barren, exposed, often gravelly slopes present within the plan area.
California globe mallow *Iliamna latibracteata*	-	-	1B.2	Chaparral (montane), lower montane coniferous forest, North Coast coniferous forest (mesic), riparian scrub (streambanks); burned areas (often). 195-6560 feet in elevation. Blooms June - August. Perennial.	*May occur.* Chaparral (montane), lower montane coniferous forest, and riparian scrub (streambanks) habitats often in burned areas present within the project area.
Dudley's rush *Juncus dudleyi*	-	-	2B.3	Lower montane coniferous forest (mesic); Blooming period: July-August; Elevation: 1200-6560 feet; Perennial herb.	*May occur.* Lower montane coniferous forest habitat present within the project area.
Small groundcone *Kopsiopsis hookeri*	-	-	2B.3	Lower montane coniferous forest, North coast coniferous forest, upper montane coniferous forest. 295-2905 feet in elevation. Blooms April - August. Perennial.	*Not expected to occur.* No north coast coniferous forest or upper montane forest within project area. Nearest occurrences are limited to South Fork Mountain, approximately 9 miles west of the project area.
Heckner's lewisia *Lewisia cotyledon* var. *heckneri*	-	-	1B.2	Lower montane coniferous forest (rocky). 740-6890 feet in elevation. Blooms (April) May-July. Perennial.	*May occur.* Lower montane coniferous forest with rocky elements present within the plan area.
South Fork Mountain lupine *Lupinus elmeri*	-	-	1B.2	Lower montane coniferous forest. 3995-6560 feet in elevation. Blooms June - July (August). Perennial.	*Not expected to occur.* No upper, north facing slopes present within the project area. Nearest occurrences are limited to South Fork Mountain, approximately 9 miles west of the project area.
Starry-tentacled bushmallow *Malacothamnus astrotentaculatus*	-	-	1B.3	Chaparral, Cismontane woodland, Riparian woodland; Burned areas; Blooming period: June-July (August-September); Elevation: 935-4775 feet; Perennial deciduous shrub.	*May occur.* Chaparral, Cismontane woodland, Riparian woodland and burned areas present within the project area.
White-flowered rein orchid *Piperia candida*	-	-	1B.2	Broadleafed upland forest, lower montane coniferous forest, North Coast coniferous forest. 100- 4300 feet in elevation. Blooms (March - April) May - September. Perennial.	*May occur.* Broadleaved upland forest, lower montane coniferous forest present within the project area.

Siskiyou jellyskin lichen *Scytinium siskiyouense*	-	-	1B.1	Lower montane coniferous forest, North Coast coniferous forest; epiphytic, usually on the bark of Fagaceae, such as *Quercus* or *Chrysolepis*. 2083-4790 feet in elevation. Lichen (no blooming period).	*May occur*. Lower montane coniferous forest habitats (epiphytic, usually on the bark of Fagaceae, such as *Quercus* or *Chrysolepis*) present within the project area.
Canyon Creek stonecrop *Sedum paradisum* ssp. *Paradisum*	-	-	1B.3	Broadleafed upland forest, chaparral, lower montane coniferous forest, subalpine coniferous forest; granite, rocky. 985-6235 feet in elevation. Blooms May - June. Perennial.	*May occur*. Broadleafed upland forest, chaparral, lower montane coniferous forest, and rocky microhabitats present within the project area.
Bolander's catchfly *Silene bolanderi*	-	-	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest, meadows & seeps, North Coast coniferous forest, ultramafic; usually grassy openings, sometimes dry rocky slopes, canyons, or roadsides; sometimes serpentinite. 1378-3773 feet in elevation. Blooms May - June. Perennial.	*May occur*. Chaparral, cismontane woodland, lower montane coniferous forest, meadows & seeps, and ultramafic habitats with grassy openings and sometimes serpentinite, dry rocky slopes, canyons, & roadsides, present within the project area.
Hooker's catchfly *Silene hookeri*	-	-	2B.2	Chaparral, cismontane woodland, lower montane coniferous forest; often in grassy openings; sometimes rocky, serpentine, and slopes. 490-4135 feet in elevation. Blooms (March) May - July. Perennial.	*May occur*. Chaparral, cismontane woodland, lower montane coniferous forest habitats with grassy openings, rocky surfaces, serpentine & slopes, present within the project area.

Notes: CRPR = California Rare Plant Rank; CEQA = California Environmental Quality Act; ESA = Endangered Species Act; NPPA = Native Plant Protection Act; SR = State Route.
1 Legal Status Definitions:
State:
SE State Listed as Endangered (legally protected by CESA) California Rare Plant Ranks (CRPR):
1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
CRPR Threat Ranks:
5.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
5.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
5.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)
2 Potential for Occurrence Definitions
Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.
Known to occur: The species has been observed within the treatment areas.

Table 4. Special-Status Wildlife Species Known to Occur in the Vicinity of the Project Area and their Potential for Occurrence in the Project Area

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Pacific tailed frog *Ascaphus truei*	-	SSC	Aquatic, Klamath/North coast flowing waters, lower montane coniferous forest, North coast coniferous forest, and redwood habitats. Restricted to perennial montane streams; tadpoles require water below 15° C.	*May occur*. There are 18 recorded CNDDB occurrences for this species within a 9-quad search of the project area. Potential suitable habitat for this species can be found in and adjacent to the project area

Northwestern pond turtle *Actinemys marmorata*	FP	SSC	Aquatic, artificial flowing waters, Klamath/North coast flowing waters, and Klamath/North coast standing waters. This species is a thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation; <6000. Elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	*Known to occur*. The northwestern pond turtle has been documented in a section of Hayfork Creek that intersects the project area. The range of this species includes the entire project area, and suitable habitat is found throughout the lower elevations (primarily around Hayfork Valley, and Hayfork Creek and its tributaries).
Northern red-legged frog *Rana aurora*	-	SSC	Suitable habitat for northern red-legged frogs includes humid forests, woodlands, grasslands, and streamsides in northwestern California, usually near dense riparian cover. This species is generally found near permanent water, but can be found far from water, in damp woods and meadows, during the non-breeding season.	*May occur.* There are no recorded CNDDB occurrences for the northern red-legged frog within a 9-quad search of the project area. Potential suitable habitat for this species can be found in and adjacent to the project area.
Foothill yellow-legged frog - north coast DPS *Rana boylii* pop. 1	-	SSC	This species can be found in aquatic, Klamath/North coast flowing waters, riparian forest, and riparian scrub habitats. Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	*Known to occur. There are numerous CNDDB occurrences for the foothill yellow-legged frog within the project area, especially within the vicinity of Hayfork Creek. Potential suitable habitat for this species can be found in and adjacent to the project area.*
Southern torrent salamander *Rhycacotriton variegatus*	-	SSC	The southern torrent salamander is found within coastal redwood, Douglas-fir, mixed conifer, montane riparian, and montane hardwood-conifer habitats. The presence of this species has a strong association with old-growth forests. Cold, well-shaded, permanent streams and seepages, or within splash zone or on moss-covered rocks within trickling water.	*May occur. There are four recorded CNDDB occurrences for the southern torrent salamander within a 9-quad search of the project area. None of these occurrences overlap the project boundary. Preferred habitat present in and adjacent to the numerous watercourses.*

American goshawk *Accipiter atricapillus*	-	SSC	North coast coniferous, subalpine coniferous forest, and upper montane coniferous forest habitats. This species is found within, and in the vicinity of, coniferous forests. Uses old nests, and maintains alternate sites. Usually nests on north slopes, near water. Red fir, lodgepole pine, Jefferey pine, and aspens are typical nest trees.	*May occur. Potential suitable habitat for this species can be found in and adjacent to the project area.*
Golden eagle *Aquila chrysaetos*	-	FP	Golden eagles are found in broadleaved upland forest, cismontane woodland, coastal prairie, Great Basin scrub, lower montane coniferous forest, pinon & juniper woodlands, upper montane coniferous forest, and valley & foothill grassland habitats. Within those habitats, golden eagles are often associated with rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of their range; also, large trees in open areas.	*May occur. There is one CNDDB occurrence of the golden eagle within a 9-quad search of the project area near the community of Hayfork. Potential suitable foraging habitat (open meadows and grasslands) and nest structures (large trees) for this species can be found in and adjacent to the project area.*
California Condor	EXPN	-	n/a	*Not Likely to Occur. The experimental population of California Condors is located approximately 80 miles northwest of the project area.*
Long-eared owl *Asio otus*	-	SSC	Cismontane woodland, Great Basin scrub, riparian forest and riparian woodland habitats. Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. The long-eared owl also requires adjacent open land with an abundant mouse population and the old nests of crows, hawks, or magpies for breeding.	*May occur. Not reported within a 9-quad search, but the project area is with the known range of this species. Additionally, riparian forest and riparian woodland habitats are present throughout the project area.*

Vaux's swift *Chaetura vauxi*	-	SSC	Lower montane coniferous forest, north coast coniferous forest, old-growth, and redwood habitats. The Vaux's swift is found within redwood, Douglas fir, and other coniferous forests. Nests in large hollow trees and snags. Often nests in flocks. This species is known to orage over most terrains and habitats but shows a preference for foraging over rivers and lakes.	*May occur. Not reported within a 9-quad search, but lower montane coniferous forest and North coast coniferous forest habitats present within the project area.*
Western snowy plover *Charadrius nivosus nivosus*	FT	SSC	Great Basin standing water, sand shore, and wetland habitats. Sandy beaches, salt pond levees and shores of large alkali lakes.	*Not expected to occur. Inhabit near-shore habitat along the Pacific coast and inland towards the Sierra Nevadas - their current range does not does not include Trinity County.*
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	FT	SE	The western yellow-billed cuckoo is found in riparian forest habitats. This species is known to be a 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. Riparian forest habitat is present within the project area and the historic range for this species was throughout the Pacific Northwest. However, in California this species is currently isolated to two separate populations in the Central Valley.*
Olive-sided flycatcher *Contopus cooperi*	-	SSC	Lower montane coniferous forest, redwood, and upper montane coniferous forest habitats. This species' nesting habitats are mixed conifer, montane hardwood-conifer, Douglas-fir, redwood, red fir and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes or other open terrain.	*May occur. Lower montane coniferous habitat and upper montane coniferous habitat present within the project area. General nesting and microhabitat features i.e. mixed conifer, Douglas-fir, and red fir with tall trees overlooking canyons, meadows or other open terrain also present within the project area.*

American peregrine falcon *Falco peregrinus anatum*	FD	SD	The American peregrine falcon is found near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scarp, depression, or ledge in an open site	*May occur. Potential suitable habitat for this species can be found adjacent to the project area.*
Bald eagle *Haliaeetus leucocephalus*	FD	SE, FP	Bald eagles are found in lower montane coniferous forest and old-growth habitats. This species prefers ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live trees with open branches, especially ponderosa pine. Roosts communally in winter.	*May Occur. One recorded observation on CNDDB in 9-quad search. In this part of their range, nest structures in upper 1/3 crown of large trees. Potential forage habitat along major rivers and estuaries. Not expected in the higher elevations of the project area where large Class 1 watercourses are absent.*
Yellow-breasted chat *Icteria virens*	-	SSC	Yellow-breasted chats are found in riparian forest, riparian scrub, and riparian woodland habitats. Summer resident, this species 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.	*May occur. Riparian forest, riparian scrub, and riparian woodland habitats present within the project area. General habitat characteristics of riparian thickets of willows and other brushy tangles near watercourses, and nesting features such as low, dense riparian, consisting of willow, blackberry, and wild grape also present within the plan area.*
Osprey *Pandion haliaetus*	-	-	Osprey can be found in riparian forest habitats. This species is found along the ocean shore, bays, freshwater lakes, and large streams. Their nests are built in tree-tops and similar human-made structures (e.g., electrical poles, marine beacon towers, etc.) within 15 miles of good fish-producing bodies of water.	*May occur. There is one occurrence of Osprey within the CNDDB 9-Quad search are. There is riparian forest habitat present within the project area along Hayfork Creek and other fish- bearing tributaries within the general vicinity.*
Purple martin *Progne subis*	-	SSC	Purple martin is found in broadleaved upland forest and lower montane coniferous forest habitats. This species inhabits woodlands, low elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine. Known to mostly nest in old woodpecker cavities; also, in human-made structures. Nest often located in tall, isolated	*May occur. Broadleaved upland forest and lower montane coniferous forest habitats are present within the project area. There is also potential for nest structures for this species in the form of tall, standing snags in the recently burned stands within the project area.*

			tree/snag.	
Yellow warbler *Setophaga petechia*	-	SSC	Yellow warblers are found in riparian forest, riparian scrub, and riparian woodland habitats. Riparian plant associations in close proximity to water. This species 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 cottonwoods, sycamores, ash, and alders.	*May occur. Riparian forest, riparian scrub, and riparian woodlands habitat is present within the project area. Willow shrubs/thickets associated with the numerous watercourses are present throughout the general area; cottonwoods can be found in lower elevations adjacent to Hayfork Creek.*
Northern spotted owl *Strix occidentalis caurina*	FT	ST	North coast coniferous forest, old-growth, and redwood habitats. Old-growth forests of mixed stands of old-growth and mature trees. Occasionally in younger forests with patches of big trees. Microhabitat features include high, multistory canopy dominated by big trees with cavities or broken tops, woody debris, and space under canopy.	*Known to occur. One recorded activity center (ACs) in CNDDB Spotted Owl Database that overlaps the project area and another eleven ACs within the 1.3-mile NSO Assessment Area. Habitat for this species present in some of the forested areas within the project area.*
Steelhead - northern California DPS summer-run *Oncorhynchus mykiss* irideus pop. 48	FT	SE	Aquatic, estuary, Klamath/North coast flowing waters habitats. Naturally spawning population of the stream-maturing summer-run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution within range more limited. Require cool water (<23C); holding habitat to withstand higher temps; lower flows in summer/fall; require loose gravels at pool tails for redd construction. Favor cool, clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	*May occur. Aquatic and Klamath/North coast flowing water habitats present within the project area.*

Steelhead - northern California DPS winter-run *Oncorhynchus mykiss* irideus pop. 49	FT	-	Aquatic, estuary, Klamath/North coast flowing waters habitats. Naturally spawning population of the ocean-maturing winter- run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution throughout range. Adults require high flows of 18-20 cm for passage and loose gravels at pool tails for redd construction. Juveniles favor areas with cool (10-17 C), clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	*May occur. Aquatic and Klamath/North coast flowing water habitats present within the project area.*
Chinook salmon - upper Klamath and Trinity Rivers ESU *Oncorhynchus tshawytscha* pop. 30	FP	ST, SSC	Aquatic and Klamath/North coast flowing waters habitats. Spring-run chinook in the Trinity River and the Klamath River upstream of the mouth of the Trinity River. Major limiting factor for juvenile chinook salmon is temperature, which strongly affects growth and survival.	*Known to occur. There are recorded CNDDB observations of this ESU within the portions of Hayfork Creek that intersect the project area.*
Western bumblebee *Bombus occidentalis*	-	SC	Meadows and grasslands with abundant flowering resources are considered preferred habitat for the western bumblebee. Once common and widespread, species has declined precipitously from central CA to southern B.C., perhaps from disease.	*May occur. Historically found throughout California. No recorded occurrences on CNDDB in 9-quad search centered on the project area. Potential habitat in the form of meadows and grasslands with ample flowering plants for forage, specifically in the un-forested areas in and adjacent to Hayfork Valley).*
Suckley's cuckoo bumble bee *Bombus suckleyi*	FP	-	Prairies, grasslands, meadows, urban and agricultural areas, and woodlands from 6-10,000 feet in elevation. Generally observed in low abundance at the margins of a host species' range.	*May occur. Suckley's cuckoo bumble bee is an obligate social parasite. Females usurp the nests of Bombus occidentalis to raise their young. There is potential Western bumble bee habitat present within the project area.*

Conservancy fairy shrimp *Branchinecta coinservatio*	FE	-	Conservancy fairy shrimp are found in valley & foothill grassland, vernal pool, and wetland habitats. This species is endemic to the grasslands of the northern two-thirds of the Central Valley; found in large, turbid pools. Inhabit astatic pools located in swales formed by old, braided alluvium; filled by winter/spring rains, last until June.	*Not expected to occur. Valley & foothill grassland, vernal pool, and wetland habitats are present, but the project area is outside of this species' known range (Central Valley from Tehama County to Merced County).*
Vernal pool fairy shrimp *Branchinecta lynchi*	FT	-	Vernal pool fairy shrimp are found in valley & foothill grassland, vernal pool, and wetland habitats. Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.	*May occur. Historically found in California and Oregon. Currently known from Redding, CA to San Diego and from the Klamath Mountains north into Oregon. Potential habitat present in the form of vernal pools within the project area (possibly in the grasslands around Hayfork).*
Monarch butterfly *Danaus plexippus plexippus*	FP	-	Monarch butterflies are found in closed-cone coniferous forest habitats. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Need Asclepias sp. (milkweed) to lay eggs. Prefer milkweed and other flowering plants for forage.	*Not expected to occur. Found mostly along the coast, roosting in Eucalyptus sp., Cupressus macrocarpa, and Pinus radiata. Asclepias sp. (milkweed) is very sparsely distributed throughout the general area.*
Vernal pool tadpole shrimp *Lepidurus packardi*	FE	-	Vernal pool tadpole shrimp are found in valley & foothill grassland, vernal pool, and wetland habitats. Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass-bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid.	*May occur. This species has patchy distribution in the California Central Valley from Visalia north to the Oregon border, and the western edge of its range overlaps the project area. L. packardi are found only in ephemeral freshwater habitats, including alkaline pools, clay flats, vernal lakes, vernal swales, and other seasonal wetlands in California.*
Trinity bristle snail *Monadenia setosa*	-	ST	The Trinity bristle snail is found in riparian forest habitats. Known only from along a few streams in the Trinity River drainage. Characteristic habitat consists of cool, moist, wet, and shady riparian zones frequently	*May occur. There are twenty-eight occurrences for the Trinity bristle snail recorded from a CNDDB 9-quad search and their preferred habitats are found within the project area. Also, recently created macrohabitat models (Sullivan 2022a) predict*

			associated with older growing late successional forests containing both conifer and hardwood elements (Sullivan 2008). Juveniles have been found under bark of standing dead broadleaf trees.	*high probability for preferred habitat for this species within portions of the project area.*
Pallid bat *Antrozous pallidus*	-	SSC	The pallid bat is found in chaparral, coastal scrub, desert wash, and Great Basin grassland habitats. Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry desert habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	*May occur. Chaparral habitats present within the project area. Pallid bats may use large trees, snags, bridges, buildings, caves, or mines in or near the project area.*
Willow Flycatcher *Empidonax traillii*	-	SE	The Willow Flycatcher is found in riparian habitat. Usually broad, open river valleys or large mountain meadows with lush growth of shrubby willows. Dense willow thickets are required for nesting and roosting.	*May occur. Riparian habitats present within the project area. This species range extends into Trinity County northwest of the project area. There are extensive willow thickets along Hayfork Creek and associated tributaries. Cattle grazing usually coincides with these willow thickets diminishing desired habitat characteristics. (Zeiner et al 1990).*
Gray wolf *Canis lupus*	FE	SE	Habitat generalists, historically occupying diverse habitats including tundra, forests, grasslands, and deserts. Primary habitat requirements are the presence of adequate ungulate prey, water, and low human contact.	*Not expected to occur. Outside current range. The gray wolf is known to be present in northeastern California in Lassen, Modoc, Shasta, and Tehama Counties, and in the southern Sierras in Tulare County.*
Townsend's big-eared bat *Corynorhinus townsendii*	-	SSC	Broadleaved upland forest, chaparral, chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, lower montane coniferous forest, meadow & seep, Mojavean desert scrub, riparian woodland, Sonora desert scrub, Sonora thorn woodland, upper montane coniferous forest, and valley & foothill grassland habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	*Known to occur. Five recorded occurrences for this species from CNDDB 9-quad search. One observation from 1998 of 'maternity colony that used more than one structure' is adjacent to portions of the project area. Large trees with basal hollows generally lacking in project area, so potential roosting habitat most likely in the form of caves and human-made structures.*
North American Wolverine *Gulo gulo luscus*	FT	ST, FP	Wolverines are found in alpine, alpine dwarf scrub, meadow & seep, montane dwarf scrub, north coast coniferous forest, riparian forest, subalpine coniferous forest, upper montane	*Not expected to occur. There are two occurrences for this species recorded from a CNDDB 9- quad search of the project area. One dated from 1974 located northwest of the project area and the second dated 1991 south of the project area, though this species*

			coniferous forest, and wetland habitats. Found in a wide variety of high elevation habitats. Needs water source. Uses caves, logs, burrows for cover and den area. Hunts in more open areas. Can travel long distances. There have only been a few observations of this species in California in the last 100 years, all from the Sierra Nevada.	*is believed to be currently extirpated from west of Highway 5. Current observations for G. gulo from the Sierra Nevada. Preferred habitats for this species are present within the project area.*
Humboldt marten *Martes caurina humboldtensis*	FT	SE, SSC	North coast coniferous forest, old-growth, and redwood habitats. Occurs only in the coastal redwood zone from the Oregon border south to Sonoma County. Associated with late-successional coniferous forests, prefer forests with low, overhead cover.	*Not expected to occur. There are two occurrences for this species recorded from a CNDDB 9-quad search of the project area. Both occurrences are from 1971 observations to five miles north of the project area in the Shasta-Trinity National Forest. There are no late-successional forests within the project area.*
Pacific fisher *Pekania pennanti*	-	SSC	Pacific fisher can be found in north coast coniferous forest, old-growth, and riparian forest habitats. Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest.	*May occur. There are forty-six recorded occurrences on CNDDB in 9-quad search. Four observations overlap the project area. They occurred in 1968, 1982, 1984 and 1986. Habitat has been greatly impacted by wildfire since these occurrences but is still present in portions of the project area.*
American badger *Taxidea taxus*	-	SSC	Alkali mash, alkali playa, alpine, alpine dwarf scrub, bog & fen, brackish marsh, broadleaved upload forest, chaparral, chenopod scrub, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub,coastal dune, coastal prairie, coastal scrub, desert dune, desert wash, freshwater marsh, Great Basin scrub, interior dune, Ione formation, Joshua tree woodland, limestone, lower montane coniferous forest, marsh & swamp, meadow & seep, Mojavean desert scrub, Mojavean dwarf scrub, north coast coniferous forest, old-growth, pavement plain, redwood, riparian forest, riparian scrub, riparian woodland, salt marsh, Sonoran desert scrub, Sonoran thorn woodland, ultramafic, upper montane	*May occur. There is one recorded occurrence for this species on CNDDB for 9-quad search from HWY 299 near big bar; undisclosed date. Habitat for the American badger is present within the project area.*

			coniferous forest, upper Sonoran scrub, and valley & foothill	

Notes: CNDDB = California Natural Diversity Database; CEQA = California Environmental Quality Act

1 Legal Status Definitions:

Federal:
FE Federally Listed as Endangered (legally protected)
FT Federally Threatened (legally protected)
FD Federally Delisted
FP Proposed for listing under the federal Endangered Species Act
State:
FP Fully Protected (legally protected)
SSC Species of Special Concern (no formal protection other than CEQA consideration)
SE State Listed as Endangered (legally protected)
ST State Listed as Threatened (legally protected)
SC State Candidate for Listing (legally protected)
SD State Delisted

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.
Known to occur: Species has been documented within the treatment site.

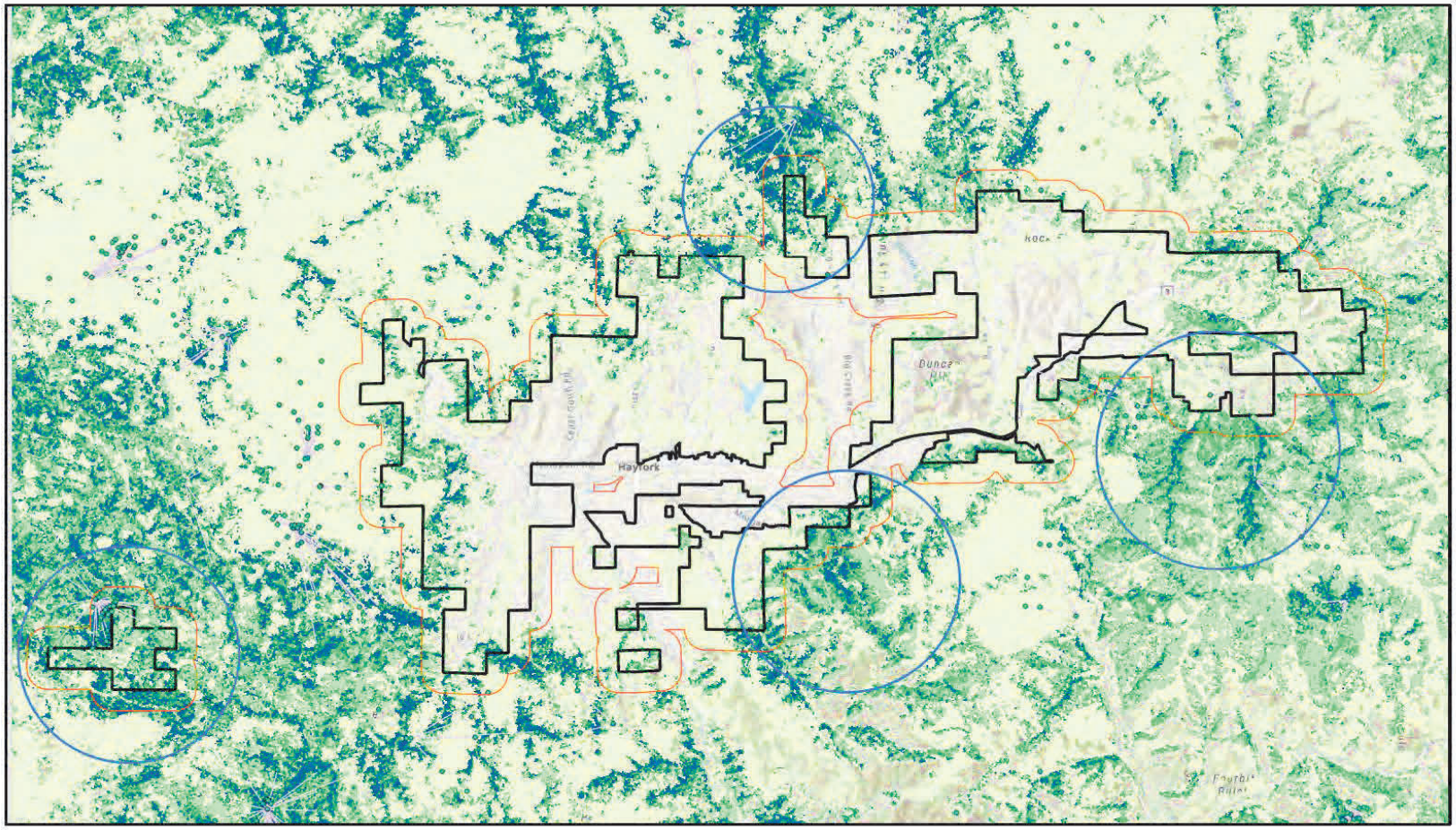

Figure 1. Four areas depicted by blue circles where the limited operating period for smoke-generating activities will remain in effect for the northern spotted owl between February 1 and July 9 (unless surveys demonstrate owls are not nesting that year). The orange buffer on the Project Boundary (black line) represents 0.25 mile. (USFWS Technical Assistance 2026-0087795-S7)

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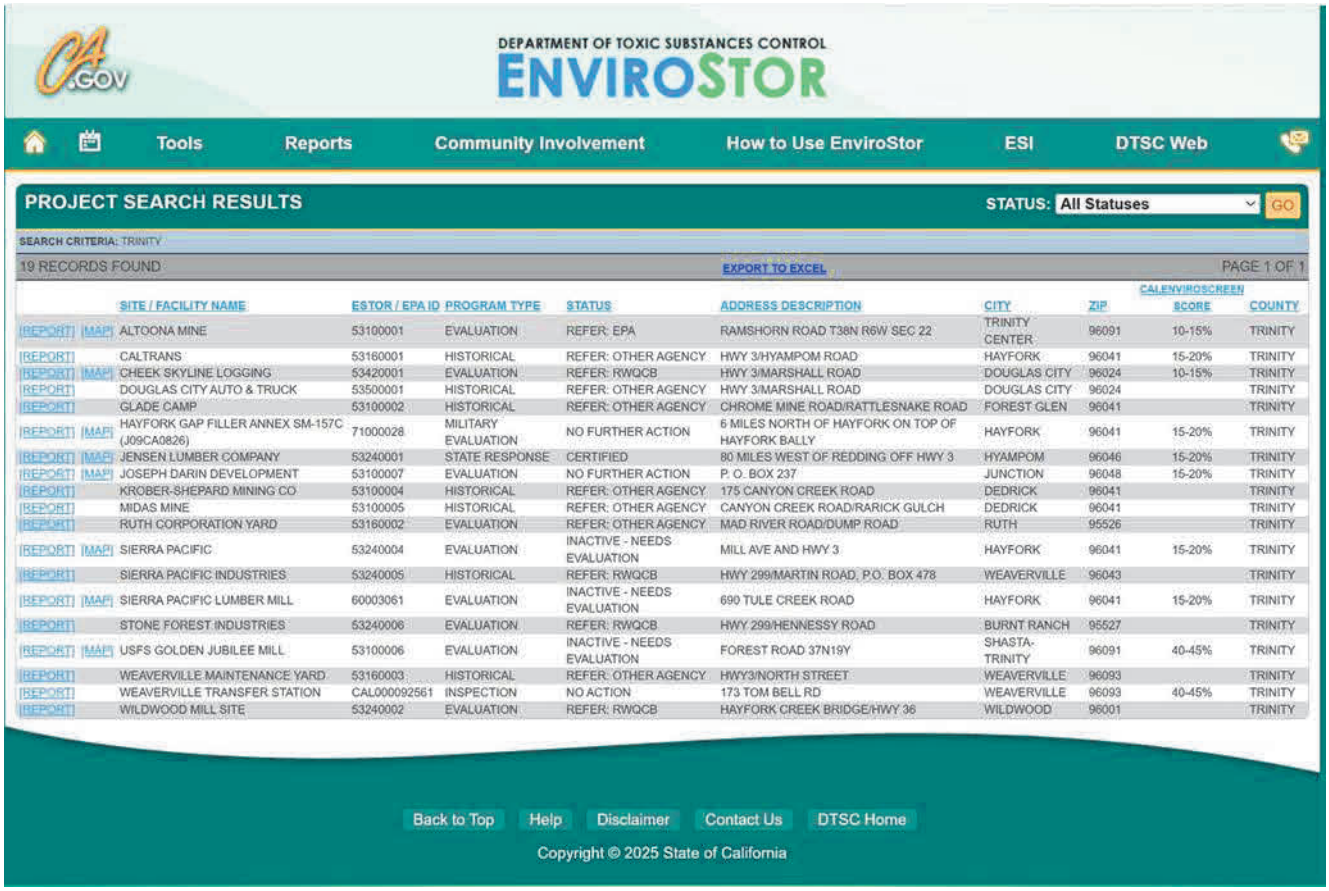
Attachment C – Hazardous Material



DEPARTMENT OF TOXIC SUBSTANCES CONTROL
ENVIROSTOR

Tools | Reports | Community Involvement | How to Use EnviroStor | ESI | DTSC Web

PROJECT SEARCH RESULTS

STATUS: All Statuses GO

SEARCH CRITERIA: TRINITY

19 RECORDS FOUND — EXPORT TO EXCEL — PAGE 1 OF 1

		SITE / FACILITY NAME	ESTOR / EPA ID	PROGRAM TYPE	STATUS	ADDRESS DESCRIPTION	CITY	ZIP	CALENVIROSCREEN SCORE	COUNTY
[REPORT]	[MAP]	ALTOONA MINE	53100001	EVALUATION	REFER: EPA	RAMSHORN ROAD T38N R6W SEC 22	TRINITY CENTER	96091	10-15%	TRINITY
[REPORT]		CALTRANS	53160001	HISTORICAL	REFER: OTHER AGENCY	HWY 3/HYAMPOM ROAD	HAYFORK	96041	15-20%	TRINITY
[REPORT]	[MAP]	CHEEK SKYLINE LOGGING	53420001	EVALUATION	REFER: RWQCB	HWY 3/MARSHALL ROAD	DOUGLAS CITY	96024	10-15%	TRINITY
[REPORT]		DOUGLAS CITY AUTO & TRUCK	53500001	HISTORICAL	REFER: OTHER AGENCY	HWY 3/MARSHALL ROAD	DOUGLAS CITY	96024		TRINITY
[REPORT]		GLADE CAMP	53100002	HISTORICAL	REFER: OTHER AGENCY	CHROME MINE ROAD/RATTLESNAKE ROAD	FOREST GLEN	96041		TRINITY
[REPORT]	[MAP]	HAYFORK GAP FILLER ANNEX SM-157C (J09CA0826)	71000028	MILITARY EVALUATION	NO FURTHER ACTION	6 MILES NORTH OF HAYFORK ON TOP OF HAYFORK BALLY	HAYFORK	96041	15-20%	TRINITY
[REPORT]	[MAP]	JENSEN LUMBER COMPANY	53240001	STATE RESPONSE	CERTIFIED	80 MILES WEST OF REDDING OFF HWY 3	HYAMPOM	96046	15-20%	TRINITY
[REPORT]	[MAP]	JOSEPH DARIN DEVELOPMENT	53100007	EVALUATION	NO FURTHER ACTION	P. O. BOX 237	JUNCTION	96048	15-20%	TRINITY
[REPORT]		KROBER-SHEPARD MINING CO	53100004	HISTORICAL	REFER: OTHER AGENCY	175 CANYON CREEK ROAD	DEDRICK	96041		TRINITY
[REPORT]		MIDAS MINE	53100005	HISTORICAL	REFER: OTHER AGENCY	CANYON CREEK ROAD/RARICK GULCH	DEDRICK	96041		TRINITY
[REPORT]		RUTH CORPORATION YARD	53160002	EVALUATION	REFER: OTHER AGENCY	MAD RIVER ROAD/DUMP ROAD	RUTH	95526		TRINITY
[REPORT]	[MAP]	SIERRA PACIFIC	53240004	EVALUATION	INACTIVE - NEEDS EVALUATION	MILL AVE AND HWY 3	HAYFORK	96041	15-20%	TRINITY
[REPORT]		SIERRA PACIFIC INDUSTRIES	53240005	HISTORICAL	REFER: RWQCB	HWY 299/MARTIN ROAD, P.O. BOX 478	WEAVERVILLE	96043		TRINITY
[REPORT]	[MAP]	SIERRA PACIFIC LUMBER MILL	60003061	EVALUATION	INACTIVE - NEEDS EVALUATION	690 TULE CREEK ROAD	HAYFORK	96041	15-20%	TRINITY
[REPORT]		STONE FOREST INDUSTRIES	53240006	EVALUATION	REFER: RWQCB	HWY 299/HENNESSY ROAD	BURNT RANCH	95527		TRINITY
[REPORT]	[MAP]	USFS GOLDEN JUBILEE MILL	53100006	EVALUATION	INACTIVE - NEEDS EVALUATION	FOREST ROAD 37N19Y	SHASTA-TRINITY	96091	40-45%	TRINITY
[REPORT]		WEAVERVILLE MAINTENANCE YARD	53160003	HISTORICAL	REFER: OTHER AGENCY	HWY3/NORTH STREET	WEAVERVILLE	96093		TRINITY
[REPORT]		WEAVERVILLE TRANSFER STATION	CAL000092561	INSPECTION	NO ACTION	173 TOM BELL RD	WEAVERVILLE	96093	40-45%	TRINITY
[REPORT]		WILDWOOD MILL SITE	53240002	EVALUATION	REFER: RWQCB	HAYFORK CREEK BRIDGE/HWY 36	WILDWOOD	96001		TRINITY

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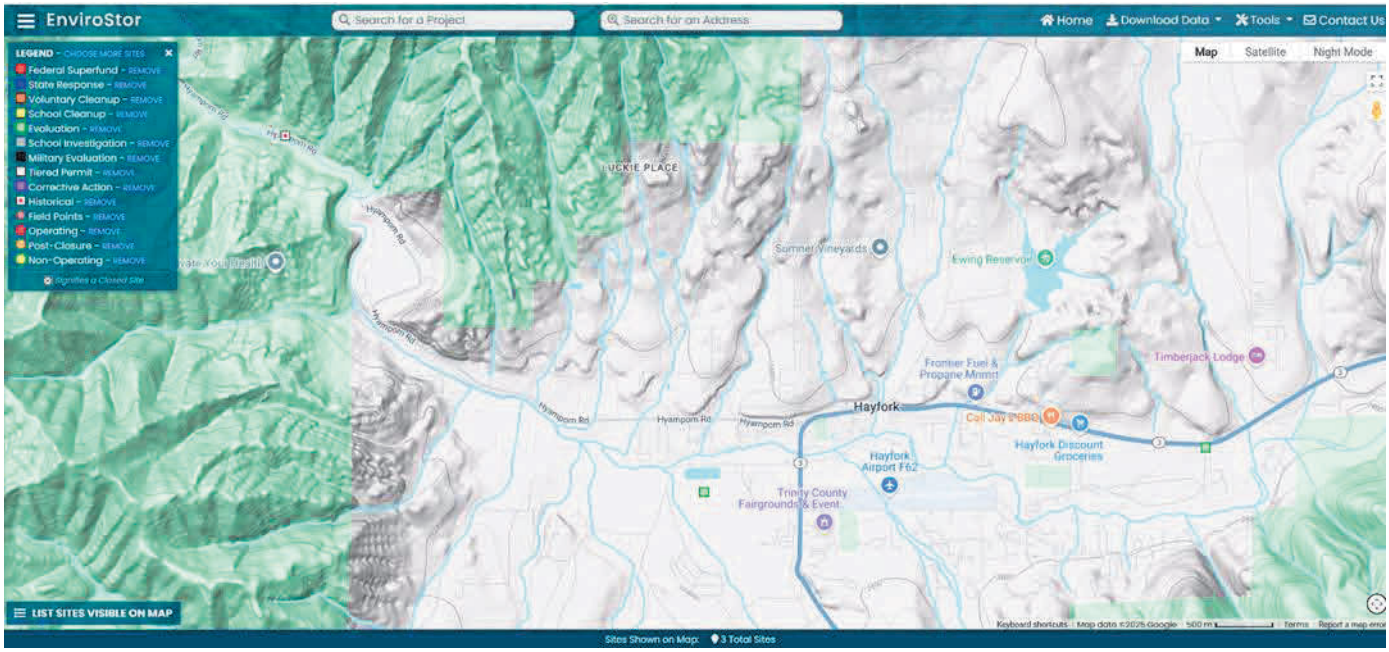
DTSC EnviroStar web search returned 19 results in Trinity County. One site is within the project area, two sites are immediately adjacent.

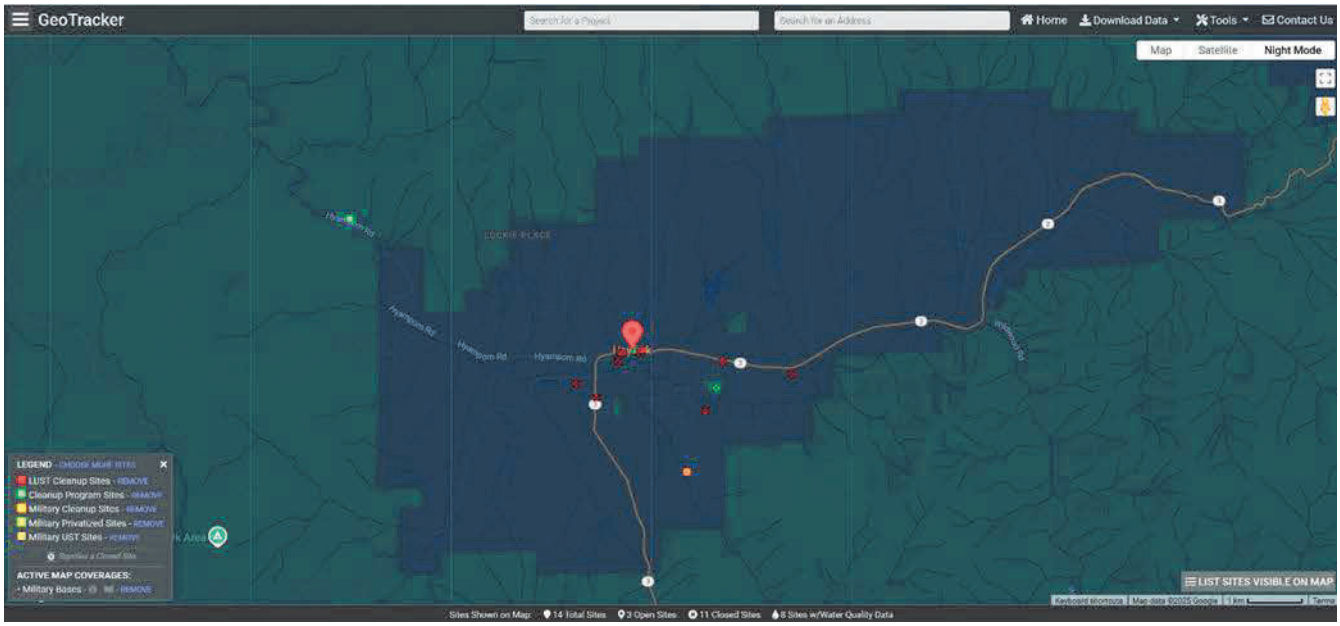


DTSC EnviroStar wed search returned 3 results in and around the project area.

SITES IDENTIFIED WITH WASTE CONSTITUENTS ABOVE HAZARDOUS WASTE LEVELS OUTSIDE THE WASTE MANAGEMENT UNIT

COUNTY	CITY	REGION	SWAT I	WASTE DISCHARGER SYSTEM NO.	SOLID WASTE ID NO.	WASTE MANAGEMENT UNIT NAME	FACILITY NAME	AGENCY NAME
DEL NORTE	CRESCENT CITY	1	2	1A880520NSL-01		DEL NORTE COUNTY- PESTICIDE STORAGE	DEL NORTE PESTICIDE STORAGE AR	DEL NORTE, COUNTY OF
CONTRA COSTA	PITTSBURG	2	1	2 071059002-02	07-A1-0001	U.S. STEEL CORP.-PITTSBURG SITE LA	WDR-USS-POSCO	USS-POSCO
SOLANO	VALLEJO	2	1	2 482011003-01	48-AA-0008	US NAVY MARE ISLAND SANITARY LANDFILL	WDR-NAVAL SHIPYARD/CLASS I LAN	MARE ISLAND NAVAL SHIPYARD
CONTRA COSTA	RICHMOND	2	3	2 071007002-01		CHEVRON CHEMICAL COMPANY-OLD SITES	WDR-ORTHO DIV-RICHMOND PLANT	CHEVRON CHEMICAL COMPANY
MONTEREY	FORT ORD (Marina)	3	1	3 270301004-01	27-AA-0015	FORT ORD LANDFILL	SANITARY LANDFILL	U.S. ARMY, FORT ORD
SANTA BARBARA	LOMPOC	3	3	3 420305001-01	42-AA-0017	LOMPOC CITY LANDFILL	SOLID WASTE DISPOSAL SITE	LOMPOC CITY
LOS ANGELES	MONTEREY PARK	4	1	4B190332001-01	19-AM-0001	OPERATING INDUSTRIES LANDFILL	OPERATING INDUSTRIES, INC.	OPERATING INDUSTRIES, INC.
TULARE	WOODLAKE	5F	1	5D540300010-01	54-AA-0007	TULARE COUNTY-WOODLAKE LANDFILL	WOODLAKE SWDS	TULARE, COUNTY OF
FRESNO	FRESNO	5F	2	5D100300001-01		MCKINLEY AVE. YARD	T.H. AGRICULTURE AND NUTRITION	NORTH AMERICAN PHILLIPS
KINGS	CORCORAN	5F	2	5D160302001-01	16-AA-0011	KINGS COUNTY-CORCORAN LANDFILL	CORCORAN SWDS	KINGS COUNTY WASTE MGMT AUTH.
FRESNO	FRESNO	5F	3	5D100319001-01	10-AA-0013	ORANGE AVENUE DISPOSAL COMPANY	ORANGE AVENUE LANDFILL	ORANGE AVENUE DISP CO. INC
TULARE	EXETER	5F	3	5D540300003-01	54-AA-0002	TULARE COUNTY-EXETER DISPOSAL SITE	EXETER SWDS	TULARE, COUNTY OF
MERCED	ATWATER	5F	4	5C240115001-01		ATWATER CITY	BERT CRANE ROAD LANDFILL	ATWATER, CITY OF
FRESNO	FOWLER	5F	5	5D100325N01-01		FOWLER CITY	FOWLER CITY LANDFILL (OLD)	FOWLER, CITY OF
BUTTE	OROVILLE	5R	2	5A042005001-01		KOPPERS COMPANY-OROVILLE SITE	KOPPERS WOOD PRESERVING ISW	KOPPERS INDUSTRIES INC.
BUTTE	CHICO	5R	4	5A040302N01-01		CHICO CITY BURN DUMP	HUMBOLDT ROAD LANDFILL	CHICO, CITY OF
SACRAMENTO	SACRAMENTO	5S	1	5A340700003-01	34-AA-0008	US AIR FORCE-MCCLELLAN AFB LANDFILL	CLASS III SITE 8 (CLOSURE)	US AIR FORCE-MCCLELLAN AFB
SACRAMENTO	MATHER (Rancho Cordova)	5S	2	5A340700001-01		US AIR FORCE-MATHER FIELD LANDFILL	MATHER AFB ENVIRONMENTAL MGMT	US AIR FORCE – MATHER AFB
SACRAMENTO	SACRAMENTO	5S	3	5B342000N01-01		SACRAMENTO ARMY DEPOT	SACRAMENTO ARMY DEPOT	U.S. ARMY
SAN JOAQUIN	STOCKTON	5S	3	5 390002NUR-01	39-AA-0006	US NAVY COMMUNICATIONS LANDFILL	U.S.N. COMMUNICATION STA. LANDF	U.S. NAVY COMMUNICATIONS
SAN JOAQUIN	FRENCH CAMP	5S	3	5 390003NUR-01		US ARMY-SHARPE ARMY DEPOT	US ARMY-SHARPE ARMY DEPOT	US ARMY
SAN JOAQUIN	TRACY	5S	5	5 390006NUR-01		SITE 300 (OTHER 39 WMUS)	LAWRENCE LIVERMORE LAB	LAWRENCE LIVERMORE LABS
INYO	KEELER	6V	1	6B142000041-01	14-AA-0008	US TUNGSTEN OWENS LAKE LANDFILL	OWENS LAKE LANDFILL	UMETCO MINERALS CORPORATION
ORANGE	FULLERTON	8	1	8300002NUR-01		MCCOLL SITE	MCCOLL SLUDGE DISPOSAL SITE	TOXIC SUBSTANCES CONTROL DIVIS
RIVERSIDE	RIVERSIDE	8	1	8 330325001-01		STRINGFELLOW QUARRY ACID PITS	STATE OF CALIFORNIA-STRINGFELLOW	TOXIC PROGRAM MANAGEMENT SECT

Site identified with waste constituents above hazardous waste levels outside the waste management unit. There are no sites in Trinity County.



Geotracker returned 14 total sites in the vicinity of the project area. Only one site, Golden LLC Diesel Spill is an Active Site within the project area.

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State Water Resources Control Board. 2025. GeoTracker. Available: https://geotracker.waterboards.ca.gov/. Retrieved May 30, 2025.

Figure 1. Hayfork Valley VTP Project Map: