

PROJECT-SPECIFIC ANALYSIS AND ADDENDUM

Upper Chowchilla River Watershed Forest Health and Fire Recovery Project Vegetation Treatment Project

Prepared for:

SIERRA·FOOTHILL
·CONSERVANCY·

May 2026

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LIST OF ABBREVIATIONS

ATV	all-terrain vehicles
Board	California Board of Forestry and Fire Protection
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal-IPC	California Invasive Plant Council
CalVTP	California Vegetation Treatment Program
CCIC	Central California Information Center
CDFW	California Department of Fish and Wildlife Service
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO_2	carbon dioxide
CWHR	California Wildlife Habitat Relationship
dB	decibel
DBH	diameter at breast height
EPA	US Environmental Protection Agency
ESA	federal Endangered Species Act
GHG	greenhouse gas
HCP	habitat conservation plan
IPaC	Information for Planning and Consultation
LRA	Local Responsibility Area
MCRCD	Mariposa County Resource Conservation District
MMRP	mitigation monitoring and reporting program
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NOA	naturally occurring asbestos
NO_X	nitrous oxide
PM	particulate matter
Program EIR	Program Environmental Impact Report
PSA	Project-Specific Analysis
PSA/Addendum	Project-Specific Analysis Addendum to the Program EIR

ROG	reactive organic gas
RPF	registered professional forester
SFC	Sierra Foothill Conservancy
SR	State Route
SRA	State Responsibility Area
SSMN	Southern Sierra Miwuk Nation
TAC	toxic air contaminant
TEK	Traditional Ecological Knowledge
UAS	unmanned aerial system
USFWS	US Fish and Wildlife
USGS	US Geological Survey
UTV	utility task vehicle
VMT	vehicle miles traveled
WLPZ	Watercourse and Lake Protection Zone

1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

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

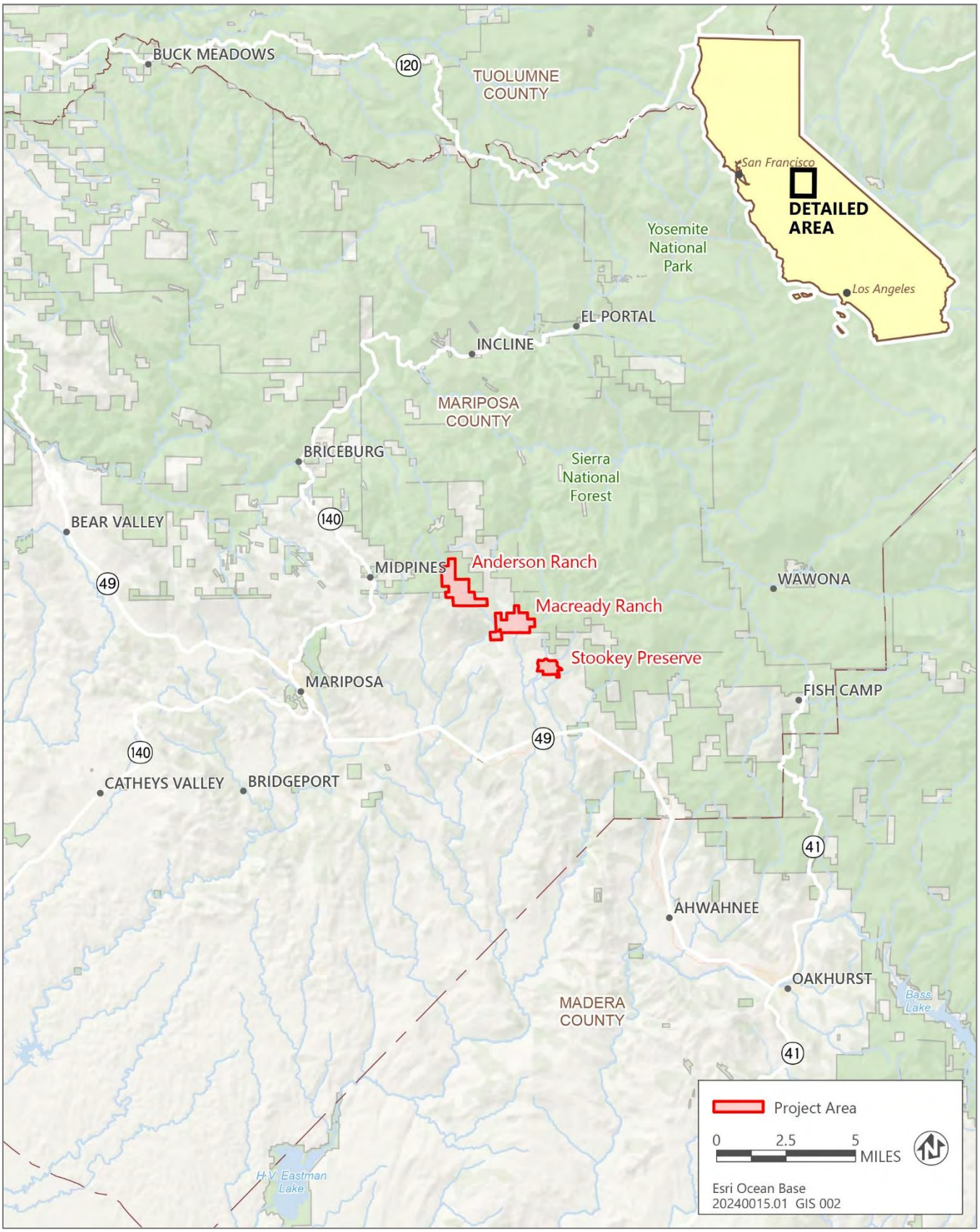
This PSA/Addendum has been prepared in compliance with the Writ of Mandate (writ) issued by the San Diego Superior Court in *California Chapparal Institute, et al* v *Board of Forestry and Fire Protection* on November 14, 2025, as explained further in Section 2.1, below.

1.1.1 Proposed Project

Sierra Foothill Conservancy (SFC) proposes to implement the Upper Chowchilla River Watershed Forest Health and Fire Recovery Project (proposed project) in the Sierra Nevada foothills of Mariposa County (Figure 1-1). The proposed project entails the implementation of vegetation treatments on up to 1,667.3 acres on land conserved by SFC (Figure 1-1). The proposed treatment types (i.e., fuel breaks and ecological restoration) and the treatment activities (i.e., manual vegetation treatment, mechanical vegetation treatment, prescribed burning, herbicide application, prescribed herbivory) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

1.1.2 Roles

This document provides CEQA compliance for the implementation of vegetation treatments that require a discretionary action by a state or local agency. The CEQA lead agency is the Mariposa County Resource Conservation District (MCRCD). The MCRCD will enter into a partnership with SFC to implement the proposed treatments, which may entail the provision of resources to SFC including staffing, and technical input; this constitutes its discretionary approval. In this PSA/Addendum, SFC is the primary "implementing entity", reflecting their role as the lead implementers of treatments, with the private landowners of Anderson Ranch and Macready Ranch as potential secondary implementing entities. As defined in the CalVTP Program EIR, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. The Program EIR contemplated that the primary discretionary approval of the public agency project proponent would be implementing the treatments and associated SPRs and mitigation measures. However, for this project, the public agency's (MCRCD) discretionary approval is the aforementioned partnership, and SFC would be implementing treatments and associated SPRs and mitigation measures. Therefore, as used in this PSA/Addendum, unless otherwise noted, SFC is the project proponent.



Sources: Adapted by Ascent in 2025.

Figure 1-1 Regional Location

SFC is a 501(c)3 non-profit regional land trust founded in 1996 that has protected over 67,000 acres to date throughout their service area of Fresno, Madera, Mariposa, and Merced Counties. In 2024, SFC was awarded California Department of Forestry and Fire Protection (CAL FIRE) Forest Health grant funding to implement fuels reduction and reforestation treatments on critical forest land protected by SFC located at the interface between rural residential areas and the Sierra National Forest.

Treatments would be conducted on three private properties: "Anderson Ranch," "Macready Ranch," and "Stookey Preserve." SFC holds two perpetual conservation easements on the Anderson Ranch (the Clark's Valley Conservation Easement and Portuguese Ridge Conservation Easement), a single perpetual conservation easement on the Macready Ranch (the Macready Conservation Easement), and owns the Stookey Preserve in fee. The Stookey Preserve is perpetually conserved by a Notice of Unrecorded Grant Agreement, issued by the Wildlife Conservation Board. The portion of the Anderson Ranch encumbered by the Clark's Valley Conservation Easement is held in fee title by the Albert W. Anderson Living Trust. The portion of the Anderson Ranch encumbered by the Portuguese Ridge Conservation Easement is held in fee title by the Albert W. and Carliene M. Anderson Family Trust. Fee title of the Macready Ranch is held by Macready Ranch Inc., 1984 Corporate Seal, Delaware. Both the Anderson Ranch and Macready Ranch are privately owned and operated by the Anderson and Macready families, respectively. The Stookey Preserve is owned and operated by SFC. The Anderson Ranch, Macready Ranch, and Stookey Preserve are sometimes referred to herein collectively as the "Properties." The Albert W. Anderson Living Trust, Albert W. and Carliene M. Anderson Family Trust, Macready Ranch Inc., 1984 Corporate Seal, Delaware, and SFC are sometimes referred to herein collectively as the "Landowners."

1.1.3 Purpose of This PSA/Addendum

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

The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR. The checklist evaluates each resource in terms of whether the later treatment project, (in this case, the proposed project), including the "changed condition," 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.

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 and revisions to standard project requirements (SPRs), which are integrated into the Program itself.

This document serves as both a PSA and an Addendum to the CalVTP Program EIR for MCRCD review and analysis under CEQA regarding the proposed project within and outside the treatable landscape covered by the Program EIR, including the proposed SPR revisions. It provides environmental information supported by substantial evidence to MCRCD in its consideration of approving implementation of the work. The project-specific mitigation monitoring and reporting program (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.

The potential exists that during pre-treatment field layout, a registered professional forester (RPF) or other qualified professional may determine that treatment area boundaries need to shift slightly from the project area identified in this PSA/Addendum to meet treatment objectives and reflect on-the-ground conditions. The RPF or qualified professional would determine if all resources in the area outside the PSA/Addendum project boundary were considered in the PSA/Addendum or are substantially the same as those considered in the PSA/Addendum, including that the cultural records search encompassed any expanded area. If resources are present that were not considered in the PSA/Addendum, additional CEQA documentation (e.g., revised PSA/Addendum) must be prepared to document whether a new significant impact or substantial increase in the severity of an identified significant impact would occur from treatments in the area outside the PSA/Addendum project boundary. All relevant SPRs and mitigation measures would be applied throughout the entire treatment area.

1.1.4 Proposed Project Revisions

PROJECT AREA OUTSIDE OF THE CALVTP TREATABLE LANDSCAPE

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). 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 87.7 acres of the 1,667.3-acre project area, comprising small sections dispersed throughout the project area. The acres outside of the mapped CalVTP treatable landscape are due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Other areas were excluded from the treatable landscape because they were not modeled as a treatable fuel type but are suitable for treatment. 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.

PROPOSED REVISIONS TO CALVTP SPRS

While the proposed treatment types and treatment activities would be consistent with the CalVTP, certain requirements of CalVTP SPRs would be infeasible, are not warranted to maintain the impact significance conclusions in the Program EIR, and, if implemented as presented in the Program EIR, would prevent the project from meeting its 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 Program EIR's description of later project activities.

SFC is proposing revisions to SPR CUL-4, SPR GEO-1, SPR HAZ-1, and SPR HYD-4. 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 section, as summarized below and presented throughout Chapter 4.

SPR CUL-4: Archaeological Surveys

SPR CUL-4, as presented in the Program EIR, requires an archaeological and historical survey to be conducted prior to implementation of any treatment activity, including treatments that do not result in ground disturbance or other risk of impact to archaeological or historical resources, which consists of the following treatment activities when heavy equipment (i.e., equipment that can cause ground disturbance) is not utilized: manual treatments, prescribed herbivory without fence installation, and herbicide application.

The application of SPR CUL-4 to all treatment activities, particularly those that do not result in any ground disturbance, is unnecessary to avoid impacts. Particularly for prescribed herbivory, fence installation could potentially penetrate the ground enough to affect buried archeological resources, but otherwise prescribed herbivory not utilizing heavy equipment is not expected to affect buried archeological resources. Therefore, if fence installation is needed to implement prescribed herbivory, SPR CUL-4 surveys would only need to occur where fence post installation would occur, and not the entire area within which prescribed herbivory is to be implemented. Conducting a site-specific survey and archaeological survey report for areas designated for manual treatments, targeted herbicide application, and prescribed herbivory that does not require fence installation, when all of these treatment activities do not utilize heavy equipment for implementation and have no potential for ground disturbance, would result in unnecessary loss of work time.

Therefore, SFC proposes to conduct archaeological surveys only for treatment activities that involve ground disturbance (i.e., treatments that include the use of heavy equipment) and prescribed burning. This revision to SPR CUL-4 would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR CUL-4 in areas where ground disturbance activities are more likely to affect archaeological artifacts.

Potential impacts resulting from revisions to SPR CUL-4 are discussed below under Section 4.4, "Archaeological, Historical, and Tribal Cultural Resources." As explained in that section, the proposed revisions to SPR CUL-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR CUL-4 is not required to reduce environmental effects on any other resources from implementation of the project. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

SPR GEO-1: Suspend Disturbance during Heavy Precipitation

SPR GEO-1, as presented in the Program EIR, requires suspension of certain treatment activities, including mechanical treatments, herbicide application, and prescribed herbivory, during precipitation (i.e., if the National Weather Service forecast is a chance [30 percent or more] of rain within the next 24 hours). As described in the CalVTP Program EIR, mechanical treatments, herbicide application, and prescribed herbivory conducted during precipitation events can result in soil disturbance, erosion, increased runoff, soil destabilization, and water quality impacts.

SFC proposes to suspend mechanical and herbivory treatments if: (1) it is actively raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities, and proposes to suspend targeted herbicide application if the National Weather Service forecast is a "chance" (30 percent or more averaged over each hour) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m.

In the Sierra Nevada where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of mechanical treatment activities in these cases could result in unnecessary loss of work time. Without this revision to SPR GEO-1, the project objectives may not be achieved. In addition, defining the 12-hour window that would be used to calculate the next day's average precipitation potential would ensure a consistent methodology for implementation.

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

SFC proposes to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area, outside of Watercourse and Lake Protection Zones (WLPZs) and away from sensitive resources. This revision gives the project proponent the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed from the site. This revision allows leaking equipment to be staged and fixed immediately, and be moved to a less sensitive area, rather than being required to demobilize and potentially risk spreading the leak further through sensitive habitats or resources. All other applicable SPRs would be following to minimize this impact. This would help prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material released in treatment areas from equipment use.

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

SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-4, as presented in the Program EIR, requires that the project proponent establish WLPZs on either side of Class I, Class II, Class III, and Class IV watercourses, as defined by 14 CCR Section 916.5 of the California Forest Practice Rules.

SFC proposes to establish the WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, targeted herbicide application, and prescribed herbivory treatment activities, and associated staging areas. This revision would limit the amount of time spent by the project proponent identifying and delineating WLPZs, as well as limit the amount of high visibility flagging used throughout the project area. This revision would also help ensure that all WLPZs in proximity to a treatment area are recently flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area, while maintaining overall intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, targeted herbicide application, and prescribed herbivory treatments.

Potential impacts resulting from revisions to SPR HYD-4 are discussed below under Section 4.5 "Biological Resources," Section 4.6 "Geology, Soils, Paleontology, and Mineral Resources," Section 4.9 "Hazardous Materials, Public Health and Safety," and Section 4.10 "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR HYD-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR.

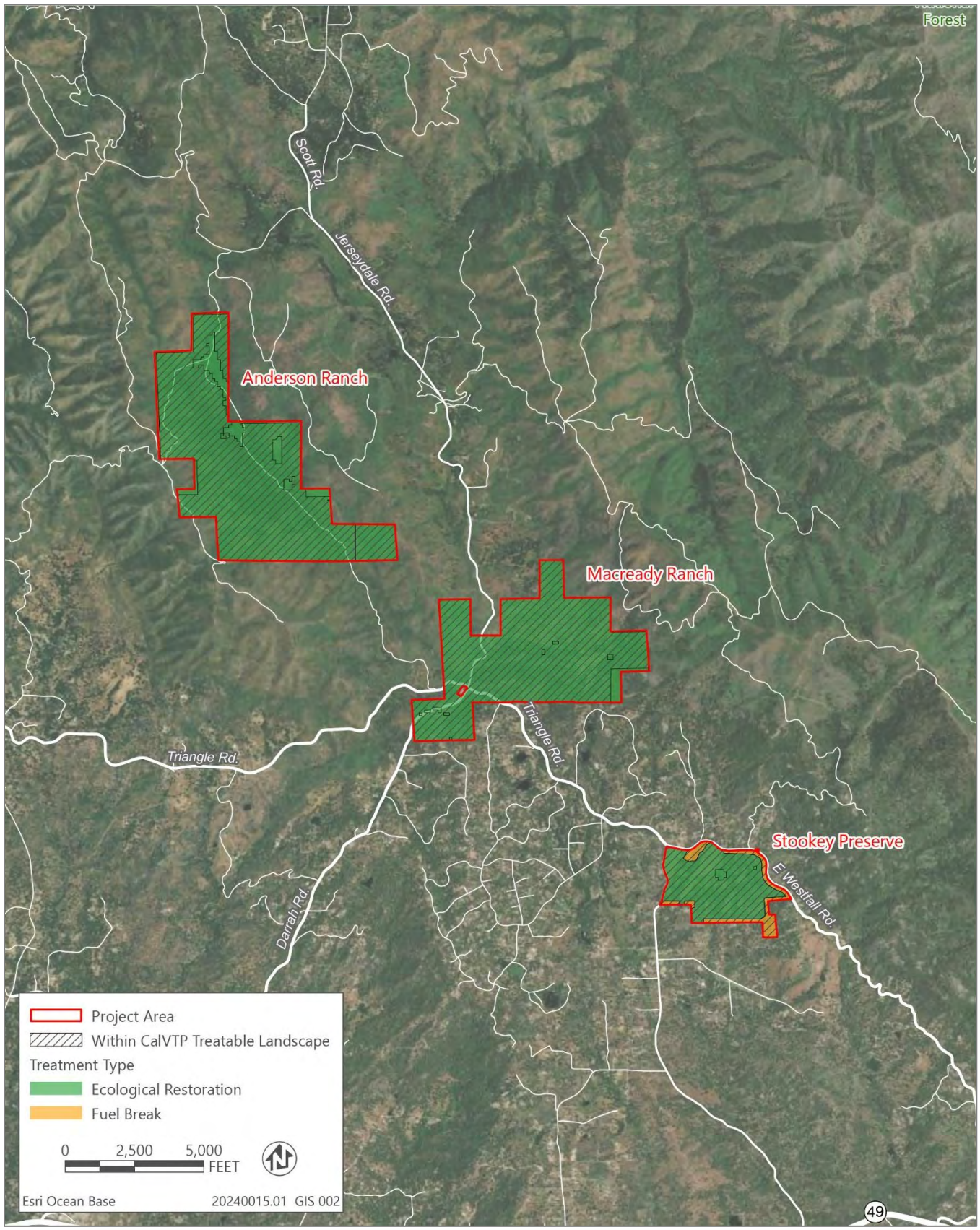
Impacts on other resources would not occur as a result of these revisions, because SPR HYD-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR HYD-4 are shown in the MMRP (Attachment A).

2 PROJECT DESCRIPTION

The proposed CalVTP treatment types are ecological restoration and fuel break. Proposed CalVTP treatment activities are prescribed burning, mechanical vegetation treatment, manual vegetation treatment, herbicide application, and prescribed herbivory. Locations of proposed treatment types are summarized in Table 2-1 and shown in Figure 2-1.

Table 2-1 Proposed CalVTP Treatments

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments	Timing/Typical Duration of Treatments
Ecological Restoration	Enhancement of forest, oak woodlands, and shrub ecosystems, increased fire resilience (development of fire adapted/resistant landscape), improved plant and wildlife habitat quality, invasive plant removal	Mechanical (mastication, ripping, biomass chipping, machine piling, brush raking, tilling, mowing, roller chopping, chaining, skidding/removal). Manual (hand thinning, pruning, piling, pulling/grubbing, lop/scatter, planting). Prescribed burning (pile burning, broadcast/ underburning, cultural burning). Biomass processing technologies (e.g., air curtain burner, carbonator). Prescribed herbivory. Herbicide (hand application: paint-on, backpack, tank and ATV sprayer, injection, hand placement of pellets)	Up to 1,627.5	Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, mowers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, propane torches, terra torches, unmanned aerial systems with plastic sphere dispensers, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, pickup trucks, backpack sprayer, porta-potty, temporary fencing	Mechanical and Manual treatments: up to 12 months per year. Prescribed burning: 1 day to 6 months per year. Prescribed herbivory: 1 week to 8 months per year. Herbicide treatment: 1 week to 6 months per year
Fuel Breaks	Improvement of egress and access for fire-suppression activities and fire control, development of fire-adapted communities, increased fire resilience (development of fire adapted/resistant landscape), invasive plant removal	Mechanical (mastication, biomass chipping, machine piling, brush raking, tilling, mowing, roller chopping, chaining, skidding/removal). Manual (hand thinning, pruning, piling, pulling/grubbing, lop/scatter, planting). Prescribed burning (pile burning, broadcast/underburning). Biomass processing technologies (e.g., air curtain burner, carbonator). Prescribed herbivory. Herbicide (hand application: paint-on, backpack, tank and ATV sprayer, injection, hand placement of pellets)	Up to 39.8	Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, mowers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, propane torches, terra torches, unmanned aerial systems with plastic sphere dispensers, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, pickup trucks, backpack sprayer, porta-potty, temporary fencing.	Mechanical and Manual treatments: up to 12 months per year. Prescribed burning: 1 day to 6 months per year. Prescribed herbivory: 1 week to 8 months per year. Herbicide treatment: 1 week to 6 months per year
Total acres			1,667.3		



Source: Adapted by Ascent in 2025.

Figure 2-1 Project Area

2.1 PROPOSED TREATMENTS

The proposed project involves two treatment types: ecological restoration and fuel break. The vegetation treatment activities proposed to implement each of these treatment types are prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory. The treatment types and treatment activities are described below.

The proposed project area encompasses chaparral vegetation that meets the Definitions of the habitat types subject to the restrictions of the writ. While the writ is active, pursuant to SPR CHAP/CSS-1, which was developed to be consistent with the writ, only certain categories of treatment in chaparral may rely on the CalVTP Program EIR for CEQA compliance. These proposed treatments are explained in Section 2.1.1.

2.1.1 Treatment Types

Proposed treatment types consist of ecological restoration and fuel break. Each treatment type is described in more detail below and consistent with the treatment types described in the CalVTP Program EIR. Wildland Urban Interface fuel reduction treatments are not proposed under this project.

The project area contains two types of chaparral habitats subject to the restrictions of the writ—mixed chaparral and post-fire successional chaparral (see Attachment B for maps of chaparral habitat types and pre- and post-fire satellite imagery). Areas classified as mixed chaparral consist of areas that currently support chaparral vegetation and were characterized by chaparral vegetation before the fires, as evidenced by satellite imagery. Ecological restoration treatments and fuel break treatments are proposed within mixed chaparral. Treatments within mixed chaparral are subject to the restrictions described in SPR CHAP/CSS-1, which was developed to be consistent with the writ. Pursuant to SPR CHAP/CSS-1, ecological restoration treatments in mixed chaparral may only consist of removal of flammable, nonnative vegetation; fuel break construction in mixed chaparral may not exceed 300 feet in width; and maintenance may only consist of removal of flammable, nonnative invasive plants.

Post-fire successional chaparral can be characterized as shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire, as evidenced by satellite imagery. Ecological restoration treatments are proposed within post-fire successional chaparral. The writ identifies these post-fire treatments as a category of treatments that are allowable in chaparral. Treatments in these areas would comply with SPR CHAP/CSS-1. Before treatments may occur, fine-scale vegetation surveys and mapping would need to confirm that alliances present in these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to A Manual of California Vegetation. Consistent with the writ, in any post-fire successional chaparral areas mapped as sensitive natural communities, treatments would consist only of removing flammable, nonnative vegetation. See "Discussion" section in Section 4.5, "Biological Resources," Impact BIO-3, and Attachment B for additional details.

Refer to Figure 2-1 for the location of each treatment type. Table 2-1 provides a summary of treatment types.

ECOLOGICAL RESTORATION

Ecological restoration treatments would be implemented in up to 1,627.5 acres of the project area. Treatments would seek to protect and restore ecological function, with the following objectives:

- Re-establish woodland and forest habitats in areas that were severely burned in recent wildfires.
- Reduce sediment runoff and erosion by planting native vegetation to increase root soil structure, stability, and canopy development.
- Improve forest characteristics such as species composition, age variability, fuels, and stand density to create conditions that are more resilient to periodic disturbances such as frequent, low-and mixed-severity wildfire.
- Allow fire to be returned to a more historical and natural role on the landscape to improve native habitats, restore healthy woodland and forest conditions, and increase landscape resiliency to stressors such as drought, bark beetle infestations, wildfire, and climate change.

- Improve natural landscape function to help reduce the impacts of climate change by sequestering carbon, protecting aquatic resources, and providing important habitat for native wildlife.
- Reduce wildfire risk to surrounding human communities and to healthy stands of native vegetation in the watershed.
- Protect on-site cultural resources.

Post-Fire Ecological Restoration

A significant portion of the project area (over 1,110 acres, as confirmed from LANDFIRE in 2025) burned in the Oak Fire in 2022, which burned at high severity in many portions of the Anderson Ranch and Macready Ranch properties. Additionally, the Ferguson Fire in 2018 burned approximately 12 acres of the eastern edge of Macready Ranch, an area that was not reburned in the Oak Fire. The Carstens Fire in 2013 also burned over 330 acres of the Anderson Ranch property in the project area, most of which was reburned in the Oak Fire. Areas that burned at high severity within the Oak Fire footprint are priority treatment locations for ecological restoration, with the objective of re-establishing woodland and forest habitats that existed before the fires.

The Oak Fire resulted in approximately 70 percent tree mortality within the project area. Salvage logging has occurred in select areas within the project area on the Anderson Ranch and Macready Ranch properties, yet large portions of predominantly dead standing and downed biomass remain. Some burned areas are characterized by a strong regrowth of early-successional shrubs, such as deer brush (*Ceanothus integerrimus*), mountain misery (*Chamaebatia foliolosa),* whiteleaf manzanita (*Arctostaphylos viscida),* and gooseberry (*Ribes* spp.). Other burned areas have sparse shrub regrowth and are largely vegetated by herbaceous species. There is some regeneration of tree species in burned areas, such as ponderosa pine (*Pinus ponderosa),* California black oak (*Quercus kelloggii)*, and big-leaf maple (*Acer macrophyllum*).

Ecological restoration in burned areas would encourage and accelerate the restoration of woodland and forest habitats that were lost in recent fires. In areas where natural tree regeneration appears to be lacking or deficient, tree planting would be implemented using seedlings germinated from locally-sourced seeds, when feasible, with a species distribution that mimics the mix of trees found onsite prior to the Oak Fire, and with a spatial distribution that will eventually grow to create a heterogeneous forest structure with individual trees, clumps of trees, and openings. This would include removal of snags and much of the dead and downed biomass to remove hazards and facilitate tree planting. However, larger snags and downed logs that have structures that provide wildlife habitat (e.g., cavities, broken tops) would be retained where feasible to provide habitat and assist with erosion control. In addition, the proposed project would include strategic removal of resprouting shrubs to facilitate tree planting in areas where shrub density makes access infeasible, or where shrub densities are high enough to limit tree establishment due to competition for water, light, and nutrients. However, enough shrub cover would be maintained to allow existing shrubs to act as nurse plants (Marsh et al. 2023; Legras et al. 2010) for naturally establishing and planted seedlings.

Ecological restoration treatments are proposed in burned areas containing mixed chaparral and post-fire successional chaparral that meet the Definitions presented in the writ. Treatments in these areas are subject to the restrictions described in SPR CHAP/CSS-1, which was developed to be consistent with the writ. Pursuant to SPR CHAP/CSS-1, ecological restoration treatments in mixed chaparral may only consist of the removal of flammable, nonnative vegetation. In addition, the writ identifies post-fire ecological restoration treatments in areas currently mapped as chaparral that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest pre-fire, as evidenced by satellite imagery, as a category of treatments that are allowable. Pursuant to SPR CHAP/CSS-1, before treatments may occur in post-fire successional chaparral, fine-scale vegetation surveys and mapping would need to confirm that alliances present in these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to *A Manual of California Vegetation*. Consistent with the writ, in any post-fire successional chaparral mapped as sensitive natural communities, treatments would consist only of removing flammable, nonnative vegetation. See "Discussion," and Impact BIO-3 sections in Section 4.5, "Biological Resources," and Attachment B for additional details.

Ecological Restoration in Unburned Stands

In addition to burned areas, ecological restoration would be implemented in portions of the project area that were not significantly affected by recent fires. In these areas, conditions in woodland and forest habitats are outside the historical range of ecological variation for measures such as tree and shrub density, fuel loading, canopy closure, and species composition and age classes. Many of these areas have dense understories of even-aged young conifers and understory shrubs. In addition to the excessive fuel-loading and abundance of ladder fuels these conditions create, they also increase competition for water, light, and nutrients, resulting in reduced ecosystem health, vigor, and resiliency. Conditions in these areas also create an increased likelihood of future high-severity fires, with potential effects including loss of mature tree cover, loss of essential wildlife habitat, and increased soil destabilization. Some of these areas are also prone to high levels of tree mortality related to drought stress, bark beetle infestations, overly dense conditions, severe weather (i.e., high amounts of precipitation or snow, wind), and other stressors.

Ecological restoration in these areas would be designed to create conditions with reduced vertical and horizontal continuity of fuels. Residual trees would have ample spacing, with an irregular distribution throughout the stand to promote a heterogeneous structure or mosaic of individual trees, clumps of trees, and openings. Treatments would focus on the thinning of overly dense trees and shrubs, typically smaller than 12-inch diameter at breast height (DBH), growing in the mid- to low-canopy of woodland and forest habitats. Targets for surface fuel treatment would include all cut material and slash, as well as downed woody material less than 16 inches in diameter at the largest end.

Treatments of understory shrubs and other understory fuels would aim to reduce the density and continuity of vegetation and decrease surface fuel loading. Individual plants or clusters of plants would be retained when feasible, while still meeting treatment goals, which include creating a horizontal separation between plants that is at least three to five times the height of the residual plants and removing understory vegetation from within the drip line of overstory trees.

Treatments of mid-story fuels would reduce ladder fuels to the intermediate, co-dominant, and dominant crown classes by reducing the density and continuity of mid- and low-canopy (intermediate and suppressed) trees where vigor, growing space, and access to sunlight are suboptimal. Treatments would also be designed to increase diversity in species composition of the understory by targeting overly abundant species for removal and retaining less abundant or more sensitive species. Conifer trees such as ponderosa pine (*Pinus ponderosa*), white fir (*Abies concolor*), and incense cedar (*Calocedrus decurrens*) under 12 inches DBH would be removed to create horizontal and vertical separation of residual trees. Hardwood and broadleaf trees such as black oak (*Quercus kelloggii*), canyon live oak (*Quercus chrysolepis*), and interior live oak (*Quercus wislizeni*), as well as sugar pine (*Pinus lambertiana*), under 12 inches DBH would be removed if they constitute potential ladder fuels (i.e., are located within the drip line of residual trees), except in areas with dense stands of young oaks, which would be thinned to reduce competition for space, light, water, and nutrients, allowing retained oak trees to grow to be larger, healthier, and more vigorous. Treatments may remove dying, diseased, and hazard trees of any size and prune lower branches of residual trees up to 10 feet above the ground.

Snags (dead standing trees) larger than 12 inches DBH and downed logs greater than 16 inches in diameter at the largest end would be retained to provide wildlife habitat, except those within 100 feet of all roads and habitable structures or those which constitute dense fuels, which would be treated if they pose a hazard.

Ecological restoration treatments are proposed in unburned areas containing mixed chaparral that meet the Definitions presented in the writ. Treatments in these areas are subject to the restrictions described in SPR CHAP/CSS-1, which was developed to be consistent with the writ. Pursuant to SPR CHAP/CSS-1, ecological restoration treatments in mixed chaparral may only consist of removal of flammable, nonnative vegetation. See "Discussion" and Impact BIO-3 sections in Section 4.5, "Biological Resources," and Attachment B for additional details.

FUEL BREAKS

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They can also provide safe emergency egress during wildfires. Fuel breaks would be implemented on

up to 39.8 acres of the project area, primarily along the property boundaries of the Stookey Preserve. These fuel breaks would be up to 500 feet wide and would protect nearby residences by creating a physical buffer zone between neighboring homes and other infrastructure and the more densely vegetated areas within the Stookey Preserve. The fuel break would serve the dual purpose of helping to protect residential homes in the event of a wildland fire on the Stookey Preserve and conversely protect the Stookey Preserve natural resources should a fire start within a residential area. The proposed project would include shaded and nonshaded fuel breaks, with shaded fuel breaks implemented in forested areas and nonshaded fuel breaks implemented in areas that contain only shrubs and herbs (i.e., no tree canopy). Fuel break treatments would include the following vegetation modifications:

- Remove trees up to 18 inches DBH to thin canopy and break up canopy continuity. Branches and leaves/needles would be chipped, masticated, or piled and burned. Boles and branches that are greater than 10 inches DBH may be chipped or cut, scattered, and laid flush with the ground, as long as they are not near structures or pose a fuel hazard.
- Trees greater than 18 inches DBH may be removed if they are dead, dying, diseased, or a safety hazard.
- Remove trees to create horizontal distances between residual trees of 20 to 35 feet between trunks such that there is 8 to 15 feet between tree crown drip lines, where feasible.
- Where trees are present, leave a canopy cover of about 60 percent, where feasible.
- Remove all downed logs (greater than 10-inch DBH) and dead and downed material (limbs, branches, and leaves) within a minimum of 100 feet of homes and 200 feet from the center line of fuel breaks. Twenty percent of downed logs may be retained when they do not pose a fire hazard.
- Retain large snags up to two per acre beyond 300 feet from homes and 200 feet from the centerline of the fuel break (with a preference for the largest snags that exhibit the form and decay characteristics favored by wildlife) unless the snags pose a hazard to implementation or personnel.
- Remove most shrubs within a minimum of 100 feet of homes and within 200 feet of the center line of the fuel break, while retaining only shrubs that are adequately spaced and are not ladder fuels in other areas.
- Reduce ground fuels to less than 5 tons per acre through prescribed burning, chipping, or mastication.
- Prune lower branches of residual trees up to 10 feet above the ground.
- Apply herbicides to trees and shrubs to prevent resprouting where sprouting species are present, such as deer brush, Himalayan blackberry (*Rubus armeniacus*), California yerba santa (*Eriodictyon californicum*), interior live oak, and other sprouting species.
- Pull up root balls of sprouting shrubs where herbicides are not viable and slopes are less than 30 percent, to maintain efficacy of the fuel break.
- Maintain fuel breaks free of flammable, nonnative plants, including invasive grasses and forbs.

Fuel break treatments are proposed in mixed chaparral that meet the Definitions presented in the writ. Treatments in these areas are subject to the restrictions described in SPR CHAP/CSS-1, which was developed to be consistent with the writ. Pursuant to SPR CHAP/CSS-1, establishment of fuel breaks in mixed chaparral may not exceed 300 feet in width; and maintenance of existing fuel breaks may only consist of removal of flammable, nonnative invasive plants.

2.1.2 Treatment Activities

The proposed treatment activities are prescribed burning, mechanical vegetation treatments, manual vegetation treatments, herbicide application, and prescribed herbivory. Each of the treatment activities is described in more detail below and are consistent with the treatment activities described in the CalVTP. Table 2-1 provides a summary of treatments and the acreage of each treatment activity in the project area. Treatment activities could occur during any time of the year. Prescribed burning and prescribed herbivory may occur any day of the week or time of day; however, burning would only occur on days permissible by the Mariposa County Air Pollution Control District and

with a prior approved CAL FIRE Burn Permit. Mechanical treatments, manual treatments, and herbicide application could occur on any day of the week, but would be limited to daytime hours. Multiple crews could be conducting treatments simultaneously throughout the project area.

PRESCRIBED BURNING

Prescribed burning would include pile burning, broadcast burning (underburning), and cultural burning, as described below.

Pile burning: Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) or hand crews and burned appropriately. Typically, dozers are equipped with a brush rake to reduce soil displacement and create "clean" piles. Pile burning would occur in an understory or in areas with little to no live overstory, including areas that have experienced previous wildfire.

Broadcast burning: Broadcast burning (i.e., understory burning) would be used to promote forest health and native flora and reduce biomass and fuel loading in shrubland, woodland, and forest vegetation types. Pretreatment of vegetation using mechanical activities, manual activities, or herbicide application may occur, where necessary, in areas proposed for broadcast burning.

Understory burns would be implemented in accordance with a specific prescription that defines the desired maximum flame lengths and fire spread rates based on fuel type, weather, slope, aspect, staffing levels, containment lines, and strategies set out in a Burn Plan. Interior portions of prescribed burns may exceed the prescribed flame lengths planned at the control lines, but the overall prescription is designed to safely contain the fire within the planned fire perimeter. Burns could occur during conditions that are conducive to burning targeted fuels (typically from September through June). Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments, including construction of handline, mow lines, or dozer lines. If control lines are needed, they would be implemented pursuant to limitations in the CalVTP Program EIR (e.g., Mitigation Measure BIO-4 requires that fire containment lines are not constructed within wetland buffers). Additionally, broadcast burning may be used for secondary treatments and maintenance after initial treatments of dense vegetation have been completed, including control of invasive plants and noxious weeds.

Prescribed burning would require between 10 and 50 crew members, depending on the size and site characteristics of the burn unit. Typically, each burn would last 1 day to 1 week. Equipment used would include water trucks, fire engines, chainsaws, drip torches, propane torches, all-terrain vehicles (ATV), utility task vehicle (UTVs), portable water tanks, water pumps, fire hoses, leaf blowers, and terra torches (see Table 2-1). Unmanned aerial systems (UAS) may be used when an area has limited accessibility. All burning would occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a Burn Plan that includes a Smoke Management Plan.

Cultural Burning: In partnership with the Landowners, the Southern Sierra Miwuk Nation (SSMN), other regional Indigenous Tribes, and CAL FIRE, cultural burns may be implemented for invasive species management; reestablishment and management of native culturally-significant plant species, such as California black oak, deer grass (*Muhlenbergia rigens*), western redbud (*Cercis occidentalis*), western bracken fern (*Pteridium aquilinum*), and willow (*Salix* sp.); seed germination; fuels management; and increasing desirable vegetative species composition. Ancillary goals of cultural burning include creating innovative spaces for Tribes to exercise Traditional Ecological Knowledge (TEK) and reclaim the cultural value and heritage the project area holds. SFC has an existing relationship with the SSMN, having collaborated together on other projects focused on cultural burning and replanting for the purpose of ecological restoration.

Pre-burn and burn activities include working closely with project partners to achieve the following:

- Consultation with SSMN, tribal stakeholders, and Cultural Burn Boss in the burn planning and design process, integration of TEK cultural transmission and workshop opportunities, and application of fire in the Project Area

- Consultation with CAL FIRE to determine availability of the agency's resources, capacity to incorporate cultural burn methodologies into the Burn Plan and process, and the preferred or most effective burn permitting method to be utilized.
- Potential development of a Burn Plan with CAL FIRE and Cultural Burn Boss, technical advisory committee members, and SSMN and Tribal partners. The Burn Plan would provide a description of the burn area, target weather conditions, hazards that may be encountered, personnel needs, safety, and contacts to make prior to burning; the purpose of the prescribed burn would be addressed along with short- and long-term management goals including potential for future cultural burning activities.
- All burning would occur in accordance with regulations regarding the use of cultural burning. Acquisition of the appropriate (Local/State/Federal) permits, registrations, and insurances once the permitting method is determined as well as pre-burning required notifications.
- Pre-burn thinning of vegetation or pruning of ladder fuels to prevent fire from reaching tree canopies. Establishment of hand lines around utilities, features at increased risk, and/or the perimeter of the burn if deemed necessary by CAL FIRE or desirable by SSMN Tribal partners.
- If applicable, closure of public access areas directly affected by the burn.
- Comprehensive safety briefings, distribution of safety protocols, establishment of emergency response procedures and contingency plan.
- Situation reporting during the active burn.
- Onsite management of active fire.

MECHANICAL VEGETATION TREATMENT

Mechanical treatments would primarily include masticating target vegetation to reduce ladder fuels and increase space between trees, as well as chipping biomass produced by manual and mechanical treatment activities. It may also include the use of bulldozers, tractors, or skid steers to move treated vegetation to processing areas (see Table 2-1).

Mechanical mastication and chipping of fuels would occur in areas that are accessible to the equipment, or via existing skid trails and roads on steeper slopes. Masticated material would not exceed an average of 8 inches in depth and chipped material would not exceed an average of 4 inches in depth. Material would not be chipped or masticated within WLPZs and chips would not be broadcast into the water or dry channel of any stream. Chips would not be concentrated at the base of retained trees.

Equipment would include masticators, chippers, excavators, skid steers, tractors, and bulldozers (see Table 2-1). Mechanical treatments would typically require up to 20 crew members.

Mechanical treatments would follow the prescription for ecological restoration and fuel breaks and would generally:

- remove ladder fuels and dead/downed woody material less than 12 inches DBH to be chipped, masticated or moved to other locations for processing;
- cut and fell trees up to 18 inches DBH in fuel break treatment areas to be chipped or masticated;
- remove select trees if they are dead, dying, diseased, or considered a safety hazard;
- prune up lower branches of trees;
- masticate or chip biomass potentially for disposal;
- remove downed logs;
- mow invasive plants and noxious weeds where population size and accessibility warrants this treatment method as most effective; and,
- use an excavator to pull up root balls of sprouting trees and shrubs where herbicides are not viable.

MANUAL VEGETATION TREATMENT

Manual treatments would primarily include hand thinning and pruning target vegetation to reduce ladder fuels, and increase space between trees, as well as hand-piling removed vegetation. Cut material would be disposed of using either chipping or piling treatments and may also be hauled to a more accessible location for mastication. Cut material within WLPZs is required to be manually removed from the WLPZ before disposal. Additionally, manual treatments would include planting in some areas. Equipment would include chainsaws, pole saws, weed-trimmers, and other common hand tools (see Table 2-1). Manual treatments would typically require between 20 and 40 crew members, and up to two crews.

Manual treatments would follow the prescription for ecological restoration and fuels breaks and would generally:

- remove ladder fuels less than 12 inches DBH;
- cut and fell larger trees up to 18 inches DBH in fuel break treatment areas to be masticated or removed with manual treatment methods (e.g., saws), chipped, or piled and burned;
- select snags (dead standing trees) may be manually treated with saws;
- remove shrubs;
- prune up lower branches of trees;
- remove downed logs;
- hand-pull or cut invasive plants and noxious weeds;
- implement flaming of invasive plants and noxious weeds (see Section 1.1.2, "Purpose of This PSA/Addendum"); and
- tree planting.

HERBICIDE APPLICATION

Herbicides would be used sparingly to control invasive plant species that threaten the native biodiversity or increase wildfire hazard. Consistent with the definitions applied in the CalVTP, invasive species are those plant species identified as invasive by the California Invasive Plant Council (Cal-IPC) or defined as noxious weeds under California law by the California Department of Food and Agriculture. Treatment would involve removing invasive plant species and noxious weeds through herbicide application.

Herbicides may be used to treat native trees, shrubs, and grasses in fuel breaks and ecological restoration treatment types to prevent resprouting where sprouting species (e.g., deer brush, interior live oak) are present and would reduce the effectiveness of fuel reduction treatments. Herbicides would also be used to promote survival of seedlings in reforestation areas.

The following herbicides, which are consistent with those considered for use in the CalVTP Program EIR, may be applied:

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

Only ground-level application would occur; no aerial spraying of herbicides would occur. The method that is least likely to affect nontarget vegetation would be used at any given site. Several herbicide application methods are available for use by on-the-ground personnel, including painting herbicide on stems, using a backpack sprayer, and hand application. Herbicide treatments would typically use a five- to fifteen-person crew, a pickup truck, a passenger vehicle to transport crew, a UTV or ATV with a sprayer/reservoir tank, and backpack sprayers (see Table 2-1). Herbicide application would comply with US Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency and California Department of Pesticide Regulation label standards. All herbicide applications would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations.

The use of herbicides may result in standing dead biomass that would need to be treated. Invasive plants and noxious weeds would be treated by piling for on-site decomposition, burning, or off-site biomass disposal. Native vegetation would be treated by burning, chipping, masticating, or off-site biomass disposal.

PRESCRIBED HERBIVORY

Prescribed herbivory for hazardous fuel reduction is the intentional use of domestic livestock to remove, rearrange, or convert vegetation in wildlands to reduce the costs and losses associated with wildfires and to enhance the condition of forests, rangelands (i.e., grasslands), and watersheds. Prescribed herbivory can offer a variety of benefits in comparison to other types of vegetation treatments. In addition to fire prevention benefits, carefully managed grazing can provide important environmental benefits such as increased soil organic matter, control of invasive species, and improved plant and wildlife habitat.

The most appropriate livestock species would be determined based on vegetation type(s) and condition (e.g., height, age class) and may include sheep or goats. A herder, fencing, mineral block, and/or a watering site may be required to keep the animals within the desired area. Herds of sheep and goats may be moved as often as every 1 to 3 days and one to two workers would be required on average to implement this treatment activity. Animal rotation would depend on the stocking rate, forage level, and pasture sizes.

Prescribed herbivory may be used for secondary treatments and maintenance after initial treatments of dense vegetation have been completed. In addition, prescribed herbivory would be used to control regrowth of existing invasive plants and noxious weeds and to help prevent establishment of new populations of invasive plants and noxious weeds.

Cattle grazing is an existing activity that is ongoing within some of the treatment areas for natural resource management purposes, such as maintaining grasslands, enhancing wildlife habitat, and reducing fine fuel loads. Cattle grazing is not included in the proposed project or analysis because cattle grazing is already occurring in the project area, and the practice would not be expanded or changed from existing conditions.

BIOMASS DISPOSAL

Biomass created during the proposed vegetation treatments described above would be disposed of primarily by the following means:

- masticating (mulching) vegetative debris and placing it on the ground concurrently with vegetation removal, and the biomass remaining after mastication would be no more than 8 inches deep on average;
- chipping, with the chipped biomass being broadcast over treatment areas not exceeding an average of 4 inches in depth, or put in piles with specifications required by the Mariposa County Air Pollution Control District and CAL FIRE;
- lopping and scattering within the treatment boundaries, and the biomass would be no more than 18 inches deep to promote decomposition;

- creating piles of cut or masticated biomass for pile burning or using biomass processing technologies (e.g., air curtain burning);
- broadcast burning; or
- taken off-site to a disposal facility.

Invasive plant and noxious weed biomass would be piled for on-site decomposition, treated on-site to eliminate the spread of seeds and propagules (e.g., piled for burning at the appropriate time), or would be disposed of off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds would not be chipped and spread, scattered, or mulched on-site. They may be placed on-site in piles to be burned.

Biomass Processing Technologies

Biomass processing technologies are designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning (refer to additional information in Section 4.3, "Air Quality," and Section 4.7, "Greenhouse Gas Emissions"). Biomass from mechanical and manual treatments could be disposed of using biomass processing technologies, which could include the following:

- **Direct Combustion – Air Curtain Burners:** Air curtain burners use direct combustion to process biomass. Combustion is an exothermic (heat-producing) reaction between oxygen and the hydrocarbon in biomass. The biomass is converted into heat, water, carbon ash, and CO_2. They are operated by depositing biomass in the firebox, an open top metal container, within which the biomass is set alight. The air curtain filter (i.e., fast-moving curtain of air) is drawn over the firebox while a blower circulates the air and smoke within the firebox, subjecting it to repeated cycles of burning in the flames. The blower creates a high temperature vortex inside the chamber to accelerate biomass combustion, more completely combusting the material and keeping most pollutants from escaping the firebox into the atmosphere. The air curtain at the top of the firebox acts as a filter to reduce any particulate matter (PM) emissions from the resulting exhaust.

  - If implemented, air curtain burners would be set up on existing roads, landings, or other disturbed areas. Air curtain burners would be used in locations that meet the qualifications for their safe use. An example of a small air curtain burner that may be used is the BurnBoss T24. This unit is towable with a standard heavy-duty pickup truck. The size is less than approximately 20 feet in length, 8 feet in width, and 6 feet in height. A small US Environmental Protection Agency (EPA) Tier 4 diesel engine powers the air curtain fan. The BurnBoss T24 consumes 5–10 cubic yards of biomass per hour and up to a third of a gallon of diesel fuel per hour. Larger air curtain burners may be used as well.

- **Pyrolysis/Carbonization:** Pyrolysis (or carbonization) can be performed in a variety of ways, from simple oxygen-depriving designs, such as an Oregon kiln, which can process up to several cubic yards at time, to modular and portable carbonation units, to more complex large-scale pyrolysis chamber systems in a fixed location that can process hundreds of tons of biomass per day (these would not be used as a component of the proposed project). Pyrolysis involves the conversion of biomass into hydrocarbon liquids, gases, or solids (or all three) in the total absence of oxygen at temperatures ranging from 400–900 degrees C. Only smaller scale, portable carbonators would be used as part of the proposed project. An example of a carbonator that may be used is the Tigercat 6050 Carbonator. This portable facility is approximately 40 feet in length, 12 feet in width, and 12 feet in height. Several Tigercat 6050 Carbonators may be used at one central location near several treatment areas.

- **Gasifier:** Gasification is defined as a high-temperature conversion of carbonaceous materials (biomass) into a combustible gas mixture under reducing conditions. Through gasification, biomass can be converted into gaseous fuels intermediate (producer gas and syngas) that can be used for heating, industrial processes, electricity generation, and liquid fuel production. The catalyst required for gasification typically consists of air, oxygen, steam, or a mixture of those three. The key benefits of using biomass as an energy source include the fact that the components, when released, do not constitute a net carbon contribution back into the atmosphere as well as the reduction on the dependence of non-renewable or imported fuel sources.

2.2 TREATMENT MAINTENANCE

Maintenance or retreatment of the areas treated under the proposed project could include the same treatment types (i.e., ecological restoration, fuel breaks) and treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments, herbicide application, and prescribed herbivory) as implemented for the initial treatments. Maintenance treatments would be dependent on regrowth conditions and would differ by location and treatment type. Retreatment in ecological restoration areas would be implemented within a given vegetation type only if that vegetation type is positively departed from its natural fire return interval (i.e., time since last burn, or last treatment, is greater than the average fire return interval for the vegetation type). These intervals vary by vegetation type. For fuel break treatment areas, retreatment is anticipated to occur every 5–10 years for forested and woodland areas, and every 3–10 years for shrub-dominated areas. Treatment maintenance methods would involve the same vegetation treatment activities used in the original treatment. Mechanical and manual treatments, prescribed burning, prescribed herbivory, and herbicide treatments may be used for maintenance of native plant regrowth and invasive plant and noxious weed control and removal after initial treatments of dense vegetation have been completed. All treatment maintenance would typically be implemented between approximately late August and February, outside of the nesting bird season, if feasible, but could be implemented year-round. Periodic treatment maintenance would occur as needed, determined by qualified staff who would monitor vegetation growth conditions and ensure treatment objectives continue to be met. The proposed project would be implemented only on properties where the landowner is a willing participant, and, although a project goal is to maintain treatments, it is possible that not every acre initially treated would be maintained in the future. For example, the landowner may change their management objectives, their land use type, or the land may change owners or management stewards.

Prior to implementing a maintenance treatment, it would be verified 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 consider potentially changed conditions or circumstances. If environmental conditions evolve (e.g., a wildfire occurs in a portion of the project area) or project approaches change to the degree that new or substantially more severe impacts may occur, a new PSA/Addendum or other environmental analysis may be warranted if determined by SFC and/or private landowners in which the proposed project is being implemented.

In addition to verifying that the PSA/Addendum continues to provide adequate CEQA coverage for treatment maintenance, the PSA/Addendum would be updated at the time a maintenance treatment is needed if 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.

3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1.	**Project Title:**	Upper Chowchilla River Watershed Forest Health and Fire Recovery Project Vegetation Treatment Project
2.	**CalVTP I.D. Number:**	2025-34
3.	**Implementing Entity's Name and Address:**	Sierra Foothill Conservancy Mailing Address: P.O. Box 691 Physical Address: 5065 Highway 140, Suite G Mariposa, CA 95338
4.	**Contact Person Information and Phone Number:**	Bridget Fithian, Executive Director (209) 742-5556 bridget@sierrafoothill.org
5.	**Project Proponent Name and Address:**	Sierra Foothill Conservancy Mailing Address: P.O. Box 691 Physical Address: 5065 Highway 140, Suite G Mariposa, CA 95338
6.	**Contact Person Information and Phone Number:**	Bridget Fithian, Executive Director (209) 742-5556 bridget@sierrafoothill.org
7.	**Project Location:**	Along Triangle, Darrah, and Jerseydale Roads in Mariposa County
8.	**Total Area to Be Treated (acres)**	Up to 1,667 acres

9. **Description of Project**:

The proposed project would restore forest health and protect headwaters of the Chowchilla River watershed in Mariposa County by implementing fuels reduction and reforestation treatments on 1,667 acres of mixed oak-conifer forests degraded by overcrowding, drought, bark-beetle infestation, extreme weather events, and catastrophic fire. Treatments would occur on critical forest land protected by Sierra Foothill Conservancy located at the interface between rural residential areas and the Sierra National Forest. The proposed treatment types (i.e., fuel breaks and ecological restoration) and the treatment activities (i.e., manual vegetation treatment, mechanical vegetation treatment, prescribed burning, herbicide application, prescribed herbivory) are consistent with those evaluated in the CalVTP Program EIR and would be implemented as allowed by the writ. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

Refer to Chapter 2, "Project Description" for a detailed description of the proposed project.

a. <u>Initial Treatment</u>
   Initial treatments would include ecological restoration treatments by manual and mechanical treatment methods. See Chapter 2, "Project Description," for additional details.

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

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

☒Prescribed Burning (Broadcast), 1,667.3 acres

☒ Prescribed Burning (Pile Burning), 1,667.3 acres

☒ Mechanical Treatment, 1,667.3 acres

☒ Manual Treatment, 1,667.3 acres

☒Prescribed Herbivory, 1,667.3 acres

☒Herbicide Application, 1,667.3 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Maintenance treatments would involve the same treatment types and activities used in the initial treatments.

Refer to Chapter 2, "Project Description," for additional details.

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities

☒Prescribed Burning (Broadcast), 1667.3 acres

☒ Prescribed Burning (Pile Burning), 1667.3 acres

☒ Mechanical Treatment, 1667.3 acres

☒ Manual Treatment, 1667.3 acres

☒Prescribed Herbivory, 1667.3 acres

☒Herbicide Application, 1667.3 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

See "Treatment Maintenance" above

10. Regional Setting and Surrounding Land Uses:

The Project would restore forest health and protect headwaters of the Chowchilla River Watershed in Mariposa County by implementing fuels reduction and reforestation treatments within mixed oak-conifer forests degraded by overcrowding, drought, bark-beetle infestation, extreme wind events, and catastrophic fire. Treatments would occur on critical forest land protected by Sierra Foothill Conservancy that sit at the interface between rural

residential areas and the Sierra National Forest, consisting of three conservation easements held by and one fee owned preserved operated by Sierra Foothill Conservancy.

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

Pesticide application permit from the Mariposa County Agricultural Commissioner.

Burn permits from the Mariposa County Air Pollution Control District and CAL FIRE.

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone.

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

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

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

Pursuant to CalVTP SPR BIO-2, Native American contacts in Mariposa County were contacted on April 1, 2026, and consisted of Jessalynn Pastran, Chairperson, Buena Vista Rancheria of Me-Wuk Indians; Jesse Galvan, THPO, Buena Vista Rancheria of Me-Wuk Indians; Adam Lewis, Tribal Cultural Resources Assistant, Calaveras Band of Mi-Wuk Indians; Debra Grimes, Tribal Cultural Resources Specialist, Calaveras Band of Mi-Wuk Indians; Gloria Grimes, Chairperson, Calaveras Band of Mi-Wuk Indians; Antoinette Del Rio, Interim Chairperson, California Valley Miwok Tribe; Anthony Wilson, Treasurer, California Valley Miwok Tribe; Lawrence Wilson Jr., Cultural Specialist, California Valley Miwok Tribe; Stephanie Suess, Community & Resources Development Director, Chicken Ranch Rancheria of Me-Wuk Indians; Cynthia Reyes, Cultural Manager, Chicken Ranch Rancheria of Me-Wuk Indians; Joanna Portillo-Hsu, Environmental & Planning Manager, Chicken Ranch Rancheria of Me-Wuk Indians; Monica Fox, Tribal Administrator, Chicken Ranch Rancheria of Me-Wuk Indians; Adam Dalton, Chairperson, Jackson Rancheria Band of Miwuk Indians; Rolland Fillmore, Cultural Preservation Representative, Jackson Rancheria Band of Miwuk Indians; Leland Valdez, Cultural Resources, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Cosme Valdez, Chairperson, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Fred Beihn, Chairperson, North Fork Rancheria of Mono Indians; Lance Fink, Environmental/Heritage Manager, North Fork Rancheria of Mono Indians; Tina Goodwin, Chairperson, Pakan'yani Maidu of Strawberry Valley Rancheria; Heather Airey, Tribal Historic Preservation Officer, Picayune Rancheria of the Chukchansi Indians; Tracey Hopkins, Chairperson, Picayune Rancheria of the Chukchansi Indians; Jazzmyn Gegere, Director of Cultural Resource Preservation, Southern Sierra Miwuk Nation; Sandra Chapman, Chairperson, Southern Sierra Miwuk Nation; Kerri Vera, Environmental Department, Tule River Indian Tribe; Neil Peyron, Chairperson, Tule River Indian Tribe; Andrea Reich, Chairperson, Tuolumne Band of Me-Wuk Indians; Stanley Cox, Cultural Resources Director, Tuolumne Band of Me-Wuk Indians; and Kenneth Woodrow, Chairperson, Wuksachi Indian Tribe/Eshom Valley Band. No responses were received as of May 2026.

DETERMINATION

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

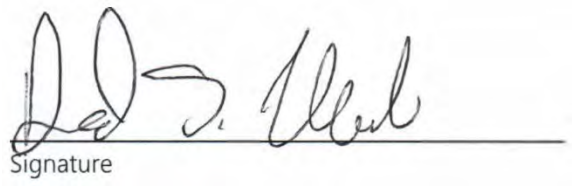
☐ I find that the effects of the proposed project (a) have been covered in the CalVTP Program EIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP Program EIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP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

☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an **ADDENDUM** is adopted to address the project areas outside the geographic extent presented in the Program EIR.

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

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

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



Signature

June 3, 2026
Date

David Mecchi
Printed Name

President of the Board
Title

Mariposa County Resource Conservation Di strict
Agency

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

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

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

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Aesthetic and Visual Resource Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.1.1 Discussion

IMPACT AES-1

Initial and maintenance treatments would be implemented using manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted application of herbicides. The potential for these treatment activities to result in short-term degradation of the visual character of a project area was examined in the Program EIR. There are no eligible or officially designated state scenic highways located within the project area. The nearest officially designated state scenic highway is State Route (SR) 140 located approximately 2.5 miles west of the project area (Caltrans 2025). In addition, SR 49, which is an eligible state scenic highway is located approximately 2.3 miles south of the project area (Caltrans 2025). Given these distances, along with intervening topography and vegetation, proposed treatments are not assumed to be visible from either SR 140 or SR 49.

Treatments would be conducted on three private properties: "Anderson Ranch," "Macready Ranch," and "Stookey Preserve" that are not accessible to the public. Although Stookey Preserve is not open for public use, limited access is provided through guided hikes, educational programs, and special events hosted by the SFC. While there are no publicly accessible recreational areas within the project area, there are recreational areas in the greater project vicinity, including the Sierra National Forest and Yosemite National Park. Given the surrounding distances, combined with intervening topography and dense vegetation, including areas of mature trees, the proposed treatments are not assumed to be visible from public viewpoints within nearby recreational areas or from eligible and officially designated state scenic highways. In addition, treatments would focus on the thinning of overly dense trees and shrubs, typically smaller than 12-inch DBH, growing in the mid- to low-canopy of woodland and forest habitats, leaving overstory vegetation. Although in the short-term after treatment, the removal of vegetation could be noticeable, mature vegetation would remain to provide partial screening of treatment areas. However, existing views of the project area have already degraded due to past high-severity wildfires (i.e., Oak Fire, Ferguson Fire, and Carstens Fire), which left extensive stands of burned trees, snags, and downed biomass. In these burned areas, proposed treatments would focus on removing dead and damaged trees, snags, and much of the dead and downed biomass, followed by replanting to restore woodland and forest habitats. Because these areas no longer contain dense vegetation, natural screening is limited. Equipment, crews, and smoke from prescribed burning could also be visible from public viewpoints and/or from the eligible and officially designated state scenic highways in the short term. The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above.

SPRs applicable to the proposed treatments are AD-3, AD-4, AES-2, AQ-2, AQ-3, and REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-2

Initial and maintenance treatments would include ecological restoration and shaded and nonshaded fuel break treatment types. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR. The project is located on private land and does not have any publicly accessible scenic vistas and would not be visible from any eligible or officially designated state scenic highways given distance, intervening topography, and vegetation (Caltrans 2025). However, proposed treatment areas, specifically the change in vegetation post-treatment, may be visible from surrounding recreational areas (e.g., Sierra National Forest and Yosemite National Park). Treatments would remove shrubs and trees smaller than 12 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 ecological restoration and

shaded and nonshaded fuel break treatments would remain consistent with the natural, vegetated landscape and would not constitute a noticeable adverse change or substantial degradation of the current visual character of the landscape. Instead, the proposed treatments would enhance scenic quality over time by re-establishing woodland and forest habitats in areas severely burned by recent wildfires, thereby improving the current visual character and benefiting public views.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AD-3, AES-1, and AES-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-3

Initial and maintenance treatments would include nonshaded fuel break treatments in areas containing shrubs and herbs (i.e., areas currently without canopy). The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because it may be infeasible to relocate a nonshaded fuel break to avoid public visibility. While there are no publicly accessible recreational areas within the project area, there are recreational areas in the project vicinity, including the Sierra National Forest and Yosemite National Park, which could provide public viewpoints of the nonshaded fuel breaks. However, visibility is unlikely due to distance and topography, therefore, nonshaded fuel breaks are not assumed to be visible from either SR 140 and SR 49.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPR AD-3 is applicable to this impact. In addition, Mitigation Measure AES-3 would apply to this treatment to minimize visual impacts, if feasible, from any recreation areas, public roads, and state scenic highways with lengthy views (i.e., longer than a few seconds) of nonshaded fuel breaks. While implementation of Mitigation Measure AES-3 would substantially reduce the potential for substantial long-term degradation of visual character, as noted in the Program EIR, nonshaded fuel breaks may be visible from public viewpoints and it is not feasible to relocate them because they would be located in strategic locations to reduce wildfire risk and support fire suppression by providing responders with a staging area. Therefore, the potential remains for substantial long-term degradation of visual character. For purposes of CEQA compliance, this impact is considered significant and unavoidable. This determination is consistent with the Program EIR and would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the

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

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	AD-3	NA	LTS	No	Yes

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

New Agriculture and Forestry Resources Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Agriculture and Forestry Resources Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.2.1 Discussion

IMPACT AG-1

Initial and maintenance treatments would include ecological restoration and fuel break treatment types. Treatment activities would include prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory. The potential for these treatment types and treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the Program EIR.

The project area includes forest land as defined by PRC Section 12220(g) (i.e., land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits). Treatments proposed under the project may include the removal of healthy trees that are up to 18 inches DBH to thin canopy and break up canopy continuity. Select larger trees may be removed if they are dead, dying, diseased, or a safety hazard. Treatments would include removal of trees in the overstory and midlevel canopy to improve forest health and reduce wildfire risk. Treatments would not affect the forest stand conditions directly or indirectly in a way that could result in conversion to a non-forest use. Vegetation management has the potential to improve forest stand conditions by reducing competition and improving the forest floor conditions to promote natural seeding of tree species. Vegetation remaining within forest land after treatment would continue to be consistent with the definition of forest land pursuant to PRC Section 12220(g).

The potential for proposed treatment activities to result in loss or conversion of forest land was examined in the Program EIR. This impact 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 project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the composition of forest land and agricultural land present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact on forest land is also the same, as described above. SPR AD-3, which requires the project to comply with local plans, policies, and ordinances regarding the conversion of forest land, is applicable to the proposed treatments. 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 AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined that 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 project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same, and for the reasons described above, 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 the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the Program EIR.

4.3 AIR QUALITY

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

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Air Quality Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.3.1 Discussion

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

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed (broadcast and pile) burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standard (CAAQS) or National Ambient Air Quality Standard (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects.

Emissions of criteria air pollutants related to the proposed treatments are within the scope of the Program EIR because the associated equipment and duration of use are consistent with those analyzed in the Program EIR. Mitigation Measure AQ-1 is also applicable to this impact. The emission reduction techniques proposed in Mitigation Measure AQ-1 would be implemented to the extent feasible. However, it may be cost prohibitive to use equipment meeting the latest efficiency standards, including meeting the US Environmental Protection Agency's (EPA's) Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. Carpooling would be encouraged by SFC, but because crews may not all be employed with the same company it may not be feasible for most workers. For these reasons, this impact would remain significant and unavoidable.

When feasible, SFC is proposing use of specialized biomass processing technologies (e.g., air curtain burners) in place of pile burning, pursuant to Mitigation Measure GHG-2. The use of air curtain burning, pyrolysis/carbonization, or gasification is proposed to process biomass. Evaluation of criteria air pollutant emissions from these biomass processing technologies conducted by Ascent Environmental (2022) indicates that smoke and criteria air pollutant emissions can be substantially reduced, compared to open pile burning. For example, use of an air curtain burner would substantially reduce reactive organic gas (ROG) and particulate matter (PM) emissions each by approximately 96 percent when compared to pile burning. For nitrous oxide (NO_X), air curtain burners are estimated to reduce NO_X emissions by at least 73 percent. Use of pyrolysis on-site and off-site, when compared to pile burning, would also substantially reduce air pollutants, including ROG by 98 percent for both types, and PM emissions by 100 percent for both types (Ascent Environmental 2022). For NO_X, pyrolysis on-site and off-site are estimated to reduce NO_X emissions by approximately 94 percent and 93 percent, respectively. Lastly, use of gasification on-site and off-site, when compared to pile burning, would substantially reduce air pollutants, including ROG by 98 percent for both types, and PM emissions by approximately 91 percent for both types (Ascent 2022). Based on available information about emissions from these types of specialized biomass processing technologies, these technologies offer an opportunity to substantially reduce local exposure to PM from smoke, a potentially beneficial difference compared to pile burning.

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

The SPRs applicable to the proposed project are AD-4 and SPR AQ-1 through SPR AQ-6. Despite the substantial reduction in criteria air pollutant emissions afforded by use of these biomass processing technologies, Impact AQ-1

must still be recognized as significant and unavoidable because of uncertainties in the extent of their use. No additional feasible mitigation measures are available. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-2

The use of vehicles and mechanical equipment during initial and maintenance vegetation treatments could expose people to diesel particulate matter emissions if present in or immediately adjacent to the project area. However, the project area is not accessible to the public and treatment activities would not take place near the same people for an extended period such that prolonged exposure would occur. The potential to expose people to diesel particulate matter emissions was examined in the Program EIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, and the types and amount of equipment that would be used, as well as the duration of use during proposed treatments are consistent with those analyzed in the Program EIR.

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

In addition, SFC proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site or removed from the treatment area, outside of Watercourse and Lake Protection Zones (WLPZs) and away from sensitive resources. 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 could affect diesel particulate emissions. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to emissions of diesel particulate matter than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-3

This impact does not apply to the treatment project because naturally occurring asbestos does not occur in the project area based on ultramafic mapping (which includes serpentine soils) by the Natural Resources Conservation Service (NRCS n.d.).

IMPACT AQ-4

The proposed project, with its SPRs applicable to prescribed burning and ongoing maintenance treatments, is designed to minimize the risk of exposing people to smoke, which includes toxic air contaminants (TAC); however, prescribed burning during initial and maintenance treatments could still expose people to TAC. This potential exposure risk was examined as an impact in the Program EIR and found to be potentially significant and unavoidable after the application of the SPRs and all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of TAC and associated levels of acute health risk with a Hazard Index greater than 1.0. When feasible, the use of specialized biomass processing technologies is proposed to reduce smoke emissions and associated TACs in comparison to pile burning. TACs resulting from the combustion of biomass are generally organic in nature and are, therefore, a subset of ROG emissions. Based on evaluation conducted by Ascent (2022), the proposed use of biomass processing technologies (e.g., air curtain burners) would reduce ROG emissions. Use of air curtain burners can reduce ROG emissions by approximately 96 percent, use of pyrolysis on-site and off-site and gasification on-site and off-site can all reduce ROG by approximately 98 percent for both types when compared to pile burning of equivalent areas (Ascent 2022). Therefore, the potential exposure of people to TACs and related health risks would be substantially lower with the use

of biomass processing technologies as compared with pile burning. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the Program EIR. Accordingly, the potential for exposure to TACs is also within the scope the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the 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. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, and AQ-6. All feasible measures to prevent and minimize smoke emissions as well as exposure to smoke are included in SPRs. No additional feasible mitigation measures are available, and this impact would remain significant and unavoidable, as explained in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-5

Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the Program EIR. Consistent with the Program EIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. This impact is within the scope of the Program EIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the Program EIR.

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

In addition, SFC proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on site or removed from the treatment area, outside of WLPZs and away from sensitive resources. 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 could affect diesel exhaust emissions and related odors. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to odors from diesel exhaust than what was covered in the Program EIR. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-6

SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes objectionable odors; however, prescribed burning during initial and maintenance treatments could still expose people to objectionable odors. Use of diesel-powered equipment during vegetation treatments could also expose people to objectionable odors from diesel exhaust. Consistent with the Program EIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. The use of biomass processing technologies (i.e., air curtain burners, carbonators, gasifiers) is proposed to reduce smoke emissions and associated odors in comparison to pile burning. When compared to pile burning, use of biomass processing technologies would substantially reduce smoke through filtering. The potential to expose people to objectionable odors was examined in the Program EIR and was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur.

The duration and parameters of prescribed burning and the exposure potential are consistent with the activities addressed in the Program EIR, and smoke would be reduced with the use of biomass processing technologies. Therefore, the resultant potential for exposure to objectionable odors from smoke is within the scope of impacts covered in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and sensitive receptors in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs. No additional feasible mitigation measures are available, and this impact would remain potentially significant and unavoidable, as explained in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR and revisions to an SPR constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR.

Revisions to SPR HAZ-1 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact AQ-2 and AQ-5 above, the revisions do not involve any changes to requirements regarding equipment maintenance that could affect diesel particulate emissions or diesel exhaust emissions and related odors and would therefore continue to reduce the potential for air quality impacts consistent with the overall intent of SPR HAZ-1. Therefore, revisions to SPR HAZ-1 would not result in a new impact that was not covered in the Program EIR. 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 and revisions SPR HAZ-1 would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur. Therefore, no new impact related to air quality would occur.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

New Archaeological, Historical, and Tribal Cultural Resources Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP Program EIR?

☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Archaeological, Historical, and Tribal Cultural Resources Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.4.1 Discussion

Consistent with SPR CUL-1, a records search of the 1,667-acre project area, including areas within and outside of the CalVTP treatable landscape, was performed by the Central California Information Center (CCIC). A search of the Anderson Ranch and Macready Ranch properties was conducted on June 25, 2025 (CCIC File 13400M); a search of the Stookey Preserve property was conducted on November 26, 2025 (CCIC File 13576M). The search revealed 24 previously recorded archaeological sites and historic features. Two are built-environment historic features (a building and a bridge), eight are historic-era archaeological sites (trash scatters, water conveyance systems, rocks walls,

building foundations), and 14 are precontact archaeological sites (bedrock mortars, lithic scatters, metates, habitation/occupation sites).

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On April 1, 2026, letters inviting the tribes to consult were emailed to the 13 tribes indicated by NAHC. No responses were received as of May 2026. A June 25, 2025 search of NAHC's sacred lands database returned negative results.

IMPACT CUL-1

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. The CCIC records search revealed two historic features. One is the C. K. Westfall House, which is locally significant and therefore a resource under CEQA; it would be avoided pursuant to SPR CUL-7. The second historic feature, a bridge, has not been evaluated for eligibility for listing in the CRHR; therefore, it is not known whether it is considered a resource under CEQA. 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 would be identified and avoided pursuant to SPR CUL-7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential 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. SPRs applicable to this impact are AD-3, CUL-1, CUL-7, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-2

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The CCIC records search revealed 22 archaeological sites; however, it is not known if they have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. A survey would be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources would be avoided according to the provisions of SPR CUL-5.

As described under Section 1.1.3, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt treatments that do not result in ground disturbance or other risk of impact to archaeological resources (e.g., manual treatments and herbicide application) from needing an archaeological resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would require pre-treatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the Program EIR. This impact was identified as significant and unavoidable in the Program EIR because of the large

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

This impact is within the scope of the Program EIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to protect any inadvertent discovery. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-3

Native American contacts in Mariposa County were contacted on April 1, 2026, and included Jessalynn Pastran, Chairperson, Buena Vista Rancheria of Me-Wuk Indians; Jesse Galvan, THPO, Buena Vista Rancheria of Me-Wuk Indians; Adam Lewis, Tribal Cultural Resources Assistant, Calaveras Band of Mi-Wuk Indians; Debra Grimes, Tribal Cultural Resources Specialist, Calaveras Band of Mi-Wuk Indians; Gloria Grimes, Chairperson, Calaveras Band of Mi-Wuk Indians; Antoinette Del Rio, Interim Chairperson, California Valley Miwok Tribe; Anthony Wilson, Treasurer, California Valley Miwok Tribe; Lawrence Wilson Jr., Cultural Specialist, California Valley Miwok Tribe; Stephanie Suess, Community & Resources Development Director, Chicken Ranch Rancheria of Me-Wuk Indians; Cynthia Reyes, Cultural Manager, Chicken Ranch Rancheria of Me-Wuk Indians; Joanna Portillo-Hsu, Environmental & Planning Manager, Chicken Ranch Rancheria of Me-Wuk Indians; Monica Fox, Tribal Administrator, Chicken Ranch Rancheria of Me-Wuk Indians; Adam Dalton, Chairperson, Jackson Rancheria Band of Miwuk Indians; Rolland Fillmore, Cultural Preservation Representative, Jackson Rancheria Band of Miwuk Indians; Leland Valdez, Cultural Resources, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Cosme Valdez, Chairperson, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Fred Beihn, Chairperson, North Fork Rancheria of Mono Indians; Lance Fink, Environmental/Heritage Manager, North Fork Rancheria of Mono Indians; Tina Goodwin, Chairperson, Pakan'yani Maidu of Strawberry Valley Rancheria; Heather Airey, Tribal Historic Preservation Officer, Picayune Rancheria of the Chukchansi Indians; Tracey Hopkins, Chairperson, Picayune Rancheria of the Chukchansi Indians; Jazzmyn Gegere, Director of Cultural Resource Preservation, Southern Sierra Miwuk Nation; Sandra Chapman, Chairperson, Southern Sierra Miwuk Nation; Kerri Vera, Environmental Department, Tule River Indian Tribe; Neil Peyron, Chairperson, Tule River Indian Tribe; Andrea Reich, Chairperson, Tuolumne Band of Me-Wuk Indians; Stanley Cox, Cultural Resources Director, Tuolumne Band of Me-Wuk Indians; and Kenneth Woodrow, Chairperson, Wuksachi Indian Tribe/Eshom Valley Band. No responses were received as of May 2026.

As described under Section 1.1.3, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt manual, prescribed herbivory, and herbicide application treatments from needing an archaeological resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments, prescribed burning) would require pre-treatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the Program EIR. This impact is within the scope of the Program EIR, because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the Program EIR. As explained in the Program EIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1 through CUL-6, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment, including skid steers, excavators, dozers, and masticators, which could uncover human remains. The CCIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the Program EIR. Additionally, consistent with the Program EIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above. The SPR applicable to this impact is AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The 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 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Revisions to SPR CUL-4 as described in Section 1.1.3, "Purpose of This PSA/Addendum," and shown in the MMRP (Attachment A), would constitute a change to the project analyzed in the Program EIR. Revisions to SPR CUL-4 exempt certain treatments that do not result in ground disturbance or other risk of impact to archaeological or historical resources (i.e., manual treatments, prescribed herbivory, and herbicide application) from needing an archaeological resource survey. Requirements under SPR CUL-4 are intended to prevent damage to archaeological resources. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would still require pre-treatment surveys; therefore, revisions to SPR CUL-4 would not result in a new impact that was not analyzed in the Program EIR. 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, and revisions to SPR CUL-4, would not give rise to any new significant impacts. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

4.5 BIOLOGICAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	AD-1 AQ-3, AQ-4 BIO-1, BIO-2, BIO-7, BIO-9 GEO-1, GEO-3 GEO-4, GEO-5, GEO-7 HYD-5	BIO-1a BIO-1b BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) PSU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	AD-1 BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-10, BIO-11 HAZ-5, HAZ-6 HYD-1, HYD-3, HYD-4, HYD-5	BIO-2a, BIO-2b, BIO-2c, BIO-2e, BIO-2g, BIO-3a, BIO-3b, BIO-3c, BIO-4	LTSM (all wildlife species except bumble bees) PSU (bumble bees)	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	AD-1 BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9 HYD-4, HYD-5, CHAP/CSS-1	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	AD-1 BIO-1 HYD-1, HYD-3, HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	AD-1 BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-10, BIO-11 HYD-1, HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife, Including Nesting Birds	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	AD-1 BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-1, AD-3	NA	NI	No	Yes

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	AD-1	NA	NI	No	Yes

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

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Biological Resources Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.5.1 Discussion

Pursuant to SPR BIO-1, Ascent biologists reviewed project-specific biological resources data, including habitat and vegetation types, special-status plants, special-status wildlife, and sensitive habitats (e.g., sensitive natural communities, chaparral, wetlands) with potential to occur in the project area. The project area is located within the Sierra Nevada ecoregion. The project area ranges in elevation from approximately 3,200 feet to 4,240 feet.

Habitat types within the project area were identified based on vegetation data from LANDFIRE's *Existing Vegetation Type* mapping (downloaded from LANDFIRE in 2025). Vegetation types were classified according to California Wildlife Habitat Relationship (CWHR) types, where possible. Habitat is often characterized by a dominant plant form, plant species, or physical characteristic, and vegetation is often considered the best representation of habitats across a landscape (CDFW 2025a).

In addition to the use of LANDFIRE's *Existing Vegetation Type* mapping, further analysis was conducted to characterize chaparral vegetation in the project area. As discussed in Chapter 2, "Project Description," Anderson Ranch and Macready Ranch have both burned due to wildfire events within the last 15 years; three wildfires burned in the region encompassing the project area in 2013, 2018, and 2022. Almost all of Anderson Ranch burned in 2013 and/or 2022, and approximately half of Macready Ranch burned in either 2018 or 2022. Many of the burned portions of the project area are currently dominated by shrubs, with sparse tree cover. Through a comparison of pre- and post-fire satellite imagery (downloaded from Google Earth in 2025), as well as a comparison of vegetation mapping from LANDFIRE (downloaded in 2025) from before the three fires (vegetation data available for 2001) and after the three fires (vegetation data available from 2024), chaparral vegetation in the project area was differentiated into two types—"mixed chaparral" and "post-fire successional chaparral."

Areas classified as mixed chaparral were characterized by chaparral before the fires, as evidenced by satellite imagery, and are characterized by chaparral still. In these areas, shrub-dominated vegetation constitutes the climax community. Areas classified as post-fire successional chaparral, on the other hand, consist of the portions of the

burned areas that were characterized by woodland or forest before the fires, as evidenced by satellite imagery. These areas were mapped by LANDFIRE as forest/woodland or montane riparian in 2001 and are visible as tree-dominated vegetation in pre-fire satellite imagery. These areas are currently undergoing a temporary, post-fire successional shrub-dominated state, with woodland, forest, or montane riparian vegetation being the climax community. LANDFIRE identifies stands of chaparral vegetation at a scale of 30-square meters, in accordance with CDFW guidance for project-specific analyses to use a minimum mapping unit of 1-acre (CDFW n.d.). See Attachment B for results of this pre- and post-fire chaparral vegetation analysis.

The acreages for shrub/scrub habitats presented in Tables 4.5-1 through 4.5-3 reflect the results of this pre- and post-fire chaparral analysis. All other habitat types and acreages presented in Tables 4.5-1 through 4.5-3 were determined from 2024 LANDFIRE mapping (downloaded in 2025).

Table 4.5-1 Habitat and Land Cover Types on Anderson Ranch

Habitat and Land Cover Types[1]	Ecological Restoration Acreage	Total Acreage
Forest/Woodland		
Sierran Mixed Conifer	233.3	**233.3**
Montane Hardwood	80.4	**80.4**
Foothill Pine	3.6	**3.6**
Forest/Woodland Total	—	***317.3***
Shrub/Scrub		
Post-Fire Successional Chaparral[2]	429.7	**429.7**
Mixed Chaparral[3]	3.6	**3.6**
Shrub/Scrub Total	—	***433.3***
Herbaceous		
Annual and Perennial Grassland	8.6	**8.6**
Herbaceous Total	—	***8.6***
Riparian/Wetland		
Montane Riparian	35.8	**35.8**
Wetland/Riparian Total	—	***35.8***
Developed/Barren[4]		
Developed	0.9	***0.9***
Barren	0.2	***0.2***
Developed/Barren Total	—	***1.1***
	Total	**796.1**

Notes: Totals may not sum exactly due to independent rounding.

[1] The Anderson Ranch portion of the project area burned in 2013 and/or 2022, except for approximately 0.2 acres.

[2] Post-fire successional chaparral has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire, as evidenced by satellite imagery (per writ instruction). Before treatments may occur in these areas, fine-scale vegetation surveys and mapping would need to confirm that all alliances within these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to CDFW and consistent with the writ.

[3] Mixed chaparral within the Anderson Ranch portion of the project area meets the Definitions of the habitat types subject to the restrictions of the writ. Pursuant to SPR CHAP/CSS-1, which reflects the restrictions of the writ, ecological restoration treatments in mixed chaparral would consist of removal of flammable, nonnative vegetation; fuel breaks established in mixed chapparal would not exceed 300 feet in width; and maintenance in mixed chaparral would consist of removal of flammable, nonnative invasive plants.

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

Source: Vegetation data downloaded from LANDFIRE in 2025, compiled by Ascent in 2025.

Table 4.5-2 Habitat and Land Cover Types on Macready Ranch

Habitat and Land Cover Types[1]	Ecological Restoration Acreage	Total Acreage
Forest/Woodland		
Sierran Mixed Conifer	156.5	**156.5**
Montane Hardwood	135.9	**135.9**
Foothill Pine	10.3	**10.3**
Forest/Woodland Total	—	*302.7*
Shrub/Scrub		
Post-Fire Successional Chaparral[2]	242.0	**242.0**
Mixed Chaparral[3]	21.5	**21.5**
Shrub/Scrub Total	—	*263.5*
Herbaceous		
Annual and Perennial Grassland	39.0	**39.0**
Herbaceous Total	—	*39.0*
Riparian/Wetland		
Montane Riparian	16.0	**16.0**
Wet Meadow	0.3	**0.3**
Wetland/Riparian Total	—	*16.3*
Developed/Barren[4]		
Developed	20.8	*20.8*
Barren	<0.1	*<0.1*
Developed/Barren Total	—	*20.8*
	Total	642.3

Notes: Totals may not sum exactly due to independent rounding.

[1] Approximately 51.4 percent (or 330 acres) of the Macready Ranch portion of the project area burned in 2022 and 2018, with approximately 48.6 (or 312.5 acres) remaining unburned.

[2] Post-fire successional chaparral has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire, as evidenced by satellite imagery (per writ instruction). Before treatments may occur in these areas, fine-scale vegetation surveys and mapping would need to confirm that all alliances within these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to CDFW and consistent with the writ.

[3] Mixed chaparral habitat within the Macready Ranch portion of the project area meets the Definitions of the habitat types subject to the restrictions of the writ. Pursuant to SPR CHAP/CSS-1, which reflects the restrictions of the writ, ecological restoration treatments in mixed chaparral would consist of removal of flammable, nonnative vegetation; fuel breaks established in mixed chapparal would not exceed 300 feet in width; and maintenance in mixed chaparral would consist of removal of flammable, nonnative plants.

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

Source: Vegetation data downloaded from LANDFIRE in 2025, compiled by Ascent in 2025.

Table 4.5-3 Habitat and Land Cover Types on the Stookey Preserve

Habitat and Land Cover Types[1]	Ecological Restoration Acreage	Fuel Break Acreage	Total Acreage
Forest/Woodland			
Sierran Mixed Conifer	48.9	14.3	**63.2**
Montane Hardwood	25.2	8.2	**33.4**
Foothill Pine	3.3	0.8	**4.1**
Ruderal Forest[2]	0.4	0.0	**0.4**

Habitat and Land Cover Types[1]	Ecological Restoration Acreage	Fuel Break Acreage	Total Acreage
Montane Hardwood-Conifer	0.0	0.3	**0.3**
Forest/Woodland Total	—	—	*101.4*
Shrub/Scrub			
Mixed Chaparral[3]	18.8	2.9	**21.7**
Shrub/Scrub Total	—	—	*21.7*
Herbaceous			
Annual and Perennial Grassland	63.2	2.5	**65.7**
Herbaceous Total	—	—	*65.7*
Riparian/Wetland			
Montane Riparian	14.0	5.0	**19.0**
Wet Meadow	5.2	0.4	**5.6**
Lacustrine	2.7	0.0	**2.7**
Wetland/Riparian Total	—	—	*27.2*
Developed/Barren4			
Developed	5.7	5.3	*11.1*
Barren	1.7	0.1	*1.8*
Developed/Barren Total	—	—	*12.9*
		Total	**229.0**

Notes: Totals may not sum exactly due to independent rounding.

[1] The Stookey Preserve portion of the project area has not burned in almost 90 years, with some areas of Stookey Preserve not having any documented fire since burn data began to be collected over 100 years ago. Habitat mapping presented in this table was developed in 2024.

[2] Strongly dominated (greater than 90 percent relative cover) by nonnative tree species, including blue gum eucalyptus. (*Eucalyptus globulus*) This type also includes degraded natural forests and woodlands with an understory strongly dominated by nonnative species (greater than 90 percent relative cover).

[3] Mixed chaparral habitat within the Stookey Preserve portion of the project area meets the Definitions of habitat types subject to the restrictions of the writ. Pursuant to SPR CHAP/CSS-1, which reflects the restrictions of the writ, ecological restoration treatments in mixed chaparral would consist of removal of flammable, nonnative vegetation; fuel breaks established in mixed chapparal would not exceed 300 feet in width; and maintenance in mixed chaparral would consist of removal of flammable, nonnative invasive plants.

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

Source: Vegetation data downloaded from LANDFIRE in 2025; refined and compiled by Ascent in 2025.

A list of special-status plant and wildlife species with potential to occur in the project area and vicinity was compiled by reviewing 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 (CNDDB 2025a; CNPS 2025); US Fish and Wildlife (USFWS) Information for Planning and Consultation (IPaC) (USFWS 2025); California Department of Fish and Wildlife Service's (CDFW) Special Animals List (CDFW 2025b); and Appendix BIO-3 (Table 13a, Table 13b, and Table 19) in the CalVTP Program EIR (Volume II) for special-status plants and wildlife that could occur in the Sierra Nevada ecoregion. A list of sensitive natural communities with potential to occur in the project area was compiled by reviewing Table 3.6-22 (pages 3.6-25–3.6-27) in the Program EIR (Volume II), reviewing *A Manual of California Vegetation* (Sawyer et al. 2009), and completing a CNDDB search of the USGS quadrangles containing and surrounding the project area (CNDDB 2025a) for sensitive natural communities that could occur in the Sierra Nevada ecoregion in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys pursuant to SPR BIO-1, from July 15–17, 2025, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability

of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1 (including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys) a list of all special-status species with potential to occur in the vicinity of the proposed project was assembled (Attachment C). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

IMPACT BIO-1

Initial and maintenance treatments could result in direct or indirect adverse effects on special-status plant species known or with potential to occur in the project area. Potential impacts resulting from maintenance activities would be generally the same as 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 competing vegetation, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for some special-status plant populations; however, repeated treatments at too-frequent intervals can have adverse effects on those same special-status plants. For example, if retreatment occurs in chaparral communities at frequencies outside the natural fire return interval, special-status plants associated with this community type could be adversely affected through habitat alteration that makes the habitat unsuitable for their growth and reproduction.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants would be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018, or current version) prior to implementing manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, or targeted herbicide application in any habitat potentially suitable for special-status plants. Pursuant to SPR BIO-7, surveys would not be required for special-status plants not listed under California Endangered Species Act (CESA) or federal Endangered Species Act (ESA) if all the following conditions apply:

- the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species (e.g., perennial rhizomatous herbs);
- the treatment is carried out during the dormant season for that species or when the species has completed its annual life cycle;
- the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment; and
- treatments are limited to those that do not disturb below the soil surface (i.e., manual treatments, broadcast burning, targeted herbicide application, prescribed herbivory) as not to destroy seeds, stumps, roots, rhizomes, bulbs, and other underground parts of special-status plants.

These conditions to avoid implementing protocol surveys pursuant to SPR BIO-7 may unnecessarily or infeasibly constrain treatment implementation if it is unknown whether special-status plants are present. In this case, protocol-level surveys could be conducted to determine presence or absence, which, depending on the results, may provide greater flexibility with timing and types of treatments that may be implemented. If treatment activities would not be limited to those that do not kill or remove vegetation or disturb the soil below the surface, or treatments cannot be completed in the dormant season and would be implemented during the growing period of non-listed (not protected under ESA or CESA) herbaceous annual species, stump-sprouting species, or geophyte species, protocol-level surveys (per SPR BIO-7) and avoidance of any identified special-status plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below.

Multiple special-status plant species that have potential to occur in the project area are perennial species, moss species, or are listed herbaceous annual species (protected under ESA or CESA). Perennials and moss species cannot

be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes. Pursuant to SPR BIO-7, any species protected under ESA or CESA cannot be seasonally avoided regardless of their life form. Therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify these species prior to implementing treatment activities in habitat that may support these species, regardless of the timing of treatments.

Where protocol-level surveys are required and special-status plants are identified during these surveys, Mitigation Measures BIO-1a or BIO-1b, depending on species status, would be implemented to avoid loss of identified special-status plants. Pursuant to Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which no treatment would occur unless a qualified RPF or biologist determines that a smaller buffer would be sufficient to avoid killing or damaging plants. If a no-disturbance buffer is reduced below 50 feet from an ESA or CESA listed plant, a qualified RPF or botanist would provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which would be included in the post-project implementation report. Treatments may not occur in areas occupied by special-status species unless a qualified RPF or biologist determines, based on substantial evidence, that the species would benefit from the proposed treatment in the occupied habitat area. In the case of plants listed pursuant to ESA or CESA, the determination of beneficial effects would need to be made in consultation with CDFW and/or USFWS, depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants would be carried out by a qualified RPF or botanist. Treatment activities and maintenance treatments would be designed so that treatments, including follow-up maintenance treatments, maintain habitat function for the special-status plant species present.

In addition, pursuant to SPR HYD-5, nontarget vegetation and special-status species would be protected from herbicides. Only ground-level targeted application would occur (no aerial spraying). Only herbicides labeled for use in aquatic environments would be used when working in riparian habitats or areas where there is a possibility the herbicide could come into direct contact with water. As noted in Chapter 2, "Project Description," herbicides would be used sparingly to control invasive plant species that threaten the native biodiversity or increase wildfire hazard.

Conclusion

The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR because habitat characteristics and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing habitat 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.

As described under Section 1.1.4, "Proposed Project Revisions," SFC proposes to revise requirements under SPR GEO-1 to remove the requirement of suspending certain treatment activities when rain is in the forecast; all other components of SPR GEO-1 would remain the same. This revision would replace the current requirement of suspending activities based on a forecasted 30 percent chance of rain within the next 24 hours. Suspension of these activities would not be based on weather forecasts alone (under which precipitation may never materialize), but rather if weather predictions materialize and lead to precipitation events. This revision is consistent with the overall intent of SPR GEO-1 because SFC would be required to suspend mechanical treatment and prescribed herbivory during precipitation, when soils are saturated, and/or when soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities, to minimize the risk of soil disturbance, erosion, increased runoff, and soil destabilization. Therefore, proposed revisions to SPR GEO-1 would not result in a substantially more severe significant effect on special-status plants than what was covered in the Program EIR. The text revisions to all measures are shown in the MMRP (Attachment A).

Biological resource SPRs that apply to the proposed project under Impact BIO-1 are SPR AD-1, AQ-3, AQ-4, BIO-1, BIO-2, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, and HYD-5. Biological resource mitigation measures that apply to the proposed project under Impact BIO-1 are Mitigation Measure BIO-1a, BIO-1b, and BIO-1c. As explained above, impacts on special-status plants resulting from the proposed project, including proposed revisions to SPR GEO-1, would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR. Therefore, this determination is consistent with the Program EIR.

IMPACT BIO-2

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

Crotch's Bumble Bee

Crotch's bumble bee (*Bombus crotchii*) was designated as a candidate for listing as endangered under CESA by the California Fish and Game Commission on May 31, 2022. In June of 2023, CDFW released *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, which included survey and mitigation guidance for Crotch's bumble bee as an updated current range map for the species (CDFW 2023). Crotch's bumble bee has recently undergone declines in abundance and distribution and is no longer present across much of its historic range (Xerces Society 2018). There are no verified detections of Crotch's bumble bee in the project area; however, the project area is within the currently accepted range of the species and has verified detections in Mariposa County (CDFW 2023; CNDDB 2025a).

Crotch's bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and overwinter sites suitable for queens. In California, Crotch's bumble bees typically inhabit open grassland and scrub habitat (Xerces Society 2018). Crotch's bumble bees nest underground and likely use, at least in part, old rodent burrows (Williams et al. 2014; Xerces Society 2018). Some bumble bees favor nest sites near woody transitional habitats and nest in holes or crevices in leaf litter, beneath woody debris, at the base of a tree, in herbaceous plant debris, or near grass clumps (Lanterman et al. 2019). Overwintering likely occurs primarily in woodlands (USFWS 2021). Overwintering queens may prefer shaded areas near trees in areas without dense vegetation and north-facing slopes (Liczner and Colla 2019; Williams et al. 2019). Bumble bees in California have been documented overwintering under 1-2 inches of duff, between leaf/need litter and mineral soil (Williams et al. 2014). The project area contains habitat suitable for Crotch's bumble bee nesting, foraging, and overwintering.

Treatment activities (i.e., manual treatments, mechanical treatments, prescribed burning, herbicide application, and prescribed herbivory) could result in temporary removal of floral resources, as well as inadvertent destruction of bumble bee nests or overwintering sites, if present in the project area, through trampling, crushing, or removal of nesting or overwintering substrate (e.g., downed woody debris, leaf litter). 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 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, limited information about nesting and overwintering behaviors, and the statewide scope of potential effects analyzed, for the purpose 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.

Crotch's bumble bees may use habitat in the project area year-round; therefore, pursuant to SPR BIO-1, impacts cannot be avoided by conducting treatments outside of a sensitive season or avoiding habitat for the species, and implementation of SPR BIO-10 would be required prior to treatment activities. Under SPR BIO-10, a habitat evaluation for special-status bumble bees would be conducted based on the recommendations within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). If the habitat evaluation determines that habitat for this species is present within a treatment area, either focused surveys for Crotch's bumble bee would be conducted, or presence of Crotch's bumble bee in the project area may be assumed (see SPR BIO-10 in Attachment A). This survey guidance does not provide survey methods for determining the presence of overwintering bumble bees because overwintering habitat is not well understood (CDFW 2023).

If Crotch's bumble bees are detected, a no-disturbance buffer would be established around active nests for mechanical treatments (see Mitigation Measure BIO-2g in Attachment A). If presence of special-status bumble bees is assumed within habitat suitable for this species as determined pursuant to SPR BIO-10, then Mitigation Measure BIO-2g would apply and prescribed burning, mechanical treatments, and herbicide application would be avoided during the colony active season. Furthermore, Mitigation Measure BIO-2g includes additional measures to avoid mortality, injury, or disturbance to Crotch's bumble bees. These measures include conducting treatments in a patchy pattern to retain floral resources for active colonies and to provide refuge for overwintering bumble bees. Additional project-specific implementation has been added to Mitigation Measure BIO-2g based on recent feedback from CDFW staff, including restrictions on herbicide application techniques and division of the project area such that the entirety of overwintering or colony habitat is not treated in a single year to further provide refuge.

With implementation of Mitigation Measure BIO-2g and applicable SPRs, habitat function for Crotch's bumble bee would be maintained during and after treatment implementation. Treatments would be designed and implemented in a patchy pattern to retain floral resources and provide refuge for bumble bees. Treatment activities in ecological restoration treatment areas would retain select logs and snags that provide wildlife habitat but do not pose safety hazards, and some of these features may provide nesting or overwintering sites suitable for Crotch's bumble bee. The proposed vegetation treatments would not cause any conversion or loss of natural land cover supporting floral resources or permanent soil disturbance that could remove availability of potential underground nesting or overwintering sites over the long term. 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. With implementation of Mitigation Measure BIO-2g and applicable SPRs, the impact of the project on habitat function for Crotch's bumble bee would be less than significant with mitigation; however, the potential for adverse effects to undetected overwintering or nesting Crotch's bumble bees would remain potentially significant and unavoidable.

Pursuant to Mitigation Measures BIO-2a and BIO-2g, the determination that habitat function would be maintained for Crotch's bumble bee must be made in consultation with CDFW. For the reasons summarized above, SFC determined that implementation of treatments would maintain habitat function for Crotch's bumble bee and consulted with CDFW to seek technical input on this determination, as required. On March 25, 2026 SFC sent a memo to Austin Fisher at CDFW and described the measures that would be taken to avoid mortality, injury, and disturbance to Crotch's bumble bee and to maintain habitat function in compliance with Mitigation Measures BIO-2a and BIO-2g. No refinements to the project description or measures resulted from this notification. These potential effects would not constitute a substantially more severe impact than what was covered in the Program EIR.

Monarch Butterfly

Monarch butterfly (*Danaus plexippus*) is proposed for listing under ESA, and as such, currently does not have protection under ESA and is considered an "other special-status species" in the CalVTP Program EIR. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions in the ESA for actions that may maintain, enhance, remove, or establish milkweed and nectar plants within the breeding and migratory range that do not result in conversion of native or naturalized grassland, shrubland, or forested habitats, including fire management actions (e.g., prescribed burning, hazardous fuel reduction activities, vegetation management, maintenance of fuel breaks and minimum clearance requirements, and other fuels reduction activities).

There are documented observations of breeding monarchs within Mariposa County, including adjacent to the project area, as well as monarch butterfly host plants (i.e., milkweed [*Ascelpias* spp.]) (Western Monarch Milkweed Mapper Database 2025). The project area is outside of monarch overwintering range; however, it is within the breeding and foraging range and contains natural habitats and floral resources that may provide foraging or breeding habitat suitable for the species. Treatments would occur in habitat that may provide foraging or breeding habitat (i.e., milkweed) for monarchs. During the foraging and breeding season, monarchs are typically found in prairies, meadows, grasslands, and along roadsides (NPS 2023). In the project area, some foraging and breeding habitat for monarchs would occur in grasslands, which comprise approximately 117 acres of the total project area. Common California milkweed species are not limited to grasslands, and can also occur in riparian areas, wetlands, open woodlands, and openings in forests. Treatment activities (i.e., mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and herbicide application) could result in the removal of floral resources, and milkweed hostplants, or direct mortality of monarch butterflies. The potential for treatment activities to result in adverse effects on monarch butterflies was examined in the program EIR.

Treatments within riparian areas and wetlands would be avoided or limited pursuant to SPRs HYD-3, HYD-4, BIO-4, and Mitigation Measure BIO-4, and milkweed would not be targeted for treatments in these habitats. Treatment activities implemented within grassland habitat would be prescribed burning and prescribed herbivory. After prescribed burning in meadows located in the foothills of Butte County where purple milkweed (*Asclepias cordifolia*), showy milkweed (*Ascelpias speciosa*), and narrow-leaved milkweed (*Asclepias fascicularis*) were present, populations of milkweed species have either increased or been maintained (Hankins, pers. comm., 2022). In spring of 2022, a monarch larva was observed on heart-leaf milkweed in an area that was burned in fall of 2021 (Hankins, pers. comm., 2022). Further, because milkweed has light, wind-blown seeds, deep rhizomes, and early successional status, showy milkweed has adaptations that typically promote fire survivorship and establishment in early postfire communities where milkweed populations are present near burned areas (Ulev 2005). Removal of milkweed is not anticipated during prescribed herbivory treatments. Livestock may avoid eating milkweed because the plants are unpalatable and contain glycosides that are toxic to cattle, goats, and sheep (Hall et al. 2020); therefore, and direct loss of monarch eggs or larvae during prescribed herbivory treatments is not likely.

The Xerces Society for Invertebrate Conservation has identified regionally appropriate monarch breeding habitat management windows during which vegetation removal should occur to avoid impacts on monarch eggs and larvae (Xerces Society 2019). The window identified for the Sierra Nevada foothill region (the location of the project area) is September 30–June 1 (Xerces Society 2019). Prescribed burning activities under the proposed project would occur from September through June, and while this mostly overlaps the recommended windows, prescribed burning could extend into the month of June, when monarchs may be foraging and breeding in the project area.

Treatments would not target and are not expected to remove significant amounts of milkweed plants, and treatments may maintain grassland habitats or improve habitat for milkweed species in grasslands, woodlands, and forests; however, prescribed burning would occur during the monarch breeding season and could result in loss of monarch eggs and larvae.

SPR BIO-10 would apply, and prior to implementation of mechanical and manual treatments, prescribed burning, or herbicide application within habitats suitable for milkweed (i.e., grassland, woodland, forest, chaparral, meadows, riparian habitat, wetlands), focused surveys for monarch host plants (milkweed [*Asclepias* spp.]) would be conducted in and within 10 feet of the project area prior to implementing treatment activities. If milkweed is detected during focused surveys, further surveys for monarch butterflies would be conducted by a qualified RPF or biologist or the species would be assumed to be present. If focused surveys are conducted and monarchs are not detected, then further mitigation for the species would not be required. If monarchs are detected during focused surveys, or are assumed to be present, then Mitigation Measure BIO-2e would be implemented. Under Mitigation Measure BIO-2e, several measures would be implemented to reduce the likelihood of mortality, injury, or disturbance to monarchs and to maintain habitat function. These measures include retention of host plants (i.e., native milkweed) and conducting treatments in a patchy pattern to retain floral resources and provide refuge for butterflies.

Habitat function for monarch would be maintained because treatment activities and maintenance treatments would not target monarch host plants and because all habitat suitable for monarch in the project area would not be treated

at once (i.e., treatments in the project area would occur over the course of several years). Prescribed fire and prescribed herbivory would also reduce encroachment of woody species and maintain grassland areas where this encroachment is occurring, potentially maintaining grassland foraging and breeding habitat for monarchs.

If treatments are implemented before monarch is listed under ESA or if this species is listed with the proposed 4(d) ruling, contacting USFWS would not be required under Mitigation Measure BIO-2e. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe impact than what was covered in the Program EIR.

Foothill Yellow-legged Frog

Foothill yellow-legged frogs – South Sierra Distinct Population Segment (DPS) (*Rana boylii* pop. 5) have experienced range contractions and are believed to be largely extirpated from Mariposa County (Center for Biological Diversity 2016). Extant populations have been found only in tributaries to the Merced River and Lack McClure, with a single larva seen in Bull Creek in 2007, and small populations documented through 2009 in Sherlock Creek (Center for Biological Diversity 2016). The most recent documented occurrence of foothill yellow-legged frog in Mariposa County was reported in 2017, where the species was detected via environmental DNA sampling, approximately 9 miles from the project site in Sherlock Creek (CNDDB 2025a). These waterways are not hydrologically connected to the project site, and foothill yellow-legged frogs demonstrate limited dispersal, with a maximum dispersal distance of 4.4 miles reported along waterways (Bourque 2008), and a maximum distance of just 80 meters from waterways (Olson and Davis 2009). Invasive predators of foothill yellow-legged frogs including bass species (*Micropterus* spp.) and American bullfrog (*Lithobates catesbeianus*) are prevalent on the project site, and breeding substrates (i.e., cobble) in waterbodies are regularly disturbed by the presence of grazing cattle in many areas. However, there remains potential that unidentified populations of foothill yellow-legged frog may be present in or near the project site.

Pursuant to SPR HYD-4, WLPZs would be implemented adjacent to all Class I and Class II streams and lakes. Additionally, pursuant to SPR HYD-3, livestock (except for cattle, which have an established presence on the project site) would be excluded from Class I and II streams or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, manual activities implemented within WLPZs may still result in injury or mortality of frogs.

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

Under Mitigation Measure BIO-2a, flagging/marking areas for avoidance in which no treatment activities would occur, biological monitoring, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of foothill yellow-legged frogs would be required.

Habitat function for foothill yellow-legged frogs 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 would be limited (e.g., no mechanical treatment, no fire ignition for broadcast burning, retention of at least 75 percent surface cover). Additionally, select large downed logs would be retained where they do not create an additional hazard or prevent project activities from being met. (e.g., downed logs would not be retained within 200 feet of fuel breaks) (see Section 2.1, "Proposed Treatments"). Chipped biomass will not exceed an average of 4 inches in depth within WLPZs to prevent suppression of seed germination in areas where amphibians may require vegetative cover. Finally, within WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remains such that cover is still available for amphibians, with a minimum retention of 10 percent relative cover per acre.

Pursuant to Mitigation Measure BIO-2a, SFC must consult with USFWS and CDFW about its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained for foothill yellow-legged frog. On March 25, 2026 SFC sent a memo to Austin Fisher at CDFW and to the Sacramento Fish and Wildlife Office describing the measures that would be taken to avoid mortality, injury, and disturbance to great gray owl and to maintain habitat function in compliance with Mitigation Measures BIO-2a. Based on this consultation, project-specific guidance was added to SPR BIO-1 to include a no disturbance buffer of 82 feet adjacent to all perennial (i.e., Class I and Class II) streams, if feasible, and to SPR BIO-10 to include a focused visual survey in areas where a no disturbance buffer would not be feasible. Project-specific guidance was added to Mitigation Measure BIO-2a to specify flagging and marking of areas of avoidance of any foothill yellow-legged frogs detected during focused surveys. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Northwestern Pond Turtle

Northwestern pond turtle (*Actinemys marmorata*) is known to occur in the project area within all three properties (Miltimore, pers. comm., 2025). Aquatic habitat suitable for northwestern pond turtle is present within ponds and streams in and adjacent to the project area, and this species could use the upland habitat within the project area in the vicinity of these features. Northwestern pond turtles may be present within upland habitat with sparse vegetation and little to no canopy cover, up to approximately 1,300 feet from aquatic habitat (USFWS 2023). Northwestern pond turtle is proposed for listing under ESA, and as such, does not currently have protection under ESA; however, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions in the ESA for projects that have beneficial or negligible impacts on the northwestern pond turtle, including wildlife suppression and management projects, such as the proposed project. "Take" is defined under ESA as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

If present, northwestern pond turtle could be inadvertently injured or killed by pile burning, mechanical treatments, and manual tree and snag removal. If pile burning occurs on or near a nest, injury or mortality of eggs or young may occur, due to crushing or elevated temperatures. Prescribed herbivory would not result in injury or mortality to western bond turtles, because grazing is not likely to remove or collapse burrows in upland habitat and the species may also move to avoid grazing animals. Workers conducting other manual treatment activities (e.g., limbing of trees, hand pulling of invasive plants) and herbicide application on foot are also unlikely to cause injury, mortality, or substantial disturbance to individual northwestern pond turtles because the workers move relatively slowly throughout the project area.

Pursuant to SPR HYD-4, a WLPZ would be implemented adjacent to all Class I and Class II streams and lakes, as well as adjacent to all Class III and Class IV streams (e.g., drainage canals, irrigation ditches); however, these measures may not avoid impacts on northwestern pond turtles if turtles are present outside of the WLPZs, are present within ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules), or if manual activities implemented within the WLPZ resulted in injury or mortality of turtles.

Northwestern pond turtles may be present relatively large distances (i.e., up to 1,300 feet) from aquatic habitat in or near the project area; therefore, it is unlikely that all habitat potentially suitable for the species can be avoided. As a result, adverse effects cannot be clearly avoided per SPR BIO-1, and focused visual encounter surveys pursuant to SPR BIO-10 for northwestern pond turtle would be conducted by a qualified RPF or biologist within upland habitat areas suitable for the species prior to pile burning, ground-disturbing treatment activities (i.e., mechanical treatments), and manual tree/snag removal. If northwestern pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species would be implemented.

If treatments are implemented before northwestern pond turtle is listed under the ESA or if this species is listed with the proposed 4(d) ruling, Mitigation Measure BIO-2b would apply to northwestern pond turtle. Under Mitigation Measure BIO-2b, additional measures would be required, including flagging/marking areas for avoidance, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of northwestern pond turtles.

Habitat function for northwestern pond turtles 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 project area would be limited. Suitable nesting habitat, including grasslands and open woodlands, would also be retained as part of habitat restoration activities.

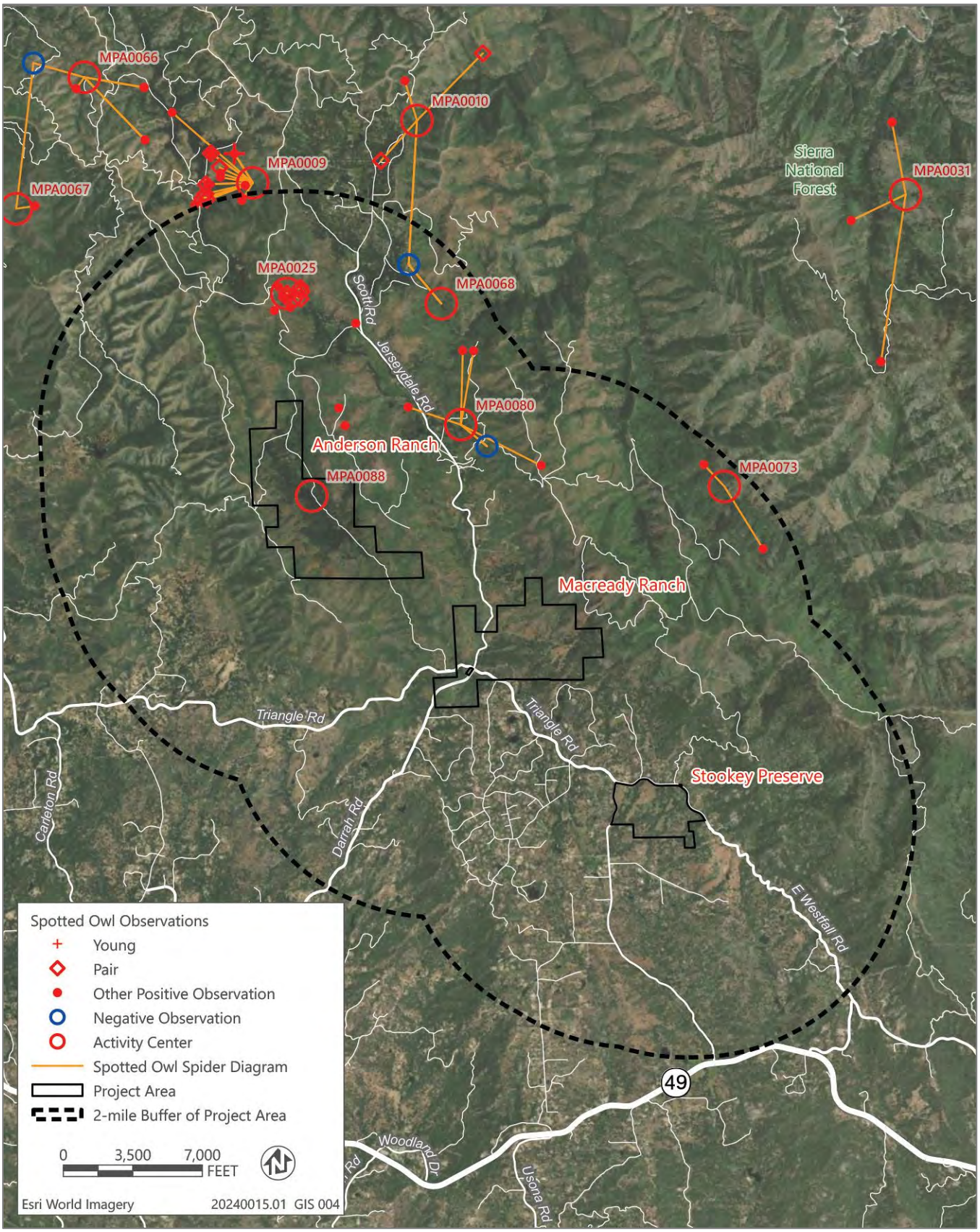
The impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

California Spotted Owl

The California spotted owl Sierra Nevada DPS is proposed for listing under ESA, and as such, currently does not have protection under ESA. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions under ESA for projects that have beneficial or negligible impacts to California spotted owl, including forest or fuels management to reduce the risk or severity of wildfire.

A single California spotted owl activity center has been documented within the Anderson Ranch property (MPA0088), based on the sighting of a lone male in May 2023 (CNDDB 2025a). The spider diagram available through the database, which represents actual and inferred relationships between spotted owl observations and activity centers, does not link any additional records to this activity center; however, additional California spotted owl activity centers have been identified outside of the project area (Figure 4.5-1) and are associated with spotted owl detections as recently as 2021 (CNDDB 2025a). Portions of the project areas on Anderson Ranch and Macready Ranch that contain mature forest may contain nesting habitat for California spotted owl. Removal of nest trees would not occur as part of ecological restoration treatments, because trees greater than 12 inches DBH would not be removed, or as part of fuel breaks because trees of greater than 18 inches DBH would not be removed. However, treatment activities that include the use of heavy equipment, multiple vehicles, loud hand tools (e.g., chainsaws), or prescribed burning could result in disturbance of nesting California spotted owls in suitable nesting habitat within or adjacent to the project area, if these activities occur during the sensitive nesting season (March 1–August 15). Prescribed herbivory and herbicide application would not result in adverse effects on nesting spotted owls because prescribed herbivory would not occur in nesting habitat suitable for the species, and because these activities would not involve the use of loud and continuous noise from equipment or tools, significant habitat modification, or substantial visual stimuli from human presence close enough to a California spotted owl nest to result in disturbance of the nest.

The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.



Source: Downloaded from CNDDB in 2025; adapted by Ascent in 2025.

Figure 4.5-1 California Natural Diversity Database Spotted Owl Detections

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for California spotted owl can be clearly avoided by conducting mechanical and manual treatments and prescribed burning outside of the season of sensitivity (i.e., the nesting season), then further mitigation would not be required. Because California spotted owl nesting occurrences are widespread throughout eastern Mariposa County, to determine whether a documented California spotted owl nesting occurrence is present in or within 0.25 miles of the project area under SPR BIO-1, a qualified RPF or biologist would review California spotted owl occurrence data in the CNDDB and the project proponent would contact US Forest Service biologists from Sierra National Forest to obtain any recent survey and occurrence data for California spotted owl on land adjacent to a treatment area that has not been made publicly available (e.g., in the CNDDB). If present, or if habitat suitable for California spotted owl nesting as determined by a qualified RPF or biologist is present in or within 0.25 miles of a treatment area, potential impacts on the nesting occurrence would be avoided by implementing a limited operating period within 0.25 miles of the occurrence or nesting habitat during the spotted owl nesting season (March 1–August 31) for mechanical treatments, manual treatments, and prescribed burning activities, and no further measures would be required to avoid impacts to nesting owls.

If the limited operating period during the nesting season is determined to be infeasible, then adverse effects would not be clearly avoided pursuant to SPR BIO-1 and protocol-level surveys for California spotted owl (per SPR BIO-10) would be conducted by a qualified RPF or biologist within nesting and foraging habitat for California spotted owl in a 0.25-mile buffer surrounding the project area prior to implementation of treatment activities. Surveys for California spotted owl would be conducted pursuant to the *Protocol for Surveying Proposed Management Activities that May Impact Northern Spotted Owls* (USFWS 2012) or any protocol subsequently developed or otherwise required by USFWS should the species be listed. If nesting California spotted owls are not identified during protocol-level surveys, then further mitigation for the species would not be required. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no disturbance buffer of 0.25 miles would be established around active California spotted owl nests and no treatment activities would occur within this buffer.

Habitat function for California spotted owl would be maintained because treatment activities would not result in the removal of trees greater than 12 inches DBH in ecological restoration treatments, and fuel break treatments would not occur in areas of habitat suitable for California spotted owls (i.e., mature, high-canopy forest). Further, if treatment areas contain habitat suitable for California spotted owls as determined by a qualified RPF or biologist, nest trees in these treatment areas would be identified as part of protocol-level surveys conducted pursuant to SPR BIO-10 prior to project activities and would not be considered for removal. In forest habitats determined by a qualified RPF or biologist to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by California spotted owl (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics, complex forest structure), treatments would be designed to retain a minimum of 60 percent canopy cover where feasible. Modification of California spotted owl habitat is not expected to occur such that any habitat would be unsuitable for the species after treatment.

Canopy cover in forest habitats occupied or potentially occupied by the species would be maintained at 60 percent or greater, and treatments would be designed by a qualified RPF to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

If treatments are implemented before California spotted owl is listed under ESA, or if this species is listed with the proposed 4(d) ruling, Mitigation Measure BIO-2b would apply. Should the proposed ESA 4(d) rule for California spotted owl be issued when the species is listed, the project would qualify for take exemption as a project conducting forest fuels management activities that reduce the risk of large-scale high-severity wildfires, and further consultation with USFWS would not be required.

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

Special-Status Birds

Six additional special-status birds may occur within the project area: Long-eared owl (*Asio otus*), American goshawk (*Astur atricapillus*), great gray owl (*Strix nebulosa*), olive-sided flycatcher (*Contopuus cooperi*), Vaux's swift (*Chaetura*

vauxi), and yellow warbler (*Setophaga petechia*) (Attachment C). Two of these species, American goshawk and great gray owl, are associated with mature forest habitats with are most likely to be present within the Anderson Ranch and Macready Ranch properties, or on US Forest Service or BLM land adjacent to the project area; however great gray owls have been historically observed at Stookey Preserve as well (Miltimore, pers. comm., 2025).

For these additional special-status bird species, mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory conducted during the nesting bird season (typically February 1-August 31) could result in direct loss of active nests if ground nests, or trees or shrubs containing nests, are removed or burned. For nests within vegetation that would not be removed, mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) potentially resulting in abandonment and loss of eggs or chicks. These species are associated with forested areas, and treatment activities conducted in or near forested habitat could result in disturbances to the species. The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

Per SPR BIO-1, adverse effects on nesting special-status birds would be clearly avoided for treatments that would occur outside of the nesting bird season, which is typically February 1–August 31. If conducting treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 would apply, and focused nesting bird surveys for long-eared owl, American goshawk, great gray owl, olive-sided flycatcher, Vaux's swift, and yellow warbler would be conducted by a qualified RPF or biologist prior to implementation of treatment activities. Established survey protocols would be followed for certain species including great gray owl (USFS 2016) and American goshawk (USFS 2006). Prior to implementing SPR BIO-10 for these species, the implementing entity would contact US Forest Service biologists from Sierra National Forest to obtain any recent survey and occurrence data for great gray owl and American goshawk for areas adjacent to the treatments that have not been made publicly available (e.g., in the CNDDB).

If no active bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during the focused surveys, then Mitigation Measure BIO-2a (for great gray owl) and BIO-2b (for long-eared owl, American goshawk, olive-sided flycatcher, Vaux's swift, and yellow warbler) would be implemented.

Under Mitigation Measures BIO-2a and BIO-2b, no-disturbance buffers would be established around nests, and no treatment activities would occur within these buffers until chicks have fledged as determined by a qualified RPF or biologist (see Mitigation Measures BIO-2a and BIO-2b in Attachment A).

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees greater than 12 inches DHB within ecological restoration treatment areas, or trees greater than 18 inches DBH in fuel break treatments, and select snags would also be retained based on treatment type, which would maintain nesting habitat. Additionally, treatments within riparian habitat (which provides habitat for yellow warblers) that is located within a WLPZ would be limited pursuant to SPR BIO-4 and SPR HYD-4 (e.g., no mechanical treatment, no fire ignition for prescribed burning, no pile burning, retention of at least 75 percent surface cover). Additionally, pursuant to SPR HYD-3, livestock would be excluded from environmentally sensitive areas such as Class I and II streams, ponds, wetlands, or riparian areas during prescribed herbivory treatments using temporary fencing or active herding.

Pursuant to Mitigation Measures BIO-2a, the determination that habitat function would be maintained for great gray owl must be made in consultation with CDFW. For the reasons summarized above, SFC determined that implementation of treatments would maintain habitat function for great gray owl and consulted with CDFW to seek technical input on this determination, as required. On March 25, 2026 SFC sent a memo to Austin Fisher at CDFW and described the measures that would be taken to avoid mortality, injury, and disturbance to great gray owl and to maintain habitat function in compliance with Mitigation Measures BIO-2a. No refinements to the project description or measures resulted from this notification. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Bats

Habitat potentially suitable for three special-status bat species – pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus frantzii*) – is present within forest habitat, rocky areas, and human-made structures (e.g., barns, open parking structures) in the project area (Attachment C). Mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat maternity roosts from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) or smoke (e.g., broadcast burning, pile burning) potentially resulting in abandonment of the roost and loss of young. Herbicide treatments that would occur away from established roads would be limited to ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems and would be conducted by crews of 5-15 people; thus, these treatments would not be expected to result in substantial disturbance to special-status bat roosts. The potential for treatment activities to result in adverse effects on special-status bats was examined in the Program EIR.

Per SPR BIO-1, if adverse on special-status bat maternity roosts would be clearly avoided by conducting mechanical treatments, manual treatments, prescribed burning, or prescribed herbivory outside of the bat maternity season (April 1-August 31 [Caltrans 2004]), then no further measures would be required. If conducting some mechanical treatments, manual treatments, prescribed burning, or prescribed herbivory would occur during the bat maternity season, then SPR BIO-10 would apply, and focused surveys for these species would be conducted by a qualified RPF or biologist within suitable habitat areas prior to initiation of mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory. If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats would be implemented.

Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around active pallid bat, Townsend's big-eared bat, or western red bat roosts, and mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory would not occur within this buffer (See Attachment A).

Habitat function for special-status bats would be maintained because treatment activities and maintenance treatments would not result in removal of trees greater than 12 inches DBH in ecological restoration treatments or greater than 18 inches DBH in fuel break treatments, select snags would be retained based on treatment type, and rocky areas would not be targeted for vegetation treatment, which would maintain roost habitat.

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

Gray Wolf

Gray wolves (*Canis lupus*) are large, wild canines. They are highly social, with mated pairs forming packs that defend territories which may may extend to 300 square miles in California (Los Padres Forestwatch 2025). They are highly generalist and occupy diverse habitats throughout North America; however, factors affecting habitat use include prey availability and abundance, presence of humans and livestock, and road density (Paquet and Carbyn 2003). Gray wolves can disperse over large distances, with some individuals dispersing up to 550 miles from their natal pack, with actual travel distances exceeding 3,000 miles (USFWS et al. 2011). Although extirpated from California by 1924, gray wolves began natural recolonization of California in 2011 (CDFW 2025c). As of April 2025, ten wolf packs have been identified and named in California, the closest of which to the project area being the Diamond wolf pack, north of the project area in Lassen, Plumas, and Sierra counties, and the Yowlumni wolf pack, south of the project area in Tulare County. Both the Diamond and Yowlumni wolf packs are approximately 120 miles away from the project area (CDFW 2025d). Although gray wolves are known to reside in Mariposa County, collared wolf OR93 is believed to have dispersed in part through northeast Mariposa County, and the founders of the Yowlumni pack (wolves LAS19M and YOW01F) may have dispersed through Mariposa County, having originated from northern California and from southwestern Oregon respectively (CDFW 2025c). It is therefore possible that gray wolves may disperse through the project area during the life of the project.

Implementation of treatments would not result in the removal of gray wolf habitat, because the project area is outside of the known range of any established wolf packs and does not contain suitable denning sites due to historic and current human disturbance. Dispersing or non-resident (i.e., not affiliated with an established pack) wolves may occur in

the project area; however, these individuals would likely flee due to the presence of equipment, vehicles, or personnel and injury or mortality would not be expected. The impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Northern California Ringtail

Northern California ringtail (*Bassariscus astutus raptor*) is primarily nocturnal, and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats. Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and dense shrub thickets. Most of these denning structures would be avoided, as live trees larger than 12 inches DBH would not be removed in ecological restoration treatments, which make up the majority of the treatments in the project area, and because rocky areas would not be targeted for vegetation treatment; however, dense shrubs may be targeted for treatment, and trees up to 18 inches would be removed for fuel break treatments, which may provide denning habitat for the species. The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the Program EIR.

Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, and injury or mortality would not be expected. Herbicide application, prescribed herbivory treatments, and some manual treatments (e.g., pruning and removal of small trees and snags less than 12 inches DBH) are not expected to result in adverse effects on ringtails because personnel would conduct these activities on foot, prescribed herbivory would be implemented in areas not likely to be occupied by ringtails (e.g., outside of riparian habitat and forest habitat), and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. However, mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH conducted during the ringtail maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30) could result in destruction or disturbance of active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Pursuant to SPR BIO-1, adverse effects on northern California ringtails would be clearly avoided for mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH that would occur outside of the ringtail maternity season and no further measures would be required.

If conducting mechanical treatments and manual treatments that would remove trees or snags greater than 12 inches DBH, or prescribed burning outside of the ringtail maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and presence of ringtails would be assumed, or focused surveys for ringtails would be conducted within the project area prior to implementation of mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH (see SPR BIO-10 in Attachment A. If ringtails are not detected during focused surveys, then further mitigation for the species would not be required. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would be implemented., and additional surveys conducted to determine if an active den is present and its location. If an active den is located, a no-disturbance buffer of at least 0.25 miles would be established around the den, and CDFW would be consulted to provide technical information on the size and shape of the den buffer. No mechanical treatments, manual treatments that would remove trees or snags greater than 12 inches DBH, or prescribed burning would occur within this buffer.

If the presence of northern California ringtails within the project area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a prior to and during implementation of mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH between April 15 and June 30, including pre-treatment den surveys, daily sweeps of the project area, and biological monitoring (see Mitigation Measure BIO-2a in Attachment A).

Habitat function for ringtails would be maintained because treatment activities and maintenance treatments would not result in removal of trees greater than 12 inches DBH in ecological restoration treatments or 18 inches DBH in fuel break treatments, select snags would be retained based on treatment type, and rocky areas would not be targeted for vegetation treatment, which would result in the retention of potential den sites.

Pursuant to Mitigation Measures BIO-2a, the determination that habitat function would be maintained for northern California ringtail must be made in consultation with CDFW. For the reasons summarized above, SFC determined that

implementation of treatments would maintain habitat function for northern California ringtail and consulted with CDFW to seek technical input on this determination, as required. On March 25, 2026 SFC sent a memo to Austin Fisher at CDFW and described the measures that would be taken to avoid mortality, injury, and disturbance to northern California ringtail and to maintain habitat function in compliance with Mitigation Measures BIO-2a. No refinements to the project description or measures resulted from this notification.

Fisher – Southern Sierra Nevada DPS

Habitat potentially suitable for fisher is present in forested portions of the Anderson Ranch and Macready Ranch project areas, and the northeastern portions of Macready Ranch overlaps with designated critical habitat for fishers. Habitat suitable for fisher is typically coniferous forests and mixed hardwood conifer forests with medium to large size class trees and deciduous-riparian areas with high percent canopy closure (CBI 2020). Fisher den and rest in hollow trees, snags, logs, and rocky areas, and female fishers may use multiple denning sites over the course of the breeding season (Nichol 2006). In 2020, the Conservation Biology Institute released *Southern Sierra Nevada Fisher Conservation Strategy Interim Recommendations*, providing categories and definitions of fisher habitat based on habitat types, CWHR size and density classes, and elevational ranges. These recommendations provide guidance for the protection of individual fishers, as well as for the retention of fisher denning habitat.

Per SPR BIO-1, the project area would be surveyed for potential denning habitat and high-quality denning habitat, as defined in *Southern Sierra Nevada Fisher Conservation Strategy Interim Recommendations* (CBI 2020). If it is determined that potential denning habitat or high-quality denning habitat is present in the project area, Mitigation Measure BIO-2a would be implemented to retain habitat quality. Additionally per SPR BIO-1, if potential or high-quality denning habitat is present on the project, it would be determined by a qualified RPF or biologist if adverse effects on fisher can be clearly avoided by conducting mechanical and manual treatments outside of the maternity season and by conducting prescribed burning outside of the early maternity season when kits are most dependent on the mother (Tucker et al 2020; USFWS 2020). If it is determined that adverse effects on fisher denning habitat, high quality denning habitat, and individuals can be avoided, no further mitigation would be required, as resting fisher would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of injury.

If conducting mechanical treatments, manual treatments, and prescribed burning outside of the identified LOPs within denning habitat and high-quality denning habitat is not feasible, implementation of SPR BIO-10 would be required, and presence of fisher would be assumed or focused surveys would be conducted to determine the presence of fisher prior to implementation of treatment activities. Surveys for fisher would be conducted by a qualified RPF or biologist following guidance in *Survey Protocol for Fisher Denning Season, Methods for Informing Denning Protection Measures* (Tucker et al. 2020). If fisher are not detected during the focused surveys, no further mitigation would be required. If fisher are detected by focused surveys or presence is assumed, additional provisions of Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, it would be assumed that an active fisher den is located in the vicinity of a fisher detection and an LOP of March 1-June 30 would apply for mechanical and manual treatments, and an LOP of March 1-May 1 would apply for prescribed burning.

Habitat function for fisher would be maintained because treatment activities would not result in the removal of trees greater than 12 inches DBH in ecological restoration treatments, and fuel break treatments would not occur in areas of habitat suitable for fishers (i.e., mature, high-canopy forest). Canopy cover in forest habitats occupied or potentially occupied by the species would be maintained at 60 percent or greater if feasible, and treatments would be designed by a qualified RPF to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

American Badger

Grassland, open scrub, and open woodland habitat in the project area not subject to high levels of human disturbance may provide habitat for American badger (*Taxidea taxus*). Pile burning, the lacing of control lines for broadcast burning, mechanical treatments, and the placement of fencing, pens, and other infrastructure for prescribed herbivory could result in the destruction of active dens and loss of adults or young through direct mortality or den collapse. Broadcast burning (other than the placing of control lines and staging areas), manual treatments, targeted herbicide application, and prescribed herbivory (other than the placement of infrastructure)

would not result in the destruction of badger dens, because personnel implementing these treatments would conduct the majority of these activities on foot. Additionally, broadcast burning, prescribed herbivory, and herbicide application are not likely to cause a substantial disruption in feeding, as these activities are not likely to be conducted in the vicinity of a den for a substantial length of time. The potential for treatment activities to result in adverse effects on American badger was examined in the Program EIR.

American badgers may use a den year-round, and because focused surveys for American badgers have not been conducted, adverse effects cannot be clearly avoided per SPR BIO-1, and implementation of SPR BIO-10 would be required prior to mechanical treatments and prescribed burning. Under SPR BIO-10, focused surveys would be conducted for American badger dens within habitat suitable for the species (i.e., grasslands, open woodland) by a qualified RPF or biologist. If American badger dens are not detected during focused surveys, then further mitigation for the species would not be required. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist and no mechanical treatments or prescribed burning would occur within this buffer.

Habitat function for American badger would be maintained because habitat suitable for the species (i.e., grasslands, open woodlands) would be maintained and additional open woodland habitat would likely be restored through thinning and removal of ladder fuels. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife species, as described above, was examined in the Program EIR. This impact on special-status wildlife is within the scope of the Program EIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape).; therefore, the potential impact on special-status wildlife species is also the same, as described above.

As described in Section 1.1.4, "Proposed Project Revisions," revisions to SPR HYD-4 are proposed to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments, and all other conditions on treatment activities within WLPZs would apply. This establishment of WLPZs within 300 feet of treatment activities would therefore provide the same reduction in impacts to wildlife as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related special-status wildlife than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-2 are AD-1, BIO-1 through BIO-5, BIO-10, BIO-11, HYD-1, HYD-3, HYD-4, HYD-5, HAZ-5, and HAZ-6. The biological resource mitigation measures that apply to project impacts under Impact BIO-2 are Mitigation Measures BIO-2a, BIO-2b, BIO-2c, BIO-2e, BIO-2g, BIO-3a, BIO-3b, BIO-3c, and BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-3

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including CDFW designated sensitive natural communities, oak woodland, chaparral, and montane riparian habitats. Montane riparian habitat is protected pursuant to California Fish and Game Code Section 1602 and could potentially contain sensitive natural communities as defined by CDFW. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed; however, retreatment at too great a frequency could result in additional adverse effects. Maintenance treatments would generally be of a lower intensity and scale than initial treatments (see Section 2.2, "Treatment Maintenance"). The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the Program EIR.

Based on the habitat mapping available for the project area, sensitive natural communities (i.e., alliances with a rarity rank of S1, S2, or S3) are potentially present in the project area. The sensitive natural communities that have potential to occur in the project area, their associated rarity rank, and the habitat types in which the communities may occur are presented in Table 4.5-4. Rarity ranks are established at the alliance level. All wetland and riparian habitats in the project area are either protected under California Fish and Game Code Section 1602, Clean Water Act Sections 401 and 404, or Porter-Cologne Water Quality Control Act, regardless of if they support vegetation assemblages designated as sensitive natural communities by CDFW. In addition, oak woodlands occur in the project area, consisting of valley oak woodland as well as oak communities present within the montane hardwood habitat type (Table 4.5-1 through 4.5-3), which includes Mediterranean California mixed oak woodland and Mediterranean California lower montane black oak forest and woodland. Oak woodlands are sensitive habitats pursuant to the Oak Woodlands Conservation Act and PRC Section 21083.4.

Table 4.5-4 Sensitive Natural Communities with Potential to Occur in the Project Area

Sensitive Natural Community[1]	Rarity Rank[2]	Habitat Type
Forest/Woodland		
Bigleaf maple forest and woodland	S3	Montane Hardwood; Montane Hardwood-Conifer
California buckeye groves	S3	Montane Hardwood
California bay forest and woodland	S3	Montane Hardwood
Incense cedar forest and woodland	S3	Sierran Mixed Conifer
Tanoak forest	S3	Montane Hardwood
Shrub		
California flannelbush chaparral[3]	S3	Mixed Chaparral; Post-Fire Successional Chaparral
Shrub tanoak chaparral[3]	S3	Mixed Chaparral; Post-Fire Successional Chaparral
Canyon live oak – interior live oak chaparral[3]	S3S4	Mixed Chaparral; Post-Fire Successional Chaparral
Herbaceous/Barren		
Tar plant fields	S2	Annual Grassland
Water blinks – annual checkerbloom vernal pools	S2	Annual Grassland
Deer grass beds	S2?	Perennial Grassland
Goldenaster patches	S3	Perennial Grassland
Fremont's tidy-tips – blow wives vernal pools	S3?	Annual Grassland
Needle grass – melic grass grassland	S3S4	Perennial Grassland
Riparian/Wetland		
Three-way sedge meadows	S1	Wet Meadow
Booth's willow – Geyer's willow – yellow willow thickets	S2	Montane Riparian; Wet Meadow
Western Labrador-tea thickets	S2	Freshwater Emergent Wetland; Montane Riparian
Iris-leaf rush seeps	S2?	Freshwater Emergent Wetland; Wet Meadow

Sensitive Natural Community[1]	Rarity Rank[2]	Habitat Type
Western false asphodel – California bog asphodel fens	S2?	Wet Meadow
Bog blueberry wet meadows	S3	Wet Meadow
Common monkey flower – thistle – hedgenettle seeps	S3	Freshwater Emergent Wetland; Wet Meadow
Black cottonwood forest and woodland	S3	Montane Riparian
Fremont cottonwood forest and woodland	S3	Montane Riparian
Jones's sedge turf	S3	Wet Meadow
Mountain alder thicket	S3	Montane Riparian
Mud sedge – short beaked sedge – seaside arrow-grass	S3	Wet Meadow
Northwest territory sedge – bluejoint graminoid wet meadow & marsh	S3	Perennial Grassland; Wet Meadow
Red-osier dogwood – interior rose – currant thickets	S3	Montane Riparian
Torrent sedge patches	S3	Montane Riparian
Western cowbane meadows	S3	Wet Meadow
Wild grape shrubland	S3	Montane Riparian
Oregon ash groves	S3.2	Montane Riparian
Blue wild rye montane meadows	S3?	Perennial Grassland; Wet Meadow
Rocky Mountain maple thickets	S3?	Montane Riparian
Water foxtail meadows	S3?	Perennial Grassland; Wet Meadow
White-tip clover swales	S3?	Annual Grassland; Wet Meadow
Arrowleaf ragwort – white corn lily – monkeyflower mesic meadow	S3S4	Wet Meadow
Soft and western rush – sedge marshes	S3S4	Freshwater Emergent Wetland; Wet Meadow

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

[2] A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this rank. A numeric range rank (e.g., S3S4) is used to indicate any range of uncertainty about the status of the ecosystem.

[3] Mixed chaparral habitat meets the Definitions of the habitat types subject to the restrictions of the writ. Within this habitat type, and pursuant to SPR CHAP/CSS-1, which was developed to ensure consistency with the writ, only certain ecological restoration treatments and fuel break treatments would be conducted. Post-fire successional chaparral has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire (per writ instruction). Fine-scale vegetation surveys and mapping would need to confirm that all alliances within these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to CDFW before treatments may be conducted in these areas.

Source: Sawyer et al. 2009; compiled by Ascent Environmental in 2025.

During the reconnaissance-level survey, several species associated with these sensitive natural communities were observed, including big leaf maple (*Acer macrophyllum*), incense cedar (*Calocedrus decurrens*), valley oak (*Quercus lobata*), and alder (*Alnus* spp.). Not all dominant or characteristic species associated with sensitive natural communities included in Table 4.5-4 were observed during the reconnaissance-level survey, but not all areas of the project area could be visited. As such, within habitat types that could contain sensitive natural communities (see Table 4.5-4) SPR BIO-3 would be implemented to determine if vegetation meets the definition of sensitive natural communities pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018) and using *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/).

All riparian habitats, regardless of their rarity rank, are a sensitive habitat type protected under California Fish and Game Code Section 1602. Montane riparian habitat is present in the project area (Table 4.5-1 through 4.5-3). Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, which would limit the extent of treatment activities within riparian habitat. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation, would not reduce stream shading and increase stream temperatures, and would be limited to

removal of uncharacteristic or undesired fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, before conducting any treatments in riparian habitat, the project proponent would notify CDFW pursuant to California Fish and Game Code 1602, when required.

SPR BIO-4 requires that treatments be designed to avoid loss or degradation of riparian habitat functions and limits herbicide use (see Attachment A). Pursuant to SPR HYD-4, driving heavy equipment, equipment fueling, placement of burn piles, and fire ignition would be prohibited within the WLPZ, except for driving heavy equipment on established dry roads in the WLPZ.

Avoiding treatment activities in all oak woodlands and potentially sensitive natural communities, dependent on where and if they are identified, would preclude achieving the treatment objectives of restoring forest health and improving wildfire resilience; therefore, Mitigation Measure BIO-3a would apply to treatment activities in oak woodlands and sensitive natural communities. Treatments have been designed in sensitive habitat types and habitats with potential to contain sensitive natural communities, such as montane riparian, to restore ecological function to these habitats and natural communities and to improve forest health and ecosystem resilience consistent with Mitigation Measure BIO-3a (see Section 2.1, "Proposed Treatments," for more detailed information).

A qualified RPF would design treatments in all sensitive natural communities and oak woodlands to ensure that the characteristics that qualify the communities as sensitive (e.g., dominant canopy species, relative percentage of dominant species, species composition, per membership rules of *A Manual of California Vegetation* [online version]) are retained post-treatment to the extent feasible. Treatments in all sensitive natural communities would be designed to maintain or improve the habitat value and functional capacity of the vegetation type compared to its existing condition and would maintain the natural species diversity, abundance, and composition of the sensitive natural community being treated. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and departure from fire return interval for each sensitive natural community and oak woodland prior to treatment. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. In addition, pursuant to Mitigation Measure BIO-3a, treatments within sensitive natural communities in fuel breaks would not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in an S3 sensitive natural community, and no fuel breaks would be created in S1 or S2 sensitive natural communities. The only exception to this prohibition of fuel breaks in S1 or S2 sensitive natural communities would be in cases where it is infeasible to meet these requirements within fuel break treatment areas because it would preclude meeting project objectives.

In accordance with Mitigation Measure BIO-3a, ecological restoration treatments within sensitive natural communities that are fire dependent, would employ prescribed burning as the primary treatment activity to mimic the natural disturbance regime where feasible and appropriate. If it is not feasible to apply prescribed burning in the fire dependent sensitive natural community because of hazardous fuel loads, either the fire dependent sensitive natural community would be avoided or, if avoidance is not an option because avoidance would not meet CalVTP program objectives (e.g., ecological restoration, community protection), manual and mechanical pretreatment activities may be employed to reduce fuel loads (e.g., dead standing vegetation) prior to implementing prescribed burning.

Maintenance treatment at too great a frequency could result in additional adverse effects. Therefore, maintenance treatments outside of the natural fire return interval of the native vegetation alliance being treated would occur only in areas where a qualified RPF or botanist determines that the goal of the initial treatment to restore the sensitive natural community to Condition Class 1 (i.e., natural vegetation composition, structure, and fuels) was not achieved with initial treatments implemented within the natural fire return interval. In those instances, lower intensity, targeted maintenance activities may be implemented outside of the natural fire return interval to achieve these goals. These lower intensity maintenance activities would consist of targeted removal of dead, dying, and diseased trees, and invasive species; or select thinning of regenerating trees and shrubs to achieve desired densities consistent with healthy examples of the vegetation alliance being treated and as described in *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/).

The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the Program EIR. Maintenance in ecological restoration areas would be implemented with consideration for the location's vegetation type (as determined by an RPF or biologist) and its natural fire return interval (i.e., time since last burn or treatment is greater than the average fire return interval for the vegetation type). Fire perimeter data (downloaded from CAL FIRE in 2025) shows that the project area has burned recently. The Carstens Fire (2013) burned approximately 28 percent of the project area, the Ferguson Fire (2018) burned less than 1 percent of the project area, and the Oak Fire (2022) burned approximately 64 percent of the project area. Of the land that burned in the Oak Fire, approximately 26 percent had burned during the Carstens Fire in 2013. In addition, most of the project area (approximately 94 percent) burned between 1911 and 1954.

In addition, pursuant to SPR BIO-4 and HYD-5, only herbicides labeled for use in aquatic environments would be used when working in riparian habitats and in areas where there is a possibility the herbicide could come into direct contact with water. Hand application of herbicides within riparian habitat would occur only during low-flow periods or when seasonal streams are dry. Pursuant to SPR HYD-5, if it is not feasible to avoid herbicide use in WLPZs of Class I and II watercourses, 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. For treatments occurring within riparian habitat, the project proponent would implement SPR BIO-4 and notify CDFW pursuant to California Fish and Game Code Section 1602 as required.

Mixed Chaparral

As noted in Tables 4.5-1 and 4.5-2, mixed chaparral is present in the project area. Mixed chaparral in the project area meets the Definitions of the habitat types subject to the restrictions of the writ (See Attachment B). Within this habitat type, and pursuant to SPR CHAP/CSS-1, which was developed to be consistent with the writ, only certain ecological restoration treatments and fuel break treatments would be conducted. When implementing fuel break treatments in mixed chaparral, SPR BIO-5 would also apply to these treatments; however, requirements in SPR BIO-5 related to ecological restoration treatments are superseded by SPR CHAP/CSS-1, which is more restrictive due to only allowing the removal of flammable, nonnative vegetation under the ecological restoration treatment type. In comparison, SPR BIO-5 requirements specifically for ecological restoration treatments allow removal of mixed chaparral habitat with retention requirements of 35 percent relative density or thinning the shrub canopy by no more than 20 percent from baseline density; however, chaparral removal for ecological restoration treatment is not permissible under the restrictions of the writ.

Ecological restoration treatments are proposed on a total of 43.9 acres of mixed chaparral in the project area across the three properties. According to SPR CHAP/CSS-1, only removal of flammable, nonnative vegetation would occur. Fuel break treatments are proposed for approximately 2.9 acres of mixed chapparal on the Stookey Reserve property. According to SPR CHAP/CSS-1, fuel break construction in mixed chapparal may not exceed 300 feet in width and maintenance of existing fuel breaks may only consist of removal of flammable, nonnative invasive plants.

For fuel break treatments, as required by SPR BIO-5, treatments implemented in mixed chaparral would be designed to avoid type conversion of mixed chaparral vegetation and to maintain habitat function. Project proponents must demonstrate with substantial evidence that the habitat function of mixed chaparral would be maintained or enhanced by the treatments applied. Per SPR BIO-5, fuel break treatments would maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function. To prevent the spread of invasive plants and noxious weeds, SPR BIO-9 would be implemented to ensure that treatment does not provide avenues for invasive plant species to be introduced to treated areas. In addition, per SPR CHAP/CSS-1, ecological restoration treatments would only consist of the removal of flammable, nonnative vegetation in ecological restoration treatment areas. Therefore, ecological function of mixed chaparral communities within the fuel break and ecological restoration treatment types would be maintained over the long term and type conversion would not occur.

The 2.9 acres of mixed chaparral habitat in the project area that would be affected by fuel break treatments constitute approximately 0.02 percent of the 13,451.3 acres of chaparral within the three watersheds (East Fork Chowchilla River, Middle Fork Chowchilla River, and West Fork Chowchilla River) that overlap the project area. Furthermore, ecological restoration treatments in mixed chaparral may only consist of removal of flammable,

nonnative vegetation; therefore, no native species within mixed chaparral would be removed from the project area as part of ecological restoration treatments. The limited scope of fuel break and ecological restoration treatments across the landscape would not constitute landscape-scale conversion of mixed chaparral habitat to other habitat types because the majority of mixed chaparral habitat would be maintained and there would not be a substantial loss of habitat function at the identified spatial scale as required by SPR BIO-5.

Post-Fire Successional Chaparral

The project area contains post-fire successional chaparral, currently in a temporary shrub-dominated state, which contains vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire, as evidenced by satellite imagery. Ecological restoration treatments are proposed on approximately 617.7 acres of post-fire successional chaparral on Anderson Ranch (burned in 2013 Carstens Fire and/or 2022 Oak Fire) and Macready Ranch (burned in 2018 Ferguson Fire and 2022 Oak Fire) (Tables 4.5-1 and 4.5-2). Ecological restoration in post-fire successional chaparral would focus on restoring woodland and forest habitats that were lost in recent fires. Natural successional processes would return these areas toward their woodland and forest climax communities over time. Ecological restoration treatments aim to facilitate and support these natural processes, and may include tree planting and strategic removal of resprouting shrubs to facilitate tree planting and seedling establishment (see "Post-Fire Ecological Restoration," section in Section 2.1.1, "Treatment Types," for additional details).

The writ identifies post-fire treatments as a category of treatments that are allowable in post-fire successional chaparral, as defined above and in the writ. Pursuant to SPR CHAP/CSS-1, which was developed to be consistent with the writ, before treatments may proceed in post-fire successional chaparral habitat, fine-scale vegetation surveys and mapping would need to confirm that alliances present in these areas have a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to *A Manual of California Vegetation*. Consistent with the writ, in any areas mapped as sensitive natural communities, treatments would only consist of the removal of flammable, nonnative vegetation. If post-fire successional chaparral areas are mapped with a state rarity rank of S4 or S5, then restoration to woodland and forest in these areas is allowed to proceed. As such, since SPR BIO-5 is intended to prevent environmental impacts associated with type conversion and maintenance of habitat function in chaparral in particular, and the goal of ecological restoration treatment in post-fire successional chaparral is to restore woodland and forest habitat function, as allowed by the writ, requirements in SPR BIO-5 do not apply to these areas.

To prevent the spread of invasive plants and noxious weeds, SPR BIO-9 would be implemented to ensure that treatment does not provide avenues for invasive plant species to be introduced to treated areas. Erosion prevention measures would also be implemented, including SPR GEO-1 which requires disturbance activities to be suspended during precipitation, SPR GEO-3, which requires the stabilization of disturbed areas in certain circumstances, and SPR GEO-4, which requires erosion monitoring.

Conclusion

The potential for treatment activities to result in adverse effects on sensitive habitats, including designated sensitive natural communities, oak woodlands, riparian habitats, and chaparral, as described above, was examined in the Program EIR. This impact on sensitive habitats is within the scope of the Program EIR, because the treatment activities and intensity of disturbance from implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same, as described above.

As described above and under Section 1.1.4, "Proposed Project Revisions," SFC proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall

intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR. For the reasons described above, the proposed revisions SPR HYD-4 would not result in a substantially more severe significant effect related to sensitive habitats, including designated sensitive natural communities, riparian habitats, oak woodlands, and chaparral than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-3 are SPRs AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, CHAP/CSS-1, HYD-4, and HYD-5. The biological resource mitigation measure that applies to project impacts under Impact BIO-3 is Mitigation Measure BIO-3a. As explained above, impacts on sensitive habitats resulting from the proposed project, including proposed revisions to SPR HYD-4, would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR. Therefore, this determination is consistent with the Program EIR.

IMPACT BIO-4

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

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, multiple types of aquatic habitats were observed, including perennial and intermittent riverine features, ponds, wet meadows, and other potential wetlands. Intermittent and perennial waterways and associated tributaries within the project area include Snow Creek, Magoon Creek, Fox Creek, Camp Meeting Creek, and various unnamed riverine features. Most of the riverine features in the project area are classified as perennial. National Wetlands Inventory (data downloaded from USFWS in 2023) identifies the project area as having approximately 6.2 acres of freshwater emergent wetland, 4.5 acres of freshwater pond, 2.1 acres of freshwater forested/shrub wetland, and 25.3 acres of riverine habitat. LANDFIRE mapping (see Tables 4.5-1 through 4.5-3) mapped approximately 5.8 acres of wet meadow on the Macready Ranch and Stookey Preserve properties, though additional wet meadow habitat was observed during the reconnaissance-level survey, particularly at Anderson Ranch. Furthermore, during the reconnaissance-level survey additional spring and riverine habitats were observed compared to what is mapped by the National Wetlands Inventory and LANDFIRE.

Additional aquatic resources, including wetlands and ephemeral streams that have not been identified or mapped, may be present throughout the project area, as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules). Therefore, pursuant to Mitigation Measure BIO-4, a qualified RPF or biologist would identify the boundaries of all wetlands and other waters in the treatment area; establish an appropriate buffer (with a minimum of 25 feet) around these features; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No fire ignition (including the associated use of accelerants) would occur within wetland buffers. A larger buffer may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., northwestern pond turtle; see Impact BIO-2 above). Treatments within wetland and other water boundaries would be limited to broadcast burning (no ignition within wetland buffer) and only where no special-status species are present and where habitat function in the wetland would be maintained or enhanced/restored. No containment lines for prescribed burning would be installed within the minimum 25-foot wetland buffers.

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. Establishment of WLPZs would result in avoidance of all stream and pond habitat for all treatment activities.

Conclusion

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the Program EIR. This impact on wetlands and other waters is within the scope of the Program EIR, because the

treatment activities and intensity of disturbance from implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wetlands is also the same, as described above.

As described above and under Section 1.1.4, "Proposed Project Revisions," SFC proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR. For the reasons described above, the proposed revisions SPR HYD-4 would not result in a substantially more severe significant effect related to wetlands than what was covered in the Program EIR.

Biological resource SPRs that apply to the proposed project under Impact BIO-4 are SPRs AD-1, BIO-1, HYD-1, HYD-3, and HYD-4. The biological resource mitigation measure that applies to the proposed project under Impact BIO-4 is Mitigation Measure BIO-4. As explained above, impacts on wetlands resulting from the proposed project, including proposed revisions to SPR HYD-4, would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR. Therefore, this determination is consistent with the Program EIR.

IMPACT BIO-5

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on local wildlife movement 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. Based on review of CDFW Areas of Conservation Emphasis Terrestrial Connectivity data, the majority of the project area is considered to be Connectivity Rank 4 – Conservation Planning Linkages, with the exception of a small portion of Macready Ranch, which is considered to be Rank 3 – Connections with Implementation Flexibility (CNDDB 2025b). The project area currently experiences anthropogenic disturbances from roads, residential structures and occupants, and cattle grazing; however, portions of the project area may function to facilitate local wildlife movement. Portions of the project area also likely function as nursery sites (e.g., deer fawning areas, common bat roosts), which may be disturbed by treatment activities. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR.

Fuel break treatments would occur near existing roads and structures, and these areas are generally subject to ongoing disturbances (e.g., vehicle traffic, human activity), as well as historic fragmentation due to past development in the surrounding area. Habitat directly adjacent to development would not be considered optimal habitat; however, wildlife may move through these areas. Ecological restoration treatments would occur in areas that contain less anthropogenically-disturbed habitat, and may function as wildlife movement corridors, particularly along riparian areas. Pursuant to SPR HYD-4, WPLZs would be established adjacent to all Class I and Class II streams and lakes, which would limit the extent of treatment activities within riparian areas (e.g., no mechanical treatment, no fire ignition for prescribed burning, retention of at least 75 percent surface cover). Within WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remains such that cover is still available for amphibians, with a minimum retention of 10 percent relative cover per acre. 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. Surveys would be conducted pursuant to SPR BIO-1, and if wildlife nursery sites (e.g., rookeries, fawning areas, common bat roosts) are detected, Mitigation Measure BIO-5 would apply to all treatment activities and a no-disturbance buffer would be established around these features, the size of which would be determined by a qualified biologist or RPF. Trees larger than 12 inches DBH would be retained in ecological

restoration areas, and trees larger than 18 inches DBH would be retained in fuel treatment areas, and pursuant to SPRs BIO-3, BIO-4, and BIO-5, treatments would be designed to maintain habitat function of sensitive natural communities, riparian habitat, and chaparral. SPR BIO-11 would require all temporary fencing associated with prescribed herbivory treatment to be wildlife friendly, such that the chance of wildlife entanglement would be minimized. Additionally, implementation of proposed treatments would not result in any new barriers to wildlife movements within (locally) or across (regionally) the project area, and there would not be a substantial change in existing conditions that facilitate wildlife movement in the project 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 program EIR (*See* Section 1.1.4 "Proposed Project Revisions"); however, this impact is within the scope of the Program EIR because, within the boundary of the project area, general habitat characteristics are similar within and outside of 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 extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

As described in Section 1.1.4, "Proposed Project Revisions," revisions to SPR HYD-4 are proposed to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments, and all other conditions on treatment activities within WLPZs would apply. This establishment of WLPZs within 300 feet of treatment activities would therefore provide the same reduction in impacts to wildlife as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related special-status wildlife than what was covered in the Program EIR.

SPRs that apply to project impacts under Impact BIO-5 are SPR AD-1, SPR BIO-1 through SPR BIO-5, SPR BIO-10, SPR BIO-11, SPR HYD-1, and SPR HYD-4. The biological resource mitigation measure that applies to project impacts is Mitigation Measure BIO-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-6

Initial treatment and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because nesting habitat suitable for common native birds is present throughout the project area. Mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory conducted during the nesting bird season could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) potentially resulting in abandonment and loss of eggs or chicks.

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

Habitat retention standards would be applied to all treatments, as described under Section 2.1, "Proposed Treatments," including DBH limits for tree removal, canopy percent cover requirements, and downed log and snag retention standards. While treatment activities would remove vegetation and alter habitat structure (e.g., amount of cover, size-class distribution) locally, treatments would not cause permanent habitat degradation or conversion to a

different habitat type that would substantially reduce habitat for common wildlife species over the long term with implementation of these standards.

The potential for treatment activities to result in adverse effects on these resources was examined in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the program EIR (*See* Section 1.1.4 "Proposed Project Revisions"); however, this impact is within the scope of the Program EIR because, within the boundary of the project area, general habitat characteristics are similar within and outside of 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 extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

Biological resource SPRs that would apply to potential impacts on common wildlife, including nesting birds, under Impact BIO-6 are SPR AD-1, SPRs BIO-1 through BIO-5, and SPR BIO-12. This determination is consistent with the Program EIR and would not constitute a substantially more significant impact than what is covered in the Program EIR.

IMPACT BIO-7

There are no applicable local ordinances relevant to biological resources in the Mariposa County Code. The Mariposa County General Plan has policies related to biological resources in Section 11.1.04 (Wildlife and Vegetation) (Mariposa County 2006). This includes Policy 11-2d, which requires the conservation of water sources for water-dependent species as well as riparian community continuity. SPR BIO-4 requires the project proponent to design treatments to avoid loss or degradation of riparian habitat function, or the project proponent is required to compensate for loss of riparian habitat, per Mitigation Measure BIO-3c. In addition, pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented, which would avoid impacting water sources and limit the extent of treatment activities within riparian habitat (e.g., no burn piles, no fire ignition, retention of at least 75 percent surface cover). Wetlands and other waters are protected by Mitigation Measure BIO-4, which requires the delineation of wetlands and other waters and application of appropriate avoidance buffers, where activities including herbicide application, soil disturbance, manual treatments, mechanical treatments, and prescribed herbivory are prohibited. Prescribed (broadcast) burning is allowed within the wetland and other water buffers, but only dependent on certain conditions including that no special-status species are present and habitat function is maintained. Fire ignition (and associated use of accelerants) is not allowed within the wetland and other water buffers. Mariposa County General Plan Policy 11-4a also applies to biological resources, requiring the conservation of the diversity of native ecosystem, plant communities, wildlife habitat, and plant and wildlife species in the County. Along with the measures discussed for Policy 11-2d above that help protect riparian communities, there are a host of measures that protect biological resources that apply to the project. This includes SPR BIO-3, which requires mapping of all sensitive habitats, including sensitive natural communities, oak woodlands, chaparral, and riparian habitat. In addition, Mitigation Measure BIO-3a requires design of treatments to avoid loss of sensitive natural communities and oak woodlands, or the project proponent would be required to compensate for loss of sensitive natural communities or oak woodlands, per Mitigation Measure BIO-3b. Furthermore, SPR BIO-5 requires the avoidance of type conversion and maintenance of habitat function of chaparral communities, SPR CHAP/CSS-1 has additional protection measures for chaparral habitats, and SPR BIO-1 recommends avoidance of suitable habitat, when feasible. When avoidance is not feasible, protocol-level or focused surveys are required for special-status plants (per SPR BIO-7) and special-status wildlife and nursery sites (per SPR BIO-10). Common nesting birds are protected by SPR BIO-12, which requires implementation of a feasible strategy to avoid disturbance of active nests, which may include appropriate avoidance buffers or modifying or deferring treatment.

The potential for the proposed treatments to conflict with local policies was examined in the Program EIR and is within the scope of the Program EIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the Program EIR. In addition, all projects implemented under the CalVTP would be required to comply with applicable local policies, plans, and ordinances, per SPR AD-3 to the extent the implementing entities are subject to them. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape

constitutes a change to the geographic extent presented in the Program EIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. The biological resource SPRs that apply to project impacts under Impact BIO-7 are SPRs AD-1 and AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-8

The potential for the proposed treatment to conflict with the provision of an adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP) was examined in the Program EIR. Implementation of the proposed vegetation treatment and maintenance treatments would not result in a conflict with an adopted HCP or NCCP because the project area is not within the plan area of, or adjacent to, any adopted HCP or NCCP (CNDDB 2025c). Therefore, this impact does not apply to the proposed project. This determination is consistent with the Program EIR and would not constitute a substantially more significant impact than what was covered in the Program EIR.

NEW BIOLOGICAL 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 that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions 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.

The proposed revision to SPR GEO-1 would constitute a change to the Program EIR. Revisions to SPR GEO-1 would replace the work stoppage of mechanical operations that cause soil disturbance, targeted herbicide application, and prescribed herbivory based on forecasted rain with a stoppage based on rain and soil saturation and compaction. The proposed revisions to SPR GEO-1 would be equally protective and would therefore not result in a new impact that was not covered in the Program EIR.

The revision of SPR HYD-4 would constitute a change to the Program EIR. Revisions to SPR HYD-4 would allow the establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged and prevent degradation of watercourses during implementation of treatment activities, because all conditions for treatments within WLPZs would apply. With the remaining requirements in SPR HYD-4, the proposed revision to SPR HYD-4 would be equally protective and would therefore not result in a new impact that was not covered in the Program EIR.

Therefore, the impacts of the proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR GEO-1 and SPR HYD-4 would not give rise to any new significant impacts not addressed in the Program EIR as described above. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	AD-3 AQ-3, AQ-4 GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, GEO-8 HYD-3, 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	AD-3 AQ-3 GEO-3, GEO-4, GEO-7, GEO-8	NA	LTS	No	Yes

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

New Geology, Soils, Paleontology, and Mineral Resources Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP Program EIR?

☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Geology, Soils, Paleontology, and Mineral Resources Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.6.1 Discussion

The project area is located within the Sierra Nevada geomorphic province. The geology of this province has evolved through smaller-scale local processes, such mass wasting, weathering, erosion, and sedimentation changing the landscape. Uplift along the eastern Sierra Nevada margin produced erosion and resulted in the predominantly east-to-west trends of incised drainages. As discussed in Section 3.7.1, "Environmental Setting," of the CalVTP Program EIR, the Sierra Nevada geomorphic province is overlapped on the west by sedimentary rocks of the Great Valley and on the north by volcanic sheets extending south from the Cascade Range. A blanket of volcanic material caps large areas in the northern part of the range. Most of the southern half of the Sierra Nevada and the eastern part of the northern half are composed of plutonic (chiefly granitic) rocks of the Mesozoic age (DeCourten 2009). Dominant soil types within the project area are Shaver-Holland-Chawanakee complex, (8 to 30 percent slopes), Musick-Hotaw complex, (8 to 30 percent slopes), and Nedsgulch-Wallyhill-Arpatutu complex, (30 to 60 percent slopes). These soil types are well drained (NRCS 2025). As discussed in Section 3.7.1, "Environmental Setting," of the CalVTP Program EIR, shallow landslides are most likely to occur in the mountainous portions of the Sierra Nevada geomorphic province. The Sierra Nevada geomorphic province is also susceptible to erosion.

IMPACT GEO-1

Vegetation treatment activities implemented within the project area would consist of manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted application of herbicides to implement ecological restoration and fuel breaks. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the Program EIR because the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR. The inclusion of land in the 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 soil characteristics are essentially the same within and outside the CalVTP treatable landscape and therefore, the potential impact related to soil erosion is also the same, as described above.

SPRs applicable to this impact are AD-3, AQ-3, AQ-4, GEO-1 through GEO-8, HYD-3, and HYD-4. SFC proposes to revise requirements under SPR GEO-1 and SPR HYD-4.

SPR GEO-1 would be revised to remove the requirement of suspending certain treatment activities when rain is in the forecast; all other components of SPR GEO-1 would remain the same. This revision would remove the current requirement of suspending activities based on a forecasted 30 percent chance of rain within the next 24 hours. Suspension of these activities would not be based on weather forecasts alone (under which precipitation may never materialize), but rather if weather predictions materialize and lead to precipitation events. This revision is consistent with the overall intent of SPR GEO-1 because SFC would be required to suspend mechanical disturbance during precipitation to minimize the risk of soil disturbance, erosion, increased runoff, and soil destabilization.

SPR HYD-4 would be revised to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of manual, mechanical, prescribed pile burning, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR.

For the reasons described above, the proposed revisions to SPR GEO-1 and SPR HYD-4 would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the Program EIR. 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 GEO-2

Treatments could include vegetation removal in areas with steep slopes (i.e., greater than 65 percent or 50 percent in high erosion areas). The project is not within an earthquake-induced landslide zone as mapped by the California Geological Survey (CGS 2025). However, as noted above, the project area lies within the Sierra Nevada geomorphic province, where shallow landslides are most likely to occur in the mountainous portions of the province. The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of treatment activities, and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the Program EIR.

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

SPRs applicable to this treatment project are AD-3, AQ-3, GEO-3, GEO-4, GEO-7, and GEO-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR and revisions to an SPR constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory 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; therefore, the impacts of the proposed treatment project are the same and, for the reasons described above, impacts are also consistent with those covered in the Program EIR.

Revisions to SPR GEO-1 and SPR HYD-4 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact GEO-1 above, the revisions would reduce the potential for runoff and soil erosion and would be consistent with the overall intent of SPR GEO-1 and SPR HYD-4. Therefore, revisions to SPR GEO-1 and SPR HYD-4 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR GEO-1 and SPR HYD-4, would not give rise to any new significant impacts. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

4.7 GREENHOUSE GAS EMISSIONS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	AD-3	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	AD-3 AQ-3	GHG-2	SU	No	Yes

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

New Greenhouse Gas Emissions Impacts: Would the treatment result in other impacts to greenhouse gas emissions that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Greenhouse Gas Emissions Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.7.1 Discussion

IMPACT GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resulting GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR AD-3, which requires consistency with local plans, policies, and ordinances, is applicable to this impact. SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments and biomass processing would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR. This impact was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. Accordingly, SFC is proposing the use of biomass processing technologies (i.e., air curtain burners, carbonators, gasifiers), which could include the "BurnBoss" and/or "FireBox," to reduce GHG emissions from pile burning when feasible. The essential function of these specialized biomass processing technologies is to reduce smoke, and resultant GHG emissions compared to pile burning by consuming biomass quickly and efficiently. For example, according to a 2020 study of biomass, air curtain burners emit 54 percent less CO_2 emissions compared to pile burning (Puettmann et al. 2020, as cited in Ascent 2022). Furthermore, the specific GHG emissions of pyrolysis (carbonization) and gasification depend on multiple factors but are lower than pile burning in all cases (Ascent 2022). In addition, the production of biochar by these technologies and subsequent application as a soil amendment provides long-term carbon sequestration benefits that are not available from pile burning.

This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the Program EIR. Mitigation Measure GHG-2 would be implemented by using biomass processing technologies, including air curtain burners, when feasible, to reduce GHG emissions associated with prescribed burning. Although use of these specialized biomass processing technologies would substantially reduce GHG emissions, emissions generated by the proposed treatments would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR AD-3 and SPR AQ-3 are applicable to this treatment.

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

NEW IMPACTS RELATED TO GHG EMISSIONS

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

4.8 ENERGY RESOURCES

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

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

New Energy Resources Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Energy Resources Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.8.1 Discussion

IMPACT ENG-1

Use of vehicles, mechanical equipment, and some manual equipment (e.g., chainsaws, hand saws,, drip torches) during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.9.1, "Environmental Setting," and Section 3.9.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing

environmental conditions pertinent to energy resources 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. 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.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered In the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	AD-3 HAZ-1, HAZ-2, HAZ-3, HAZ-4 HYD-4	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	AD-3 HAZ-2, HAZ-3, HAZ-4, HAZ-5, HAZ-6, HAZ-7, HAZ-8, HAZ-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	LTSM	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	AD-3 HAZ-2, HAZ-3, HAZ-4	HAZ-3	LTSM	No	Yes

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

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts to hazardous materials, public health and safety that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Hazardous Materials, Public Health and Safety Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.9.1 Discussion

IMPACT HAZ-1

Initial and maintenance treatments would consist of manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted application of herbicides. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. SPR AD-3, HAZ-1 through HAZ-4, and HYD-4 are applicable to this treatment.

SFC proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site or removed from the treatment area, outside of WLPZs and away from sensitive resources. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. 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, potentially resulting in releasing more hazardous materials during removal of the equipment. 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. For the reasons described, the proposed revision to SPR HAZ-1 would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials compared to what was covered in the Program EIR.

SFC also proposes to revise SPR HYD-4 by establishing WLPZs buffers for only the watercourses within 300 feet of treatment activities. This revision would help ensure that all WLPZs in proximity to a treatment area are recently flagged without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the original purpose and intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR. For the reasons described, the proposed revision to SPR HYD-4 would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials compared to what was covered in the Program EIR.

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

IMPACT HAZ-2

Treatments would include herbicide application to target plant species using ground-based methods, including painting herbicide on stems, using a backpack sprayer, and hand application. No aerial spraying of herbicides would occur. The potential for treatment activities to cause a significant health hazard from use of herbicides was examined in the Program EIR. This impact is within the scope of the Program EIR because the herbicides (i.e., Clopyralid, Glyphosate, Imazapyr, Sulfometuron, Triclopyr, Nonylphenol, Cleantraxx, Borax, Hexazinone, Velpar, and Indaziflam) and application methods that would be used are consistent with those analyzed in the Program EIR. In addition, herbicides would be applied by licensed applicators in compliance with all laws, regulations, and herbicide label instructions, consistent with herbicide use described in the Program EIR. Consistent with the Program EIR, SPRs HAZ-2 through HAZ-9 would be implemented, which require the preparation of a spill prevention and response plan triple rinsing of herbicide containers before disposal, proper storage of herbicides, and measures to minimize herbicide drift to non-target areas.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and 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. SPRs AD-3 and HAZ-2 through HAZ-9 are applicable to this project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-3

Treatments would include soil disturbance and prescribed burning, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the Program EIR. This impact was identified as potentially significant in the Program EIR because hazardous materials sites could be present within treatment sites throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance or burning in a hazardous materials site was uncertain.

As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. No active hazardous materials sites were identified within the project area (SWRCB 2025; DTSC 2025; CalEPA 2025). Therefore, no hazardous materials sites would be disturbed by treatments, and this impact would be less than significant.

This impact is within the scope of the Program EIR because the types of treatments and associated equipment that could potentially expose workers or the environment to hazardous materials are consistent with those analyzed 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 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. SPRs AD-3, HAZ-2, HAZ-3, and HAZ-4 are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project areas constitutes a change to the geographic extent presented in the Program EIR and revisions to an SPR constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR.

Revisions to SPRs HAZ-1 and HYD-4 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact HAZ-1 above, the revisions would reduce the potential for hazardous material releases in treatment areas from equipment use and would prevent degradation of watercourses, consistent with the overall intent of SPRs HAZ-1 and HYD-4. Therefore, revisions to SPRs HAZ-1 and HYD-4 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPRs HAZ-1 and HYD-4, would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 HYDROLOGY AND WATER QUALITY

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

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	AD-3 GEO-5 HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes

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

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Hydrology and Water Quality Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.10.1 Discussion

The project area is primarily within the Upper Chowchilla River watershed and the Bear Creek-Merced River watershed. Major hydraulic features in the project area include De Long Creek, Camp Meeting Creek, Fox Creek, Magoon Creek, and Snow Creek (USGS 2025). Several of the impacts below (i.e., Impact HYD-1 through Impact HYD-4) evaluate compliance with water quality standards or waste discharge requirements. All include implementation of SPR HYD-1, which requires compliance with water quality regulations. The State Water Resources Control Board requires all projects using the CalVTP Program EIR to follow the requirements of their Vegetation Treatment General Order, which would meet the requirements of SPR HYD-1. Users of the CalVTP PSA process are automatically enrolled in the General Order and are required to implement all applicable SPRs and mitigation measures from the Program EIR. In addition, the General Order requires project proponents to comply with any applicable Basin Plan prohibitions.

IMPACT HYD-1

Initial and maintenance treatments would include prescribed burning. Ash and debris from treatment areas that are treated with prescribed burning could be washed by runoff into adjacent drainages and streams. Prescribed burning would only be implemented during appropriate burn windows (typically fall, winter, spring, and early summer) when environmental conditions (e.g., windspeed, weather forecast, fuel moisture) are conducive to burning targeted fuels, while reducing the risk of high severity burns. WLPZs would be implemented for Class I and Class II streams that are within 300 feet of treatment areas pursuant to SPR HYD-4. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the Program EIR.

The proposed revisions to SPR HYD-4 require the establishment of WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, targeted herbicide application, and prescribed herbivory treatment activities, and associated staging areas. This revision would limit the amount of time spent by the project proponent identifying and delineating WLPZs, as well as limit the amount of high visible flagging used throughout the project area. This revision would also help ensure that all WLPZs in proximity to a treatment area are recently

flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area, while maintaining overall intent of SPR HYD-4 to prevent degradation of watercourses during implementation of treatments. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related to water quality 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 Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, BIO-4, BIO-5, GEO-4, GEO-6, HYD-2, and HYD-4. As explained above, impacts on water quality resulting from the proposed project would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-2

Initial and maintenance treatments would include manual and mechanical treatment activities. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR.

Revisions to SPRs HYD-4, GEO-1, and HAZ-1 are proposed. The proposed revisions to SPR HYD-4 require the establishment of WLPZ buffers for only the watercourses within 300 feet of the manual and mechanical. This revision would limit the amount of time spent by the project proponent identifying and delineating WLPZs, as well as limit the amount of high visible flagging used throughout the project area. This revision would also help ensure that all WLPZs in proximity to a treatment area are recently flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area, while maintaining overall intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual and mechanical.

SPR GEO-1 would be revised to suspend mechanical and herbivory treatments if: (1) it is actively raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities, and proposes to suspend targeted herbicide application if the National Weather Service forecast is a "chance" (30 percent or more averaged over each hour) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m. In the Sierra Nevada where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of mechanical treatment activities in these cases could result in unnecessary loss of work time. Without this revision to SPR GEO-1, the project objectives may not be achieved. In addition, defining the 12-hour window that would be used to calculate the next day's average precipitation potential would ensure a consistent methodology for implementation.

SPR HAZ-1 would be revised to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area, outside of WLPZs and away from sensitive resources. This revision gives the project proponent the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed from the site. This revision allows leaking equipment to be staged and fixed immediately, and be moved to a less sensitive area, rather than being required to demobilize and potentially risk spreading the leak further through sensitive habitats or resources. All other applicable SPRs would be following to minimize this impact. This would help prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material released in treatment areas from equipment use.

For the reasons described above, the proposed revisions to SPRs HYD-4, GEO-1, and HAZ-1 would not result in a substantially more severe significant effect related to water quality 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 surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. SPRs applicable to this impact are

AD-3, BIO-1, GEO-1 through GEO-5, GEO-7, GEO-8, HYD-1, HYD-2, HYD-4, HYD-5, HAZ-1, and HAZ-5. As explained 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 HYD-3

Initial and maintenance treatments would include prescribed herbivory. The potential for prescribed herbivory to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of grazing animals (e.g., goats, sheep) and the grazing intensity to manage and remove vegetation are consistent with those analyzed in the Program EIR. Environmentally sensitive areas, such as watercourses, riparian woodlands, and sensitive habitat areas as well as areas potentially containing special-status plant species or cultural resources, would be identified and avoided if prescribed herbivory would have an adverse effect on the resource. A herder, fencing, mineral block, or a watering site may be required to keep the grazing animals within the desired area. A buffer of approximately 50 feet would be maintained between sensitive and actively grazed areas as required by SPR HYD-3.

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 surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed herbivory treatments is also the same, as described above. SPRs applicable to this impact are AD-3, HYD-2, and HYD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-4

Initial and maintenance treatments would include targeted application of herbicides. Herbicides would be used sparingly to control invasive plant species that threaten native biodiversity or increase wildfire hazard. Consistent with the definitions applied in the CalVTP, invasive species are plant species identified as invasive by the Cal-IPC or defined as noxious weeds under California law by the California Department of Food and Agriculture. Treatment would involve removing invasive plant species and noxious weeds through herbicide application. Herbicides may be used to treat native trees, shrubs, and grasses in fuel breaks and ecological restoration treatment types to prevent resprouting where sprouting species (e.g., deer brush, interior live oak) are present and would reduce the effectiveness of fuel reduction treatments. Herbicides would also be used to promote survival of seedlings in reforestation areas.

Consistent with the Program EIR, herbicide application would be implemented only at ground-level by manual application devices (i.e., spot, foliar spray, or cut stump method by hand) and would comply with EPA and DPR label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of herbicides and associated impacts to water quality are consistent with those analyzed 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, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from use of herbicides is also the same, as described above. SPRs applicable to this impact are AD-3, BIO-4, HAZ-5, HAZ-7, HYD-2, and HYD-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT 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 treatment area was examined in the Program EIR. This impact on site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR.

SPRs applicable to this impact are AD-3, GEO-5, HYD-2, HYD-4, and HYD-6. The proposed revisions to SPR HYD-4 require the establishment of WLPZ buffers for only the watercourses within 300 feet of the manual and mechanical. This revision would limit the amount of time spent by the project proponent identifying and delineating WLPZs, as well as limit the amount of high visible flagging used throughout the project area. This revision would also help ensure that all WLPZs in proximity to a treatment area are recently flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area, while maintaining overall intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual and mechanical. Revisions to SPR HAZ-1 would allow for leaking equipment to 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. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related to drainage patterns 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, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the 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 hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same, and for the reasons described above, impacts of the proposed project are also consistent with those covered in the Program EIR.

Revisions to SPRs HYD-4, GEO-1, and HAZ-1 would constitute a change to the project analyzed in the Program EIR. However, as described under Impacts HYD-1, HYD-2, and HYD-5 above, the revisions would reduce the potential for hydrology and water quality impacts consistent with the overall intent of SPRs HYD-4, GEO-1, and HAZ-1. Therefore, revisions to these SPRs would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present; the inclusion of areas outside the CalVTP treatable landscape; and revisions to SPRs HYD-4, GEO-1, and HAZ-1 would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Land Use and Planning, Population and Housing Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.11.1 Discussion

IMPACT LU-1

Vegetation treatment activities would occur in Mariposa County consisting of up to 1,667.3 acres on land conserved by SFC. Treatments would be conducted on three private properties: "Anderson Ranch," "Macready Ranch," and "Stookey Preserve." The potential for vegetation treatments to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the Program EIR. The proposed project would not conflict with any land use plan, policy, or regulation (including noise ordinances, as explained in Section 4.12, or local tree removal ordinances or HCPs, as explained in Section 4.5, Impact BIO-7). SPR AD-3 would be implemented, which would ensure that the project does not conflict with land use plans, policies, and regulations. Treatments would be designed and take place in a manner that is consistent with applicable plans, policies, and regulations outlined in *The County of Mariposa General Plan* (Mariposa County Planning Department 2006), *Updated 2024 Mariposa County Community Wildfire Protection Plan* (Wildfire Planning International LLC et al. 2024), and *Mariposa County Local Hazard Mitigation Plan* (Mariposa County 2025).

The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those analyzed in the Program EIR. 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 Program EIR. However, land uses in the project area are essentially the same within and outside the

treatable landscape; therefore, the land use impact is also the same, as described above. Treatment types would be consistent with those described in the Program EIR. The SPR applicable to this impact is AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

IMPACT LU-2

Treatment implementation would require workers. The potential increase in demand for workers to implement initial and maintenance treatments and resultant potential for substantial population growth was examined in the Program EIR. Manual treatments would involve 20 and 40 crew members and up to two crews. Mechanical treatments would typically require up to 20 workers and equipment operators. Prescribed broadcast burns typically last approximately 1 day up to 1 week where the average number of workers on a prescribed burn is between 10 and 50 crew members. Biomass burning requires a crew of two to three people per burner and operating multiple burners next to each other would not necessarily require additional people. Typically, herbicide application would be carried out by five to 15 workers. Prescribed herbivory typically requires one to two workers on-site to monitor and manage grazing animals. Although treatments would result in temporary increase in the demand of workers, the increase in worker demand would not represent a substantial increase in demand for new residents in the region. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR because the number of workers required for implementation of the treatments is consistent with the crew sizes analyzed in the Program EIR for the treatment activities proposed.

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, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the population and housing impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are within the CalVTP treatable landscape and are consistent with the treatment types and activities covered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "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 are the same, and for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to land use and planning or population and housing would occur that is not covered in the Program EIR.

4.12 NOISE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3 NOI-1, NO1-2, NOI-3, NOI-4, NOI-5, NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated Single-Event Noise Levels During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	NA	LTS	No	Yes

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

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Noise Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.12.1 Discussion

IMPACT NOI-1

Proposed treatments would require the use of noise-generating equipment. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the Program EIR. Treatment activities would occur during any time of the year. All treatment activities operating heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) would occur during daytime hours (i.e., 7:00 a.m. and 6:00 p.m.) if such noise would be audible to receptors, per SPR NOI-1. Prescribed burning may occur any day of the week or time of day within identified burn prescription windows. As such, there is the potential for some prescribed burning to occur during nighttime and weekend hours, though during these times nighttime activities would not include use of heavy equipment, per SPR NOI-1. Manual treatments, mechanical treatments, and targeted herbicide application would occur on any day of the week but would generally be limited to daytime hours. Prescribed herbivory would not result in noise impacts. Any heavy equipment operation associated with prescribed herbivory would occur during daytime hours. There is no noise ordinance in Mariposa County that limits vegetation-treatment or construction-related activities.

As discussed in the Program EIR, the most noise-intensive treatment activities are manual, mechanical, and prescribed burning treatments; prescribed herbivory and herbicide application treatments generally result in a negligible amount

of noise disturbance. For manual, mechanical, and prescribed burning treatments, noise levels generated by individual equipment range from 75 to 87.9 decibels (dB) at 50 feet from the noise source (75 to 85 dB at 50 feet from the noise source for projects without the use of helicopters). The most frequently used noise-generating types of equipment proposed for this project would be chainsaws, dozers, excavators, and shears on a backhoe. Although multiple pieces of equipment would be operated simultaneously to implement a treatment, they would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment, such as masticators and chippers. This impact is within the scope of the Program EIR because the number of pieces of equipment that would be operated simultaneously, types of equipment proposed, and the temporary and sporadic nature of the equipment use are consistent with the assumptions analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential 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. SPRs applicable to this impact are AD-3 and NOI-1 through NOI-6. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area consisting of, but not limited to, Jerseydale Road, Darrah Road, Triangle Road, and East Westfall Road. Haul truck trips on the local roadways would pass by residential receptors, and the event of each truck passing by could increase the single-event noise level (SENL). The potential for a substantial short-term increase in SENL was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. The haul trips associated with the treatment would occur during daytime hours (per SPR NOI-1), which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. SPR NOI-1 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW NOISE IMPACTS

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

4.13 RECREATION

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

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

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Recreation Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.13.1 Discussion

Treatments would be conducted on three private properties: "Anderson Ranch," "Macready Ranch," and "Stookey Preserve" that are not accessible to the public. Although the Stookey Preserve is not open for public use, limited access is provided through guided hikes, educational programs, and special events hosted by the SFC. Although there are no publicly accessible recreational areas within the treatment areas, there are recreational areas in the greater project vicinity, including the Sierra National Forest and Yosemite National Park. Recreational activities within the Sierra National Forest include camping, hiking, fishing, boating, horseback riding, hunting, skiing, snowshoeing, and off-highway vehicle use.

IMPACT REC-1

Treatments would occur on private lands that are not accessible to the public or adjacent to roadways and are in areas away from designated recreation areas. However, vegetation treatment activities have the potential to disrupt recreational activities by degrading the experience of recreationists in nearby areas, including those listed above, through the creation of noise, dust, degradation of scenic views, or increased traffic when treatments are implemented near recreation areas. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. Nuisance impacts related to noise, air quality, aesthetics, and transportation would be avoided or minimized as explained in the discussion for those respective resource areas in this PSA/Addendum.

The potential for the proposed treatment project to impact recreation is within the scope of the Program EIR because the treatment activities, and their duration and intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the availability of recreational resources within the project vicinity is essentially the same within and outside the CalVTP treatable landscape and the treatment activities and intensity are consistent with those analyzed in the Program EIR. The SPR applicable to this treatment is REC-1.

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

NEW RECREATION IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC 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 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental 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 of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

4.14 TRANSPORTATION

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

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Transportation Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.14.1 Discussion

IMPACT TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including Jerseydale Road, Darrah Road, Triangle Road, and East Westfall Road. The potential for a temporary increase in traffic to result in a conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the Program EIR. The proposed treatments would be short term, and temporary increases in traffic are within the scope of the Program EIR because the treatment duration and limited number of vehicles (i.e. heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways across a large project 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 Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. The SPRs applicable to this impact are AD-3 and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke that could potentially affect visibility along nearby roadways. Hauling heavy machinery and operating large trucks along roadways could also result in a transportation hazard. The potential for smoke to affect visibility along roadways and large trucks to result in hazards during implementation of the treatment project were examined in the Program EIR. SPR TRAN-1 requires that prescribed burning operations are monitored and that traffic control operations be initiated if burning operations begin to affect traffic safety along any roadways. SPR TRAN-1 also requires that if the treatment manager deems it necessary, a traffic management plan would be prepared prior to initiating treatment activities when traffic generated by the project would result in substantial obstructions, hazards, or delays. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration and intensity and types of equipment used for treatments are consistent with that 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, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. SPRs applicable to this impact are AD-3, HYD-2, and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT TRAN-3

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT. As noted under Impact TRAN-3 in the Program EIR, individual vegetation treatment projects under the CalVTP are likely to generate fewer than 110 trips per day, which would be considered a less-than-significant transportation impact for specific later activities, as described in the Technical Advisory on Evaluating Transportation Impacts, published by the Governor's Office of Planning and Research, now known as the Governor's Office of Land Use and Climate Innovation (OPR 2018). Manual treatments would require one or two crews of approximately three to 20 members to implement treatments. To implement mechanical treatments, one hand crew of approximately five to 20 workers may aid equipment operators in achieving treatment specifications, and the average number of workers on a prescribed broadcast burn would be approximately 50 crew members over a limited period of time. Related to biomass processing technologies, the operation of an air curtain burner, for example, would require a crew of two to three people per burner, and operating multiple burners next to each other would not necessarily require additional people. Herbicide application would be carried out by two to four workers, and prescribed herbivory would require a herder and one to two support workers. Treatments are expected to be spread across different locations within the project area and would be conducted at different periods of time over the course of the project. Thus, treatments under the proposed project would typically require between one and 50 crew members with several crews implementing treatments simultaneously, dispersed throughout the project area. Therefore, the anticipated crew sizes are sufficiently small so that the total increase in VMT would not likely exceed

110 trips per day. In addition, as mentioned above, the increase in vehicle trips would be dispersed to multiple roadways throughout a large project area. However, individual treatment projects would contribute to the overall annual net increase in VMT generated by the CalVTP. Although 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. Although the net increase in VMT is not expected to generate greater than 110 trips per day, because the project would contribute to the overall annual net increase in VMT generated by the CalVTP, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable.

This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips would be temporary and dispersed over multiple roadways. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the transportation-related conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. No SPRs are applicable to this impact. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON TRANSPORTATION

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

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

New Public Services, Utilities and Service Systems Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Public Services, Utilities and Service Systems Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.15.1 Discussion

IMPACT UTIL-1

Initial and maintenance treatments would consist of prescribed burning, mechanical vegetation treatment, manual vegetation treatment, herbicide application, and prescribed herbivory. Water would be required during implementation of the proposed project as a safety measure for fire suppression during a prescribed burn, for livestock used for prescribed herbivory, and to minimize dust if excessive while traveling on unpaved roads or to remove visible dirt or mud that gets tracked out onto public paved roadways (per SPR AQ-4). If needed, water would be supplied from water trucks or tanks or existing on-site troughs for livestock. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of activities and impacts addressed in the

Program EIR because the size of areas proposed for prescribed burn treatments, amount of water required for prescribed burning, dust control, and domestic livestock, as well as the water source types 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, 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. SPR AD-3 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass from vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of by several means: chipping, mastication, and lop and scatter on-site. Pile burning, broadcast burning, and specialized biomass processing technologies (e.g., air curtain burner) may be used in some areas. Invasive plant and noxious weed biomass would be treated on-site or disposed of off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds.

The potential for solid waste generation to exceed state standards or local infrastructure capacity was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the types and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site in some parts of the treatable landscape could exceed the capacity of existing infrastructure for handling biomass. For the proposed project biomass created during initial and maintenance treatments would be disposed of though mastication, chipping, lopping and scattering, creating piles or masticated for burning, broadcast burning, or taken off-site to a disposal facility. Per SPR UTIL-1, a waste disposition plan would outline the hauling locations prior to biomass being hauled off-site. The two closest large-scale biomass processing facilities are within 125 miles of the project area. Merced Power Plant, Merced County, California, is approximately 55 miles from the project area, Pacific Ultrapower Chinese Camp, Tuolumne County, California, is approximately 60 miles from the project area, and DTE Stockton Biomass, Stockton, California, is approximately 120 miles from the project area.

The volume of biomass generated from treatments is not expected to exceed the capacity of existing disposal facilities in the area because biomass would be disposed of primarily by other methods (e.g., mastication, chipping, lop and scattering, prescribed burning, use of biomass processing technologies [e.g., air curtain burner]). However, because the project would generate biomass needing off-site disposal, it would contribute to the environmental significance conclusion in the Program EIR. Therefore, for the purposes of CEQA compliance, this PSA/Addendum identifies the impact as significant and unavoidable.

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, within the boundary of the project area, conditions related to biomass in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. SPR AD-3 is applicable to this impact. SPR UTIL-1 would be applicable for treatments where biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass from vegetation removal within the treatment areas. If off-site disposal is required, treatment activities would comply with all federal and state management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals,

statutes, and regulations related to solid waste was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the types and amount of biomass that would be hauled off-site 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, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. SPR AD-3 is applicable to this impact. SPR UTIL-1 would be applicable to treatments where biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. SFC has considered the site-specific characteristics of the proposed treatments w and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the Program EIR.

4.16 WILDFIRE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Impact WIL-1, pp. 3.17-14 – 3.17-15	Yes	AD-3 BIO-6 HAZ-2, HAZ-3, HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Postfire Flooding or Landslides	LTS	Impact WIL-2, pp. 3.17-15 – 3.17-16	Yes	AD-3 AQ-3 GEO-3, GEO-4, GEO-5, GEO-8	NA	LTS	No	Yes

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

New Wildfire Impacts: Would the treatment result in other impacts to related to wildfire that are not evaluated in the CalVTP Program EIR? ☐ Yes ☒ No

If yes, complete row(s) below and discussion

New Wildfire Impacts	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

4.16.1 Discussion

IMPACT WIL-1

The objective of the proposed project is to reduce wildfire risk. Proposed vegetation treatment activities include prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory. Machine-powered hand tools would have federal- or state-approved spark arrestors, which prevent the emissions of flammable debris. Vegetation treatment involving mechanical equipment poses a risk of accidental ignition. Vegetation treatment crews would carry one fire extinguisher per chainsaw and one long-handle shovel and one axe or Pulaski to quickly respond to an ignition should one occur. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final Program EIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and assessment of favorable weather conditions before a burn can occur on a given day. Prior to implementing a broadcast burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water containers and safety equipment would be staged on-site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is

within the scope of the Program EIR because the types of equipment and treatment duration and the types of prescribed burning methods proposed as part of the project are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AD-3, HAZ-2, HAZ-3, and HAZ-4.

SPR BIO-9 would also be implemented as part of proposed treatment design to avoid the spread or introduction of annual grasses rated as invasive by Cal-IPC or designated as noxious weeds by the California Department of Food and Agriculture. Invasive annual grasses can provide flashy fuels for wildfire ignition; these would be managed pursuant to SPR BIO-9 such that their establishment in treated areas would be avoided. In addition to SPR BIO-9, management of flashy fuels is integrated into project design through the following actions: the maintenance of fuel breaks to be free of flammable, nonnative plants, including invasive grasses and forbs; the use of prescribed herbivory to control regrowth of existing invasive plants and noxious weeds and to help prevent establishment of new populations of invasive plants and noxious weeds; and the use of prescribed burning, including broadcast burning and cultural burning, to control of invasive plants and noxious weeds to reduce wildfire risk.

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

IMPACT WIL-2

Vegetation treatment activities include prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration, and methods of prescribed burning implementation are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatments would occur on flat to moderate slopes accessible to the equipment, or via existing skid trails and roads on steeper slopes (i.e., 35–50 percent), SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post-wildfire landslide and flooding risk in treated areas. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON WILDFIRE

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

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No references are used in this chapter.

Section 4.16, "Wildfire"

No references are used in this chapter.

Attachment A

Mitigation Monitoring and Reporting Program for the Upper Chowchilla River Watershed Forest Health and Fire Recovery Vegetation Treatment Project

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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for approval of the proposed project because the Project-Specific Analysis/Addendum to the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (Program EIR) (PSA/Addendum) identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. Standard project requirements (SPRs), which are part of the project description, have been incorporated to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. While only mitigation measures are required to be covered in an MMRP, both SPRs and mitigation are included in this MMRP to assist in implementation of all environmental protection features of later activities consistent with the CalVTP Program EIR.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to facilitate the implementation of SPRs and mitigation measures. The attached table presents the text of each SPR and mitigation measure from the CalVTP Program EIR that is applicable to the project, the timing of its planned implementation, the implementing entity, and the entity with monitoring responsibility. The numbering of SPRs and mitigation measures follows the numbering used in the Program EIR. SPRs and mitigation measures that are referenced more than once in the PSA are not duplicated in the MMRP. Instructions for project-specific guidance to implement certain SPRs and Mitigation Measures have been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to mitigation measures in the Program EIR are shown in underline and strikethrough. In all cases, the additional project-specific implementation instruction and clarifying edits to mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the Program EIR.

ROLES AND RESPONSIBILITIES

The Mariposa County Resource Conservation District (MCRCD) is the lead agency under CEQA. The MCRCD will enter into a partnership with Sierra Foothill Conservancy (SFC; the implementing entity), who will implement the proposed treatments. MCRCD's Board will approve a resolution establishing the partnership and delegate implementation of the MMRP to SFC. The partnership may entail the provision of resources to SFC including staffing and technical input.

Unless otherwise specified herein, SFC is responsible for implementing the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. As the CEQA lead agency, MCRCD has delegated responsibility to SFC to confirm that implementation of mitigation measures and SPRs occurs in accordance with the MMRP and pursuant to Section 15097(a) of the State CEQA Guidelines.

As defined in the CalVTP Program EIR and the PSA/Addendum, 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 SPRs and mitigation measures in this MMRP direct the project proponent to implement actions to avoid, minimize and mitigate impacts. As the implementing entity and reflecting delegation by MCRCD, SFC will implement the SPRs and mitigation measures. "Project proponent,"" as used in the SPRs and mitigation measures refers to SFC.

REPORTING

Pursuant to State CEQA Guidelines Section 15097(a), MCRCD has delegated monitoring and reporting responsibilities to SFC, who accepted this delegation. shall document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- SPRs and Mitigation Measures – This column provides the text of the applicable SPR or adopted mitigation measure.
- Timing – This column identifies the time frame in which the SPR or mitigation measure will be implemented.
- Implementing Entity – This column identifies the party responsible for implementing the SPR or mitigation measure.
- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.

QUALIFICATION REQUIREMENTS FOR BIOLOGICAL AND CULTURAL RESOURCE MEASURES

The biological and cultural resource SPRs and mitigation measures in the attached MMRP table require that qualified individuals implement components of the measures. The CalVTP Program EIR requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including biologist, botanist, ecologist, Registered Professional Forester (RPF), biological technician, or supervised designees working at the direction of a qualified professional) as long as they are qualified for the task at hand.

Archaeologically Trained Resource Professional: To be qualified, an archaeologically trained resource professional would hold a valid Archaeological Training Certificate issued by CAL FIRE and the Board of Forestry and Fire Protection or equivalent state or local agency training or certification. Work performed by an archaeologically trained resource professional must be reviewed and approved by a qualified archaeologist.

Qualified Archaeologist: To be qualified, an archaeologist would hold a Prehistoric Archeology, Historic Archeology, Conservation, Cultural Anthropology, or Curation degree from an accredited university and meet the Secretary of Interior's Qualifications Standards (36 CFR Part 61). The project proponent will review the resume and approve the qualifications of the archaeologists.

Qualified RPF or Biological Technician: To be qualified, an RPF or biological technician would 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting biological monitoring of relevant species or resources, and 4) be knowledgeable about state and federal laws regarding the protection of special-status species. The project proponent will review the resume and approve the qualifications of RPFs or biological technicians.

Qualified RPF or Biologist: To be qualified, an RPF or biologist would hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university and: 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting field surveys of relevant species or resources, 4) be knowledgeable about survey protocols, 5) be knowledgeable about state and federal laws regarding the protection of special-status species, and 6) have experience with CDFW's California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS). The project proponent will review the resume and approve the qualifications of RPFs or biologists. If species-specific protocol surveys are performed, surveys would be conducted by qualified RPFs or biologists with the minimum qualifications required by the appropriate protocols, including having CDFW or USFWS approval to conduct such surveys, if required by certain protocols.

Qualified RPF or Botanist: To be qualified, an RPF or botanist would 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal, state, and local statutes and regulations related to plants and plant collecting. The project proponent will review the resume and approve the qualifications of RPFs or botanists.

Standard Project Requirements	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.	Prior to treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR AD-4: Public Notifications for Prescribed Burning: At least three days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	At least three days prior to the commencement of prescribed burning operations.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AD-6: Public Notifications for Treatment Projects One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	One to three days prior to the commencement of a treatment activity.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board of Forestry and Fire Protection (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), or project latitude/longitude; ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public at least 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 (following initial treatment): ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work;	During the proposed, approved, and completed stages of the project. **Information on the proposed project (PSA/Addendum in progress) was submitted to CAL FIRE on December 2, 2025.**	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ 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.			
Chaparral and Coastal Sage Scrub Standard Project Requirement			
SPR CHAP/CSS-1: Chaparral and Coastal Sage Scrub To be consistent with the Writ of Mandate and its Exhibit A (dated November 14, 2025) in Case No. 37-2020-00005203-CU-TT-CT, for the purposes of this SPR only, chaparral and coastal sage scrub are defined as follows: **Chaparral**: Dominated by evergreen, drought-tolerant shrubs that are typically 1.5–3 meters tall (Barbour, Keeler-Wolf, and Schoenherr 2007) with stiff branches, and sclerophyllous (i.e., hard leaved) leaves. ▶ Chaparral alliances are listed in level 1, 2 of the Key to Shrublands in the California Native Plant Society's (CNPS) Manual of California Vegetation. This definition does not include alliances dominated by coyote brush (*Baccharis pilularis*). ▶ Dominant plant species may include manzanita (*Arctostaphylos* spp.), ceanothus (*Ceanothus* spp.), chamise (*Adenostoma fasciculatum*), redshank (*Adenostoma sparsifolium*), sugarbush (*Rhus ovata*), scrub oak species (e.g., *Quercus berberdifolia*, *Q. dumosa*, *Q. durata*), Mission manzanita (*Xylococcus bicolor*), mountain mahogany (*Cercocarpus montanus*), hollyleaf cherry (*Prunus ilicifolia*), redberry (*Rhamnus crocea*), toyon (Heteromeles arbutifolia) and evergreen buckthorn (*Rhamnus ilicifolia*). **Coastal sage scrub:** Dominated by drought-tolerant, deciduous, lower-growing (typically 1–1 .5 meters tall) (Barbour, Keeler-Wolf, and Schoenherr 2007), shallow-rooted, aromatic shrubs with soft, flexible branches, and soft, deciduous leaves that drop off in response to drought. ▶ Coastal sage scrub alliances are listed in level 15 and 15' under 1, 2', 12 ', 13', 14 of the Key to Shrublands in the CNPS Manual of California Vegetation. This definition does not include alliances dominated by coyote brush (*Baccharis pilularis*) or nonnative species (e.g., broom [*Genista monspessulana*, *Cytisus scoparius*], *Cotoneaster* spp.). ▶ Dominant or diagnostic plant species may include: California sagebrush (*Artemisia californica*), white sage (*Salvia apiana*), black sage (*Salvia mellifera*), purple sage (*Salvia leucophylla*), California brittle bush (*Encelia californica*), buckwheat (*Eriogonum* spp.), monkey flower (*Diplacus* spp.), and stands with other species dominant to co-dominant listed in level 15' under 1 , 2', 12', 13', 14. A stand of chaparral or coastal sage scrub is defined as a spatially continuous unit of shrub vegetation composed of chaparral and/or coastal sage scrub alliances. A chaparral and/or coastal sage scrub stand may be surrounded by forest, grassland, or woodland vegetation. All references to the CNPS Manual of California Vegetation are to the most current online edition, available at https://vegetation.cnps.org/.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
As required in Exhibit A of the Writ of Mandate, treatments in chaparral and coastal sage scrub will be limited to activities listed below: ▶ New linear, accessible strategic fuel breaks located along ridgelines, roadsides, and in other critical defensive locations determined by responsible fire agencies, provided that long-term maintenance of flammable nonnative vegetation is included. Such fuel break treatments shall be the minimum width necessary to provide for firefighter safety, operational procedures, and back firing operations, and shall not exceed 300 feet in width; ▶ Maintenance of existing fuel breaks and prior treatment areas to control flammable, nonnative invasive plants; ▶ Wildland-Urban Interface (WUI) fuel reduction treatment located within 1,000 feet of the Interface layer mapped in the CAL FIRE WUI layer (WUI25 1) (available at: https://hub-calfire-forestry.hub.arcgis.com/maps/ab3148666b084efcbe3bec0bf6af7441/explore?location=36.998595%2C-121.992016%2C13), provided that long-term maintenance of flammable, non-native vegetation is included, with a preference for hand thinning. ▶ Ecological restoration treatments consisting of removal of flammable, nonnative vegetation; and/or ▶ Treatments where the stand of chaparral or coastal sage scrub has a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to the California Department of Fish and Wildlife (available at: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#lists), and has generated following a fire within the last 15 years in an area previously characterized by woodland or forest before the fire, as evidenced by satellite imagery and as defined in accordance with the Key to Main Vegetation Categories in the CNPS Manual of California Vegetation.			
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.	During mechanical and manual treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR AES-2: Avoid Staging within Viewsheds The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR AQ-3: Create Burn Plan The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Prior to prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR AQ-6: Prescribed Burn Safety Procedures Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	During prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements			
SPR CUL-1: Conduct Record Search An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **A complete record search of the 1,667-acre project area has been conducted; see PSA/Addendum for a summary of results.**	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **Outreach to the NAHC has occurred, Tribes have been contacted, and a Sacred Lands File query has been completed; see PSA/Addendum for a summary of consultation and Sacred Lands File query results.**	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to all initial treatment activities. Not required prior to maintenance treatments if research remains valid.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR CUL-4: Archaeological Surveys The project proponent will coordinate with an archaeologically trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Revisions to the SPR:** Text of the original SPR will be removed and replaced with new language. The original language states, "This SPR applies to all treatment activities and treatment types, including treatment maintenance." The revised language states, "This SPR applies to treatment activities that involve ground disturbance (i.e., treatments that include the use of heavy equipment or fence installation) and prescribed burning under all treatment types, including treatment maintenance."	Prior to all initial treatment activities that involve ground disturbance and prescribed burning. Not required prior to maintenance treatments if initial surveys remain valid.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-5: Treatment of Archaeological Resources If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR CUL-6: Treatment of Tribal Cultural Resources The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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 Program EIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Prior to treatment activities. **Initial data review and reconnaissance-level survey have been conducted; see PSA/Addendum for summary of results.**	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Guidance to Implement SPR BIO-1 Special-Status Plants For special-status plants not listed under CESA or ESA, to avoid impacts on herbaceous annual species, stump-sprouting species, or geophyte species (e.g., perennial rhizomatous herbs), only non-ground-disturbing treatment activities (i.e., manual treatments, broadcast burning, targeted herbicide application, prescribed herbivory) will be implemented and only during the dormant season for these species (e.g., when the plant has no aboveground parts), if feasible, provided the treatment will not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of these species. If the limited operating period for herbaceous annual species, stump-sprouting species, or geophyte species (i.e., only non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys will be required per SPR BIO-7. Note that ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning may result in impacts on these plant species even when dormant and will not be conducted without prior implementation of SPR BIO-7. Special-status Wildlife ▶ To avoid impacts on monarch butterflies, a limited operating period for mechanical treatments, manual treatments, prescribed burning, and herbicide application from June 1 to September 30 will be implemented, if feasible. If conducting some treatments outside of the monarch breeding window for the Sierra Nevada foothill region is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on foothill yellow-legged frogs, a no disturbance buffer of 82 feet will be implemented adjacent to all perennial (i.e., Class I and Class II) streams, if feasible. If the 82-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 would be implemented within areas of suitable habitat. ▶ To avoid impacts on California spotted owls, the following measures will be implemented: ▪ To determine whether a documented California spotted owl nesting occurrence is present within 0.25 miles of the project area, a qualified RPF or biologist will review California spotted owl occurrence data in the CNDDB and will contact US Forest Service Biologists from Sierra National Forest and Bureau of Land Management (BLM) to obtain any recent survey and occurrence data for California spotted owl activity adjacent to the treatment area that have not been made publicly available (e.g., in the CNDDB). ▪ If a nesting occurrence is determined to be present, or if habitat suitable for California spotted owl nesting as determined by a qualified RPF or biologist is present in or within 0.25 miles of a treatment area, potential impacts on the nesting occurrence or nesting habitat will be avoided by implementing a limited operating period within 0.25 miles of the occurrence or nesting habitat during the spotted owl nesting season (March 1-August 31) for mechanical treatments, manual treatments, and prescribed burning, if feasible. If the limited operating period is determined to be infeasible, then SPR BIO-10 will be implemented.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To avoid impacts on special-status nesting birds, a limited operating period for mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory from February 1 to August 31 will be implemented, if feasible. If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on special-status bat maternity colonies, a limited operating period for mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory from April 1 to August 31 will be implemented, if feasible. If conducting some treatments outside of the bat maternity season is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on northern California ringtail, a limited operating period for mechanical treatments, prescribed burning (including broadcast and pile burning), and manual treatments that would remove trees or snags greater than 12 inches DBH from April 15 to June 30 will be implemented, if feasible. If conducting mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH outside of the ringtail maternity season is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on gray wolves, the project proponent will query the CDFW Wolf Tracker web map and Approximate Area of Gray Wolf Activity map prior to project implementation to determine if any collared wolves or wolf packs are in the project vicinity. If CDFW data determines that gray wolves may be in the project area or immediate vicinity, CDFW will be contacted to determine if additional measures are needed to avoid impacts on wolves. ▶ To avoid impacts on fisher, the following measures will be implemented: ▪ A qualified RPF or biologist will identify areas of potential denning habitat and high-quality denning habitat, as defined in *South Sierra Nevada Fisher Conservation Strategy Interim Recommendations* (CBI 2020). ▪ In areas of potential denning habitat or high-quality denning habitat, limited operating periods for mechanical and manual treatments from March 1 to June 30, and from March 1 to May 1 for prescribed burning, will be implemented in accordance with Table 2 in *South Sierra Nevada Fisher Conservation Strategy Interim Recommendations* (CBI 2020), if feasible. If these limited operating periods are determined to be infeasible, SPR BIO-10 will be implemented. 2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7).			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-1** <u>Special-status Wildlife</u> ▶ Because there is no reliable season during which all impacts on Crotch's bumble bee and American badger could be avoided and avoidance of habitat is not feasible for these species, implementation of SPR BIO-10 would be required. ▶ Because there is no feasible no-disturbance buffer that would reduce all impacts on northwestern pond turtle, and avoidance of habitat is not feasible for this species, implementation of SPR BIO-10 would be required.			
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.	Prior to all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see *Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service*). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by pursuant to 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	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
(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 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 Program EIR 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 Program EIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: ▶ Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ▶ For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ▶ Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ▶ 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 Program EIR, such as geographic context. It is beyond the legal scope of the Program EIR 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 Program EIR.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-6: Prevent Spread of Plant Pathogens When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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 Program EIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys.	Prior to all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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. **Project-Specific Guidance to Implement SPR BIO-7** ▶ If the limited operating period (i.e., non-ground-disturbing treatment activities conducted during the dormant season) for non-ESA and -CESA herbaceous annual species, stump-sprouting species, or geophyte species is determined to be infeasible, then protocol-level surveys for these species will be conducted prior to implementation of treatments. ▶ Protocol-level surveys will be conducted for all special-status plants listed under ESA or CESA and non-stump sprouting perennial species not listed under ESA or CESA prior to implementation of treatments.			
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;	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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). 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. **Project-Specific Guidance to Implement SPR BIO-10** ▶ Because limited operating periods for special-status bumble bees are not feasible (per SPR BIO-1), to avoid impacts on Crotch's bumble bees, a habitat assessment for Crotch's bumble bees will be conducted based on guidance in *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). If the habitat assessment determines that habitat suitable for Crotch's bumble bee is present within a treatment area, then focused surveys for the species will be conducted prior to implementing treatments, or presence of this species will be assumed. The survey will be conducted following *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). If Crotch's bumble bees are detected during focused surveys, or assumed to be present in the project area, Mitigation Measure BIO-2g will be implemented. ▶ Focused surveys for monarch host plants (milkweed [*Ascelpias* spp.]) will be conducted in and within 10 feet of the project area prior to implementing treatment activities. If milkweed are detected during focused surveys, further surveys for monarch butterfly eggs, larvae, and pupae may be conducted, or presence of monarch may be assumed. If milkweed host plants are detected during focused surveys and monarch butterflies are detected or assumed present, Mitigation Measure BIO-2e will be implemented.	No more than 14 days prior to treatment, unless otherwise specified in a protocol.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Because no-disturbance buffers for northwestern pond turtle are not feasible (pursuant to SPR BIO-1), to avoid impacts on northwestern pond turtle, focused visual encounter surveys for this species and for potentially suitable nests and burrows will be conducted within habitat areas suitable for the species prior to pile burning, mechanical treatments, and manual tree/snag removal within 1,300 feet of aquatic habitat (i.e., streams, ponds). If nests or burrows potentially suitable for northwestern pond turtles are detected, the RPF or qualified biologist will inspect the burrow to determine whether it is occupied (e.g., use a burrow scope). If northwestern pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species will be implemented. ▶ If the no-disturbance buffer for foothill yellow-legged frog is determined to be infeasible, to avoid impacts on the species, focused visual encounter surveys for foothill yellow-legged frog will be conducted prior to treatment activities within 82 feet of perennial (i.e., Class I and Class II) streams. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2a for this species will be implemented. ▶ If the limited operating period for California spotted owl is determined to be infeasible, to avoid impacts on the species, protocol-level surveys for California spotted owl will be conducted by a qualified RPF or biologist where a documented nest or nesting habitat is present within 0.25 miles of treatment activities. The protocol-level surveys will be completed prior to implementation of treatment activities and, to the extent feasible, during the year of treatment implementations; otherwise, the surveys may be completed no more than one year prior to implementation. Surveys for California spotted owl will be conducted pursuant to Protocol for Surveying Proposed Management Activities that May Impact Northern Spotted Owls (USFWS 2012) or any protocol subsequently developed or otherwise required by USFWS should the species be listed. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b will be implemented. ▶ If the limited operating period for nesting birds is determined to be infeasible, to avoid impacts on special-status birds (i.e., long-eared owl, American goshawk, great gray owl, olive-sided flycatcher, Vaux's swift, and yellow warbler) focused surveys for nests of these species will be conducted prior to implementing treatment activities during the nesting bird season (February 1-August 31). Surveys for American goshawk will be conducted pursuant to *Northern Goshawk Inventory and Monitoring Technical Guide* (USFS 2006), and surveys for great gray owls will be conducted pursuant to *Survey Protocol for the Great Gray Owl (*Strix nebulosa*) within the Northwest Forest Plan Area* (USFS 2016). The typical search areas will be 0.25 miles for long-eared owl, American goshawk, and great gray owl, and 100 feet for other special-status bird species. Prior to conducting focused surveys, US Forest Service Biologists from Sierra National Forest and BLM will be contacted, to obtain any recent survey and occurrence data on land adjacent to treatment areas for American goshawk and great gray owl that have not been made publicly available (e.g., in the CNDDB). If active special-status bird nests are observed during the focused surveys, then Mitigation Measure BIO-2a (for great gray owl) and Mitigation Measure BIO-2b (for long-eared owl, American goshawk, olive-sided flycatcher, Vaux's swift, and yellow warbler) will be implemented. ▶ To avoid impacts on special-status bats (i.e. pallid bat, Townsend's big-eared bat, western red bat), focused surveys for maternity roosts of these species will be conducted prior to implementing treatment activities (except for herbicide application) during the bat maternity season (April 1-August 31). If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats will be implemented.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If the limited operating period for northern California ringtail is determined to be infeasible, to avoid impacts on the species, focused surveys for ringtail, including non-invasive survey methods (e.g., trail cameras, track plates, hair snares), will be conducted prior to implemented prior to implementing mechanical treatments, prescribed burning, and manual treatments that would remove trees greater than 12 inches DBH, during the ringtail maternity season (April 15-June 30). If baited trail cameras are used, the qualified RPF or biologist may be required to obtain a valid CDFW Scientific Collecting Permit. If presence of ringtail is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented. ▶ If the limited operating periods for fisher are determined to be infeasible, to avoid impacts on the species, focused surveys for fisher will be conducted by a qualified RPF or biologist following the *Survey Protocol for Fisher Denning Seasons; Methods for Informing Denning Protection Measures* (Tucker et al. 2020). If baited trail cameras are used, the qualified RPF or biologist will obtain a valid CDFW Scientific Collecting Permit before using bait. If fisher are detected during the focused surveys, or presence of is assumed, Mitigation Measure BIO-2a will be implemented. ▶ To avoid impacts on American badgers, a focused survey for the species and for potential dens will be conducted prior to implementing mechanical treatments and prescribed burning in habitat suitable for the species (i.e., grassland, open woodland). If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented.			
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.	Prior to and during all prescribed herbivory treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-12: Protect Common Nesting Birds, Including Raptors The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP Program EIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ **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.	Prior to and during all treatment activities. Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically no more than approximately 14 days before treatment); if an active nest is observed, implement avoidance strategies prior to and during treatment	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
The revised language states, "The project proponent will suspend mechanical and prescribed herbivory treatment if (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities. The project proponent will suspend herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m."			
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.	During mechanical treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During mechanical, prescribed herbivory, and prescribed burning treatment activities that result in exposure of bare soil over 50 percent or more of the treatment area.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during mechanical, prescribed herbivory, and prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	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.	During mechanical, manual, and prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During mechanical, manual, and prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during mechanical treatment activities on slopes greater than 50 percent.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Hazardous Material and Public Health and Safety Standard Project Requirements			
SPR HAZ-1: Maintain All Equipment The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Revisions to the SPR:** Text of the original SPR will be removed and replaced with new language. The original language states, "Any equipment found leaking will be promptly removed." The revised language states, "Any equipment found leaking will be promptly stabilized and fixed on-site outside of Watercourse and Lake Protection Zones (WLPZ), or promptly removed and repaired off-site."	Prior to and during treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During manual treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR HAZ-3: Require Fire Extinguishers The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	During manual treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to and during herbicide treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HAZ-6: Comply with Herbicide Application Regulations The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. ▶ Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Prior to and during herbicide treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During herbicide treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During herbicide treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HAZ-9: Notification of Herbicide Use in the Vicinity of Public Areas For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. 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.	Post signs prior to the start of herbicide treatment activities and maintain the signs in place for at least 72 hours after treatment ceases.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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. **Project-Specific Guidance to Implement SPR HYD-1** Vegetation treatment activities may result in discharges to waters of the state; therefore; compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code compliance for projects that prepare a CalVTP PSA or PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HYD-2: Avoid Construction of New Roads The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR HYD-3: Water Quality Protections for Prescribed Herbivory The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ▶ Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ▶ Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Prior to prescribed herbivory treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Establish WLPZs during design of treatment project; implement WLPZ protections during treatment for all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

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

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
The following WLPZ protections will be applied for all treatments: ▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ Burn piles will be located outside of WLPZs. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs. ▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 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.		Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Revisions to the SPR: Text of the original SPR will be removed and replaced with new language. The original language states, "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)." The revised language states, "The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses within 300 feet of proposed manual, mechanical, prescribed burning, targeted herbicide application, and prescribed herbivory treatment activities as well as staging areas, as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version)."			
SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative). ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	During herbicide treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Prior to any ground disturbing activities; after any ground disturbing activities if required.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
SPR NOI-2: Equipment Maintenance The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all mechanical treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prior to mechanical treatment activities occurring within 1,500 feet of noise-sensitive receptors.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
Recreation Standard Project Requirements			
SPR REC-1: Notify Recreational Users of Temporary Closures If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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.	Prepare TMP prior to treatment and implement TMP during treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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.			
Public Services and Utilities Standard Project Requirements			
SPR UTIL-1: Solid Organic Waste Disposition Plan For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Prior to and during mechanical and manual treatment activities that require the disposal of material outside the treatment area.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics			
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.	Conduct visual reconnaissance prior to implementing non-shaded fuel breaks; if public viewing points identified, attempt to relocate, or implement a shaded fuel break, if feasible.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
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;	During all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.			
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.	During all ground-disturbing activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Biological Resources			
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of 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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment 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 (and associated use of 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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.			
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when:	Prior to, during, and after all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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 the lead agency determines after consultation that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. **Project-Specific Guidance to Implement Mitigation Measure BIO-2a** Foothill yellow-legged frog ▶ If foothill yellow-legged frogs are detected during focused surveys, flagging/marking areas for avoidance in which no treatment activities would occur, and biological monitoring and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of this species, would be required. Great gray owl ▶ If active great-gray owl nests are detected during focused surveys, a no-disturbance buffer of at least 0.25 miles will be established around the nests, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Northern California ringtail ▶ If the limited operating period for northern California ringtail is determined to be infeasible and ringtails are detected during focused surveys implemented under SPR BIO-10, then additional surveys will be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist, a no-disturbance buffer of at least 0.25 miles will be implemented around the den, and mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. ▶ If the limited operating period for ringtail is determined to be infeasible and presence of ringtails is assumed, then the following avoidance and minimization measures will be required: ▪ **Year-Round Take Avoidance Measures.** During mechanical treatment activities in heavy brush habitat (e.g., dense conifer saplings, blackberry, shrubs), and after the standard equipment warm-up period, heavy machinery activities in heavy brush habitat will be conducted slowly and cautiously. For example, the head of a masticator will pause above a patch of heavy brush for several seconds before removing the brush. A qualified RPF or biologist will explain this process to contractors and will observe mechanical treatments on the first day of work to ensure that the methods are understood and implemented properly; this could be combined with other pre-activity survey or contractor awareness training requirements. Contractors will watch for ringtail as they masticate in heavy brush. If a ringtail is observed, the contractor will direct			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
treatment activities to halt, and the ringtail will be allowed to leave the area unharmed before treatment begins. If a ringtail is observed outside of maternity season, the qualified RPF or biologist will be contacted and will perform a sweep of the treatment area before work resumes. If the qualified RPF or biologist observes a resting ringtail or active non-maternity den, treatment activities will not occur within that day's treatment area until the ringtail leaves the area on its own. If the qualified RPF or biologist observes a ringtail or confirms the contractor's observation (i.e., based on contractor description or photograph), the occurrence will be reported to CDFW at R4Timber@wildlife.ca.gov. ▪ **Den Surveys.** Within seven days prior to the start of mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH during the ringtail maternity season, a qualified RPF or biologist will conduct a den search in the treatment area to be treated the next week. The qualified RPF or biologist will search for large trees (i.e., greater than 12 inches DBH) with appropriate cavities (i.e., holes larger than 3 inches in diameter, cavities extending approximately 12 inches down from the cavity hole). If found, the qualified RPF or biologist will inspect the cavity using a cell phone with a flash, or other tools (e.g., borescopes) to determine whether ringtails are present. Areas (e.g., large trees) with appropriate den habitat, occupied or not, will be marked (i.e., with flagging, spray paint), for inspection during future sweeps (as described below). The qualified RPF or biologist will also search for dens in dense brush habitat and will note any sightings of fleeing adult ringtails. ▪ **Active Dens.** If active ringtail dens are discovered during a den survey or daily sweep, a no-disturbance buffer of at least 0.25 miles will be implemented around the den, and mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. The 0.25-mile buffer will incorporate the den and an area greater than the typical ringtail home range in northern California (Wyatt, pers. comm., 2021). If an active den is discovered, CDFW (R2Timber@wildlife.ca.gov) will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer. ▪ **Daily Sweeps, Training, and Monitoring.** If active ringtail dens are not discovered, the following measures will be implemented to avoid inadvertent destruction of active dens that eluded detection during the den search as well as take of adult ringtails and kits. ▪ **Daily Sweeps.** On the first morning of work for mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH, a qualified RPF or biologist will conduct a sweep of the area to be treated that and will search all habitat suitable for ringtails where treatment will occur that day (i.e., larger trees, heavy brush, rock piles, burn piles) for active dens or adults, including the trees with cavities previously marked by the qualified RPF or biologist. On following days, a trained contractor will search all areas previously marked by the qualified RPF or biologist for active dens (see training requirements below under "Training and Monitoring"). If an active den is discovered during a daily sweep, the qualified RPF or biologist will be notified, all work will stop, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and the requirements described above under "Active Dens" will be followed.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ **Training and Monitoring.** On the first morning of work for mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH, the qualified RPF or biologist will provide biological resource training (as required under CalVTP Program EIR SPR BIO-2) for all contractors. In addition to standard biological resource training, the qualified RPF or biologist will provide additional training specific to ringtail that will include the following elements: • Description of ringtail appearance (i.e., physical features, typical size); description of typical ringtail behavior; description of denning habitat suitable for ringtail, particularly in that week's treatment area. The approximate location of large trees with cavities that were previously marked will be noted; • Measures required during operation, including daily sweeps of habitat suitable for ringtail where treatment will occur that day (i.e., heavy brush habitat, previously marked tree cavities), year-round take avoidance measures, and required increased vigilance when operating in heavy brush; • Measures required if a ringtail is spotted (i.e., all work halts until a qualified RPF or biologist can conduct a den search and sweep; if the qualified RPF or biologist observes a ringtail or confirms the contractor's observation, the occurrence will be reported to CDFW at R2Timber@wildlife.ca.gov); • Measures required if a ringtail den is found (i.e., 0.25-mile no-disturbance buffer and requirements described above under "Active Dens" will be followed); • Definition of and legal consequences for take of ringtail (i.e., fined and/or imprisoned following terms in Section 12008.1 of the California Fish and Game Code); and • Requirements for contacting CDFW (R2Timber@wildlife.ca.gov) include the following circumstances: ringtails observed during treatment activities (notify within 3 business days); and active ringtail den discovered (notify within 24 hours); or take of ringtail occurs (notify within 24 hours). <u>Fisher</u> ▶ If the limited operating periods for fisher (pursuant to SPR BIO-1) are determined to be infeasible, and presence of fisher is detected during focused surveys or assumed (pursuant to SPR BIO-10), then the following avoidance and minimization measures will be required: ▪ Limited operating periods for mechanical and manual treatments (March 1-June 30) and for broadcast and pile burning (March 1-May 1). ▪ Known fisher den or rest trees, including surrounding trees that provide beneficial thermal or predatory protection, will not be removed.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Fisher Denning Habitat ▶ In high quality denning habitat for fisher, as determined by a qualified biologist or RPF based on the definition in *South Sierra Nevada Fisher Conservation Strategy Interim Recommendations* (CBI 2020) pursuant to SPR BIO-1, the following habitat retention measures will be required if feasible: ■ All conifer snags greater than 35 inches DBH and all hardwood snags greater than 27 inches DBH will be retained. ■ Retention of large trees (i.e., greater than 24 inches DBH) with deformities, broken tops, large branches, and cavities will be prioritized. ■ A wide distribution of snags and downed logs will be retained, at an average of 2 to 5 logs per acre greater than 20 inches diameter. ■ A multi-storied canopy will be retained in drainages, swales, and north-facing slopes. Prescribed fire intensity will be limited in areas with large trees and large snags. ▶ Any den structure known to have been active within the past 5 years will be buffered by 60 acres of the most suitable, connected habitat to form a 'den cluster'. If 60 acres of suitable habitat are not available surrounding the den, then the den structure should be buffered by the amount of connected suitable habitat remaining. ▶ In areas meeting the criteria for potential denning habitat where locations of dens are unknown, a qualified RPF or biologist familiar with fisher ecology will identify 60 acres of 'potential' den clusters, using the definition of high quality denning habitat. Where 60 acres of high quality denning habitat is not available, den clusters should include the amount of connected high quality denning habitat available. ▶ Within den clusters, fuels management will be limited to patchy surface and ladder fuel removal. Vegetation structure will not be altered to the point that it no longer qualifies as high-quality habitat (i.e., greater than 60 percent cover and mean DBH of 24 inches in the stand).			
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▪ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Guidance to Implement Mitigation Measure BIO-2b Northwestern pond turtle ▶ If northwestern pond turtles or nests are detected during focused surveys, the following will be required: flagging/marking areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of these species. ▶ Should the proposed ESA 4(d) rule for northwestern pond turtle be issued when the species is listed, the project would qualify for take exemption as a project conducting forest fuels management activities that reduce the risk of large-scale high-severity wildfires, and further consultation with USFWS would not be required. California spotted owl ▶ If nesting California spotted owls are identified during protocol-level surveys, a no disturbance buffer of 0.25 miles will be established around active California spotted owl nests and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. ▶ Should the proposed ESA 4(d) rule for California spotted owl be issued when the species is listed, the project would qualify for take exemption as a project conducting forest fuels management activities that reduce the risk of large-scale high-severity wildfires, and further consultation with USFWS would not be required. Special-status birds ▶ If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of at least 0.25 miles for American goshawk and long-eared owl nests, and at least 100 feet around the nests of other special-status birds will be established, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Special-status bats ▶ If an active pallid bat, Townsend's big-eared bat, or western red bat roost is detected during focused surveys, then a no-disturbance buffer of 250 feet will be established around the roost, and mechanical treatments, manual treatments, prescribed herbivory, and prescribed burning will not occur within this buffer. American badger ▶ If an active American badger den is detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around the den, and no mechanical treatment or prescribed burning will occur within this buffer until the den is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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. 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.	Prior to, during, and after all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

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

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*)
Behren's silverspot butterfly	blue violet (*Viola adunca*)
callippe silverspot butterfly	California golden violet (*Viola pedunculata*)
Carson wandering skipper	salt grass (*Distichlis spicata*)
El Segundo blue butterfly	seacliff buckwheat (*Eriogonum parvifolium*)
Hermes copper butterfly	spiny redberry (*Rhamnus crocea*)
Kern primrose sphinx moth	plains evening-primrose (*Camissonia contorta*), field primrose (*Camissonia campestris*)
Laguna Mountains skipper	Cleveland's horkelia (*Horkelia clevelandii*), sticky cinquefoil (*Drymocallis glandulosa*)
Lange's metalmark butterfly	naked-stemmed buckwheat (*Eriogonum nudum*)
lotis blue butterfly	seaside bird's foot trefoil (*Hosackia gracilis*)
Mission blue butterfly	lupine (*Lupinus* spp.)
Myrtle's silverspot butterfly	blue violet
Oregon silverspot butterfly	blue violet
Palos Verdes blue butterfly	Santa Barbara milkvetch (*Astragalus trichopodus*), common deerweed (*Acmispon glaber*)
San Bruno elfin butterfly	broadleaf stonecrop (*Sedum spathulifolium*), manzanita (*Arctostaphylos* spp.), huckleberry (*Vaccinuum* spp.)
Smith's blue butterfly	seacliff buckwheat, seaside buckwheat (*Eriogonum latifolium*)
Quino checkerspot butterfly	dwarf plantain, purple owl's clover

Mitigation Measures	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 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. **Project-Specific Guidance to Implement Mitigation Measure BIO-2e** ▶ If host plants for monarch butterflies are detected, and monarch eggs, larvae, or pupae are detected during focused surveys pursuant to SPR BIO-10 or assumed to be present, host plants will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants, if feasible. ▶ If monarch butterflies are detected during focused surveys pursuant to SPR BIO-10, or presence is assumed, treatments will be conducted in a patchy pattern to the extent feasible in grasslands and oak woodlands, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat and floral resources are retained.			
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season.	Prior to all treatment activities. During all treatment activities (if special-status bumble bees are identified during surveys or assumed to be present).	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). **CESA and ESA Listed Species.** A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. **Other Special-status Species.** A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Guidance to Implement Mitigation Measure 2g To avoid impacts on Crotch's bumble bee, the following measures will be implemented when implementation of surveys under SPR BIO-10 results in identification of habitat suitable for the species and the species is detected, or presence of the species is assumed: ▶ If Crotch's bumble bees are detected during focused surveys, a no-disturbance buffer of at least 50 feet will be established around any identified nest colonies, and no mechanical treatment activities will occur within this buffer until the nesting colony is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. ▶ If surveys for nest colonies are not conducted and presence is assumed, mechanical treatment will not occur during the flight season (April through August) in habitats determined to be suitable for nesting Crotch's bumble bees by a qualified RPF or biologist. ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat during the flight season (April through August), and herbicide application will not target native flowering plants while blooming. Herbicide application will be conducted with ground-level application only (e.g., painting herbicide on stems, backpack sprayer, hand application). ▶ Prescribed burning and biomass disposal will be designed to avoid bumble bee nest colonies and floral resources: ▪ Burn piles that remain on site for greater than one year will be surveys for bumble bee nests prior to burning by a qualified biologist, or they will be burned during the season when bumble bees are inactive (October through February). ▪ Broadcast burning in habitat suitable for Crotch's bumble bees will be restricted to the winter season prior to the emergence of bumble bee floral resources. Generally, prescribed burning will be limited to October 31 – February 28. If conditions in a given year vary and the timing of floral resources emergence is altered by unusual conditions (e.g., heavy rains, extended cold season), the prescribed burning window may be altered as determined by a qualified RPF or biologist. Variation from the October 31 to February 28 broadcast burning window will be documented in the post-project implementation report.			
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined.	Prior to and during treatment activities in areas that contain sensitive natural communities or oak woodlands.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the 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 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.
	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

Mitigation Measures	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 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. 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.	Prior to, during, and after all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Prior to and during all treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy
Greenhouse Gas Emissions			
Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the *National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire* (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. 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.	Prior to and during prescribed burning treatment activities.	Sierra Foothill Conservancy	Sierra Foothill Conservancy

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

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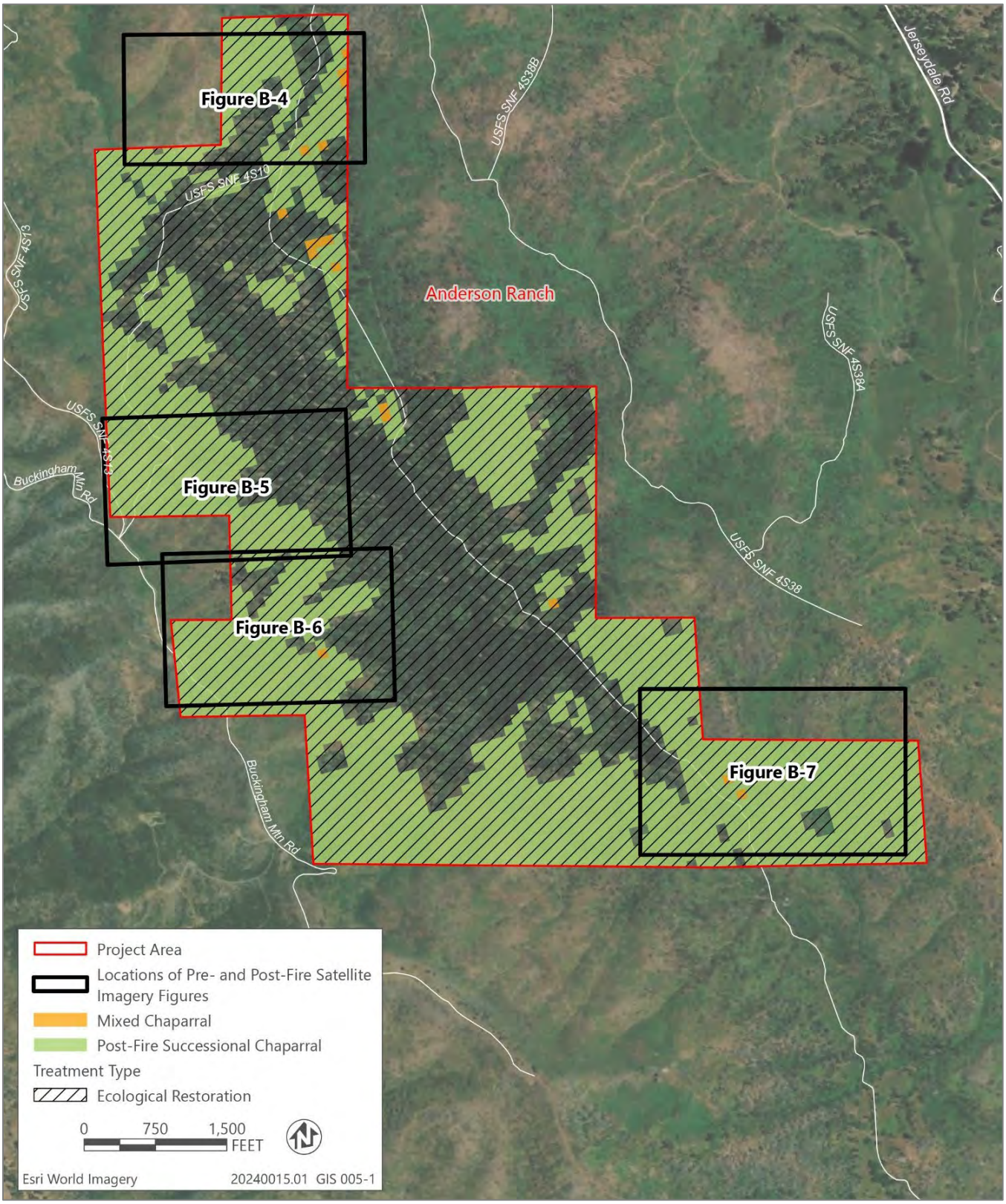
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Attachment B

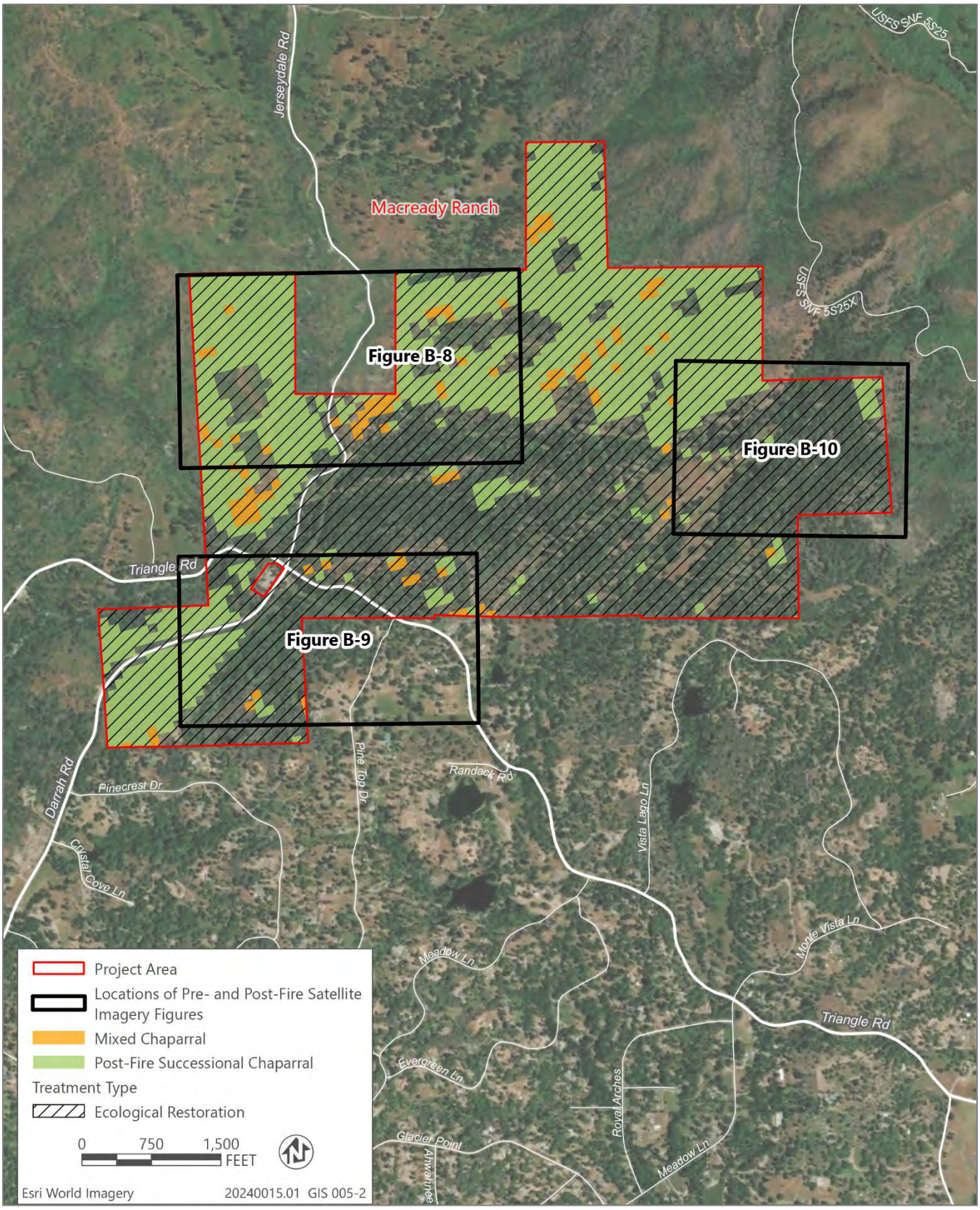
Chaparral Mapping and Pre- and Post-Fire Satellite Imagery for Anderson Ranch and Macready Ranch

CHAPARRAL MAPPING



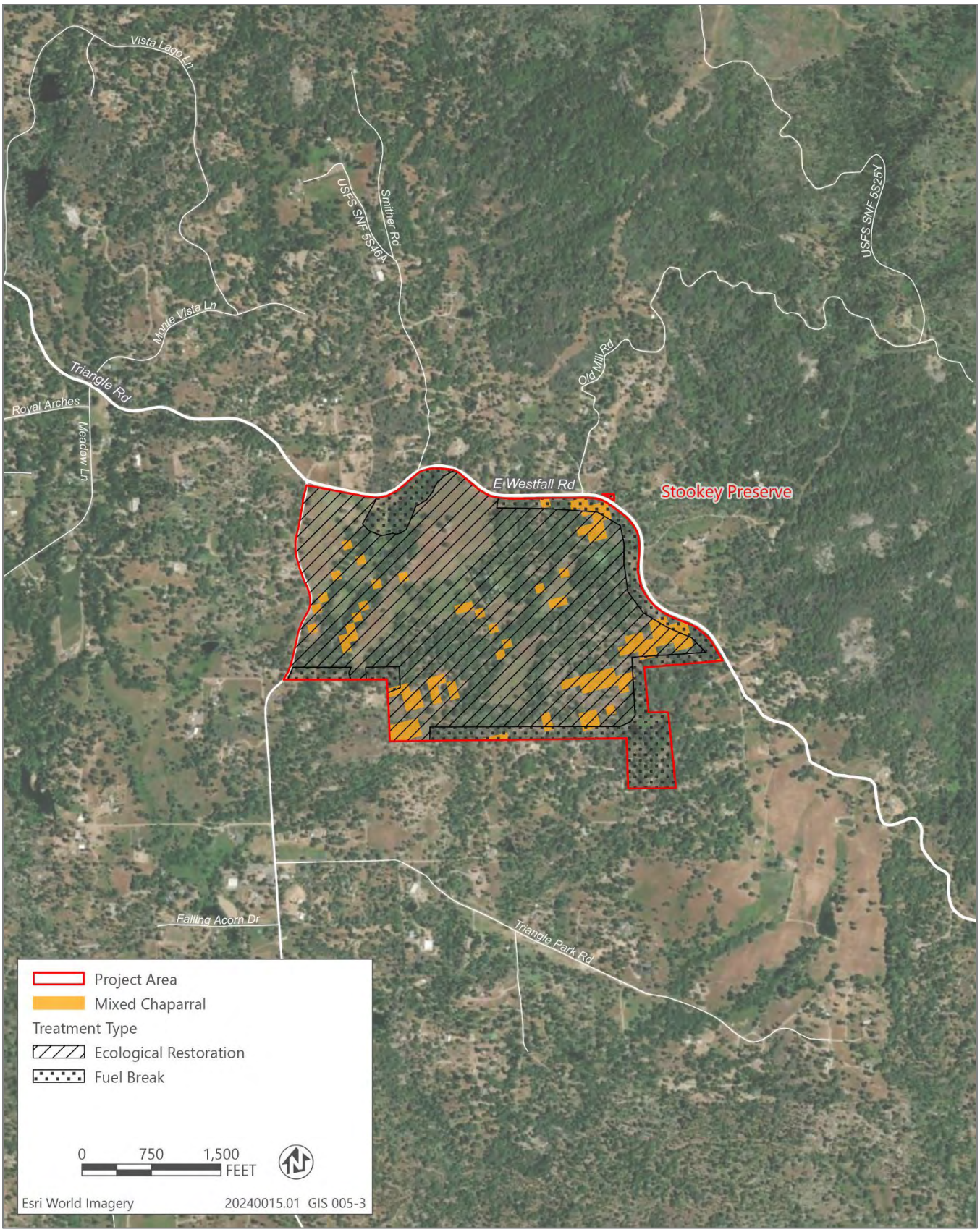
Source: Adapted by Ascent in 2025.

Figure B-1 Post-Fire Successional Chaparral and Mixed Chaparral on Anderson Ranch Property Based on Satellite Imagery Analysis



Source: Adapted by Ascent in 2025.

Figure B-2 Post-Fire Successional Chaparral and Mixed Chaparral on Macready Ranch Property Based on Satellite Imagery Analysis



Source: Adapted by Ascent in 2025.

Figure B-3 Mixed Chaparral on Stookey Preserve Property

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PRE- AND POST-FIRE SATELLITE IMAGERY FOR ANDERSON RANCH AND MACREADY RANCH



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Northern portion of Anderson Ranch shown in both photos (see Figure B-1 for photo locations). Left photo is from July 8, 2012. Right photo is from October 24, 2024. Project area is located between the red lines and below red line on the left. Small patches of mixed chaparral are interspersed within the dominant forest and woodland types in the northern portion of the property in 2012 (left photo). By 2024, after burning in 2013 and 2022, as well as some salvage logging, a substantial amount of vegetation has been removed from the landscape, particularly in the western portion of the project area shown (right photo). Post-fire successional chaparral (Figures B-1 and B-4) mapped in the northern portion of Anderson Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-4 North Portion of Anderson Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Middle western portion of Anderson Ranch shown in both photos (see Figure B-1 for photo locations). Left photo is from July 8, 2012. Right photo is from October 24, 2024. Project area located right of the red lines. The largest patch of chaparral pre-fire in 2012 on Anderson Ranch is shown towards the top of the photo, on the left side of the road (left photo). There is also a fairly large patch to the right of the road. Other than that, the project area shown is mainly dominated by forest and woodland types. By 2024, after burning in 2013 and 2022, as well as some salvage logging, a substantial amount of vegetation has been removed from the landscape, particularly in the northwest portion of the project area shown (right photo). Post-fire successional chaparral (Figures B-1 and B-5) mapped in the middle western portion of Anderson Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-5 Middle Western Portion of Anderson Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



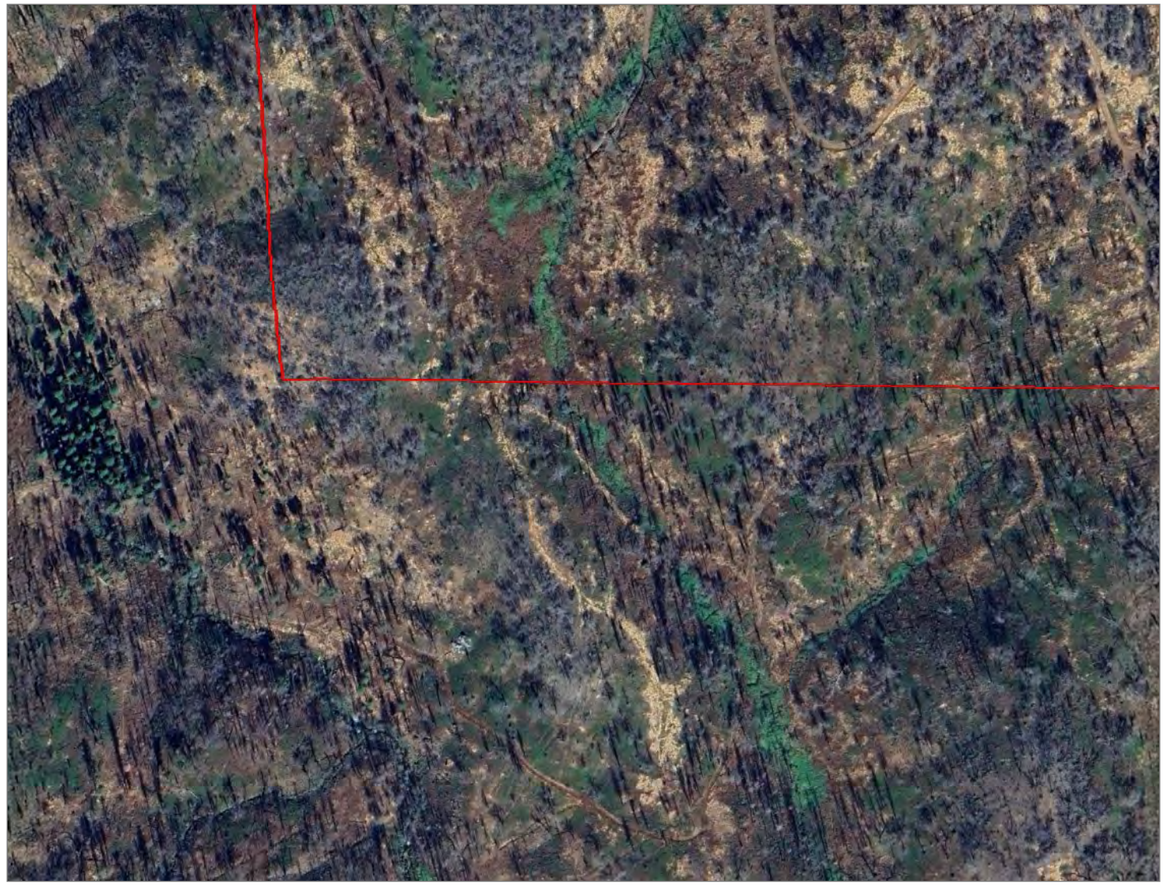
Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Western portion of Anderson Ranch towards bottom of the property shown in both photos (see Figure B-1 for photo locations). Left photo is from July 8, 2012. Right photo is from October 24, 2024. Project area is to the right of the red lines. Patches of mixed chaparral are interspersed within the dominant forest and woodland types in the western portion of the property (left photo). By 2024, after burning in 2013 and 2022, as well as some salvage logging, a substantial amount of the vegetation has been removed from the landscape, particularly on the west side of the photo, though some forest remains in the middle of the property on the east side of the property (right photo). Post-fire successional chaparral (Figures B-1 and B-6) mapped in the western portion of Anderson Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-6 Western Portion Towards Southern End of Anderson Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Southeastern portion of Anderson Ranch shown in both photos (see Figure B-1 for photo locations). Left photo is from June 3, 2020. Right photo is from October 21, 2024. Project area is to the left and below the red lines. There are minimal patches of chaparral in the middle of the photo in 2020, but the landscape is dominated by forest and woodland types (left photo). By 2024, after burning in 2022, as well as some salvage logging, most of the vegetation has been removed from the landscape, though one patch of forest is present on the left side of the photo towards the middle of the property (right photo). Post-fire successional chaparral (Figures B-1 and B-7) mapped in the southeastern portion of Anderson Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-7 Southeastern Portion of Anderson Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Northwestern and northern portions of Macready Ranch shown in both photos (see Figure B-2 for photo locations). Left photo is from June 3, 2020. Right photo is from October 21, 2024. Project area is below and to left of the red lines. Larger patches of chaparral are present in 2020 on the left side of the photo interspersed with some grassland and forest and woodland types (left photo). There are also patches of chaparral towards the middle of the photo, next to the fuel break and some patches on the right side towards the top of the property; however, the dominant vegetation types in 2020 imagery are forest and woodland. By 2024, after burning in 2022, as well as some salvage logging, most of the vegetation has been removed from the landscape, though some forest is present towards the bottom of the photo towards the middle of the property (right photo). Post-fire successional chaparral (Figures B-2 and B-8) mapped in the northwestern and northern portions of Macready Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-8 Northwestern Portion of Macready Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Middle portion and towards the southwestern portion of Macready Ranch. Left photo is from June 3, 2020 (see Figure B-2 for photo locations). Right photo is from October 21, 2024. Project area is above red line on bottom and to the right of the red line on the left side. Large patches of chaparral are present in the middle of the property in 2020, with trees interspersed on the edges, shown at the top right side of the photo (left photo). There are also patches of chaparral surrounding the building towards the bottom left of the photo. By 2024, after burning in 2022, as well as some salvage logging, some of the vegetation is still scorched and there is noticeably less tree cover (right photo). There are still some larger forest patches towards the middle of the property at the top ride side of the photo, but minimal trees survived towards the bottom of the property, on the left side of the photo, although vegetation is still green there and throughout the photo including live trees. Post-fire successional chaparral (Figures B-2 and B-9) mapped in the middle portion of Macready Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-9 Middle Portion and Towards the Southwestern Portion of Macready Ranch



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.



Source: Data downloaded from Google Earth in 2025; adapted by Ascent in 2025.

Eastern portion of Macready Ranch shown in both photos. Left photo is from August 11, 2017 (see Figure B-2 for photo locations). Right photo is from August 8, 2018. Project area is to the left of the red line. Minimal patches of chaparral are present, interspersed within the dominant forest and woodland types on the eastern side of the property (left photo). In 2018, minimal area in the project area burned at low severity, with some tree mortality occurring along the eastern border of the property (right photo). Post-fire successional chaparral (Figures B-2 and B-10) mapped in the eastern portion of Macready Ranch is shrub-dominated vegetation that has generated following a fire within the last 15 years in an area that was characterized by woodland or forest before the fire. See "Discussion," section in Section 4.5, "Biological Resources," for details on aerial pre- and post-fire analysis for determining specific locations of post-fire successional chaparral and mixed chaparral.

Figure B-10 Eastern Portion of Macready Ranch

Attachment C

Biological Resources

BIOLOGICAL RESOURCES OCCURRENCE DETERMINATIONS

Based on implementation of SPR BIO-1 (including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys) a list of all special-status species with potential to occur in the vicinity of the proposed project was assembled and is provided below. For more details on methods used to compile species lists, see "Discussion," in Section 4.5, "Biological Resources".

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]
Yosemite onion *Allium yosemitense*	—	SR	1B.3	Broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest. Open, rocky slopes. 1,740–6,650 feet in elevation. Blooms April–July. Geophyte.	May occur. Forest, woodland, mixed chaparral, and post-fire successional chaparral[3] habitats suitable for this species are present in the project area.
Big-scale balsamroot *Balsamorhiza macrolepis*	—	—	1B.2	Chaparral, valley and foothill grassland, cismontane woodland. Sometimes on serpentine (ultramafic affinity = 2.5 [strong indicator]). 110–4,810 feet in elevation. Blooms March–June. Perennial.	Known to occur. Big-scale balsamroot has a historical record in the project area from 1886 on the Macready property (CCH2 2025). Mixed chaparral, grassland, woodland, and post-fire successional chaparral habitats suitable for this species are present in the project area. Although there are no ultramafic soils mapped in the project area, this species can occur off ultramafic soils.
Tulare rockcress *Boechera tularensis*	—	—	1B.3	Subalpine coniferous forest, upper montane coniferous forest. Rocky slopes. 5,990–11,010 feet in elevation. Blooms June–July. Perennial.	Not expected to occur. Project area is out of elevational range of this species.
Mariposa pussypaws *Calyptridium pulchellum*	FT	—	1B.1	Cismontane woodland, chaparral. On granite domes, restricted to exposed sites. 1,440–3,410 feet in elevation. Blooms April–August. Annual.	Not expected to occur. There is no granite dome habitat suitable for this species in the project area.
Grassland suncup *Camissonia lacustris*	—	—	1B.2	Valley and foothill grassland, cismontane woodland, lower montane coniferous forest, chaparral. Gravelly, sometimes on serpentine, granitic. Occurs on serpentine 1,310–1,970 feet and not on serpentine 650–5,250 feet. 650–5,250 feet in elevation. Blooms April–June. Annual.	May occur. Grassland, woodland, forest, and post-fire successional chaparral habitats suitable for this species are present in the project area.
Bolander's woodreed *Cinna bolanderi*	—	—	1B.2	Meadows and seeps, upper montane coniferous forest. Streamsides and other mesic areas. 3,980–7,290 feet in elevation. Blooms July–September. Perennial.	May occur. Streamside and wetland habitats suitable for this species are present in the project area.
Small's southern clarkia *Clarkia australis*	—	—	1B.2	Cismontane woodland, lower montane coniferous forest. Open, rocky sites in conifer forest or oak woodland. 2,980–6,810 feet in elevation. Blooms May–August. Annual.	May occur. Conifer forest and woodland habitats suitable for this species are present in the project area.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Mariposa clarkia *Clarkia biloba* ssp. *australis*	—	—	1B.2	Chaparral, cismontane woodland. Several sites occur in the foothill woodland/riparian ecotone. 390–4,810 feet in elevation. Blooms April–July. Annual.	May occur. Mixed chaparral, woodland, post-fire successional chaparral, and riparian habitats suitable for this species are present in the project area.
Merced clarkia *Clarkia lingulata*	—	SE	1B.1	Chaparral, cismontane woodland. Metamorphic gravels and talus and in red clay on north-facing slopes and in canyon bottoms. 1,390–1,980 feet in elevation. Blooms May–June. Annual.	Not expected to occur. Project area is out of elevational range of this species.
Beaked clarkia *Clarkia rostrata*	—	—	1B.3	Cismontane woodland, valley and foothill grassland. North-facing slopes; sometimes on sandstone. 190–3,000 feet in elevation. Blooms April–May. Annual.	May occur. Woodland and grassland habitats suitable for this species are present in the project area.
Mariposa cryptantha *Cryptantha mariposae*	—	—	1B.3	Chaparral. On serpentine outcrops (ultramafic affinity = 6 [strict endemic]). 650–2,140 feet in elevation. Blooms April–June. Annual.	Not expected to occur. Project area does not contain serpentine habitat suitable for this species.
Jepson's dodder *Cuscuta jepsonii*	—	—	1B.2	North coast coniferous forest. Streamsides. 390–9,010 feet in elevation. Blooms July–September. Annual.	May occur. Streamside habitat suitable for this species is present in the project area.
Yellow-lip pansy monkeyflower *Diplacus pulchellus*	—	—	1B.2	Lower montane coniferous forest, meadows and seeps. Vernally wet depressions or seepage areas. Soils can be clay, volcanic, or granitic. 2,200–6,400 feet in elevation. Blooms April–July. Annual.	May occur. Wetland habitat suitable for this species is present in the project area.
Koch's cord moss *Entosthodon kochii*	—	—	1B.3	Cismontane woodland. Moss growing on soil on riverbanks. 600–3,280 feet in elevation. Perennial.	May occur. Riverbank habitat suitable for this species is present in the project area.
Mariposa daisy *Erigeron mariposanus*	—	—	1A	Cismontane woodland. One site known. 1,970–2,630 feet in elevation. Blooms June–August. Perennial.	May occur. Woodland habitat suitable for this species is present in the project area.
Congdon's woolly sunflower *Eriophyllum congdonii*	—	SR	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. In cracks in rock outcroppings, and on talus; sometimes with blue oak (*Quercus douglasii*), California buckeye (*Aesculus californica*). 1,640–6,240 feet in elevation. Blooms April–June. Annual.	May occur. Rock outcrop habitat suitable for this species is present in the project area.
Slender-stemmed monkeyflower *Erythranthe filicaulis*	—	—	1B.2	Cismontane woodland, lower montane coniferous forest, meadows and seeps, upper montane coniferous forest. Disturbed, moist loamy soil, generally in partial shade. 2,030–5,530 feet in elevation. Blooms April–August. Annual.	Known to occur. Slender-stemmed monkeyflower has a documented occurrence in the project area on the Macready property (CNDDB 2025a). Woodland, conifer forest, and mesic habitats suitable for this species are present in the project area.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Slender-stalked monkeyflower *Erythranthe gracilipes*	—	—	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. Disturbed or burned areas on decomposed granite. 1,640–4,270 feet in elevation. Blooms April–June. Annual.	May occur. Mixed chaparral, woodland, conifer forest, and post-fire successional chaparral habitats with granite substrate suitable for this species in places that have been disturbed or burned are present in the project area.
Parry's horkelia *Horkelia parryi*	—	—	1B.2	Openings in chaparral or woodland. 280–3,660 feet in elevation. Blooms April–September. Perennial.	May occur. Mixed chaparral, post-fire successional chaparral, and woodland habitats suitable for this species are present in the project area.
Short-leaved hulsea *Hulsea brevifolia*	—	—	1B.2	Lower montane coniferous forest, upper montane coniferous forest. Gravelly soil; forest openings and road cuts. 4,920–10,500 feet in elevation. Blooms May–August. Perennial.	May occur. Conifer forest habitat suitable for this species is present in the project area.
Madera leptosiphon *Leptosiphon serrulatus*	—	—	1B.2	Cismontane woodland, lower montane coniferous forest, chaparral. Openings. Dry slopes; often on decomposed granite in woodland. 980–4,270 feet in elevation. Blooms April–May. Annual.	May occur. Woodland, conifer forest, chaparral, and post-fire successional chaparral habitats suitable for this species are present in the project area.
Congdon's lewisia *Lewisia congdonii*	—	SR	1B.3	Chaparral, valley and foothill grassland, lower montane coniferous forest, cismontane woodland, upper montane coniferous forest. In crevices on slopes among rocks. Granitic or metamorphic substrates. 1,970–6,810 feet in elevation. Blooms April–June. Perennial.	May occur. Mixed chaparral, grassland, conifer forest, woodland, and post-fire successional chaparral habitats suitable for this species are present in the project area.
Yosemite lewisia *Lewisia disepala*	—	—	1B.2	Lower montane coniferous forest, pinyon-juniper woodland, upper montane coniferous forest. Fine gravel on rock outcrops, ridges, or domes. Granitic soils. 3,390–11,490 feet in elevation. Blooms March–June. Perennial.	May occur. Conifer forest habitat with granitic soils suitable for this species is present in the project area.
Congdon's lomatium *Lomatium congdonii*	—	—	1B.2	Cismontane woodland, chaparral. Serpentine soils (ultramafic affinity: 6 [strict endemic]) with serpentine chaparral plants and gray pines. 1,100–2,050 feet in elevation. Blooms March–June. Perennial.	Not expected to occur. Project area does not contain serpentine habitat suitable for this species.
Mariposa lupine *Lupinus citrinus* var. *deflexus*	—	ST	1B.2	Chaparral, cismontane woodland. Decomposed granitic or sandy soils. 1,410–2,250 feet in elevation. Blooms April–May. Annual.	May occur. Mixed chaparral, woodland, and post-fire successional chaparral habitats with granitic or sandy soils suitable for this species are present in the project area.
Shaggyhair lupine *Lupinus spectabilis*	—	—	1B.2	Chaparral, cismontane woodland. Open rocky slopes of serpentine (ultramafic affinity: 6 [strict endemic]). 850–2,710 feet in elevation. Blooms April–May. Annual.	Not expected to occur. Project area does not contain serpentine habitat suitable for this species.
Shevock's copper moss *Mielichhoferia shevockii*	—	—	1B.2	Cismontane woodland. Moss on metamorphic rocks; mesic sites. 2,460–4,600 feet in elevation. Perennial.	May occur. Woodland habitat with metamorphic rock suitable for this species is present in the project area.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Yosemite popcornflower *Plagiobothrys torreyi* var. *torreyi*	—	—	1B.2	Lower montane coniferous forest, meadows. Forest edges, flats. 3,550–6,890 feet in elevation. Blooms April–June. Annual.	May occur. Conifer forest and meadow habitats suitable for this species are present in the project area.
Yosemite bog orchid *Platanthera yosemitensis*	—	—	1B.2	Wet meadows. 6,890–7,500 feet in elevation. Blooms July–August. Perennial.	Not expected to occur. Project area is out of elevational range of this species.
Nuttall's ribbon-leaved pondweed *Potamogeton epihydrus*	—	—	2B.2	Shallow water, ponds, lakes, streams, irrigation ditches. 970–8,660 feet in elevation. Blooms July–September. Geophyte.	May occur. Shallow water, ponds, lakes, streams, and ditches suitable for this species are present in the project area.
Robbins' pondweed *Potamogeton robbinsii*	—	—	2B.3	Marshes and swamps. Deep water, lakes. 5,020–10,830 feet in elevation. Blooms July–August. Geophyte.	May occur. Pond habitat suitable for this species is present in the project area.
White beaked-rush *Rhynchospora alba*	—	—	2B.2	Freshwater marshes and sphagnum bogs. 190–6,700 feet in elevation. Blooms June–August. Geophyte.	May occur. Wetland habitat suitable for this species is present in the project area.
Northern slender pondweed *Stuckenia filiformis* ssp. *alpina*	—	—	2B.2	Shallow, clear freshwater of lakes, ponds, and drainage channels. 980–7,060 feet in elevation. Blooms May–July. Geophyte.	May occur. Ponds and drainage channels suitable for this species are present in the project area.
Bolander's clover *Trifolium bolanderi*	—	—	1B.2	Moist mountain meadows. 6,690–8,530 feet in elevation. Blooms June–August. Perennial.	Not expected to occur. Project area is out of elevational range of this species.

Notes: CRPR = California Rare Plant Rank; CEQA = California Environmental Quality Act; ESA = Endangered Species Act; NPPA = Native Plant Protection Act.

1 Legal Status Definitions

Federal:

FT Federally Listed as Threatened (legally protected by ESA)

State:

SE State Listed as Endangered (legally protected by CESA)

ST State Listed as Threatened (legally protected by CESA)

SR State Listed as Rare (legally protected by NPPA)

California Rare Plant Ranks (CRPR):

1A Plant species that are presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years. A plant is extinct if it no longer occurs anywhere. A plant that is extirpated from California has been eliminated from California but may still occur elsewhere in its range.

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:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

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

0.3 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.

3 Post-fire successional chaparral is only located on Anderson Ranch and Macready Ranch properties.

Sources: CCH2 2025; CNDDB 2025a; CNPS 2025; USFWS 2025.

Special-Status Wildlife Species Known to Occur in the Vicinity of the Project Area and Their Potential for Occurrence in the Project Area

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Invertebrates				
Crotch's bumble bee *Bombus crotchii*	—	SC	Found primarily in California: mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	May occur. The project area contains grassland and scrub habitat with flowering plants suitable for Crotch's bumble bee.
Western bumble bee *Bombus occidentalis*	—	SC	Once common throughout much of its range, in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Not expected to occur. The project area is outside of the expected modern range of western bumble bee (CNDDB 2025b, 2025c).
Monarch butterfly *Danaus plexippus*	FP	—	Habitat requirements include host plants for larvae (primarily milkweeds [Asclepias spp.]); adult nectar sources (i.e., flowering plants); and sites for roosting, thermoregulation, mating, hibernation, and predator escape. Additionally, monarch butterfly requires conditions and resources for initiating and completing migration both to and from winter roosting areas. 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.	May occur. The project area contains flowering resources suitable for breeding monarch butterflies, and monarchs have been previously sighted in areas surrounding and between the three properties in the project area (Western Monarch Milkweed Occurrence Database 2025).
Valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	FT	—	Riparian scrub. Occurs only in the Central Valley of California, in association with blue elderberry (Sambucus mexicana). Prefers to lay eggs in elderberries 2–8 inches in diameter; some preference shown for "stressed" elderberries.	Not expected to occur. The three properties in the project area are at elevations of approximately 3,000 feet or greater, which is above of the elevational range for valley elderberry longhorn beetles, which is up to approximately 500 feet (USFWS 2019).
Fish				
Hardhead *Mylopharodon conocephalus*	—	SSC	Klamath/North coast flowing waters, Sacramento/San Joaquin flowing waters. Low to mid-elevation streams in the Sacramento-San Joaquin drainage. Also present in the Russian River. Clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic centrarchids predominate.	Not expected to occur. The project area is at the edge of the expected range of hardhead (CNDDB 2015), and available stream channels are known to contain centrarchid species including bass.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Amphibians				
California tiger salamander - central California DPS *Ambystoma californiense* pop. 1	FT	ST	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Not expected to occur. There has been a documented occurrence of a single California tiger salamander in nearby Mariposa (CNDDB 2025a); however, the project area is outside of the expected range of the species (CNDDB 2016a).
Yosemite toad *Anaxyrus canorus*	FT	SSC	Meadow and seep, subalpine coniferous forest, and wetlands. Vicinity of wet meadows in central High Sierra, 6,400 to 11,300 feet in elevation. Primarily montane wet meadows; also in seasonal ponds associated with lodgepole pine and subalpine conifer forest.	Not expected to occur. The project area is outside of the expected range of Yosemite toad (CNDDB 2016b).
Limestone salamander *Hydromantes brunus*	—	ST FP	Chaparral, cismontane woodland, and limestone. Limestone outcrops in gray pine-chaparral belt along the Merced River and its tributaries, from 800-2,600 feet in elevation. California buckeye is an indicator of optimal habitat. Seeks cover in limestone caverns, talus, rock fissures, surface objects.	Not expected to occur. The project area is outside of the expected range of limestone salamander (CNDDB 2019a).
Foothill yellow-legged frog (South Sierra DPS) *Rana boylii* pop. 5	FE	SE	Sierra Nevada from South Fork American River subbasin (HU 8) in El Dorado County south to Tehachapi Mountains in Kern County. 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.	May occur. The project site is within the predicted range of foothill yellow-legged frog (CNDDB 2019b); and perennial waterways in the project site may provide suitable habitat for foothill yellow-legged frogs.
California red-legged frog *Rana draytonii*	FT	SSC	Artificial flowing waters, artificial standing waters, freshwater marsh, marsh & swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, south coast flowing waters. Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Not expected to occur. The project area is within the historic range of California red-legged frog (CNDDB 2016c); however, the species is believed to have been extirpated from Mariposa prior to 1996 (Jennings et al. 1993; USFWS 2002). Although the species has since been reintroduced approximately 20 miles away in the Yosemite Valley, California red-legged frogs have shown a limited capacity for dispersal distances over 800 meters (USFWS 2022). This reintroduction required intensive removal of predatory American bullfrogs (*Lithobates catesbeianus*), which are prevalent in waterbodies throughout the project area.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Sierra Nevada yellow-legged frog *Rana sierrae*	FE	ST	Always encountered within a few feet of water. Tadpoles may require 2 to 4 years to complete their aquatic development.	Not expected to occur. The project area is outside of the expected range of Sierra Nevada yellow-legged frog (CNDDB 2016d).
Reptiles				
Northwestern pond turtle *Actinemys marmorata*	FP	SSC	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 miles (0.5 km) from water for egg-laying.	Known to occur. Aquatic and upland habitat suitable for northwestern pond turtle is present on all three properties in the project area, and the species has been previously observed on all three properties (Miltimore, pers. comm., 2025).
Birds				
Grasshopper sparrow *Ammodramus savannarum*	—	SSC	Valley and foothill grassland. Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not expected to occur. The project area is outside of the predicted range for grasshopper sparrow (CNDDB 2016e).
Short-eared owl *Asio flammeus*	—	SSC	Great Basin grassland, marsh and swamp, meadow and seep, valley and foothill grassland, and wetlands. Found in swamp lands, both fresh and salt; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	Not expected to occur. The project area is outside of the predicted winter range of short-eared owl, approximately 40 miles from the breeding range of the species (CNDDB 2016f), and does not contain adequate wetland or wet grassland habitat suitable for short-eared owl breeding or wintering.
Long-eared owl *Asio otus*	—	SSC	Cismontane woodland, Great Basin scrub, riparian forest, riparian woodland, and upper montane coniferous forest. Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	May occur. All three properties in the project area contain woodland habitat suitable for breeding long-eared owls, as well as open habitat suitable for foraging.
American goshawk *Astur atricapillus*	—	SSC	Nests primarily in conifer forest and aspen stands with high canopy closure (typically greater than 70 percent), relatively high density of large live and dead trees, low density of small trees, and low shrub/sapling and ground cover. Reuses old nests and maintains alternate nest sites. Often nests on gentle to moderate north slopes and near water. Forages in moderately dense, mature forests and younger forests, some openings, and along forest edges. Usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees.	May occur. High canopy old growth habitat suitable for American goshawk is present on both the Anderson and Macready properties. The Stookey property does not contain sufficient closed canopy habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Vaux's swift *Chaetura vauxi*	—	SSC	Lower montane coniferous forest, north coast coniferous forest, old growth, redwood. Redwood, Douglas fir, and other coniferous forests. Nests in large hollow trees and snags. Often nests in flocks. Forages over most terrains and habitats but shows a preference for foraging over rivers and lakes.	May occur. The Anderson Ranch and Macready Ranch properties contain mature, coniferous forest habitat suitable for Vaux's swift.
Northern harrier *Circus hudsonius*	—	SSC	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Not expected to occur. The project area is outside of the predicted winter range of northern harrier, approximately 22 miles from the breeding range of the species (CNDDB 2016g) and does not contain sufficient marsh or wet areas suitable for the species.
Olive-sided flycatcher *Contopus cooperi*	—	SSC	Lower montane coniferous forest, redwood, upper montane coniferous forest. 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. The project area contains montane forest habitat suitable for olive-sided flycatcher.
White-tailed kite *Elanus leucurus*	—	FP	Cismontane woodland, marsh and swamp, riparian woodland, valley and foothill grassland, and wetlands. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Not expected to occur. The project area is outside the expected range of white-tailed kite (CNDDB 2016h) and does not contain adequate grassland with isolated trees for nesting or wetland breeding habitat suitable for the species.
Willow flycatcher *Empidonax traillii*	—	SE	Meadow and seep, riparian scrub, riparian woodland, and wetlands. Inhabits extensive thickets of low, dense willows on edge of wet meadows, ponds, or backwaters; 2,000-8,000 feet elevation Requires dense willow thickets for nesting/roosting. Low, exposed branches are used for singing posts/hunting perches.	Not expected to occur. The project area does not contain sufficient riparian habitat or dense willow thickets suitable for willow flycatchers.
Yellow-breasted chat *Icteria virens*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Summer resident; inhabits riparian thickets of willow and other shrubby tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	Not expected to occur. The project area is outside of the edge of the predicted range for yellow-breasted chat (CNDDB 2016i) and does not contain sufficient riparian habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
California condor *Gymnogyps californianus*	FE	SE FP	Chaparral, valley and foothill grassland. Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	Not expected to occur. The project area is approximately 90 miles from known condor occurrences documented in Sequoia National Forest in 2020 (USFWS 2020); however, although the project area is within the foraging range of this location, California condors are not known to currently breed or regularly roost in Sequoa National Forest, and the project area is outside of the foraging range of known condor breeding sites.
Loggerhead shrike *Lanius ludovicianus*	—	SSC	Broadleaved upland forest, desert wash, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodlands, riparian woodland, Sonoran desert scrub. Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs for nesting.	Not expected to occur. The project area is at the edge of the predicted range of loggerhead shrike (CNDDB 2016j) and does not contain dense shrub habitat suitable for loggerhead shrike.
Purple martin *Progne subis*	—	SSC	Broadleaved upland forest, lower montane coniferous forest. Inhabits woodlands, low elevation coniferous forest of Douglas fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	Not expected to occur. The project area contains forest habitat suitable for purple martin; however purple martins in the Sierra Nevada are thought to be limited to a few northern areas (Airola 2024).
Yellow warbler *Setophaga petechia*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	May occur. Coniferous forest habitat suitable for yellow warbler and proximate to water is present in the project area.
Great gray owl *Strix nebulosa*	—	SE	Lower montane coniferous forest, old growth, subalpine coniferous forest, upper montane coniferous forest. Resident of mixed conifer or red fir forest habitat, in or on edge of meadows. Requires large diameter snags in a forest with high canopy closure, which provide a cool sub-canopy microclimate.	May occur. The three properties in the project area all contain montane hardwood-conifer forest habitat suitable for breeding great gray owls, as well as grassland and meadow habitat suitable for foraging. Great gray owls have been known to historically nest or forage on the three properties (Miltimore, pers. comm., 2025).

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
California spotted owl *Strix occidentalis occidentalis*	FP	SSC	Broadleaved upland forest, lower montane coniferous forest, and upper montane coniferous forest. Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Canopy closure greater than 40 percent. Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	May occur. A California spotted owl was reported in 2003 along Snow Creek, within 100 feet of the Anderson Ranch property. Suitable breeding habitat for spotted owls continues to be present along Snow Creek on the Anderson Ranch property, and within old-growth portions of the Macready Ranch property that was not burned in the 2022 Oak Fire. The Stookey Preserve property does not contain similarly suitable habitat for California spotted owls.
Mammals				
Pallid bat *Antrozous pallidus*	—	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	May occur. The three properties in the project area all contain tree and snag roosting habitat suitable for pallid bats.
Sierra Nevada mountain beaver *Aplodontia rufa californica*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Dense growth of small deciduous trees and shrubs, wet soil, and abundance of forbs in the Sierra Nevada and east slope. Needs dense understory for food and cover. Burrows into soft soil. Needs abundant supply of water.	Not expected to occur. The project area is outside of the expected range of Sierra Nevada mountain beaver (CNDDB 2016k).
Northern California Ringtail *Bassariscus astutus raptor*	—	FP	Riparian habitats, forest habitats, and shrub habitats in low to middle elevation.	May occur. The project area contains forest, riparian, and shrub habitats suitable for ringtail, as well as large trees for denning.
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.	May occur. The project area is outside of any reported areas of wolf activity or pack territory; however, it is between two known packs within dispersal range of each other. The nearest areas of wolf activity, the Beyem Seyo pack to the north and the Yowlumni pack to the south, are both more than 120 miles away from the project area (CDFW 2025).

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Townsend's big-eared bat *Corynorhinus townsendii*	—	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Requires large cavities for roosting, which may include abandoned buildings and mines, caves, and basal cavities of trees. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	May occur. The project area contains large trees, including oaks, with roosting habitat suitable for Townsend's big-eared bat.
Spotted bat *Euderma maculatum*	—	SSC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.	Not expected to occur. The project area does not contain rock or cliff habitat suitable for roosting spotted bats, or aquatic habitat for foraging.
Western mastiff bat *Eumops perotis californicus*	—	SSC	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Found in a variety of habitats, from desert scrub to chaparral to oak woodland and into the ponderosa pine belt and high elevation meadows of mixed conifer forests. The distribution of this species is likely geomorphically determined, with the species being present only where there are significant rock features offering roosting habitat.	Not expected to occur. The project area does not contain significant rock features suitable for roosting western mastiff bats.
Wolverine *Gulo gulo*	FT	ST FP	Alpine, alpine dwarf scrub, meadow and seep, montane dwarf scrub, north coast coniferous forest, riparian forest, subalpine coniferous forest, upper montane coniferous forest, wetland. Found in the north coast mountains and the Sierra Nevada. 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.	Not expected to occur. The project area is outside of the expected range of wolverine (CNDDB 2016l), and below the elevational range of alpine/subalpine habitat types typically utilized by wolverine.
Western red bat *Lasiurus frantzii*	—	SSC	Cismontane woodland, lower montane coniferous forest, riparian forest, riparian woodland. Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. The project area contains woodland and forest habitat suitable for western red bats, as well as open areas for foraging.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Fisher - Southern Sierra Nevada ESU *Pekania pennanti* pop. 2	FE	ST SSC	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. High canopy coniferous forest habitat suitable for fisher is present along Snow Creek on the Anderson Ranch property, and in the southern portion of the Macready Ranch property that did not burn during the 2022 Oak Fire. The Stookey Preserve property includes less high canopy closure; however, it contains a large amount of cavities, snags, and logs suitable for denning. Critical habitat for fisher is present along the northwestern edge of the Macready Ranch property, some of which burned and is now marginal habitat following the 2022 Oak Fire.
American badger *Taxidea taxus*	—	SSC	American badgers are most commonly found in treeless areas including tallgrass and shortgrass prairies, grass-dominated meadows, and fields within forested habitats and shrub-steppe communities. Most abundant in drier open stages of most shrubs, forest, and herbaceous habitats with friable soils. Need sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	May occur. All three properties in the project area contain spaces that are, or are directly adjacent to, grass dominated habitat suitable for American badger.
Sierra Nevada red fox - Sierra Nevada DPS *Vulpes vulpes necator* pop. 2	FE	ST	Use multiple habitat types in the alpine and subalpine zones including high-elevation conifer dominated by whitebark pine, mountain hemlock and lodgepole pine, as well as meadows and fell-fields; typically, in areas of heavy snow cover. Generally, above 1,200 meters (3,900 feet).	Not expected to occur. The project area is outside of the expected range of Sierra Nevada red fox (CNDDB 2016m), below 3,700 feet in elevation, and does not contain alpine or subalpine habitat where the species is typically found.

Notes: CEQA = California Environmental Quality Act; CNDDB = California Natural Diversity Database; DPS = distinct population segment; ESU = evolutionarily significant unit; ssp. = subspecies.

[1] Legal Status Definitions

Federal:
FE Endangered (legally protected)
FT Threatened (legally protected)
FP Federally proposed for listing (no formal protection other than CEQA consideration)
FC Federal candidate for listing (no formal protection other than CEQA consideration)
FD Federally delisted

State:
SE Endangered (legally protected)
ST Threatened (legally protected)
SC State candidate for listing (legally protected)
SD State delisted

FP Fully protected (legally protected)
SSC Species of special concern (no formal protection other than CEQA consideration)

Sources: Airola 2024, Bondi et al 2013, Bourque 2008, CNDDB 2015, CNDDB 2016a through 2016m, CNDDB 2019a and 2019b, CNDDB 2025a through 2025c, Jennings et al 2019, Miltimore 2025, Olson and Davis 2009, USFWS 2002, USFWS 2009, USFWS 2022, USFWS 2025, Western Monarch and Milkweed Occurrence Database 2025.

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CCH2. *See* California Consortium of Herbaria 2.

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